DEPARTMENT OF FORESTRY AND FIRE PROTECTION
NORTHERN REGION HEADQUARTERS - SANTA ROSA
135 Ridgway Avenue
Santa Rosa, CA, 95401
(707) 576-2959
Website: www.fire.ca.gov

October 15, 2026

GUALALA REDWOOD TIMBER LLC
P O BOX 197
GUALALA, CA 95445

Timber Harvesting Plan
No: 1-26-00147-SON
Noce THP

Letter of Return

CAL FIRE received the above referenced Timber Harvesting Plan on 10/7/2026. The California Forest Practice Act and the regulations of the State Board of Forestry require that timber harvesting plans and their amendments contain certain specific information before they can be accepted for filing. This Plan or amendment does not contain the required information and has been determined to be unacceptable for filing.

Authority for Return:

14 CCR § 897(b)(3) *The information in proposed plans shall be sufficiently clear and detailed to permit adequate and effective review by responsible agencies and input by the public to assure that significant adverse individual and cumulative impacts are avoided or reduced to insignificance.*

14 CCR § 1037 *When the Director finds a plan inaccurate, incomplete or otherwise not in proper order, the plan shall be returned to the submitter with written specifications of the deficiencies.*

The Plan or amendment was not accepted for filing primarily because of the following:

The Plan is insufficiently clear and detailed to permit adequate and effective review and to assure that significant adverse individual and Cumulative Impacts are avoided or reduced to insignificance [ref. 14 CCR § 897(b)(3)]; it is inaccurate and incomplete, and it cannot be filed pursuant to 14 CCR § 1037. Written specifications of the deficiencies are provided below. Please revise the Plan to address the following for compliance with 14 CCR § 1035.1(a).

The following deficiencies are recommended to be addressed prior to resubmitting the Plan or amendment:

Review Agency	Question
CAL FIRE	1. Section I, Item 7.d. (page 4): The Mendocino Coast HU, Gualala River HA, Gualala River is also 303(d) listed for aluminum. [ref. https://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/303d/]. Please revise Item 7 accordingly.
CAL FIRE	2. Section II, Item 14.b. – Group Selection (page 13): 14 CCR § 913.2(a)(2) requires the Plan to specify post-harvest stocking levels rather than provide a range of possible post-harvest stocking levels. Please revise the Plan to specify the percentage of the stand to be harvested via Small Groups per 14 CCR § 913.2(a)(2). Additionally, please consider adding a statement that the Plan will be amended if this percentage changes.
CAL FIRE	3. Section II, Item 14.b. VR & No Harvest. Cable corridors are described as being a minimum of 15 ft in VR and a maximum of 15 ft in No Harvest. Please revise VR silviculture for consistency and enforceability.

Review Agency	Question
CAL FIRE	4. Section II, Item 14.f3. (page 16): Considering that (1) the proposed variable retention occurs within a stand composed of 51% hardwoods, (2) one of the objects of the Project is to manage hardwood dominated states for the promotion of conifer growth, and (3) the proposed variable retention is similar to a shelterwood removal step (which could make it more difficult for Group A Commercial Species to recapture the site after harvest); it appears that Group B commercial species will need to be reduced to maintain the relative site occupancy of Group A commercial species. Please address this concern and revise the plan as necessary for accuracy [ref. 14 CCR § 912.7(d)].
CAL FIRE	5. Section II, Item 14.j. (page 19): Please revise the plan to check the "Yes" box, as a regeneration plan is required under 14 CCR § 913.4(d) and has already been included in the plan.
CAL FIRE	6. Section II, Regeneration Plan (page 20): Section II proposes that aggregate retention may be entered and harvested prior to 50 years, while the discussion of variable retention in Section III states that aggregate retention areas will be retained for a minimum of 50 years. Please revise the plan for consistency and clarity.
CAL FIRE	7. Section II, Soil Stabilization. Page 32 excludes skid-trail running surfaces on slopes below 10% and road running surfaces from straw/slash treatment, except near landings and crossings. Page 62 requires the running surface of skid roads to be treated with slash. Page 147 instead specifies straw or slash for skid roads on slopes above 10%. Please revise the plan for consistency
CAL FIRE	8. Section II, Item 24.b. (page 44): The descriptions of existing conditions and proposed treatments for map points S1 and S2 appear to meet the definition of Reconstructed Road under 14 CCR § 895.1. Please revise the Plan to accurately classify these road segments.
CAL FIRE	9. Section II & III, Items 26 & 27.j. The plan exists within the Coastal Anadromy Zone of the Coast Region. 14 CCR Section 916.9(g)(2) requires a minimum postharvest canopy cover of 80% with at least 25% overstory conifer canopy cover. The proposed Class II-L canopy retention is not in compliance with the FPRs. Please revise the plan for compliance.
CAL FIRE	10. Section II, Item 27. The harvesting of trees in the core and inner zones of Class I watercourses and core and inner zones of Class II-L watercourses may be permitted to provide full suspension when cable yarding through the channel zone. The discussion within section II does not make clear that the corridors are necessary to provide full suspension specifically through channel zones and the associated discussion in section III appears to be related to faller safety. Please revise the plan for consistency and conformance to 14 CCR Section 916.9. Please note that operations allowed under 14 CCR Section 916.9(e)(1)(C) are allowable for public health, safety, and general welfare, any justification related to such an allowance must extend benefits to the public beyond those workers employed for the discretionary timber operations.
CAL FIRE	11. Section II, WLPZ Water Bars. Page 147 instead specifies straw or slash for skid roads on slopes above 10%. Page 146 directs low-EHR waterbarring, whereas Items 18 and 27 direct treatment according to mapped EHR. Please revise for consistency.
CAL FIRE	12. Section II, Item 23. Item 23.d. indicates that winter landing construction is not proposed, however the WPOP on page 40 states that landing construction is proposed during the winter period. Please revise the plan for consistency.
CAL FIRE	13. Section II, Item 26. The retention for Class I and Class II WLPZ states alternately that the largest 13 conifers and largest 13 trees will be retained per acre. Please revise to conifer for compliance with 14 CCR Section 916.9.

