

**OFFICIAL RESPONSE TO SIGNIFICANT ENVIRONMENTAL POINTS RAISED
DURING THE TIMBER HARVESTING PLAN EVALUATION PROCESS**

**FROM THE DIRECTOR OF THE CALIFORNIA DEPARTMENT OF FORESTRY
AND FIRE PROTECTION (CAL FIRE)**

TIMBER HARVESTING PLAN (THP) No:	1-21-00076-SON
SUBMITTER:	Gualala Redwood Timber LLC
COUNTY:	Sonoma
END OF PUBLIC COMMENT PERIOD:	September 10, 2021
DATE OF RESPONSE AND APPROVAL:	October 1, 2021

The California Department of Forestry and Fire Protection (CAL FIRE) serves as the lead agency in the review of Timber Harvesting Plans. These plans are submitted to CAL FIRE, which directs a multidisciplinary review team of specialists from other governmental agencies to ensure compliance with environmental laws and regulations. As a part of this review process, CAL FIRE accepted and responded to comments, which addressed significant environmental points raised during the evaluation of the plan referenced above. This document is the Director's official response to those significant environmental points, which specifically address this Timber Harvesting Plan. Comments, which were made on like topics, have been grouped together and addressed in a single response. Remarks concerning the validity of the review process for timber operations, questions of law, or topics and concerns so remote or speculative that they could not be reasonably assessed or related to the outcome of a timber harvesting operation, have not been addressed.

Sincerely,



Shawn Headley
Forester II, Forest Practice
RPF #2970

cc: RPF, Unit, File; Timber Owner, Timberland Owner and/or Submitter
CP, CDFW, DPR, & RWB

<https://caltreesplans.resources.ca.gov/caltrees/caltrees.aspx>

PUBLIC NOTIFICATION

To inform the public of this proposed Timber Harvesting Plan (THP) and determine if there were any concerns with the plan the following actions were taken:

- Notice of the receipt of the plan was submitted to the county clerk for posting with other environmental notices.
- Notice of the plan was posted at the Department's local office and also at the regional office in Santa Rosa.
- Notice of the receipt of the THP was sent to those organizations and individuals on the Department's list for notification of plans in the county.

THP REVIEW PROCESS

The laws and regulations that govern the Timber Harvesting Plan review process are found in Statute law in the form of the Forest Practice Act which is contained in the Public Resources Code (PRC) and Administrative law in the rules of the Board of Forestry and Fire Protection (the Forest Practice Rules) which are contained in the California Code of Regulations (CCR).

The Forest Practice Rules are lengthy in scope and detail and provide explicit instructions for permissible and prohibited actions that govern the conduct of timber operations in the field. The major categories covered by the rules include:

- Timber Harvesting Plan contents and the Timber Harvesting Plan review process
- Silvicultural methods
- Harvesting practices and erosion control
- Site preparation
- Watercourse and lake protection
- Hazard reduction
- Fire protection
- Forest insect and disease protection practices
- Coastal Commission Special Treatment Areas
- Use, construction and maintenance of logging roads and landings
- County-specific rules

When a THP is submitted to the Department, it undergoes a multidisciplinary review consisting of several steps. In addition to CAL FIRE, the Review Team members include representatives of the California Department of Fish and Wildlife (CDFW); the appropriate Regional Water Quality Control Board (RWQCB or RWB); California Geological Survey (CGS); the Department of Parks and Recreation (DPR); the appropriate County Planning office; and if within their jurisdiction, the Coastal Commission (CC) (14 CCR §1037.5(a)). Once submitted the Director determines if the plan is accurate, complete, and in proper order, and if so, files the plan (14CCR §1037). In addition, the Review Team determines whether a Pre Harvest Inspection (PHI) is necessary, and what areas of concern are to be examined during the inspection (14 CCR §1037.5(g)(1)).

If the plan is accepted for filing, and a PHI is determined to be needed, a field review is conducted to evaluate the adequacy of the THP. All agency personnel who comprise the multidisciplinary

Review Team are invited to attend the PHI as well as other experts and agency personnel whom the Department may request. During this field review, additional mitigation and/or recommendations may be formulated to provide greater environmental protection. These recommendations are forwarded to the RPF along with the Review Team member's PHI Report. The RPF will respond to the recommendations made and forward these to the Region office and Second Review Team Chair.

