LITTLE PEPPERWOOD THP – SECTION III

14 CCR 1034(gg) General Site Description

Project Location:
Little Pepperwood is a 269-acre timber harvest plan (THP) located in southern Mendocino and northern Sonoma Counties, approximately 3 miles east of the town of Gualala, CA. The project location is legally described as portions of Sections 20, 21, 28, 29 and 30 of Township 11N, Range 14W, Mount Diablo Base & Meridian. The THP is situated within the McGuire Ridge USGS 7.5 Minute Quadrangle. The project area is not accessible to the public without permission from the landowner. To access the plan area, one would travel from the town of Gualala via Gualala Road, thence through locked gates onto private roads maintained by the landowner.

Soils and Topography:
The topography of the plan area ranges from relatively flat ridgetops to steep hillslopes, with average slopes ranging from 40-60%. All slope aspects are represented within the THP area. Elevations in the project area range from 80 feet to 1560 feet above sea level. Soils present within the plan area include the Woodin-Yellowhound complex, 30-50% slopes, Woodin-Yellowhound complex, 50-75% slopes, Yellowhound-Kibesillah complex, 50-75% slopes, MLRA 4B, and the Yellowhound-Kibesillah-Ornbaun complex, 30-50% slopes, MLRA 4B. The erosion hazard rating for the plan area is low, moderate, and high. An Estimated Surface Erosion Hazard worksheet is included in Section V of the THP.

Watershed and Stream Conditions:
The THP is located within the Big Pepperwood Creek (CalWater #1113.850201) and Lower Rockpile Creek (CalWater #1113.820003) Planning Watersheds, which are tributary to the Gualala River. Surface flow from the THP drains into Big Pepperwood Creek (Class I), an unnamed Class I watercourse (informally known as Little Pepperwood Creek), and several unnamed Class II and III watercourses tributary to Big Pepperwood and Rockpile Creeks. Current and historic land use within the watersheds is predominantly timber production. The Gualala River is listed as impaired for sediment, temperature and aluminum pollution under Section 303(d) of the Federal Clean Water Act (CWA).

There are several Class II and Class III watercourses interior to the THP area which experience either perennial or seasonal flow. There are two (2) Class I watercourses adjacent to the THP which shape the project boundary. Average stream gradients range from gentle to steep (5-35%+). Channel material consists of native soils, cobbles and gravels, bedrock, and woody debris. Average instream large woody debris levels are moderate to high. Current shade canopy levels range from approximately 70% to 95%. A detailed description of watershed conditions as well as a summary of past projects within the Watershed Assessment Area is included in Section IV of this Plan. Refer to Section II for a description of the proposed silvicultural prescriptions that may affect watershed conditions, as well as watercourse crossing protection and WLPZ buffers.

Vegetation and Stand Conditions:
Overstory vegetation within the THP is dominated by coast redwood *(Sequoia sempervirens)*, Douglas-fir *(Psuedotsuga menzisii)*, western hemlock (*Tsuga heterophylla*), sugar pine *(Pinus lambertiana)*, tanoak *(Notholithocarpus densiflorus)*, madrone *(Arbutus menzisii)*, and golden chinquapin (*Chrysolepis chrysophylla*) with evergreen huckleberry (*Vaccinium ovatum*), blue blossom (*Ceanothus thyrsiflorus*), manzanita (*Arctostaphylos spp.*), sword fern (*Polystichum munitum*) and various forbs and grasses comprising the understory. Canyon live oak (*Quercus chrysolepis*), California bay laurel (*Umbellularia californica*) and bigleaf maple (*Acer macrophyllum*) are sparsely present and restricted to microsites within the THP area. Exact species composition of a given stand depends on

elevation, slope aspect, soil characteristics, stand history, and proximity to watercourses. The entire THP is considered Site III timberland.

Current stand conditions are typical of industrially managed forestland in the Gualala River Watershed. Abiotic factors such as climate, hydrology, topography, soils, and geology have influenced the development and composition of the stands over millennia. Anthropogenic activities have had perhaps a greater influence on the current stand conditions since the original logging of the mid-to-late 19th century. The combination of abiotic factors and human activity has resulted in stands that vary in age, structure, and species composition. The western THP units are typically well stocked with a light hardwood component and a western hemlock/grand fir component. Eastern THP units by comparison are poorly stocked with a heavy hardwood component and a sugar pine component. Aspect also plays a strong role in shaping stand conditions, with north facing slopes supporting more conifer stocking than southern slopes.

The majority of the plan area was last harvested in the early 1990s under THPs 1-90-036-MEN and 1-90-097-MEN using evenaged and special prescription management. Portions of the plan area have not been harvested since the mid-century tractor logging era (1950s-1960s). Approximately 4 acres of the THP were harvested under THP 1-17-104-SON using unevenaged management. Average conifer diameter ranges from 8" to 20" at dbh with scattered large trees primarily within the WLPZ and older stands. Average merchantable conifer age ranges from 30 to 65 years with residuals at 80 years or more.

See Item 14 discussion below for a more detailed description of current stand stocking.

ANALYSIS OF PROJECT ALTERNATIVES

I. PROJECT DESCRIPTION, PURPOSE(S), AND NEED(S):

Project Description: The project is described in Sections I, II, and III of the THP. The Timberland Productivity Act of 1982 restricts the use of lands zoned Timberland Production Zone (TPZ) exclusively to the growing and harvesting of timber and compatible uses; it also establishes a presumption that timber harvesting is expected to and will occur on such lands. All of the lands included in the THP are TPZ lands which have timber production as the primary use.

Purpose(s). The landowner's purposes in undertaking the project are:

(1) Access, harvest and regenerate the forested area delineated in the THP.
(2) Maximize sustained production of high-quality timber products.
(3) Maintain a forest products industry in the local community.
(4) Maintain or improve existing wildlife habitat.
(5) Maintain or improve existing cold-water fisheries.
(6) To earn an economic return by operating the property, including the plan area, as commercial timberland per its present zoning and intended land use.

Need(s). The needs for the project from the perspective of the landowner are:

1) To meet certain fixed costs of ownership including, but not limited to, taxes, insurance, and debt service payments on loans, and meeting Maximum Sustained Production (MSP) as required by the Forest Practice Act and the Forest Practice Rules.
2) To maintain the flow of high-quality timber products to the economy, sustain a forest products industry, and provide a source of employment in the local community.
   Log deliveries to the landowner's own mills are being supported in part by transported logs from other counties, and in the past even from other countries (New Zealand), to enable local mills to continue to operate. Supplying logs from outside the local geographic area is undesirable for many reasons. Transportation impacts to the environment (including air pollution and Green House Gas (GHG) emissions) are greater. Moreover, other states and countries from which logs must be imported may have far more lenient forestry regulations than California. Supplying local sawmills with logs from local timberlands is a far more efficient use of resources and has less environmental impacts than importing logs from other states and countries. The THP

