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October 22, 2026

SAVE THE REDWOODS LEAGUE
220 Montgomery Street, Suite 350
San Francisco, CA 94104

Re: 1-26-00099-SON

The above referenced Plan began the final interagency review (aka “second review”) on 10/22/2026. Before the Review Team can complete the evaluation of conformance to the Rules and regulations of the Board for this Plan, CAL FIRE will need responses to the following recommendations:

1	Regarding the RPF response to PHI recommendation 1, CAL FIRE appreciates the additional information, however the substance of the recommendation has not been addressed or received response. Please provide accurate taxonomic identification of the populations identified during the PHI. Additionally, please revise, or have revised, the observed plant species list to reflect to current scientific name of California harebell (Smithiastrum prenanthoides).
2	Rule citations throughout the Plan (e.g., pp. 13, 17, 75, etc…). Numerous citations in Section II and elsewhere refer to Northern Forest District rules rather than the applicable Coast Forest District rules. Review and correct the citations throughout the Plan.
3	Section II, Item 30, Slash Treatment (page 63). The Plan proposes mastication and broadcast burning, which are treatments alternative to those required by 14 CCR Section 917.2(b). Please provide explanation and justification for these alternatives including description of the portions of the plan are in which they will be utilized, and shall consider the type of remaining vegetation, topography, climate, and degree of public exposure fire history.
4	Section II, Proposed Road R1, MP 10. The lower switchback includes fill approximately 10 feet thick at the outside road edge, extending approximately 40 feet downslope. The map point description and the geologist’s recommendations in Section V describe a fill slope of approximately 67 percent. Under 14 CCR § 923.4(j), fill slopes exceeding 3 feet in vertical thickness are limited to 65 percent. Revise MP 10 in the Road Point Table, both copies of Appendix A to the geologic report, and the associated narratives to require a finished fill slope of 65 percent or flatter, with sufficient construction tolerance. If a steeper slope is necessary, identify the specific exception under 14 CCR § 923(c) and provide a site-specific explanation addressing slope stability and sediment delivery. Review and revise the road footprint, fill volume, drainage design, and associated impact analysis to reflect the revised geometry.
5	Section II, Item 32, Coho (page 73). The plan states that if fish are identified at MP13, the RPF will consult with CDFW but does not identify operational conditions under the described situation. Revise the plan to address, such as prohibiting operations until revised timber operations have been approved.
6	Section II, Item 32. The Plan identifies the peregrine falcon as a state candidate for delisting, although the species was delisted in California in 2009. Revise the species’ status description.
7	Section III, Alternatives Analysis, no project. The plan calls no project inconsistent with TPZ zoning and reasons that MSP cannot be achieved without this harvest. Retaining TPZ zoned forestland does not establish that this particular THP must be approved. Denial or modification of one harvest is not a permanent prohibition on all compatible stewardship. Please revise the plan to correct the no-project rationale and describe realistic baseline stewardship and foreseeable management without this approval.