A Second Review Team meeting is held where members of the multidisciplinary Review Team meet to review all the information in the Plan, and develop a recommendation for the Director (14 CCR §1037.5(g)(2)). Prior to and/or during this meeting they examine all field inspection reports, consider comments raised by the public, and discuss any additional recommendations or changes needed relative to the proposed THP. These recommendations are forwarded to the RPF. If there are additional recommendations, the RPF will respond to each recommendation, and forward the responses to the regional office in Santa Rosa.

The representative of the Director of the Department reviews all documents associated with the proposed THP, including all mitigation measures and plan provisions, written correspondence from the public and other reviewing agencies, recommendations of the multidisciplinary Review Team, and the RPF's responses to questions and recommendations made during the review period. Following consideration of this material, a decision is made to approve or deny a THP.

If a THP is approved, logging may commence. The THP is valid for up to five years, and may be extended under special circumstances for a maximum of two more years, for a total of seven years.

Prior to commencing logging operations, the Registered Professional Forester must meet with the licensed timber operator (LTO) to discuss the THP (CCR §1035.2); a CAL FIRE representative may attend this meeting. The Department makes periodic field inspections to check for THP and rule compliance. The number of inspections depends upon the plan size, duration, complexity, and the potential for adverse impacts. Inspections include but are not limited to inspections during operations pursuant to Public Resources Code (PRC) section 4604, inspections of completed work pursuant to PRC section 4586, erosion control monitoring as per PRC section 4585(a), and stocking inspection as per PRC section 4588.

The contents of the THP, the Forest Practice Act, and Rules, provide the criteria which CAL FIRE inspectors use to determine compliance. While the Department cannot guarantee that there will be no violations, it is the Department's policy to vigorously pursue the prompt and positive enforcement of the Forest Practice Act, the Forest Practice Rules, related laws and regulations, and environmental protection measures that apply to timber operations on non-federal land in California. This enforcement is directed primarily at preventing forest practice violations, and secondarily at prompt and adequate correction of violations when they occur.

The general means of enforcement of the Forest Practice Act, the Rules, and other related regulations range from the use of violation notices, which require corrective action, to criminal proceedings through the court system. Timber operator and Registered Professional Forester licensing action may also be pursued. Most forest practice violations are correctable and the Department's enforcement program assures correction. Where non-correctable violations occur, criminal action is usually taken. Depending on the outcome of the case and the court in which the

case is heard, some sort of environmental corrective work is usually done. This is intended to offset non-correctable adverse impacts.

Once harvesting operations are finished, a completion report must be submitted certifying that the area meets the requirements of the rules. CAL FIRE inspects the area to verify that all aspects of the applicable rules and regulations have been followed, including erosion control work. Depending on the silvicultural system used, the stocking standards of the rules must be met immediately or in certain cases within five years. A stocking report must be filed to certify that the requirements have been met.

FOREST PRACTICE TERMS

§	Section	NSO	Northern Spotted Owl
BAA	Biological Assessment Area	OEI	O'Conner Environmental Inc.
CAL FIRE	California Department of Forestry & Fire Protection	OR	Official Response
CCR	California Code of Regulations	PC	Public Comment
CDFW	California Department of Fish and Wildlife	PHI	Pre-Harvest Inspection
CEG	Certified Engineering Geologist	PRC	Public Resources Code
CEQA	California Environmental Quality Act	RWB	Regional Water Quality Control Board
CESA	California Endangered Species Act	RPF	Registered Professional Forester
CFS	Cubic ft. per second	SIS	Siskiyou
CIA	Cumulative Impacts Assessment	SOAR	Save Our Annapolis Road
CGS	California Geological Survey	SOD	Sudden Oak Death
DBH/dbh	Diameter Breast Height	SON	Sonoma
DPR	Department of Parks and Recreation	THP	Timber Harvesting Plan
DWS	Domestic Water Supply	TMDL	Total Maximum Daily Load
ECP	Erosion Control Plan	TPZ	Timber Production Zone
ESU	Evolutionary Significant Unit	TSR	The Sea Ranch
FPR's	California Forest Practice Rules	USFWS	U.S. Fish and Wildlife Service
GRT	Gualala Redwood Timber Co.	USGS	U.S. Geologic Survey
GC	Government Code	WAA	Watershed Assessment Area
NCRWQCB	North Coast Water Quality Control Board	WLPZ	Watercourse & Lake Protection Zone
LTO	Licensed Timber Operator		