area is part of a land holding owned by Gualala Redwood Timber, LLC. Gualala Redwood Timber, LLC is part of an integrated group of companies affiliated with Pacific States Industries DBA Redwood Empire Sawmills that processes redwood logs into a variety of finished and landscape material products. Gualala Redwood Timber, LLC and Redwood Empire Sawmills are owned by a family that has been doing business in Sonoma County for fifty years, and now is in its second generation of family members active in the operations. The founder of the company lives in Sonoma County. Logs generated from this THP create employment for foresters, loggers and truckers who deliver logs to the Redwood Empire Sawmills located in Cloverdale and Asti, California. These sawmills generate products that are sold into local retail yards or are sold to redwood remanufacturing plants in Sonoma County, and each step of this lumber production adds value to the products and creates economic revenue for the company, jobs for local workers and companies, and tax revenues for local communities and for Sonoma County. Businesses that use products generated from the Redwood Empire redwood timberlands include Reuser Inc. in Cloverdale (producers of landscape products from redwood bark and shavings), Friedman's Home Improvement, Mead Clark Lumber Company, Burgess Lumber, Healdsburg Lumber, Lowes, NuForest redwood remanufacturing plant, and other local lumber suppliers. Timber yield taxes from the THP go directly to Sonoma County for maintenance and improvement of infrastructure, roads, and public safety and security services. Additional tax revenues that benefit County residents are generated from sales tax, lumber products assessment tax, and property taxes. The logs harvested from the THP generate income for many ancillary local businesses where the timber and sawmill workers spend their earnings for food, gas, clothing, home maintenance and repairs, and other living necessities. The timber generated on a sustainable basis from this THP and from these lands significantly adds to the well-being of the residents of the Gualala area and to residents and businesses in Sonoma and Mendocino Counties.

Objective(s). The project objectives are:

(1) To grow and harvest timber in a long-term sustainable manner and reduce dependence on purchasing logs from the open market. The landowner has made significant investments in its milling infrastructure, which needs to remain working in order to recover facility improvement and maintenance costs, while at the same time remain a viable business with the capacity to produce a reasonable profit.

(2) To manage overstocked and hardwood dominated stands for the promotion of conifer growth while maximizing timber stand growth and production over time for forest products -- i.e., maintain or increase Maximum Sustained Production (MSP).

(3) To plan and implement the timber operation to contribute to restoration of properly functioning salmonid habitat. This entails using the individual tree silviculture as prescribed by the Anadromous Salmonid Protection (ASP) Rules within WLPZ areas in ASP watersheds with the goal of increasing the proportion of large trees for large wood recruitment to benefit salmonids. Additional requirements of the ASP Rules are to retain higher basal area of conifers, provide additional shading, develop vertical structural diversity, and support a diversity of plant, shrub, and tree species for nutrient input. The ASP Rules assure protection and enhancement of public trust resources (fisheries, water quality, wildlife).

(4) In addition, it is an objective of this THP to upgrade existing forest roads and watercourse crossings which will in turn reduce soil erosion and reduce the amount of sediment being introduced into the watershed. By upgrading watercourse crossings, waterbarring, sloping and correctly draining roads and skid trails overall sediment yields will be reduced.

The project is to be carried out in accordance with the California Forest Practice Act, Forest Practice Rules, and other applicable agency Rules and regulations. Potential impacts specifically identified are mitigated to less-than-significant levels by additional measures other than what is prescribed in the Forest Practice Rules.

a. Describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant Effects of the Project, and evaluate the comparative merits of the alternatives [ref. 14 CCR §§ 15126.6(a) & 15252(a)(2)(A)].

- Every conceivable alternative to the Project does not need to be considered [ref. 14 CCR § 15126.6(a)].

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- The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant Effects of the Project [ref. 14 CCR § 15126.6(f)].
- The discussion of alternatives shall focus on alternatives to the Project, or its location, which are capable of avoiding or substantially lessening any significant Effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more costly [ref. 14 CCR § 15126.6(b)].
- The range of potential alternatives to the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant Effects [ref. 14 CCR § 15126.6(c)].
- Include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project [ref. 14 CCR § 15126.6(d)].
- If an alternative would cause one or more significant Effects in addition to those that would be caused by the Project as proposed, the significant Effects of the alternative shall be discussed, but in less detail than the significant Effects of the Project as proposed [ref. 14 CCR § 15126.6(d)].

No Project [ref. 14 CCR § 15126.6(e)]:
CEQA Guidelines require all projects to consider the no-project alternative. The No Project alternative is feasible. This alternative would avoid any potential impact that directly results from the timber operations proposed being conducted. Although the No Project is feasible, it would not fulfill the purposes, needs, or objectives set forth by the landowner. This alternative does not improve stocking, nor does it enable the landowner achieve maximum sustained production of forest products. The decision not to proceed with the harvest would not alter the need to convert raw timber into lumber to meet statewide demand. This makes it highly likely that leakage would occur, and that the need for raw materials would have to come from somewhere, be it another local forest or a source farther away. The decision not to proceed would likely result in reduced yield tax revenue to the county. The no-project alternative does not alter the landowner's need to generate revenue to pay for the land or to create feedstock for the sawmill, meaning that any supplementary

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acreage within the ownership would need to be assessed for timber harvesting. Finally, by engaging in this project as proposed, the landowner is compelled by regulation to allocate revenues generated by the project to road improvements to reduce potential road sediment sources. In this project, 20 road points are identified as needing upgrades to reduce the potential for sediment delivery to watercourses. In addition to these drainage structures, by engaging in operations at this location the landowner will take additional steps including but not limited to grading, installation of waterbars/critical dips, and other road maintenance activities, that will reduce the road's hydrologic connectivity. In conclusion, this alternative is feasible and may avoid some impact, but in the absence of the project the landowner's objectives are not met and sediment issues may not be addressed.

Alternative Timber Operations†:

Alternative Silviculture:

Evenaged Regeneration Methods

Evenaged regeneration methods, such as clearcuts and shelterwood/seed tree silvicultural systems were considered for this project but were ultimately determined to not meet the landowner's objectives for management in this THP nor for future management of the property after this THP.

Clearcutting is an alternative silviculture that was considered for this harvest plan. Clearcuts create opportunity for the replacement of an entire stand, allowing the regeneration and tending of a new cohort. Clearcuts have some similarities with stand replacing natural disturbances and provide areas with high availability of resources such as sunlight and soil nutrients to support a new young stand. Clearcutting typically involves the removal of the entire merchantable overstory of a stand, significantly reducing overstory canopy which results in reduced rainfall interception and may result in reduced root strength, both factors affecting slope stability and surface soil erosion potential. Due to the presence of unstable areas and areas of high erosion hazard rating (EHR) within THP units and the fact that the RPF is not qualified to make determinations regarding project impacts on slope stability and landsliding potential, in addition to age-related restrictions imposed by the Forest Practice Rules [ref. 14 CCR 913.1(a)], clearcutting was deemed to be unfeasible and undesirable for the management of the project area.

Shelterwood/seed tree systems are generally prescribed for mature stands that contain healthy overstory conifers that will act as good seed sources for a new cohort in the understory. Overstory trees provide soil stability and protection for young trees that establish after the harvest. The forester has control over what seed trees are left after the harvest, giving them the opportunity to engineer a vigorous forest in the long term. This system was applied during the last entry in the 1990s to most of the proposed project area. Due to the current species composition, lack of suitable overstory seed trees, current stand structure and overall understocking of conifers within the plan area means that this silviculture would not fit with the long-term management objectives of the property.