Review Agency	Question
CAL FIRE	14. Section II, Item 30.a (page 71): It is unclear whether Noce Road is a public or private road. Item 30.a. is marked "Yes," but the subsequent description identifies the road as private. Please revise the plan to clarify the road's classification and resolve this inconsistency.
CAL FIRE	15. Section II, Item 32.a. – Northern Spotted Owl (page 73): Please revise the THP to reference 14 CCR § 919.9(d), instead of (c), for accuracy.
CAL FIRE	16. Section II, Road Work Order (pages 91-98): The Plan identifies the priority levels for the road work order points, as required by 14 CCR § 923.1(e)(5), but does not define or explain what each priority level represents. Please revise the plan to describe the priority levels and their intended meaning.
CAL FIRE	17. Section II, Road Work Order (pages 91-98): The plan indicates in item 24 that significant existing and potential erosion sites exist within the Plan, but none are identified. Please revise the road work order to identify which sites constitute significant existing or potential erosion sites pursuant to 14 CCR Section 923.1.
CAL FIRE	18. Section II, Road Work Order (pages 91-98): The ECP in section V indicates that several unstable areas were found near watercourses but were not caused by human activity and do not have feasible treatment. If any such site are associated with Logging Roads, Landings, and Watercourse crossings in the Logging Area and are significant existing or potential erosion sites, please revise the plan to disclose and map the sites pursuant to 14 CCR Section 923.1(e)(4).
CAL FIRE	19. Section II, Road Work Order (pages 91-98): The ECP in section V identifies potential installation of 30" culvert at mp13, however the road work order in section II does not provide this consideration. Please revise section II to include an option to install a culvert which has been sized for 100-year flow and is installed to grade.
CAL FIRE	20. Section II, MP6763 (page 96): The plan indicates that impact avoidance at the site is dependent upon a fisheries impact minimization plan, however the plan is not included within the proposed plan. Please revise the plan to include the minimization plan.
CAL FIRE	21. Section II, MP6763 (page 96): Please provide bridge and block dimensions, including flow and clearance dimensions, to allow for complete and adequate review.
CAL FIRE	22. Section II, Road Work Order – Road Points 1-3 & T2 (pages 90, 91 & 97): On page 80, the protection measures for California red-legged frog states that work on these road/map points will only occur during the dry season. To facilitate the LTO's successful implementation of these protection measures, please consider noting this requirement within the road work order.
CAL FIRE	23. Section II, Road Work Order & Road Work Map South (pages 95 & 105): The Road Work Order describes treatment for map point 18, which is not identified on the maps. However, map point 19 on the South Road Work Map appears to correspond to the location described for point 18 in the table. Please revise the map and table to resolve this discrepancy.
CAL FIRE	24. Section II, Road Work Order (page 97): The proposed treatment for T2 is unclear. The Plan states that the Tractor Road is "not to be used for harvesting" and that the proposed work is limited to reinstalling waterbars and restoring drainage. However, the Plan subsequently states that these treatments are not required if operations do not occur within the relevant portion of the THP. These statements appear contradictory because the Tractor Road is not proposed for harvesting, and the specified treatments are restorative. Please clarify whether the Tractor Road will be used, what treatments are required, and under what circumstances those treatments must be implemented.