[sic] Word used verbatim as originally printed in another document. May indicate a misspelling or incorrect word usage

PUBLIC COMMENT SUMMARY

During the public comment period for this THP as described above, there were 5 public comment letters received at the CAL FIRE Region Headquarters in Santa Rosa. These public comments brought up concerns that are addressed in this Official Response (OR). General concerns are grouped by subject matter and followed by the Department's response. Original text taken directly from the public comments are presented as *italicized text*. Unique individual concerns from public comment letters are addressed after the general concerns immediately following that comment along with referencing any general comment responses that may be associated with that response. The public comments are identified with the CAL FIRE "PC" code. A copy of the original letters and any large attachments sent to the Department are viewable through the Department's online Forest Practice Database CalTREES.

CalTREES instructions: navigate to <https://caltreesplans.resources.ca.gov/caltrees/caltrees.aspx> Click the search icon at the top of the page, then type the Plan # in the Record Number box (county identifier not needed). Under the Document Number column, select the Plan Number for the "Timber Harvest Plan" Type. Below the "Record Details" should be a list of attachments for the Plan. (Note: if there are a substantial number attachments, or attachments with large file sizes, it may take some time to load) The Public Comments are labeled under "Record Type" and are in pdf format, usually with a "PC" label.

SUMMARY OF SIGNIFICANT ENVIRONMENTAL GENERAL CONCERNS WITH RESPONSES

1. GENERAL CONCERN: Cumulative Visual Impacts and Silviculture Prescription

RESPONSE: The description of the Visual Resources Assessment area and impacts for the Spruce THP (1-21-000076-SON) are present in the THP as required by 14 CCR § 912.9 Technical Rule Addendum No. 2. There are several parts of the Cumulative Impacts Assessment of the THP (Section IV, pp. 137.1 – 193) that address potential Visual impacts, including a map showing Visual Assessment Area boundary (THP § IV pg. 140) and the Visual Assessment (THP § IV pp. 174 – 175). The Visual Assessment area is described as, "generally the logging area that is readily visible to significant numbers of people who are no further than three miles from the timber operation." (THP § IV pg. 153). The THP goes on to state, "[t]he plan is adjacent to Annapolis Road (County Road 0301), The Sea Ranch 'Hot Spot,' and the Gualala River, and will be partially visible from these three lightly-trafficked areas- from a vehicle in the case of Annapolis Road, while recreating at The Sea Ranch 'Hot Spot,' and while floating the Gualala River in a small boat." (THP § IV pg. 174).

The visual impacts of the THP were assessed during the PHI by the CAL FIRE inspector, and found to be minimal and reasonable:

Portions of the THP area visible to the public, whether from TSR Airport zone, the hiking trail down to the South Fork Gualala River "Hot Spot", or from Annapolis Road, will retain the same post-harvest appearance of a forested landscape. The THP area is designated by Sonoma County as Timber Production Zone (TPZ), where the expectation is that trees will be

harvested periodically to supply the public with the variety of wood products that they expect to be available for home construction and at their local retail outlets. (PHI Report pg. 10).

The proposed silviculture of the THP is Selection (on Site Class II), which requires at least 75 ft²/acre of basal area overall and at least 15 ft²/acre of basal area of trees ≥18" dbh will be retained post-harvest (THP § II, pg. 12). The THP also includes an addendum regarding estimated pre- and post-harvest stocking, showing that the post-harvest average diameter will be close to the same as the pre-harvest diameter, and may in fact increase (THP § III pg. 118). There are several Class II WLPZ areas for sag ponds near both the Sea Ranch "Hot Spot" and Annapolis Road (see silviculture map, THP § II pg. 73); within the WLPZ buffers for these features, which range from 50-100 ft. in width depending on slope, the first 15' from the bank edge is no harvest, with the remainder requiring a minimum of 50% residual canopy cover (THP § II pp. 47-48). These areas will therefore maintain even higher stocking, further minimizing any potential visual impacts.

The CAL FIRE inspector concludes the following from page 2 and 3 of the PHI report for the proposed silviculture:

Selection is an appropriate silviculture method for 2nd and third growth well-stocked redwood/Doug-fir/Grand fir conifer stands.

The chosen silviculture method is appropriate for the continued regeneration & maintenance of these stands.