Alternative Yarding Methods:

Yarding Methods Not Chosen:

Helicopter - This method would fulfill many of the project objectives and could avoid some of the impacts associated with ground-based yarding. However, to utilize this yarding method, the landowner would need to create at least one large landing that is sufficient in size to facilitate a log deck, a helicopter landing zone, YUM piles, and a refueling zone. No landings currently meet the size requirement, so the landowner would need to clear and level at least one large area of forest to accommodate helicopter yarding, resulting in new impacts including noise impacts, loss of top soil, loss of growing space, habitat loss, and increased erosion potential. Additionally, helicopter yarding is extremely expensive to the point of being cost prohibitive for the volume and quality of timber in the THP. Helicopter logging operations present unique safety concerns and complex logistical considerations. No local contractors currently have the expertise or capacity for helicopter logging, and the landowner is committed to supporting local businesses when feasible. For these reasons helicopter yarding has been rejected as an alternative yarding method.

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Alternative Location:
This alternative would involve carrying out the harvesting proposed in the THP at a different location on the landowner's property. This alternative is feasible and would fulfill many of the project objectives. The landowner purchased the timberland for the sole purpose of managing the property for timber production, while at the same time

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giving full consideration to protection of other resources and the environment. Each stand is at different stages in growth and production, and each THP area and watershed present different challenges in terms of protecting the resources and the environment. Over the years, each THP involves a further investment in the long-term growth and productivity of the particular timber stands within the THP area, as well as producing timber products to generate income and finance initiatives to stabilize roads, improve conifer stocking, and enhance fish and wildlife habitat.

Even if the landowner were able to generate income by harvesting elsewhere on the property, the primary objectives of this THP can no more be met under the Alternative Project Location alternative than under the No Project alternative. Commercial timber management needed to properly maintain production from these stands can only occur with a THP. Selection of the Alternative Project Location alternative would essentially mean that these lands and these timber stands would be taken out of production. For that reason, the Alternative Project Location is inconsistent with the primary objectives of this landowner in owning timber lands and is inconsistent with the project area land use zoning (Timberland Production Zone).

CEQA recognizes that, particularly with projects involving natural resources, alternative locations may not be feasible. 14 CCR § 15126.6 (f)(2)(A)(B). Further, the key question in analyzing alternative locations is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion. In this case, because the THP is on lands in the Gualala River Watershed it is considered a sensitive area due to geologic reasons. However, because lands within the Gualala River Watershed comprise a significant percentage of the landowner's holdings, at some point harvesting will occur at these locations. The only way to avoid the potential impacts of harvesting sensitive areas would be to forgo timber harvesting in any of them. However, as noted, the lands are zoned Timberland Production Zone. They were so zoned when the landowner purchased the timberlands that include this THP area. As a result, the lands commanded a purchase price commensurate with that zoning designation and its highest and best use; viz., timber production. The landowner is not willing to refrain from lawful and responsible management of its timberlands, including lands in the Gualala River Watershed. Indeed, the landowner must manage those timberlands for Maximum Sustained Production (MSP) (14 CCR § 913.11), as required by the Forest Practice Act and Forest Practice Rules, subject to the highly prescriptive constraints imposed by the Forest Practice Rules, and the WLPZ and ASP Rules in particular. Moreover, by harvesting elsewhere potential impacts associated with this THP would not be avoided, but rather would merely be shifted to another area of the timberlands. Some potential impacts would be exacerbated. Additionally, shifting harvest to another location would note address the identified road points that need improvement. Harvesting at other locations would require many of the same measures to avoid or substantially lessen such impacts to less-than-significant levels.

Reduced Size:
This alternative is feasible, but it would not further reduce potential adverse impacts or cumulative effects. The decision to reduce the project size would result in the additional acreage being selected at an alternative location (see above). The project, as proposed, has been designed in a way to avoid significant impacts. Reducing the size of the project would likely not further reduce impacts from the proposed operations.

Delaying project:
This alternative would involve carrying out the project as proposed, except at a future time. Delaying the project for several years, say 5 to 10 years, was examined as a potential alternative. This alternative would attain many of the landowner's objectives by allowing the landowner to manage the parcel for eventual timber production, even though postponing the operations would delay the Forest Manager/RPF from maximizing the productivity of the stands in the THP area, as required by the Forest Practice Act and Forest Practice Rules. Such postponement would also delay implementation of the management that will improve forest health and productivity.

Altering the timing of operations such that some other area of the property is entered and harvested now, so that this area can be entered at a later point in time, would not have the effect of mitigating or avoiding potential significant adverse or cumulative impacts associated with harvesting the proposed stands. Rather, it might result in lowering the area's mean annual growth and reduce the property's overall growth to achieving MSP, contrary to the mandate of the Forest Practice Act and the Forest Practice Rules. Additionally, by delaying road work identified in the Section II, Map

Point Table along with routine road maintenance delaying this project may actually result in more impacts than if the project were to occur within the timeframe proposed.

1. **Alternatives to the Proposed Project:**

    b. Describe the rationale for selecting the alternatives to be discussed [ref. 14 CCR § 15126.6(c)].

No Project [ref. 14 CCR § 15126.6(e)]: This alternative was selected in compliance with 14 CCR § 15126.6(e) which requires all projects to consider the no project alternative.

Alternative Timber Operations†:
Alternative Silviculture: Different silvicultural systems will result in different harvest intensities and can create a variety of forest structural conditions following operations. Alternative silvicultures could still meet many of the project objectives. Regulations restrict what silvicultures can be utilized in certain circumstances.

†to the specific Timber Operations that, if unmitigated, would have a Significant Adverse Impact on the Environment or a reasonable potential to join with the Impacts of any other Project to cause, add to, or constitute significant adverse Cumulative Impacts

Alternate Yarding Methods: As discussed above, although feasible, helicopter logging was not selected largely due to operational and economic constraints that make ground-based and cable yarding the most appropriate yarding methods for this particular project.

Other alternative(s) (if applicable):
Alternate location: Identified as a feasible alternative to meet many of the project objectives. This alternative would avoid site-specific impacts from timber harvest, and past public participation has identified this as an alternative.

Reduced Size: Identified as a feasible alternative to meet many of the project objectives. This alternative would avoid site-specific impacts from timber harvest for the areas excluded from harvest, and past public participation has identified this as an alternative.

Delaying Project: Identified as a feasible alternative that would alter the timing of impacts from this project well still enabling the landowner to harvest the project area at a later date.

The alternatives identified above would change the location and timing of impacts from the project as proposed, but would not avoid impacts since operations would still occur in a different location to fulfill the landowners objectives.

    c. Identify any alternatives that were considered but were rejected as infeasible and briefly explain the reasons underlying these determinations [ref. 14 CCR § 15126.6(c)].

- Among the factors that may be used to eliminate alternatives from detailed consideration are:
    - failure to meet most of the basic project objectives,
    - infeasibility, or
    - inability to avoid significant environmental impacts.

Alternative Land Uses: The land in question is zoned for Timber Production and the landowner purchased the land with the intention of generating sawlogs as discussed in the project objectives. This alternative does not meet the most basic objectives of the project.

This THP, as proposed, is preferred over the above alternatives for the following reasons:

- The No Project Alternative. The landowner acquired these lands for the exclusive purpose of growing and harvesting timber. This project is one of many needed to allow the landowner to operate a viable business.