8	Section III, Alternative Yarding Methods. (page 128-). The plan states that "the selection area could also be cable yarded, this alternative would be economically infeasible due to the low volume to be removed, and it would not preclude the need for the road construction". The purpose of logging roads under the Forest Practice Rules is to provide for trucks to go to and from Landings to transport logs and other forest products (14 CCR Section 895.1). Provided that cable operations would allow for all material to be yarded up to the ridge where road R1 is proposed and facilitate the removal of forest products, please revise the plan to explain why R1 would remain necessary. Additionally, please provide a substantive economical analysis demonstrating economic infeasibility of cable yarding and an economic feasibility analysis of the proposed road construction and yarding. Please note that economic feasibility considers whether the plan as revised could be conducted on a commercial basis within 5 (five) years of the submission of the plan and not solely on the basis of whether extra cost is required to carry out the alternatives.
9	Section III, R1 alternatives. The analysis discusses several alternative methods and the CEG-assisted R1 alignment, but rejects lighter commercial removal, size reduction, or omission of R1 largely because the proposed design is already compliant and would best achieve the stated objectives. Please revise the analysis to provide a clear, supported evaluation of these alternatives.
10	Section II, Item 23, WPOP. (page 34-36). The in-lieu proposals for L2 and WLPZ skid trails prohibit operations and use during the winter period while the WPOP proposes unrestricted ground-based yarding, ground based yarding of logs from the WLPZ, shovel-yarding and feller-buncher operations, and use of existing seasonal landings within the WLPZ during portions of the winter period. Please revise the plan for consistency & accuracy.
11	Section II, Road work table, MP T3 (page 88). T3 is described in relation to L1 when it exists in relation to and effects L2 on the maps. Please revise
12	Section II, MP 13 work order and Low Water Crossing Diagrams. Please revise the plan to demonstrate that proposed ford geometry is suitable for 100 year flow.
13	Section II, 1600 Notification (page 145). Revised Coho instructions and MP 13 road work instruction restrict work on MP13 to June 15-October 15. The 1611 notification on page 145 provides for work from June 1-October 15, and the ECP in Section 5 describes work from April 1-November 15. Please revise the plan to describe prescriptive consistency of operations at MP 13.
14	Section II Road Work Table, Section III Alternative analysis, T1-4. The plan identifies tractor watercourse crossings T1-T4 as SEPES, however SEPES are considered within the FPRs in relation to Logging Roads. Please distinguish these sites from those subject to the provisions of 14 CCR Section 923 et seq.
15	Section II, Item 32 (page 64). Plan states NSO survey will be amended into plan, but are already in section V. Please revise.
16	Section V, ECP (page 320). The ECP identifies unstable area potentially producing sediment which are not disclosed due to the prescriptive definition of controllable sediment discharge sources. If such sources exist in relation to Logging Roads, please revise the plan to disclose the non-treatable SEPES within Section II or III.
17	Section III, Shaded Fuelbreak Table (page 135). Post-harvest redwood diameter-class entries total 60 ft²/acre, but the redwood subtotal is printed as 38. Please revise
18	Section IV, Sediment discussion (page 177). The ECP lists 16 sediment-source volumes totaling 241 cubic yards; Section IV reports approximately 238 cubic yards controlled. The difference appears to be the ECP's 3 cubic yards at WH-2. Please revise the plan for consistency.
19	Section V, ECP (pages 321-325). ECP entries for T1-T3 state "No" in the 1600 column, although the Section II Road Point Table and section 1611 list include them. Please revise the plan for consistency and accuracy.
20	Section IV, Existing watercourse crossing upgrades (page 173). The plan states 7 watercourse crossing upgrades are proposed in the plan then provides a list of 8 sites. Please revise.

21	Section IV, p241. The plan states that high levels of culls will be retained in analyzing effects on biological resources, however the fuelbreak prescription proposes retention of "only the healthiest and most vigorous trees" and that lager woody debris from storm damage may need to be reduced. Please revise the analysis within Section IV to describe and consider the proposed fuel treatments in relation to residual snags, and to consider the proposed removal of large woody debris in the consideration of downed large woody debris.
22	Section IV, Road Construction, Sediment Analysis. The proposed construction of R1 does not consider or express the potential risks of sediment delivery on the same basis as either legacy activities or potential beneficial actions, but relies on net sediment reduction within impact analysis. Please revise the plan to provide a reasonable comparison using consistent units, time periods, delivery likelihoods and effective reaches to provide for clear and consistent review and evaluation of impacts.
23	Section III and IV. Section III describes Haupt Creek Watershed as 6,044 acres, and Section IV describes it as 6,039 acres. Please revise.
24	Sections III and IV. The general descriptions in sections III and IV identify the projects lowest elevation as 600ft, however geological, botanical, and hydrological reports and information in the plan identifies substantially lower project area elevations. Please address and revise.
25	Section III, Fuelbreak Prescription. The plan provides the citation of "Dagley, 2009", however a complete citation could not be located elsewhere. Please provide the complete citation to CAL FIRE.
26	Section IV, Fog Drip Analysis. The plans impact determinations related to fog drip are conclusory. The project describes canopy removal as an impact pathway, and the project proposes substantial canopy modification and reduction, however these actions are not considered or analyzed. Please revise the analysis to evaluate the effects of the proposed canopy changes on fog drip and support the resulting impact determinations.
27	Section IV, Soil Productivity Analysis. The analysis states that losses of growing space and soil compaction would be offset by improved access. Improved access is a management benefit and does not itself offset adverse effects on soil or productivity. Similarly, continued non-use of existing trails is part of the environmental baseline and is not appropriate to credit as a project benefit. Revise the analysis to distinguish access benefits from effects on soil productivity and recognize recovery benefits only where proposed operations would improve conditions beyond baseline recovery.
28	Section IV, GHG Calculator. Both Silvicultural methods show inputs on Step 10 of the calculator, but no value is calculated from projected equipment use. Please revise the calculator to include the resulting calculated values.
29	Section V, Geo Report (page 286). The pre- and post-harvest stand conditions used in the geologic report do not match the fuelbreak conditions described in Section III, resulting in a 10 percent underestimation of the percentage of basal area removed. Have an appropriately licensed professional review and revise the report to reflect the correct stand conditions and address any necessary changes to the analysis and recommendations associated with the greater harvest intensity. Additionally, geo table 2 assumes 100 acres of fuelbreak and 23 acres of selection, elsewhere acreage is 102 and 21, respectively. Please address.
30	Section V, page 362. Please provide a late seral vegetation map which overlays the proposed project boundaries.
31	Section V, page 382. The plan states that an NSO pair was detected at SON112 in 2026 and that it is occupied by a pair of barred owls. Survey data appears to associate barred owl activity with SON0019. Please revise.
32	Section V, Pre- and post-harvest owl habitat table. The narrative of habitat on page 478 does not describe type changing, however the table provided on page 479 shows 10 acres of nonhabitat being upgraded to nest roost and foraging. Please revise.
33	Section II, Section V, murrelet summaries. Section II and the 2026 conclusion imply no murrelet detections have occurred over multiple prior years, while the historical material and CDFW letter describe confirmed 2018-2019 ARU detections. Please revise