The proposed regeneration methods meet the intent of Public Resource Code (PRC) 4513 by meeting the goal of maximum sustained production of high-quality timber products.

In its Visual Assessment, the Plan Submitter, "...note[s] that the current view is objectively a direct result of silviculture identical to that proposed in this THP, last implemented just twelve years ago. As this would be the fourth entry in the past 31 years, the likely impacts of this THP are comparable to those past THPs which have contributed to the very appearance of the stand that is being advocated for in public comment." (THP § pg. 175).

THP Section IV, Cumulative Impacts Assessment, Visual Assessment, provides an analysis of the visual effects of this THP. Portions of the THP area visible to the public, whether from TSR Airport zone, the hiking trail down to the South Fork Gualala River "Hot Spot", or from Annapolis Road, will retain the same post-harvest appearance of a forested landscape. The THP area is designated by Sonoma County as Timber Production Zone (TPZ), where the expectation is that trees will be harvested periodically to supply the public with the variety of wood products that they expect to be available for home construction and at their local retail outlets.

Considering the consistent management of the Plan Area and the Selection silviculture being implemented, the Department agrees with the Plan Submitter's Visual Assessment finding that there will be no adverse cumulative impact to the visual resource and the Selection silviculture is an appropriate harvest method for the THP.

2. GENERAL CONCERN: Wildfire Risk / Hazard

RESPONSE: Under the "Wildfire Risk and Assessment" portion of the Cumulative Impacts Assessment, on THP § IV pp. 188-189 the Plan discusses in detail the severity zone, fuel conditions, and fuel breaks of the harvest area.

Timber harvesting maintains, reuses and creates skid trails, cable corridors and truck roads whose presence, by definition, is a fuel break. The Gualala river and the riparian area and gravel bars on the River and the main tributaries act as natural fuel breaks.

Through the implementation of selection Silviculture, “the selective removal of trees will result in crown separation reducing vertical and horizontal continuity in the stand.” (THP § IV pg. 188). The THP has provisions for the treatment of slash within 100 feet of Annapolis Road to reduce fire hazards. (THP § II pg. 59).

The CAL FIRE inspector concluded the following from page 10 in the Spruce PHI report:

“Mitigation for the disposal and incorporation of slash into the soil nutrient cycle is addressed through use of a Fire Protection Zone [Ref 14 CCR 895.1] & a setback of slash generated at any logging landing. Analysis of time view satellite imagery demonstrates that the THP area percent of forest overstory cover has only fluctuated within a narrow range over previous decades of selective timber harvesting. The prescription removal of suppressed & intermediate conifers, combined with selective spacing of retained co-dominant trees, will result a stand structure that is far more resilient to wildfire than are the non-native Monterey Pine & Monterey Cypress stands widely utilized as windbreaks along Highway One & adjacent to TSR residential structures located from Stewarts Point to Gualala.”

The CAL FIRE PHI report also states on page 7 that; “Treatment of Slash to Reduce Fire Hazard [Ref 14 CCR 917.2] is required within 100- ft adjacent to Annapolis County Road.”

During timber harvest operations, equipment and personnel are required by regulation to be available to fight a fire if one should start in the immediate vicinity when harvesting is occurring. Code section PRC 4428 requires that each logging crew have a fire cache and PRC 4431 requires that each chainsaw operator have at least one serviceable round point shovel or one serviceable fire extinguisher within 25 feet. These firefighting tools, and equipment such as tractors/skidlers allow operators to immediately respond should a fire start as the result of natural causes, harvest operations, or and other causes in the vicinity of harvest operations. Periodic inspections by Cal Fire inspectors include the verification of the required firefighting equipment on-site, and a violation may be issued for non-compliance.

The Department agrees with the findings from the wildfire assessment found on THP page 198;

The potential for significant forest fuel loading will not be created within the plan area. Generated slash from timber operations often breaks down and deteriorates within 5 to 10 years along the coast. The proposed project is not anticipated to cumulatively add to an increase in wildfire risk or hazard in the area.

3. GENERAL CONCERN: Water drafting

RESPONSE: The Spruce THP includes provisions for water drafting at one location on the South Fork Gualala River:

The drafting site at Valley Crossing is the same location as was reviewed and approved under THP 1-19-051-SON ("Hazel") and associated CDFW 1600 series agreement #1600-2019-0161-R3. This site is also a water source for THP 1-20-0144-SON ("Sheps"). The following information is provided pursuant to 923.7(l)(2).

