

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

135 Ridgeway Ave.
 Santa Rosa, CA 95401
 (707) 576-2959
 Website: www.fire.ca.gov



Date: February 11, 2021
 Ref: 1-20-00188-SON

Chris Poehlmann
 40555 Sleepy Hollow Road
 Annapolis, CA 95412
chrispoehlmann@gmail.com

Dear Mr. Poehlmann:

You submitted two emails to the California Department of Forestry and Fire Protection (CAL FIRE) on December 11, 2020 and January 6, 2021 regarding Timber Harvesting Plan (THP) 1-20-00188-SON, located on Rancho de los Aviadores LLC property near Annapolis, CA, Sonoma County. A list of abbreviations is provided for your benefit in understanding the Department's responses.

CAL FIRE	California Department of Forestry and Fire Protection	PRC	Public Resources Code
CDFW	California Department of Fish and Wildlife	RFPFP	Reasonably Foreseeable Probable Future Project
NCRWQCB	North Coast Regional Water Quality Control Board	RPF	Registered Professional Forester
CCR	California Code of Regulations	THP	Timber Harvesting Plan

PUBLIC COMMENT # 20PC-00000557:

Please discard the previous email without the enclosed map and substitute this version for the public comment file on 1-20-00188-SON
 Thank you.

12/9/2020

Re. 1-20-00188-SON

Dear Calfire and agency review team,

As an owner of an adjacent parcel contiguous to the plan boundary to the south, I have reviewed the submitted THP and have a few observations that should help complete the data set and aid the successful review and eventual completion of this harvest proposal.

I believe the proposed sivicultural prescriptions are appropriate for this ridgetop parcel with its history of recent historic and less than optimal timber removal. The descriptions of the water courses and existing stocking seem accurate using for comparison my parcel next door as are the mitigations proposed for the roads, skid trails and stream crossings.

The proposed use in Section II, Item #16 of cable yarding (a rarely used technique in recent history in this aea of the watershed) is commendable considering the steep terrain and selection harvesting. Hopefully this technique will minimize the proposed use of ground based equipment on steep, 50% to 60% slopes with a Moderate EHR above Grasshopper Creek.

Overall the plan seems appropriate, and importantly, only if the marking is done so as to promote a rapid recovery of a forest that cannot only provide maximum sustained production of high-quality timber products but attain more mature climax vegetation aiming ultimately towards a late seral composition. If this happens, it will be management to be proud of and that will promote species diversity in a healthy forest.

Two items that should be addressed in the THP and its review for approval are as follows.

There is one additional house structure that seems to not be indicated on the mapping near the center of the plan area. It would seem would be appropriate to include it so that the fire hazard reduction for this structure can be included in the plan and the provisions for slash clearing in the proper perimeters for this structure can be accomplished by the applicant.

The other item is the existence of an additional future project that is not included in the cumulative effects analysis of this project in the two planning watersheds that it is located in, Grasshopper Creek and Little Creek planning watersheds.