These lands are zoned TPZ and timber harvests are expected to occur. This alternative would not address the need to upgrade the road network . This alternative was therefore rejected.

- Alternative Silvicultural and Yarding Methods. None appear to be necessary, because the RPF has exercised professional judgment and has demonstrated proper justification for the methods chosen. These are consistent with MSP, LTSY goals of the landowner and protection of the resources as required by the FPRs. The THP review process and pre-harvest inspections allow the various agencies the opportunity to make recommendations to change the RPF's silviculture or yarding method choices, if it is deemed necessary for protection of the resources. This alternative was therefore rejected, as no better alternatives have been identified at this time.
- Delaying the Timing of the Project, Reduced Size, or Alternative Project Locations on the Ownership. If this project is not allowed to occur, another project would need to be proposed to balance the effect of not conducting this project where and when it is proposed. This alternative is rejected because it is inconsistent with the project objectives and would not lessen adverse impacts on the environment.
- Alternative Land Uses. There does not appear to be any alternative land uses that the RPF can identify at this time that would be legal. This alternative is therefore rejected.

In summary:
The landowner finds that the highest and best use of the property is the use proposed in this THP.

DISCUSSION AND JUSTIFICATION OF SECTION I & II ITEMS

ITEM 11 RESPONSIBILITIES/NOTIFICATIONS:

Item 11(e): The plan preparing RPF is a contractor hired by the Plan Submitter to perform duties relating to the preparation and submission of this Timber Harvest Plan to the CAL FIRE Director. The RPF is responsible for the complete and accurate preparation of this THP and responding to agency concerns throughout the review process. Work completed prior to the Pre-Harvest Inspection by the RPF or supervised designee includes flagging boundaries and watercourse buffers, classifying watercourses, locating unstable areas, archaeological sites and other sensitive sites, and completing the PHI sample mark. The RPF is not responsible for work completed post-PHI, except for that work as required by PHI and Second Review recommendations. The implementation and administration of timber operations is the responsibility of the Plan Submitter. The plan preparing RPF has not been retained for professional advice or administrative services after approval of the Plan by the Director.

The Plan Submitter, or successor in interest, shall:

a) Ensure that an RPF conducts any activities that require an RPF.

b) Provide the RPF preparing the plan or amendments with complete and correct information regarding pertinent legal rights to, interests in, and responsibilities for land, timber, and access as these affect the planning and conduct of timber operations.

c) Sign the THP certifying knowledge of the plan contents and the requirements of this section.

d) (1) Retain an RPF who is available to provide professional advice to the LTO and timberland owner upon request throughout the active timber operations regarding:

- the plan,
- the Forest Practice Rules, and
- other associated regulations pertaining to timber operations.

(2) The plan submitter may waive the requirement to retain an RPF to provide professional advice to the LTO and timberland owner under the following conditions:

- the plan submitter provides authorization to the timberland owner to provide advice to the LTO on a continuing basis throughout the active timber operations provided that their timberland owner is a natural person who personally performs the services of a professional forester, and such services are personally performed on lands owned by the timberland owner;

- the timberland owner agrees to be present on the logging area at a sufficient frequency to know the progress of operations and advise the LTO, but not less than once during the life of the plan; and

- the plan submitter agrees to provide a copy of the portions of the approved THP and any approved operational amendments to the timberland owner containing the General Information, Plan of Operations, pertinent Section II maps, and any other information deemed by the timberland owner to be necessary for providing advice to the LTO regarding timber operations.

(3) All agreements and authorizations required under 14 CCR 1035(d) (2) shall be documented and provided in writing to the Director to be included in the plan.

e) Within five (5) working days of change in RPF responsibilities for THP implementation or substitution of another RPF, file with the Director a notice which states the RPF's name and registration number, address, and subsequent responsibilities for any RPF required field work, amendment preparation, or operation supervision. Corporations need not file notification because the RPF of record on each document is the responsible person.

f) Provide a copy of the approved THP and any approved operational amendments to the LTO.

g) Notify the Director prior to commencement of site preparation operations. Receipt of a burning permit is sufficient notice.

h) Disclose to the LTO, prior to the start of operations, through an on-the-ground meeting, the location and protection measures for any archaeological or historical sites requiring protection if the RPF has submitted written notification to the plan submitter that the plan submitter needs to provide the LTO with this information.

Notification of Commencement of Operations (14 CCR § 1035.4):
Each calendar year, within fifteen days before, and not later than the day of the start of a timber operation, the Timber Harvesting Plan Submitter, unless the THP identifies another person as responsible, shall notify CAL FIRE of the start of timber operations. The notification, by telephone or by mail, shall be directed to the appropriate CAL FIRE Unit Headquarters, Forest Practice Inspector, or other designated personnel.

Minimum Stocking Standards (14 CCR § 1071):
Within five years after the completion of timber operations or as otherwise specified in the rules, a report of stocking on the entire area logged under the plan and shown on a revised map shall be filed with the Director by the timber owner or the agent thereof. If stocking is required to be met upon completion of timber operations, the stocking report shall be submitted within six months of the completion of operations.

Waterbreaks (14 CCR § 914.6 (h)):
Waterbreaks or any other erosion controls on skid trails, cable roads, layouts, firebreaks, abandoned roads, and site preparation areas shall be maintained during the prescribed maintenance period and during timber operations as defined in PRC Sections 4527 and 4551.5 so that they continue to function in a manner which minimizes soil erosion and slope instability, and which prevents degradation of the quality and beneficial uses of water. The method and timing of waterbreak repair and other erosion control maintenance shall be selected with due consideration given to the protection of residual trees and reproduction and the intent of 14 CCR § 914 [934, 954].

(i) The prescribed maintenance period for waterbreaks and any other erosion control facilities on skid trails, cable roads, layouts, firebreaks, abandoned roads, and site preparation areas, shall be at least one year. The Director may prescribe a maintenance period extending as much as three years after filing of the work completion report in accordance with 14 CCR 1050.

Timber Operations, Winter Period (14 CCR § 914.7 (c), (2)):
Erosion control structures shall be installed on all constructed skid trails and tractor roads prior to the end of the day if the U.S. Weather Service forecast is a "chance" (30% or more) of rain before the next day, and prior to weekend or other shutdown periods.

Road Maintenance [All Districts] (14 CCR § 923.4)
Logging roads, landings, and associated drainage structures used in a timber operation shall be maintained in a manner which minimizes concentration of runoff, soil erosion, and slope instability and which prevents degradation of the quality and beneficial uses of water during timber operations and throughout the prescribed maintenance period. In addition, those roads which are used in connection with stocking activities shall be maintained throughout their use even if this is beyond the prescribed maintenance period.

The prescribed maintenance period for erosion controls on permanent and seasonal roads and associated landings and drainage structures which are not abandoned in accordance with 14 CCR 923.8 [943.8, 963.8] shall be at least one year. The Director may prescribe a maintenance period extending up to three years in accordance with 14 CCR 1050.

License for Erosion Control Maintenance (14 CCR § 1022.3):
A timber operator license is not required for the maintenance of erosion control structures following the completion of timber operations described in an approved work completion report for a THP.

ITEM 14 SILVICULTURE:
1034(m) Identity of the regeneration methods, intermediate treatments, special harvesting methods, alternative prescriptions, and any information specified by the district Rules.