The drafting site is on the South Fork of the Gualala River. The South Fork of the Gualala is contained in the San Andreas Fault in a 100-200 foot wide, very low gradient alluvial channel. The alluvium has been estimated to be up to 175 feet deep in the center and tapering toward the edges. The summer wetted channel is approximately 25 feet wide. The substrate is composed of cobbles, small gravel, sand, and silt. The stream banks have a 50% slope and transition onto the alluvial flats which can be up to 1000 feet wide and are 20-30 feet higher in elevation. (THP § II pg. 53)

According to the THP, "In aggregate, GRT's THPs will use no more than 25,000 gallons per day from drafting sites along the South Fork Gualala River." (ibid). This explicit limit is an enforceable part of the Plan. Additionally, the Plan submitter states that, "GRT has four THPs (including this THP) that may be drafting from the South Fork Gualala river at several different locations. Forest management needs at GRT aside, other landowners upstream may be drafting for agricultural purposes." (THP § II pg. 54). The THP further states that, "[t]he road network that is expected to require watering associated with this THP is approximately 3,700 ft. in length. For dust abatement, it is anticipated that this will require approximately 4,000 gallons applied once every two days, on average." (THP § II pg. 53).

In addition to this information clarifying how much water the THP will use, how much water the landowner expects to use in total, and the extent of the road system, the size (54.5 acres) of the THP should also be taken into account- as is noted in the PHI report, it is likely that the harvest period for this project will realistically only require water for "4-8 week[s]..."(Preharvest Inspection Report pg. 10).

CAL FIRE believes that the THP includes the appropriate description and analysis of water drafting to be conducted for the Spruce THP. The Plan properly accounts for (and limits) the cumulative drafting by multiple THPs on the Plan Submitter's property and should protect water resources in accordance with the CDFW 1600 agreement.

4. GENERAL CONCERN: Noise from timber operations will be a nuisance

RESPONSE: The THP is located in a rural area zoned timber production zone (TPZ). Because the majority of the area is rural and zoned for timber production and agriculture, periodic noise from timber harvesting is expected to occur.

The THP area is zoned TPZ and the statute that established this zoning classification is included in code sections 51100-51282.5 of the Government Code (GC). Code section GC 51115.5 alerts the public to the expectation that timber harvest is likely to occur:

Timber operations not nuisance; exceptions.

(a) Notwithstanding any other provision of law, timber operations conducted within a timber production zone pursuant to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973

(Chapter 8 (commencing with Section 4511) of Division 4 of the Public Resources Code) shall not constitute a nuisance, private or public.

(b) This section is not applicable with respect to any timber operation which (1) endangers public health or public safety or (2) prohibits the free passage or use of any navigable lake, river, bay, stream, canal, or basin, or any public park, street, or highway.

(c) For purposes of this section, the term "timber operation" means the cutting, removal, or both, of timber or other wood forest products, including Christmas trees, from timberlands for commercial purposes, together with all the work incidental thereto, including, but not limited to, construction and maintenance of roads, fuel breaks, fire breaks, stream crossings, landings, skid trails, beds for falling trees, fire hazard abatement, and preparation, transportation, and delivery of timber and other wood products to market.

Sonoma County has a "Right to Farm Ordinance" that addresses noise that may be associated with timber harvest operations.

Sec. 30-25. Nuisance - agricultural operation. No agricultural operation conducted or maintained on agricultural land in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the county, shall be or become a nuisance for purposes of this code or county regulations if it was not a nuisance when it began, provided that such operation complies with the requirements of all applicable federal, state, and county statutes, ordinances, rules, regulations, approvals, and permits. The provisions of this section shall not apply where a nuisance results from the negligent or improper management or operation of an agricultural operation.

Agricultural operations are defined in the ordinance:

Agricultural operation' means and includes, but shall not be limited to, the cultivation and tillage of the soil, dairying, the production, irrigation, frost protection, cultivation, growing, harvesting, processing, and storing of any agricultural commodity, including viticulture, horticulture, timber, or apiculture, the raising of livestock, fur bearing animals, fish, or poultry, and any commercial agricultural practices performed incident to or in conjunction with such operations, including preparation for market, delivery to storage or to market, or delivery to carriers for transportation.