Review Agency	Question
CAL FIRE	25. Section II, THP Maps (pages 99-108): Please confirm that the "Jeep Trail" is not a road that will be used for, or potentially Impacted by, Timber Operations. Otherwise, please classify it as permanent, seasonal, temporary, deactivated, or proposed for abandonment per 14 CCR § 1034(x)(4).
CAL FIRE	26. Section II, THP Maps (pages 99-108): Please revise the legends within the THP maps to only describe the features present within the map that correspond with the legend for clarity and compliance with 14 CCR § 1034(x).
CAL FIRE	27. Section II, Silviculture Map North (page 100): Within Inner Zone B at the southern end of the WLPZ, the map depicts proposed group selection along the outer edges of Inner Zone B. Please clarify the proposed treatment and revise the map as necessary to resolve any inconsistency with the previously described protection measures and 14 CCR § 916.9(f)(3)(D).
CAL FIRE	28. Section II, Site Preparation Map (not included): The Site Preparation addendum states that the boundaries of the Site Preparation areas are different than the Logging Area boundaries; however, the Plan does not include a map identifying the boundaries of Site Preparation areas. Please revise the Plan for compliance with 14 CCR § 915.4(f).
CAL FIRE	29. Section III, Project Location (page 123): The Plan states that the THP is located approximately 2-3.5 air miles east and northeast of Annapolis, CA; however, the notice of intent states that it is approximately 2-3.5 miles west and northwest of Annapolis, CA. Please revise the Plan for accuracy.
CAL FIRE	30. Section III, Alternatives Analysis (pages 129-139): Most of the alternatives considered were not examined in detail; instead, they were considered and rejected during scoping (due to infeasibility and/or failure to meet most of the basic project objectives) such as Conservation Easement or Public Land Purchase [ref. 14 CCR § 15126.6(c)]. Please revise the Plan to provide detailed consideration of alternatives to the Project that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen any potential significant Effects [ref. 14 CCR § 15126.6(c) & (f)]. For example, evaluate a focused range of alternatives that directly address the identified concerns, including eliminating road construction within Unit D, avoiding roads within sensitive biological protection areas, and modifying tractor yarding boundaries in areas identified as feasible for cable yarding on page 143.
CAL FIRE	31. Section III, Alternatives Analysis (pages 131-139): Please revise the analysis to provide a more thorough comparison of the Effects of each alternative with the Effects of the proposed Project.
CAL FIRE	32. Section III, No Project Alternative (page 131): The proposed Plan includes treatments for Significant Existing Erosion Sites [ref. 14 CCR § 895.1: Significant Existing or Potential Erosion Site]. Please revise the "No Project" alternative to disclose and discuss the potential significant Effects of this alternative [ref. 14 CCR § 15126.6(d)].
CAL FIRE	33. Section III, Evenaged Silviculture Alternative (page 132): The Evenaged Silviculture and Special Prescription alternatives state that the landowner's objectives include implementing uneven-aged management. However, the objectives listed on page 129 and the proposed use of variable retention do not clearly establish that uneven-aged management is a landowner objective. Please clarify which landowner objectives these alternatives would not meet and provide a more detailed comparison of their potential effects with those of the proposed Project to substantiate why these alternatives were rejected.