This THP demonstrates MSP pursuant to 913.11(c).

Selection (36 acres):
This stand comprises the WLPZ areas of the plan and the approximately 4-acre ridgetop stand last harvested under THP 1-17-104-SON via tractor selection. The selection stand is primarily occupied by redwood, Douglas-fir and tanoak. Western hemlock, grand fir, and sugar pine are present in less than significant volumes and will likely not be harvested. Various other hardwood species are present in small numbers and are not reported in the table below. The proposed harvest will maintain the existing stand structure and establish a new age class while providing shade canopy, wildlife structure, snag and LWD recruitment (WLPZ).

Selection Composition & Stocking

	Species Composition (%)	Preharvest BA	Postharvest minimum BA
RW	55%	135	35
DF	33%	85	25
Other conifer	2%	5	15
HW	10%	25	N/A
Total Conifer	90%	225	75

Group Selection (36 acres):
There are two Group Selection stands proposed under this THP. Both stands were part of THP 1-90-036-MEN but were not logged. The Group Selection stands are well stocked with second growth timber but have a patchy structure with areas of heavy tanoak stocking. Sugar pine is well represented in the eastern Group Selection unit. The proposed harvest will maintain the existing second growth structure and open the canopy to establish a new age class. Group openings may be designated at the Plan Submitter's discretion following plan approval.

Group Selection Composition & Stocking

	Species Composition (%)	Preharvest BA	Postharvest minimum BA
RW	40%	75	35
DF	30%	55	25
SP	15%	25	15
HW	15%	30	N/A
Total Conifer	85%	155	75

Commercial Thinning (24 acres):
There are two Commercial Thinning units proposed under this THP. The northern unit was last harvested under THP 1-90-036-MEN as a Clearcut unit. The southern unit was harvested under THP 1-90-097-MEN as a Rehab unit. Both stands exhibit similar composition and structure. The preharvest dominant and codominant crown canopy is occupied by trees approximately 30-35 years old and 11" dbh. Pursuant to 14 CCR 913.3(a)(1)(B) the minimum postharvest stocking shall be 100 trees per acre over 4" dbh.

Commercial Thinning Composition & Stocking

	Species Composition (%)	Preharvest BA	Postharvest minimum stocking (TPA)
RW	50%	75	55
DF	40%	65	45
HW	10%	15	N/A
Total Conifer	90%	140	100

Variable Retention (VR) Prescription (173 acres):
Variable retention is an approach to harvesting based on the retention of structural elements or biological legacies (trees, snags, logs, etc.) from the pre-harvest stand for integration into the post-harvest stand to achieve various ecological, social and geomorphic objectives. The major variables in the variable retention harvest system are retention types, densities, and spatial arrangement of retained structures; aggregated retention is the retention of structures or biological legacies as intact forest patches within the harvest unit; dispersed retention is the retention of structures of biological legacies in a dispersed or uniform pattern. Retained trees may be intended to become part of future stands managed by the Selection regeneration method. Retained trees are often designated as decadent tree or snag recruitment hence not ever intended for harvest. Regeneration after harvest outside of aggregated retention patches may be obtained by direct seeding, planting, sprouting, or by natural seedfall.

VR units of this THP will meet retention standards through the aggregated retention method. The objective of the retention is to create and/or maintain an unevenaged stand structure, so that future harvest can utilize unevenaged regeneration methods. Retention elements shall include biological legacies such as snags, wildlife trees, and decadent/deformed trees; and structural elements such as Class III watercourse drainages and headwall swales, springs/seeps, and unstable areas. The aggregated retention method preserves a patch of intact stand around these features/elements.

General Description of Aggregate Retention Group Locations (14 CCR 913.4 (d)(8)): Aggregate retention groups shall be at least ¼ acre and larger. These groups are located throughout the units, protecting topographic features such as headwall swales, unstable areas and Class III watercourse ELZs, and around unique habitat features of the unit such as springs/seeps, old growth trees, wildlife trees, and/or snags, where present.

Future conditions or events that may allow for the harvest of retained trees may include fire, insect/disease infestations, or storm damage which may cause dead/dying/diseased tree conditions. Intermediate treatments or harvests such as commercial thinning may be proposed in 20 years' time from this harvest entry in order to maintain the growth and vigor of the regenerated stand.

Timber operations are permitted within VR aggregates, which shall be limited to cable corridor placement and tailholding to facilitate cable yarding. These operations are subject to applicable unstable area restrictions.

Retention trees shall be protected to the extent feasible during Timber Operations consistent with 14 CCR § 914.1; 914.2(e); 914.3; 915.2; 915.3 and 917.7.

Retention Standards:

Unit	Unit Size (ac.)	Retention Standard	Minimum Aggregated Retention Area (ac.)	Actual Aggregate Retention Area (ac.)
VR1	23	>10% of the preharvest area	2.3	3.0
VR2	22	>10% of the preharvest area	2.2	4.1
VR3	21	>10% of the preharvest area	2.1	4.3
VR4	33	>15% of the preharvest area	4.95	5.1
VR5	22	>10% of the preharvest area	2.2	2.5
VR6	25	>10% of the preharvest area	2.5	3.4
VR7	27	>10% of the preharvest area	2.7	3.8

Retention trees located within any standard width WLPZ will be excluded from calculating retention. Retention standards shall be met on each 20-acre maximum area within each harvest unit.

Future Harvest of Retention Trees

Aggregate retention trees and sub-commercial conifers left during this entry may be harvested during the next harvest entry. The harvesting of trees prior to 50 years following the establishment of retention trees is an exception to the standard rule 913.4 (d)(3)(K) which states: "Trees shall be retained for at least 50 years unless a shorter period of time is described in the plan, explained, and justified by the RPF and approved by the Director."

Explanation: The retained trees are intended to become part of a future stand managed by the selection regeneration method. Due to site productivity, the future selection entry may occur prior to the end of the 50-year period. The landowner at that time would like the opportunity to harvest some of the retained trees in an effort to establish a new age class under the areas occupied by the larger retention trees or to release thrifty third growth timber that has become established following the variable retention entry.

Justification: Although this exception will allow for harvesting of retained trees prior to the end of the 50-year period, the majority of the retained trees will be required to be retained in the future entry as well. This exception would allow trees retained solely for the purpose of meeting minimum retention standards for variable retention to be free to harvest in association with an intermediate treatment of the regenerated portion of the stand. The intermediate treatment will require that no more than 50% of the retained shall be harvested and a minimum of 100 square feet of conifer basal area per acre will be retained. Retained trees in a future harvest will include at a minimum, wildlife trees and snags retained during the variable retention entry. The future selective entry will further enhance the structure of the stand that was established following the variable retention entry and many of the elements retained during the variable retention entry will be maintained or enhanced.