34	Section IV, Section V, Botanical Resources. The Section IV nine-quad list differs from the botanical report's list by three quadrangles. The botanical topographic description gives slopes only up to about 40%, although the THP includes steeper R1 work. Some Section IV state-rank cells contain rare-plant-rank codes. Please revise
35	Regarding RPF response to PHI recommendation 11, CAL FIRE appreciates the additional information provided in the RPF's response. After evaluating the proposed operations, CAL FIRE and the NCRWQCB have determined that the proposal, without implementation of the proposed mitigation, is inadequate to prevent sediment delivery. Please see Supplemental Discussion attached. Following any revisions to the Plan related to R1 as recommended above, please revise Section IV to accurately and completely disclose potential impacts related to R1 construction and include adoption of the feasible mitigation measure. Additionally, please revise the alternatives analysis in Section III to evaluate feasible alternatives that would further minimize potential environmental effects associated with sediment delivery from an un-rocked road surface. Failure to adopt feasible mitigation does not conform to the Forest Practice Act and Rules and would require a recommendation for denial.
36	Additional questions - see email to Review Chair

CAL FIRE will delay making a decision on whether the Plan conforms with the Rules of the Board until responses are received and reviewed. CAL FIRE will assume the extension of the public comment period is granted, unless otherwise notified, which shall tentatively close 10 days after the completion of the final interagency review in accordance with PRC § 4582.7(a). For any questions, please contact the Review Team Chairperson.

cc: Unit, File
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Supplemental Discussion for October 22, 2026 1-26-00099-SON 2nd Review Team Recommendation #35

Use of R1 without the mitigative road rocking through the WLPZ and the adjoining full-bench segment may cause or add to significant cumulative sedimentation effects under the THP's own analytical framework. The plan identifies road surfaces as potential continuing sediment sources, describes pathways connecting those sources to watercourses, and recognizes receiving-channel conditions adversely affected by accumulated sediment. Its conclusion that R1 will avoid significant effects depends on implementing a combination of drainage, surface stabilization, slope-protection, and operating measures. The proposed plan, absent extended rocking would change a significant premise of that conclusion.

The THP defines sediment-induced cumulative watershed effects as occurring when material from separate locations enters the watercourse system and combines downstream to change water quality or channel conditions. The Plan identifies road building, deferred maintenance, road failures, and other land uses as contributors to downstream sedimentation. It also recognizes that sediment already stored in channels and banks continues to be released during high flows. Accordingly, evaluation must rest on whether sediment produced by an un-rocked R1 could combine with those continuing sources and worsen receiving-water conditions. The analysis encompasses recurring surface erosion as well as episodic crossing failures and landslides. (THP pages 167–171.)

R1's location both in relation to a sensitive watercourse and topographically creates a credible delivery pathway. Approximately 330 feet of the road would occupy the Class I WLPZ, generally 30–100 feet upslope of and parallel to the watercourse, on surrounding slopes described as 30–65 percent. Although this segment follows an existing skid trail and requires relatively limited widening, the proposal establishes a road surface for hauling and equipment access. Limited excavation does not establish that the resulting traffic and runoff will produce no additional sediment. The plan itself identifies road use and tractor yarding as activities with the greatest potential to contribute fine sediment within the plan area. (THP pages 39–40, 163, and 173–175.)