Review Agency	Question
CAL FIRE	34. Section III, Alternative Silviculture (page 132): The alternative silviculture's considered and described were rejected upon scoping (because of failure to meet most of the basic project objectives [ref. 14 CCR § 15126.6(c)]). Please revise this alternatives to consider silvicultural methods that were not rejected upon scoping due to not meeting landowners' objectives and could feasibly avoid or substantially lessen any potential significant Effects [ref. 14 CCR § 15126.6(c) & (f)].
CAL FIRE	35. Section III, Alternatives Analysis – Size Reduction of the Harvest Area (pages 133 & 134): The analysis states "With proper implementation of the CA Forest Practice Rules, there should be no measurable Project or Cumulative Impacts to watershed, biological, or soil resources, regardless of Harvest Area size." Please substantiate this statement or remove it.
CAL FIRE	36. Section III, Alternatives Analysis – Size Reduction of the Harvest Area (pages 133 & 134): The reduced-harvest alternative lacks evidence and analysis. Please revise the analysis to compare the proposed Project (and its potential Effects) to modified or reduced versions of the Project (and their potential Effects).
CAL FIRE	37. Section III, Comparison of Alternatives – Alternative Harvest Approaches (page 138): The Plan states that a "lesser intensity of harvest would not be financially viable and would not allow productive restoration of the stand." However, the plan does not provide sufficient information to support this conclusion or demonstrate as reduced harvest intensity was no adequately evaluated as an alternative. Please revise the analysis to evaluate whether a reduced-intensity harvest could meet the Project objectives while avoiding or substantially lessening potential significant adverse impacts.
CAL FIRE	38. Section III, Plan Addendum to Item 14 (page 142): The addendum describes old growth trees as retention elements to meet the objectives of variable retention, but the tables indicate that the Plan does not propose retention of any conifer larger than 30" dbh or any hardwood greater than 36" dbh. Please revise the Plan to address this inconsistency.
CAL FIRE	39. Section III, Plan Addendum to Item 21.b. & 21.c. (pages 143 & 144): The justification for the proposed exception states that "the existing skid trail network had been used in the past with no significant adverse effects." However, the plan does not provide supporting evidence for this claim. Please revise the plan to describe the monitoring conducted to assess potential effects, the history of the skid trail network (e.g., when it was last used and how frequently it has been used), and the similarities and differences between past harvest activities and those proposed under the current plan. Use this information to substantiate the claim that the proposed exception meets the requirements of 14 CCR § 914.2(f)(5).
CAL FIRE	40. Section III, Plan Addendum to Item 21.b. & 21.c. (pages 143 & 144): The proposed Plan does not explain and justify how the proposed exception will conform to 14 CCR Section 914, as required by 14 CCR Section 914.2(f)(5). Please revise the plan to provide clear conformance.
CAL FIRE	41. Section III, Addendum to Item 27.j. (page 148): The addendum states "Implementation of the standard prescription requiring all marking be completed prior to the PHI (and prior to felling operations per 14 CCR 913.2(a)(1)) is not feasible for this given circumstance." However, the addendum also states that "all trees proposed for harvest within the WLPZ will be marked prior to felling in accordance with 14CCR 913.2 (a)(l)", which indicates that Marking prior to felling operations is Feasible. Please revise the addendum for consistency.

Review Agency	Question
CAL FIRE	42. Section III, Addendum to Item 27.j. (page 148): The addendum states "If unforeseen hazard trees must be felled during operations to facilitate safe yarding, such trees will not be harvested and will remain on site unless they are marked prior to harvest." Please change the last word of this sentence ("harvest") to "felling operations" for consistency with 14 CCR § 913.2(a)(1).
CAL FIRE	43. Section IV, Past Projects: The total summary lists 47.90 acres of special prescriptions, but its supporting rows list 6.26 acres VR, 27.49 acres fuelbreak, 64.11 acres VR and 192.23 acres VR: 290.09 acres. DDDE rows total 411.10 acres, compared with 20.54 in the summary; forest-fire-prevention rows total 125.83 acres, compared with 277.42. Listed no-harvest rows total 35.65 acres, compared with 48.24. The reported categories do add to 2,961.90 acres, but the supporting rows do not produce that total. Please revise the plan for accuracy.
CAL FIRE	44. Section IV, Probable Future Projects: Narrative identifies Card as 1-26-00021-SON; the WAA future table instead prints 1-21-00012-SON and the BAA table prints 1-26-00012 -SON. Please revise the plan for consistency and clarity.
CAL FIRE	45. Section IV, Probable Future Projects: Numerous resource subjects consider approximately 756 acres of future unevenage management, however the future projects table considers approximately 765 acres. Please revise the plan for consistency.
CAL FIRE	46. Section IV, Wildfire Risk & Hazard Impacts Assessment Area Description (page 167): The Plan states "The assessment area includes the THP, and all of the surrounding area in the vicinity within 300 feet, including the residential homes and dwellings." However, considering that there is a residential dwelling approximately 360 feet from the THP, it is unclear whether it is within the assessment area. Please revise the assessment area description for clarity. Additionally, if there are residential dwellings within the assessment area, please revise the assessment to explicitly discuss the fuel loading in the vicinity of residential dwellings.
CAL FIRE	47. Section IV, Sediment Effects – Past Projects & Reasonably Foreseeable Probable Future Projects (pages 177-179 & 184): Please revise the assessment to briefly describe the location of Past Projects and Reasonably Foreseeable Probable Future Projects per TRA #2.D.1.
CAL FIRE	48. Section IV, Sediment Effects – Past Projects (page 177): Please revise the assessment to identify and briefly describe the location of 1-15-042-SON, which was re-approved in 2019, per TRA #2.D.1. Additionally, please revise the Cumulative Impacts assessment for each resource subject to disclose and discuss the Effects of this Past Project.
CAL FIRE	49. Section IV, Sediment Effects – Baseline Conditions – Roads (page 180): The baseline conditions discussion does not provide sufficient information about existing road conditions, including appurtenant roads within the WLPZ, to support an adequate analysis. Please revise the Plan to describe the roads proposed for use, their existing conditions, and their potential to deliver sediment to Watercourses.
CAL FIRE	50. Section IV, Sediment Effects – Reasonably Foreseeable Probable Future Projects (page 184): The THP number provided for the filed Plan in the Mouth of the Gualala Rover Planning Watershed Table appears to be incorrect. Please revise the Plan for accuracy.