The following tables depict estimated average preharvest and postharvest basal area stocking by species and diameter class for VR Units pursuant to 913.4(d)(7):

VR1 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Sugar pine Pre/post	Hardwood Pre/Post
2-6"	5/5	5/5	0/0	5/1
7-12"	15/5	10/5	0/0	20/2
13-18"	20/2	10/1	0/0	25/3
19-24"	15/2	15/2	0/0	20/2
25-30"	3/0	5/1	3/3	5/5
31-36"	2/0	2/0	3/3	5/5
37-42"	2/0	1/0	2/2	5/5
Total	62/14	48/14	8/8	85/23

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VR2 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Sugar pine Pre/post	Hardwood Pre/Post
2-6”	2/2	2/2	0/0	5/1
7-12”	10/5	5/5	0/0	25/3
13-18”	15/2	10/3	0/0	25/3
19-24”	20/2	10/1	0/0	20/2
25-30”	5/1	5/1	1/1	10/10
31-36”	4/0	3/0	2/2	5/5
37-42”	2/0	2/0	2/2	0/0
Total	58/12	37/12	5/5	90/24

VR3 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Other Conifer Pre/post	Hardwood Pre/Post
2-6”	5/5	5/5	1/1	5/1
7-12”	10/5	5/5	2/2	20/2
13-18”	10/1	5/1	2/2	25/3
19-24”	15/2	10/1	1/1	20/2
25-30”	10/1	10/1	1/1	5/5
31-36”	3/0	3/0	2/2	5/5
37-42”	2/0	2/0	1/1	0/0
Total	55/14	40/13	10/10	80/18

VR4 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Other Conifer Pre/post	Hardwood Pre/Post
2-6”	5/5	5/5	1/1	5/1
7-12”	5/5	5/5	0/0	20/2
13-18”	10/1	5/1	0/0	25/3
19-24”	15/2	10/1	1/1	25/3
25-30”	10/1	5/1	1/1	10/10
31-36”	3/0	3/0	2/2	0/0
37-42”	2/0	2/0	0/0	0/0
Total	50/14	35/13	5/5	85/19

VR5 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Other Conifer Pre/post	Hardwood Pre/Post
2-6”	5/5	5/5	1/1	5/1
7-12”	3/3	5/5	0/0	20/2
13-18”	10/1	5/1	0/0	20/2
19-24”	15/2	10/1	1/1	20/2
25-30”	10/1	5/1	1/1	10/10
31-36”	2/0	3/0	2/2	0/0

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37-42”	2/0	2/0	0/0	0/0
Total	47/12	35/13	5/5	75/17

VR6 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Sugar pine Pre/post	Hardwood Pre/Post
2-6”	3/3	3/3	2/2	5/1
7-12”	5/3	5/5	1/1	20/2
13-18”	5/1	7/1	3/3	25/3
19-24”	12/1	5/1	2/2	7/5
25-30”	10/1	5/1	5/5	3/3
31-36”	5/1	2/0	2/2	0/0
37-42”	0/0	0/0	0/0	0/0
Total	40/12	27/11	15/15	60/14

VR7 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Sugar pine Pre/post	Hardwood Pre/Post
2-6”	3/3	3/3	2/2	5/1
7-12”	5/2	3/3	1/1	30/3
13-18”	10/1	5/1	3/3	22/2
19-24”	10/1	5/1	2/2	8/5
25-30”	5/1	3/0	5/5	5/5
31-36”	2/0	1/0	2/2	0/0
37-42”	0/0	0/0	0/0	0/0
Total	35/8	20/8	15/15	70/16

ITEM 19-21(g) USE OF GROUND BASED EQUIPMENT ON UNSTABLE AREAS:

The Standard Rule: *14 CCR 914.2(d) Heavy equipment shall not operate on unstable areas. If such areas are unavoidable, the RPF shall develop specific measures to minimize the effects of operations on slope instability. These measures shall be explained and justified in the plan and must meet the requirements of 14 CCR 914.*

Explain and describe each proposed practice: Ground-based equipment use is proposed on a feature that is mapped as a probable dormant mature rock slide on the publication Geologic and Geomorphic Features Related to Landsliding, Gualala River Watershed by Fuller and others. The exception area is approximately 6.3 acres in size, however only two tractor roads are proposed to be reused. The area was last harvested using ground-based equipment and the existing infrastructure supporting ground-based systems is in good condition.

How the proposed practice differs from the standard practice: The proposed practice would allow for ground-based operations on a known unstable area.

The specific locations where it shall be applied: The proposed practice will occur in designated tractor ground in Variable Retention Unit #6 within the feature identified as D1 on THP maps. See THP maps in Section II for precise location.

Explanation and justification as to how the protection provided by the proposed practice is at least equal to the protection provided by the standard rule: Per 14 CCR 914.2(f)(5): The RPF may propose exceptions to the limitations on tractor operations described above, if the proposed exception will comply with 14 CCR 914, and if the Plan both clearly explains the proposed exception and justifies how the proposed exception will comply with 14 CCR §

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914. The location of Tractor Roads, except for those used in Tethered Operations, to be used under such exceptions shall be flagged prior to the pre-harvest inspection or, when a pre-harvest inspection is not required, prior to the start of Timber Operations.

The area was assessed for cable yarding potential. The harvest unit was found to contain the following conditions: predominantly moderate slopes, short reaches, lack of adequate deflection for cable yarding, and/or lack of existing access roads for cable yarding equipment. Existing tractor roads that do not require reconstruction will be utilized, thereby minimizing the potential for concentrated soil displacement and excessive site disturbance. Tractors are restricted to existing skid trails in these areas. The existing tractor road network will provide adequate access for the proposed harvest and will allow for the reuse of an existing tractor landing on the permanent road.

The proposed practice will provide protection equal to that of the standard rule by using only pre-existing stable tractor roads where potential for sediment delivery to watercourses can be effectively avoided. The exception practice is proposed on upper slopes above an existing, stable permanent truck road approximately 2,000' from the nearest receiving Class I watercourse. Localized areas exhibiting signs of slope movement (scarps, hummocky ground, leaning or pistol-butt trees) within D1 have been identified by the RPF on the ground and have been designated equipment exclusion zones (EEZ). No skid trail use or timber operations of any kind will occur in these EEZs. See THP maps in Section II for EEZ locations.

This activity is not expected to have a significant adverse effect on the beneficial uses of water or soil productivity based on the following factors:

- No tractor road use during the winter period.
- Heavy equipment use is limited to ingress and egress on existing skid trails where slopes exceed 65% or where slopes exceed 50% with High EHR.
- Heavy equipment is restricted to existing tractor roads pre-flagged by the RPF.
- End lining into steep areas from existing skid trails is required where timber cannot be felled onto the trail.
- Concentrations of soil or debris crowded off the outside edge of a tractor road will be pulled back onto the tractor road at the completion of operations.
- Upon completion skid trails utilized shall be waterbarred to the Extreme EHR standard.

ITEM 21(b) & (c) USE OF GROUND BASED EQUIPMENT ON SLOPES STEEPER THAN 65% AND ON SLOPES STEEPER THAN 50% WHERE THE EHR IS HIGH OR EXTREME

The Standard Rule: CCR 914.2 (f) The following limitations shall apply:
(1) Except for Tethered Operations, heavy equipment shall be prohibited where any of the following conditions are present:
(A) Slopes steeper than 65%
(B) Slopes steeper than 50% where the erosion hazard rating is high or extreme.

Explain and describe each proposed practice: Ground-based equipment use is proposed in two areas where the average slope exceeds 50%, in places exceeding 65%, and EHR is High. The exception areas total approximately 6.3 acres in aggregate. The exception areas were last harvested using ground-based equipment and the existing infrastructure supporting ground-based systems is in good condition. Reuse of existing tractor roads will allow for the installation of modern erosion control facilities.