It must be noted that full-bench construction addresses a different component of sediment risk from road-surface use and rocking. Benching and endhauling reduce the amount of potentially unstable fill placed on steep slopes, but do not, by themselves, protect exposed running surfaces against erosion during subsequent use and rainfall. The THP itself anticipates that incidental instability in new cuts may leave material on the benched road. It also explains that road surfaces can provide chronic fine sediment and that wet-weather traffic can bring fines to the surface. Under this reasoning, a road could remain structurally stable while continuing to generate sediment capable of reaching a watercourse. (THP pages 82–83, 170–171, and 175–177)

The full-bench segment, the MP 10 switchback, and the lower road form an adjoining road corridor above the Class I watercourse drainage whereby sediment generated from outside the WLPZ could reach receiving waters through road drainage, downslope runoff, or intervening tributaries. The Plan is clear that whether that delivery occurs depends on drainage locations, discharge volumes, slope conditions, and the effectiveness of intervening filtering areas. The THP additionally recognizes that forest vegetation may filter sediment but that sufficient runoff or road failure can overcome that protection. Its prescribed outsloping and rolling dips reduce this risk while the extended rocking additionally addresses sediment generation along the contributing road surface. Those measures serve complementary functions in terms of delivery potential. (THP pages 39–41, 82–83, and 174–177.)

Dry-weather construction and prescriptive restrictions on saturated-soil operations address important periods of risk, but the sediment pathway continues to exist following construction. The road will remain exposed to later rainfall, and use can disturb previously stabilized surfaces. Consequently, the absence of sediment movement during construction would not establish that an un-rocked road will remain an insignificant sediment source through subsequent storms and operating periods. The Plan's separate requirements for drainage, surface treatment, and wet-weather restrictions reflect this continuing exposure. (THP Items 23–24 and pages 32–41 and 177–179.)

The receiving-water conditions play an important role in determining the significance of the potential contribution. The THP acknowledges sediment impairment in the Gualala River system and describes gravel embeddedness, pool filling, aggradation, bank cutting, and downcutting as expressions of sediment effects. Its baseline discussion reports moderate-to-high embeddedness using the 2001 stream inventory, while also recording the RPF's observation of minimal pool filling within the plan area. It explains that fine sediment can reduce spawning-gravel quality and that pool filling can diminish rearing habitat and contribute to temperature effects. These conditions provide a reasoned basis for concern that recurring sediment from an inadequately protected road could prolong or worsen existing habitat limitations. The impairment designation alone does not establish the significance of every additional sediment increment, rather the argument arises from the combination of identified sources, plausible delivery pathways, and sensitive receiving conditions resulting in cumulative effects. (THP pages 154, 163–164, 168, and 180–181.)

The proposed correction of other erosion sites does not resolve this question quantitatively. The Plan estimates 238 cubic yards of sediment discharge controlled through proposed operations. While that estimate concerns identified controllable material, it is not a calculation or evaluation of R1's recurring road-surface sediment yield over its operating life. The Plan does not demonstrate, on a common temporal and delivery basis, that reductions at other sites would compensate for the additionally identified potential sediment generated without extended road rocking. The Plan's Section IV expectation of improved watershed conditions therefore cannot be interpreted as applicable to an untreated scenario. (THP pages 177–179.)

The geological assessment likewise conditions its impacts conclusion on implementing the THP's watercourse protections, erosion controls, and report recommendations. It supports the combined protective approach and does not establish that full-bench construction alone would make an un-rocked road surface an insignificant sediment source. (THP page 297.)

The revised plan expressly incorporates extended rocking into its justification for the road. Section III places the requirement within its discussion of offsetting road-system mitigation and protection of salmonid habitat on steep slopes with access to watercourses. Section II repeats the requirement in the general construction specifications, steep-slope provisions, and instructions to the LTO. Its repeated inclusion supports treating rocking as an integral part of the mitigated as-revised project on which the significance finding rests. The temporary straw-mulch contingency outside the WLPZ applies to unforeseen inability to complete rocking and anticipates subsequent installation but it does not establish equivalent protection for routine continued use without rocking. (THP pages 39, 41, 78, 83, and 139–140.)

Accordingly, the THP provides a defensible basis for concluding that use of R1 without the specified extended rocking may cause or add to significant cumulative sedimentation effects. Its existing finding of no reasonable potential for significant cumulative watershed effects cannot be assumed to apply after that protection is removed or materially reduced. A reduced-rocking proposal would require additional site-specific support addressing sediment generation during use, drainage and delivery pathways, receiving-channel sensitivity, and the effectiveness of substitute protections. As considered within the Plan's analytical framework, retaining the continuous rocking requirement through the WLPZ and adjoining full-bench segment serves as necessary mitigation to achieve the results of the Plan's cumulative-effects analysis.