Review Agency	Question
CAL FIRE	51. Section IV, Reasonably Foreseeable Probable Future Projects (pages 184, 195, 198, 201, 211, etc.): The Cark, Herman & Salt THPs are frequently mentioned, but their potential Effects are not sufficiently described. What are the potential physical changes in the Environment from these Reasonably Foreseeable Probable Future Projects? Please revise the Cumulative Impacts assessment to disclose and consider their potential direct and indirect Effects. Moreover, please explain how the potential Effects of proposed Timber Operations could combine with the Effects of Past Projects and Reasonably Foreseeable Probable Future Projects to change the physical environmental conditions related to each resource subject, and then explain why these potential Cumulative Impacts are less than significant.
CAL FIRE	52. Section IV, Watershed Impacts Assessment – Proposed THP – Yarding Methods (pages 189 & 200): The assessment states "WLPZ facilities proposed for use will receive treatments that will result in a net-zero change to the physical environment, or will actually result in a reduction of sediment by re-waterbarring trails that did not have them or have lost them which would reduce the concentration of runoff." Please revise the assessment to provide additional supporting information, such as a description of the proposed seeding/mulching/Slash packing, and explain why these treatments in concert with rolling dips and/or waterbars will prevent sediment transport during future flood events.
CAL FIRE	53. Section IV, Watershed Impacts Assessment – Proposed THP – Peak Flow (page 212): The peak flow effects conclusion indicates that no intensive broadcast burning is proposed within the plan. Hazard reduction disclosures within Section II do propose broadcast burning. Please revise section IV to consider these activities and provide analysis relative to the intensity of the operations and the resulting potential impacts
CAL FIRE	54. Section IV, Soil Productivity Impacts Assessment (page 218-227): On page 166, the assessment area is described as the timber harvesting area. Please revise the assessment to remove discussion of Past Projects and Reasonably Foreseeable Probable Future Projects that are not within the assessment area for accuracy.
CAL FIRE	55. Section IV, Biological Impacts Assessment – Measures for Fish (page 270): The assessment inaccurately states "There will be no timber harvesting operations within the Class I and Class II-L WLPZ (and beyond in some locations) and Class II-S core zones within the THP boundary." Please revise the assessment for accuracy.
CAL FIRE	56. Section IV, Biological Impacts Assessment – Measures to benefit canopy (page 271): The assessment states "There will be no timber harvesting within any Class I WLPZ where current canopy levels are less than 80%." However, the class I protection measures for Buckeye Creek indicate that only 50% of the overstory canopy must be retained within the Inner Zone B. Please address this inconsistency and revise the assessment as necessary for accuracy.
CAL FIRE	57. Section IV, Recreational Resources Impacts Assessment – Past Projects (page 275): The assessment includes a discussion on Past Projects that have been conducted with the assessment area but does not describe the Effects of these Past Projects on the recreational activities. Please revise the assessment to describe how Past Projects have affected recreational activities within the assessment area. If these Projects have not affected any recreational activities, then state so.
CAL FIRE	58. Section IV, Recreational Resources Impacts Assessment – Proposed THP (page 275): The Plan states that there is no public recreation near the Plan area; however, the discussion within the baseline conditions is focused on the use of the landowner's property for many recreational activities and the visual resources Impacts assessment indicates that there is public use of Buckeye Creek. Please revise the assessment to describe how the proposed Timber Operations could affect recreational activities within the assessment area.