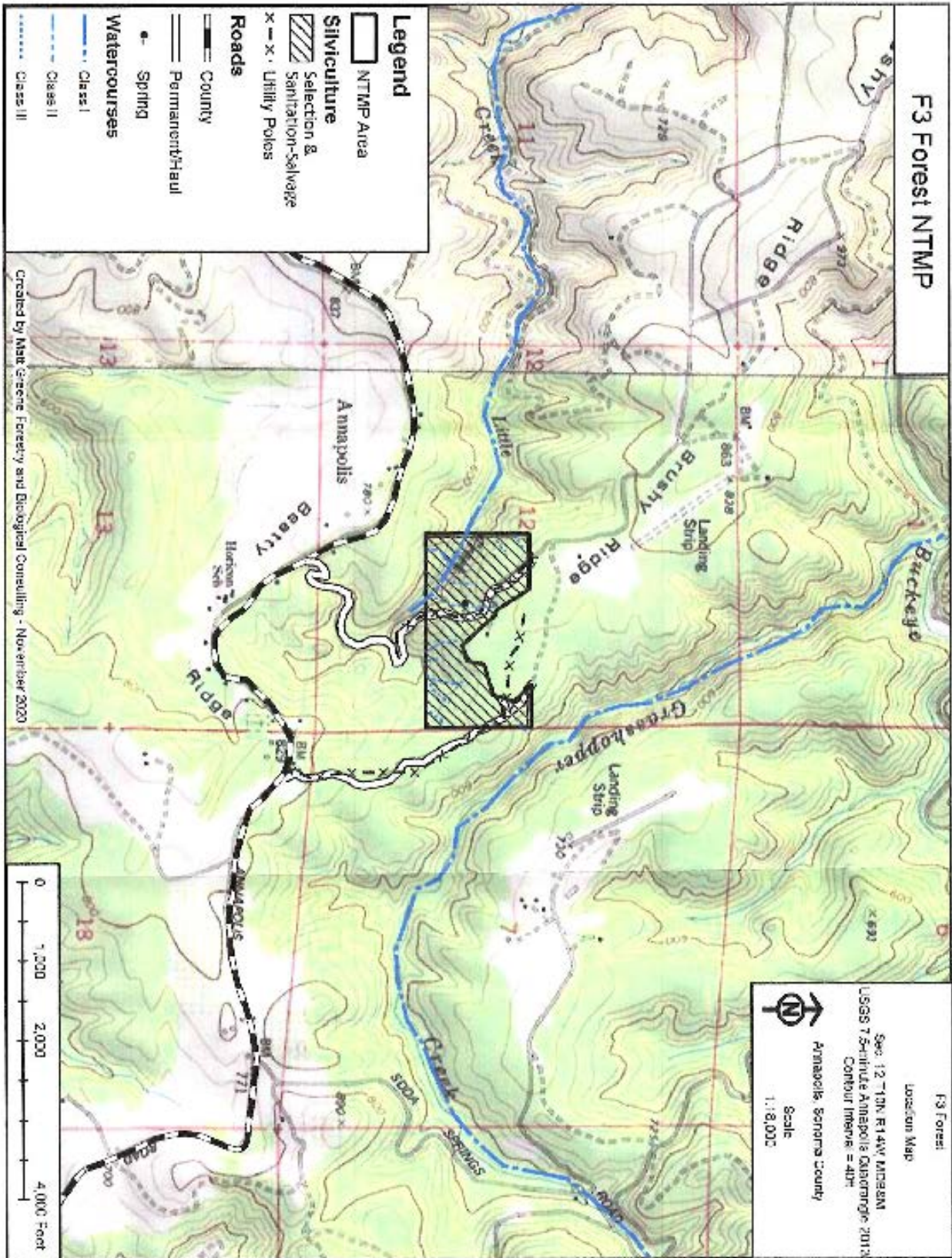
See the attached map below that was forwarded to me and my wife that shows a large NTMP in progress contiguous with 1-20-00188-SON. The data needed for adding to the cumulative effects analysis of 1-20-00188-SON can easily be obtained by contacting RPF Matt Greene at:

Matt Greene Forestry & Biological Consulting
35640 Hauser Bridge Road
Cazadero CA 95421
Phone (707) 847-3761
Fax (707) 847-3905
calforestry@gmail.com

I would hope that my ongoing communications with Darrell Rogers will continue to include the issues of the retention of selected trees and groupings near my adjacent home and shop for their aesthetic properties/visual resources on our forested adjacent parcels.

I also note in Section IV, Cumulative Impacts Analysis, that the box was checked indicating no potential impacts are to be expected to traffic resources. I also hope that in my future conversations with Darrell Rogers that he can describe a plan for equipment and log truck movement on the dirt roads in our immediate area that will minimize traffic and noise impacts. I urge the review team to also advance these questions in the review and PHI of this plan and approve a final plan version that minimizes any of these potential impacts.

I wish the review team and the applicant well in this plan design process and the review of it so as to maximize the ecological end results for this parcel's forest and the larger forest that it is a part of. It is my belief that this is also one of the main goals of the applicant.



RESPONSE:

The comment supports the use of cable yarding under this THP. However, on November 20, 2020, in response to First Review Question #4, the RPF removed the option for cable yarding from the THP by submitting a revised THP page 18. This revision was submitted prior to the PHI on November 24, 2020, and the Review Team was able to evaluate the proposed ground-based operations. The “Harvesting Operations” section of the CAL FIRE PHI Report indicates that the ground-based operations proposed in the THP are appropriate, and no recommendations were made.