How the proposed practice differs from the standard practice: The proposed practice would allow for ground-based operations on slopes steeper than 65% and on slopes steeper than 50% where the EHR is high or extreme.

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The specific locations where it shall be applied: The exception practice is proposed in an area of VR Unit 3/GSEL Unit 2 and VR Unit 6. See THP maps in Section II for precise location.

Explanation and justification as to how the protection provided by the proposed practice is at least equal to the protection provided by the standard rule: Per 14 CCR 914.2(f)(5): The RPF may propose exceptions to the limitations on tractor operations described above, if the proposed exception will comply with 14 CCR 914, and if the Plan both clearly explains the proposed exception and justifies how the proposed exception will comply with 14 CCR § 914. The location of Tractor Roads, except for those used in Tethered Operations, to be used under such exceptions shall be flagged prior to the pre-harvest inspection or, when a pre-harvest inspection is not required, prior to the start of Timber Operations.

Each area was assessed for cable yarding potential. These units were found to contain the following conditions: predominantly moderate slopes, short reaches, lack of adequate deflection for cable yarding, and/or lack of existing access roads for cable yarding equipment. Existing tractor roads that do not require reconstruction will be utilized, thereby minimizing the potential for concentrated soil displacement and excessive site disturbance. Tractors are restricted to existing skid trails in these areas. The existing tractor road network will provide adequate access for the proposed harvest.

The proposed practice will provide protection equal to that of the standard rule by using only pre-existing stable tractor roads and potential for sediment delivery to watercourses can be avoided. This activity is not expected to have a significant adverse effect on the beneficial uses of water or soil productivity based on the following factors:

- No tractor road use during the winter period.
- Heavy equipment use is limited to ingress and egress on existing skid trails where slopes exceed 65% or where slopes exceed 50% with High EHR.
- Heavy equipment is restricted to existing tractor roads pre-flagged by the RPF.
- End lining into steep areas from existing skid trails is required where timber cannot be felled onto the trail.
- Concentrations of soil or debris crowded off the outside edge of a tractor road will be pulled back onto the tractor road at the completion of operations.
- Upon completion skid trails utilized shall be waterbarred to the Extreme EHR standard.

ITEM 25(b) PROPOSED ROAD AND LANDING CONSTRUCTION IN ASP WATERSHEDS

14 CCR 923.1(g): In watersheds with listed anadromous salmonids and in planning watersheds immediately upstream of, and contiguous to, any watershed with listed anadromous salmonids, where Logging Road or Landing construction or reconstruction is proposed, the plan shall identify:

(1) How the proposed operations will fit into the systematic layout pattern: **This THP proposes one short spur road totaling approximately 150 feet in length to access a control point for cable yarding operations such that blind leads are avoided and deflection is improved. This spur is necessary to facilitate contemporary cable yarding systems in a unit that was previously harvested with ground-based equipment. The alternative to building the proposed road spur would involve extensive exception skidding on slopes >65% and reopening a legacy road which requires extensive reconstruction across unstable areas and installation of five crossing structures.**

(2) What, if any, offsetting mitigation measures, including, but not limited to, Abandonment of Logging Roads and Landings, are needed to minimize potential adverse Impacts to watersheds from the road system: **The construction of the proposed road spur will allow for the passive abandonment of a legacy road which**

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already had crossings removed and is revegetating. Further, the new road construction will meet the following conditions:

- **New roads will be outsloped to the extent feasible and drained with waterbreaks or rolling dips.**
- **Proposed and existing roads will have waterbreaks installed to the standards of 923.5(f).**
- **Significant Discharge Sites will be addressed within the plan.**
- **New road construction will avoid watercourses, WLPZs, ELZs and unstable areas.**
- **New road construction will avoid crossing slopes steeper than 50%.**
- **New road construction will not exceed grades of 15%.**

14 CCR 923.4(s)(1): Specific provisions for the protection of salmonid habitat for all logging road(s) construction on slopes, greater than 50% with access to a watercourse or lake: **None proposed.**

14 CCR 923.5(q)(2): Specific erosion control measures for all permanent and seasonal roads with a grade of 15% or greater which extends 500 feet or more: **This condition does not exist for any proposed roads or existing roads interior to the THP. There is an approximately 800' segment of existing seasonal road appurtenant to the THP with an average grade exceeding 15%. This segment has existing, functional rolling dips per the specifications of 923.5(f) which will be maintained during and after operations. No additional erosion control measures are necessary.**

ITEM 27(j) ALTERNATIVE WATERCOURSE PROTECTION

Pursuant to 14 CCR 916.6 an Alternative Watercourse and Lake Protection Measure is proposed.

916. 6, 936. 6, 956. 6 Alternative Watercourse and Lake Protection [All Districts]

(a) Alternative prescriptions for the protection of watercourses and lakes may be developed by the RPF or proposed by the Director on a site-specific basis provided the following conditions are complied with and the alternative prescriptions will achieve compliance with the standards set forth in 14 CCR 916.3 [936.3, 956.3] and 916.4(b) [936.4(b), 956.4(b)].

(1) The following information regarding an alternative prescription shall be included in the THP:

(A) An identification of each standard prescription which would be replaced by the alternative prescription.

No standard prescription is being replaced in its entirety. The plan submitter is seeking to allow the felling of unmarked trees within the core zone and inner zone of a WLPZ which may be necessary for safety & cable clearance. This practice does not apply to trees within the channel zone of any WLPZ. The standard prescriptions which require all marking within the WLPZ to be completed prior to the PHI, and which prohibit the harvesting of unmarked trees are 14 CCR 916.5(e)"A", "B", "D", and "E". Unmarked trees felled within the WLPZ shall not be harvested but rather shall be left on site as LWD.

(B) An identification of any beneficial uses of water or other features listed in 14 CCR 916.4(b) [936.4(b), 956.4(b)] which may be adversely affected by the replaced standard prescription and the alternative practice.

The LTO is directed to comply with any other applicable Forest Practice Rules, and therefore none of the features or beneficial uses listed in 916.4 should be adversely affected.

(C) An evaluation of any significant effects on such beneficial uses or features due to implementation of the alternative prescription.

No significant effects are anticipated, therefore there are none to evaluate.

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(D) A clear and complete explanation and justification as to the reasons why, given site- specific technical, environmental, economic, or institutional considerations, an alternative prescription is needed. The reasons given must include at least one of the following:

(aa)Implementation of the specified standard prescriptions would not be feasible.

(bb)Implementation of the specified standard prescription(s) would not adequately prevent or reduce damage to the quality and beneficial uses of water.

(cc) Implementation of the proposed alternative prescription would provide equal or greater protection, including all proposed mitigations for the quality and beneficial uses of water and those features listed in 916.4(b) [936.4(b), 956.4(b)] than would implementation of the specified standard prescriptions**.**

Implementation of the standard prescription requiring all marking be completed prior to the PHI is not feasible for this given circumstance. Cable roads are not usually laid out until well after THP approval. Cable road placement is governed by suitable road locations and the availability of safe, functional tailholds.

(E) A plan for evaluating the results of the proposed alternative practice by either the plan submitter or the Director. The plan must include the criteria and procedures for evaluating and inspecting each approved alternative practice.

The proposed practice may be evaluated by either party during any inspection. The criteria and procedures for evaluating the alternative are the same as those for evaluating the standard. The L TO is still required to meet the standards in all other respects.