Review Agency	Question
CAL FIRE	59. Section IV, Visual Resources Impacts Assessment – Baseline Conditions (page 276): The description of the environmental setting includes discussion of the proposed THP's potential Effects as well as a significance determination: "implementation of the plan as proposed will have less than significant visual impacts as a result of this project." Please reorganize the visual Impacts assessment for clarity and consistency.
CAL FIRE	60. Section IV, Visual Resources Impacts Assessment – Past Projects (page 277): The assessment states "Past projects within the assessment area have positively affected the visual resources by retaining many larges trees throughout the project area" and that "There are no past projects that have significantly affected visual resources." A description of one physical condition that has not changed as a result of Past Projects is less substantive than a description of what has changed. Please revise the assessment to describe how Past Projects have changed the aesthetics within the assessment area. Additionally, considering that the description of the environmental setting (baseline conditions) focuses on Slash, please revise the assessment to describe how Past Projects have changed the amount of Slash that is visible within the assessment area. Furthermore, please revise the "Proposed THP" subsection to describe how the proposed Timber Operations will change the amount of Slash that is visible within the assessment area. And then explain why these Cumulative Impacts are less than significant.
CAL FIRE	61. Section IV, Traffic Impacts Assessment – Baseline Conditions (page 278): Please revise the assessment to include an estimate of the current volume of traffic within the assessment area.
CAL FIRE	62. Section IV, Traffic Impacts Assessment – Past Projects (page 278): Please revise the assessment to include an estimate of additional traffic volume caused by Past Projects within the assessment area.
CAL FIRE	63. Section IV, Traffic Impacts Assessment – Reasonably Foreseeable Probable Future Projects (page 278): It is unclear if Card, Herman and Salt THPs will affect traffic on Noce Road and Annapolis Road. Please address and revise the assessment to estimate the additional potential traffic volume from Reasonably Foreseeable Probable Future Projects within the assessment area. Additionally, please remove any speculative discussion of future Projects that do not meet the definition of Reasonably Foreseeable Probable Future Projects.
CAL FIRE	64. Section IV, Traffic Impacts Assessment – Proposed THP (page 278): Please revise the assessment to include an estimate of additional traffic volume caused by the proposed Project.
CAL FIRE	65. Section IV, Traffic Impacts Assessment – Conclusion (pages 278 & 279): Please revise the conclusion to explain how the potential Effects of proposed Timber Operations could combine with the Effects of Past Projects and Reasonably Foreseeable Probable Future Projects to change the volume of traffic within the assessment area, and then explain why these potential Cumulative Impacts are less than significant. Additionally, please consider revising the assessment to note that none of these Projects are Development Projects, and that additional volume of traffic caused by each of these Projects is temporary.
CAL FIRE	66. Section IV, Wildfire Risk and Hazard Assessment – Proposed THP (page 291): Please revise the assessment to disclose and describe the proposed Slash treatment within 100 feet of Noce Road.
CAL FIRE	67. Section IV, Wildfire Risk & Hazard Impacts Assessment (page 291): On page 167, the assessment area is described as the THP area plus 300 feet. Please revise the assessment to remove discussion of Past Projects and Reasonably Foreseeable Probable Future Projects that are not within the assessment area for accuracy.