The comment also raises the concern that a structure located near the center of the plan area was omitted from the THP maps, and that fire hazard reduction for this structure needs to be included in the plan. Page 3 of the RPF’s response to the Review Team Recommendations (received January 4, 2021) states that:

The public letter also mentioned that a house was missing from the plan however after consultation with the landowner and examination of the property we believe the letter writer may have been referring to a building that no longer exists.

Review of 2019 NAIP aerial imagery appears to show that all structures have been mapped on the maps on THP pages 62 – 63.1, and 63.3. THP Section II, Item #30(d), page 55, provides appropriate slash treatment mitigations near structures maintained for human habitation per 14 CCR 917.2(c). Fire hazard reduction appears to have been properly addressed in the THP.

A concern was raised in the comment regarding the omission of a future project from the THP’s cumulative effects analysis. The comment included a map of the project, an NTMP being prepared by RPF Matt Greene. As of the date of this Official Response this NTMP had not been submitted to CAL FIRE, so this NTMP does not have an official NTMP harvest document number to reference.

In the RPF’s responses to PHI Recommendations received by CAL FIRE on January 4, 2021, the RPF revised pages 85, 89, 90, 92, and 93 to incorporate the additional acreages from the proposed NTMP into the cumulative impacts analysis. Due to these revisions, the acres of Reasonably Foreseeable Probable Future Projects (RFPFPs) within the Little Creek planning watershed increased from 21 acres to 76 acres, and the acres for RFPFPs within the Grasshopper Creek watershed increased from 72 acres to 74 acres. After these changes, RFPFPs will include 1.3% of the area in the Little Creek planning watershed, and 1.26% in the Grasshopper Creek watershed. Given that the additional RFPFP is an NTMP that will implement unevenaged management, CAL FIRE believes that impacts from this THP combined with the NTMP will be less than significant.

Regarding impacts to visual resources and aesthetics, THP page 141 acknowledges that there may be a minimal impact to visual resources as a result of timber operations. Attempts have been made to maintain visual resources by buffering areas proposed for Rehabilitation of Understocked Areas silviculture with Selection silviculture. Based on review of the Silviculture map on THP page 62, this appears to be the case, and the Review Team did not raise any concerns regarding impacts to Visual Resources during the PHI.

Regarding impacts due to traffic and noise, THP pages 142 and 143 (received January 11, 2021) were revised to include an updated discussion of traffic and mitigations for potential noise impacts. THP page 142 indicates that approximately five loads per day will leave the plan area for a period of three months, in addition to a pickup truck for the logging crew. THP page 143 includes enforceable mitigations that

restrict the logging crew to working from sunrise to 6:00 PM, with no operations allowed on Sundays. CAL FIRE believes that with the level of traffic expected from this THP, that these mitigations are reasonable and appropriate.

PUBLIC COMMENT # 21PC-00000062

Review Team,

Please respond to the need to notify the RPF to update (as per the filed comment letter attached below) the cumulative impacts analysis contained in Section IV of this THP to include a future NTMP in the planning phase and described in the letter. As per the FPR's, all past, present, and future projects in the THP's planning watershed need to be included and analyzed in the plan's Cumulative Effects Analysis before Board approval.

See the screen shot below from the PHI Report and Recommendation submission dated 1/6/21 in the file of this THP.

Regards,

Chris Poehlmann

40555 Sleepy Hollow Road

Annapolis

73. Has the RPF correctly assessed the potential for significant cumulative impacts upon resource values within the defined assessment areas? Yes

Inspectors Observations:

74. Has the RPF accurately listed all known past/present/future projects within the assessment area? [Including other CEQA projects that have a similar effect on the environment] Yes
If "No", explain:

RESPONSE:

Please see the response to 20PC-000000557 regarding cumulative impacts.

Please consider this letter as the Department's "Official Response to Significant Environmental Points Raised during Public Review of THP 1-20-00188-SON." The plan was found in conformance with the Forest Practice Act on February 11, 2021 and approved on that date.

Sincerely,



Dominik Schwab

Forester III, Forest Practice

RPF #2823

cc: RPF, Unit, File; Timber Owner, Timberland Owner, and/or Submitter
CP, CDFW, DPR, & RWB through <https://caltreesplans.resources.ca.gov/caltrees/caltrees.aspx>