(2) The alternative measures stated in the plan shall be written so that they provide clear, enforceable standards for the guidance of the timber operator.

When LTOs are amended to the THP, they shall acknowledge this on the LTO Responsibility Form.

See Section II, Item 27(j).

(3) Prior to beginning or continuing an operation in which alternative measures have been added to an approved THP in regard to watercourse and lake protection measures, the timber operator shall acknowledge the new specifications by signing and filing with the Director, a copy of the amended plan.

ITEM 36 CULTURAL RESOURCES

The following is a description of the procedures required to be taken by the RPF to determine presence of, assessment, and protection of cultural resources present in the THP area. The following is performed by a Cal Fire certified Archaeological Surveyor: pre-survey research is conducted including reviewing previously recorded sites on the property and pertinent literature. Native American groups are contacted with a confidential letter asking them to provide information on known sites of significance to them and for their input on the proposed project. The entire THP area is surveyed to locate and record any new significant sites, if discovered, and to locate existing sites. The Native American groups previously contacted as part of the research process are again notified that archaeological sites have been found, and requesting their input on site protection measures. Protection measures are determined in consultation with the Cal Fire Archaeologist to avoid or mitigate disturbance to sites within the THP. This process is contained within a Confidential Archaeological Addendum to the THP.

1. **Training and Experience of Archaeological Surveyors:**

   Name of current Archaeological Surveyor(s): Seamus Fleming

( ) Archaeological Survey conducted by Professional Archaeologist

(x) Archaeological Survey conducted by person with current CALFIRE Archaeological Training

CALFIRE Archaeological Training Course # 202R

Date Training Course was completed: April 17, 2025

2. Archaeological Records Check Information:

A records check was conducted through the Northwest Information Center on 2/20/2026, NWIC File No. 25-1241. The results of the records check are contained in the THP's Confidential Archaeology Addendum.

3. Native American Consultation Information:

Native American groups on the CAL FIRE Native American Contact List (NACL) for Southern Mendocino County and Sonoma County (NACL dated 2/4/2026) were contacted on 2/6/2026. Responses were received from several Native American groups. The Kashia Band of Pomo Indians responded with a request for a site visit of the THP area, which occurred on 4/14/2026. Information relating to the site visit and consultation is confidential. Other responses were limited to confirmation of receipt and a statement that the project area is outside of the tribe's aboriginal territory and/or the tribe has no concerns with the proposed project. The following groups were contacted:

Tribe/Organization	Affiliation	Contact(s)
NATIVE AMERICAN HERITAGE COMMISSION	N/A	None listed
Big Valley Rancheria of Pomo Indians	Pomo	Flaman McCloud, Jr. Chairperson
Cahto Tribe of the Laytonville Rancheria	Cahto, Kato, Pomo	Misty Davidson, Chairwoman Rachael Phillips, Member-at-large Kendra Campbell, Secretary-treasurer Tasheena Sloan, Vice Chairperson
Cloverdale Rancheria of Pomo Indians	Pomo	Patricia Hermosillo, Chairperson Vickey Macias, Treasurer-administrator
Coyote Valley Band of Pomo Indians	Pomo	Jennifer Feliz, Chairperson Eddie Knight, Sr., THPO
Dry Creek Rancheria of Pomo Indians	Pomo	Chris Wright, Chairperson Sherrie Smith, THPO
Elem Indian Colony of Pomo Indians	Pomo	Agustin Garcia, Chairperson April Popaditch, Vice Chairperson
Estom Yumeka Maidu Tribe of the Enterprise Rancheria	Estom Yumeka Maid	Glenda Nelson, Chairperson Nelson Smith, THPO
Federated Indians of Graton Rancheria	Coast Miwok, Southern Pomo	Gene Buvelot, Council Member Buffy McQuillen, THPO
Guidiville Rancheria of California	Pomo	Michael Derry, Historian Bunny Tarin, Tribal Administrator
Grindstone Rancheria of Wintun-Wailaki	Nomlaki, Southern Wintun, Wailaki	Ronald Kirk, Chair
Habematolel Pomo of Upper Lake	Pomo	Robert Geary, THPO Sherry Treppa, Chairperson Michael Marcks, Vice Chairperson
Hopland Band of Pomo Indians	Shokowa-ma, Sokow-Shanel	Sonny Elliott, Sr., Chairperson Ramon Billy, Jr., THPO
Kashia Band of Pomo Indians of Stewarts Point Rancheria	Pomo	Dino Franklin, Chairman Anthony Macias, THPO Jessica Chavez, THPO Assistant Vaughn Pena, Tribal Administrator

Koi Nation of Northern California	Pomo	Darin Beltran, Chairperson Robert Morgan, THPO Dino Beltran, Vice Chairperson
Lytton Rancheria	Pomo	Brenda Tomares, Attorney
Manchester Point Arena Band of Pomo Indians	Pomo	Tisha Gonzalez, Chairperson
Middletown Rancheria of Pomo Indians	Lake Miwok, Pomo	Justin Reyes-Gutierrez, THPO Michael Rivera, Jr., Tribal Council Rep Kathleen Beltran, EPA Director Jose Simon III, Chairperson
Mishewal-Wappo Tribe of Alexander Valley	Wappo	Scott Gabaldon, Chairperson Christi Gabaldon, Tribal Monitor
Muwekma Ohlone Indian Tribe of the SF Bay Area	Costanoan	Monica Arellano, Vice Chair Charlene Nijmeh, Chairperson Bernadette Quiroz, MDL Tribal Rep
Noyo River Indian Community	Pomo	None listed
Pinoleville Pomo Nation	Pomo	Leona Williams, Chair
Potter Valley Tribe	Pomo	Salvador Rosales, Chairperson
Redwood Valley Little River Band of Pomo Indians	Pomo	Debra Ramirez, Chairperson
Robinson Rancheria of Pomo Indians	Pomo	Sonja Poe, Chairperson George Bernard, Environmental Director Stephanie Nix, Acting THPO
Round Valley Reservation/ Covelo Indian Community	Yuki, Pit River, Achomawi, Pomo, Conkow, Wailaki, Nomlaki, Wintu	Patricia Rabano, THPO Joseph Parker, President
Scotts Valley Band of Pomo Indians	Pomo-Wailaki	Shawn Davis, Chairperson
Yokayo Tribe	Pomo	Chairperson

4. Survey Methods and Procedures:

Survey strategy: An examination of company GIS layers, internal records, aerial photos, and previous CAAs was conducted along with a discussion with company staff and other RPFs who are familiar with the area. From these records along with the surveyor's experience and general trends where archeologic sites have been located on the ownership high probability areas were selected to be surveyed within the project area at varying intensities above cursory. Particular areas determined to be sensitive include trending ridges, alluvial terraces, stream confluences, springs, midslope benches, road cuts, skid trails, uprooted trees, gopher mounds, and ecotones.

5. Survey Results: Reviewers – refer to Section VI.

Survey results are contained in the THP's Confidential Archaeology Report. Disclosure is confidential under CEQA Guideline 15120(d) and Government Code Section 6254. Avoidance strategies and mitigations to protect Archaeological Sites (if any exist) are developed with the guidance of the State Archaeologist and consultation with Native American tribes.