Review Agency	Question
CAL FIRE	68. Section IV, Noise Impacts Assessment Resources (pages 293 & 294): The assessment includes speculation and unsubstantiated opinion or narrative (e.g., "Past projects likely did not have an impact on noise for humans in the past from near the project area because there were less residents within 0.5 miles that were not accustomed to the sounds of the local economy"). Please revise the: • Baseline conditions subsection to include an estimate of the current volume of ambient noise within the assessment area, • Past Projects subsection to include an estimate of additional volume (and timing) of noise caused by Past Projects (which does not include logging operations prior to the Forest Practice Act [ref. 14 CCR § 895.1: Project & Past Project]) within the assessment area, • Reasonably Foreseeable Probable Future Projects subsection to estimate the additional potential volume (and timing) of noise from Reasonably Foreseeable Probable Future Projects within the assessment area, • Proposed THP subsection to include an estimate of additional volume (and timing) of noise caused by the proposed Project, and • Conclusion subsection to explain how the potential Effects of proposed Timber Operations could combine with the Effects of Past Projects and Reasonably Foreseeable Probable Future Projects to change the volume (and timing) of noise within the assessment area, and then explain why these potential Cumulative Impacts are less than significant.
CAL FIRE	69. Section IV, GHG analysis and worksheets (pages 283-286): The narrative describes 93,194.48 metric tons CO2 sequestration over 100 years and a 16-year break point. The summaries show 9 years for group selection, 13 for single-tree selection and 30 for VR. VR cycles include a harvest at year 110, so the submitted calculation does not share the asserted uniform 100-year horizon. Please revise the plan for consistency and clarity.
CAL FIRE	70. Section IV, GHG analysis: The ownership percentages on p. 279 are wrong: 28,000/16.6 million is about 0.169%, and 28,000/7.3 million is about 0.384%, not 0.0017% and 0.0038%.
CAL FIRE	71. Section V, Owl Survey Sheets (page 416): The plan proposes surveys according to current (2012) USFWS protocol, which recommends complete coverage within seven days or using separately delineated surveys. The 2026 visit 3 survey sheet combines survey efforts across 24 days but does not describe the biological or statistical appropriateness of such methodology. Please revise the plan to address the statistical and biological suitability of such methodology.
ARCH	71. RETURN: A confidential ARCH RTQ report has been prepared based on review of THP Section VI: CAA.

Review Agency	Question
CDFW	72. Section II, Item 32(a), pages 81-82, Coho Salmon, Chinook Salmon, Steelhead – The THP states, "A temporary bridge is proposed for installation at Road Point #673." and the Map Point Table, page 96, states "A tractor and excavator will be needed to enter the channel during installation and removal, this equipment is limited to no more than two passes in the channel during the installation and removal." The THP does not disclose the potential presence of listed fish species (coho salmon, chinook salmon, steelhead) in the Class I watercourse and no protective measures to avoid impacts to listed fish species and spawning habitat during temporary bridge construction are provided. Please consider revision of Item 32(a) to disclose listed fish species (i.e. coho salmon, chinook salmon, steelhead) presence and spawning habitat present within the area of temporary bridge installation and heavy equipment passage. Please consider revision of Item 32(a) to include protective measures for listed fish species and spawning habitat due to passage of heavy equipment through the Class I watercourse channel (e.g. work period restriction, spawning habitat and fish presence surveys, exclusion netting). The "Notification Information List Pursuant to Fish and Wildlife Code Section 1611" (1611 Addendum), Section III, page 153, states the work period is "June 1 through October 15 for Map Point 673 (temporary bridge at Buckeye Creek)." Typically, work conducted within Class I fish bearing streams is restricted to June 15 through October 15. To avoid impacts to listed fish species that may be present during temporary bridge construction, please consider revision of the 1611 Addendum to state a June 15 through October 15 work period will be implemented at Map Point 673 to be consistent with the CDFW Lake and Streambed Alteration Agreement covering this map point. Item 32(a) does not include a specific work period for Map Point 673. Please consider revision of Item 32(a) to include a work period of June 15 through October 15 for each listed fish species, (i.e., coho salmon, chinook salmon, steelhead).
CDFW	73. Section II, Item 26(e), page 56, Lake and Streambed Alteration Agreement (LSAA) – Item 26(e) is checked "Yes" indicating this THP is being used as Notification to CDFW for a Streambed Alteration Agreement (Fish and Game Code Section §1611) for Map Points 1, 2, 4, 5, 6, 7, 8, 11, 13, 14, 17, 673, and 2061. The Map Point Table on page 93 for Map Point 9 states, "remove the culvert and replace with a 24" culvert…" This crossing is listed as "No" for requiring a 1600, however, the work includes a modification of the stream bank and bed which constitutes a significant impact. Please consider revising the Map Point Table to state "Yes" for 1600 for Map Points 9. CDFW will determine within 30 days (per Fish and Game Code Section §1602(a)(2)) of filing date if the Notification is complete. CDFW is required to submit a draft LSAA within 60 calendar days from the date the notification is deemed complete. Unless you request otherwise, the notification will be deemed void if the THP is returned by CAL FIRE or withdrawn by the submitter. Please note that if it is determined during the PHI that the proposed timber operations may substantially alter the bed, bank, or channel of a watercourse at additional locations, those map points may require notification to CDFW for inclusion in the LSAA (Fish and Game Code §1600 et. seq.). The notification requirements apply to any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel. This includes ephemeral streams and watercourses with a subsurface flow. Please be advised that on June 1, 2022, CDFW began processing LSAA notifications using the Environmental Permit Information System (EPIMS). This transition does not change the notification process for projects with an approved THP. CDFW encourages the applicant to visit https://epims.wildlife.ca.gov/index.do to register for an account so that CDFW can use this system to process the LSAA and transmit draft and final agreements in as timely a manner as possible. Additional information regarding the Lake and Streambed Alteration Program is available at https://wildlife.ca.gov/Conservation/LSA.

Review Agency	Question
CGS	74. The flow calculations included in Section V of the THP appear to use 100-year return period precipitation rates (labeled Rainfall Intensity in the THP) that are lower than reported by the NOAA Atlas 14 website. Using the 10 minute intensity reported on the Atlas 14 website is consistent with the methodology recommended in Cal Fire's watercourse crossing manual (Cafferata and others, 2017). Using a lower intensity in the 100-year flow calculations may result in crossing structures (culverts and rock armoring) that are undersized for the predicted 100-year flood flows. For example, at Map Point 7 the THP proposes to downsize an existing failing 36 inch diameter culvert to a new 30 inch diameter culvert where an existing seasonal road crosses a Class II watercourse. The calculations included in Section V of the THP appear to use a 100-year return period precipitation rate (labeled Rainfall Intensity in the THP) of 1.87 in/hr, resulting in a predicted 100-year flow of 10.6 cfs. The intensity used in the calculation is lower than what is reported by the NOAA Atlas 14 website, which reports a 10 minute rainfall intensity of 3.33 at the approximate crossing location (First Review Attachment 1). The revised calculated 100-year flow using the Atlas 14 intensity of 3.33 in/hr results in a predicted flow of 18.9 cfs, which results in a headwater to diameter ratio (HW/D) of approximately 1.0 for the proposed 30 inch diameter culvert at Map Point 7. This suggests that the proposed replacement 30 inch diameter culvert is undersized to accommodate the predicted 100-year flood flow and debris. Conversely, the existing 36 inch diameter culvert has a HW/D of approximately 0.7, much closer to the optimal HW/D (0.67) recommended by Cafferata and others (2017). Please justify why the lower intensities and resulting smaller culvert and rock sizes are appropriate or revise the calculations and proposed crossing structures accordingly.
WQ	75. North Coast RWQCB Waste Discharge Information for RPF: Discharges, or potential discharges of waste from timber harvesting on private lands within the North Coast Region must be permitted under either Waste Discharge Requirements or Waivers of Waste Discharge Requirements. Following plan approval by CAL FIRE, and prior to beginning timber harvest activities, landowners must apply for coverage under the General WDRs (Order No. R1-2004-0030), the NTMP General WDRs (Order No. R1-2013-0005), an individual waiver or WDR, or in some cases a Watershed-wide WDR. Please note, the Categorical Waiver (Order No. R1-2009-0038) is no longer active. All THPs must seek coverage under the General WDR or apply for an individual waiver or WDR. Copies of the GWDR, as well as other timber related information, can be found at the following web address: https://www.waterboards.ca.gov/northcoast/water_issues/programs/forest_activities/private_forest_land/
WQ	76. The table on page 93 of the THP showing road point 7 states that the existing 36" culvert is to be replaced with a smaller 30" culvert. Please check this to verify it is the correct proposal.

NOTE: If the Plan or amendment is resubmitted, please include a copy of the original first page of the General Section (Section I). Provide a cover letter explaining where the requested changes appear in the resubmitted Plan or amendment referenced by the numbers and/or letter of the items noted in this letter.

Resubmit the entire Plan or amendment with the required changes appropriately imbedded and include the CAL FIRE assigned Plan or amendment number listed with the documentation. If submitted through CalTREES, login to your account and upload the revised Plan or amendment pdfs in their entirety to resubmit. If necessary, re-post any revised public Notices in accordance with the Forest Practice Rules and update any relevant information.

Timber harvesting operations are not to commence until the Plan or amendment is found to be in conformance by the Director.

Sincerely,

Eric Hedge, RPF 3010
Forester III
Forest Practice Manager, Coast Region

cc: Unit, File
To view harvesting documents, please visit: https://aca-prod.accela.com/CALTREES/Default.aspx