There is a trade-off between hours of operations and total duration of any project. By operating more days a week and more hours per day the total duration of the project is much shorter than if operations were to be confined to just week days or to shorter hours each day. Given that the Plan is 51 acres of Selection harvesting, it is expected that operations could be completed in one summer season. The noise generated from the operations is intermittent and seasonal. Timber operations and will not continue after they are complete, unlike the noise generated from the adjacent traffic on Annapolis road or from the nearby airport.

The CAL FIRE inspector concluded the following on page 10 pf the PHI report:

There are no adjacent residences located along any portion of the THP boundary. TSR Airport and adjacent open space occupy the western side and the northern side is a forested slope. The limited, dispersed noise resulting from timber harvest activity, which

for the THP area only occurs within a 4-8 week time frame every 10-12 years, can be considered standard business practice for lands zoned TPZ in Sonoma county.

5. CONCERN: Increased erosion and sedimentation

RESPONSE: Section II, Item 18, of the THP outlines in detail the different mitigations measures for soil stabilization and erosion control which contains provisions intended to prevent sediment delivery, per 14 CCR §§ 914, 914.6, and 923.5. This includes Soil Stabilization Requirements (THP § II pp. 21-26), an assessment of all potential erosion sources related to roads and skid trails (THP § II pp. 41-42) and includes guidance for hydraulic disconnection of roads and treatments for soil surface protection by applications of mulch and seed on bare ground.

Section II, Items 19 – 27 of the Plan include substantial and highly regulated requirements for timber operations to protect against potential erosion. Some of these include the winter operations restrictions, heavy equipment limitations, road use management, and watercourse protection measures. These Items are at the center of harvesting Plans to ensure that timber operations do not significantly damage the environment, will not increase erosion potential, and are in compliance with the FPRs.

Starting on page 104 Section V, the THP contains the “Erosion Control Plan”, which outlines the required provisions the Plan submitter shall follow during the life of the THP. Additionally, there is a list of past completed work that has contributed positively in the mitigation of erosion and sedimentation control, demonstrating the landowner’s commitment to protecting the watershed from point source pollution.

The CAL FIRE inspector stated the following from page 10 from the PHI report.

Public comment refers to the "West Fork Gualala River", which is an unknown location. Periodic harvest entry & subsequent financial benefit allow landowners to continue the trend of minimizing sediment delivery from their forest infrastructure by installing/maintaining drainage facilities and remediating legacy impacts by replacing and/or removing damaged & non-functional watercourse structures.

During the Preharvest inspection, neither the CAL FIRE inspector, nor any other attending agency representative express concern, for any unmitigated erosion or sedimentation potential. These issues are one of the primary concerns the Review Team assesses in the field.

6. CONCERN: Flora and fauna protection (biological resource impacts)

RESPONSE: Biological resources in the assessment area are detailed at length in the THP, including Item 32: Biological Resources (THP § II pp. 61-70), Addendum to Item 32 (THP § III pp. 120-136), California Natural Diversity Database 9-quad Report (THP § V pp. 257-262), and NSO Documentation (THP § V pp. 263-303). The NSO information includes information regarding known or past Activity Centers within 0.7 miles (THP § V pg. 263), survey stations used in owl surveys (pg. 264), pre- and post-harvest NSO habitat (pp. 265-268), and survey history for both the activity center within 0.7 miles of the project (pg. 269) and completed surveys for 2020 and 2021 (pp. 270-271.1). Frequency of the NSO surveys met or exceeded the protocols laid out in the USFWS 2011 (revised

November 1, 2019) NSO Survey Protocol. Following the Preharvest Inspection, CDFW did not make any further recommendations regarding NSO.

A seasonally-appropriate botanical survey will be conducted and submitted as an amendment to the THP prior to commencement of operations. THP Item # 32, Section II, Plant Protection Measures, will follow current CDFW protocols and shall notify the Department and CDFW with the survey results prior to operations. Default mitigation measures consist of a 50-foot buffer around sensitive plants if rare plants are found after Plan approval until specific measures can be developed (pg. 68).

The CAL FIRE inspector concluded the following for fish and wildlife observations for the THP:

The NSO database search, habitat typing/assessment, survey results & monitoring data are provided in THP Sections II & V. Sufficient NSO information has been provided for review under 14 CCR 919.9(e), Take Avoidance Scenario #4, Attachment A (3-15-11) – Coast.

The THP area is within the range of the Central California Coho (State & Federally Threatened) and Steelhead (Federally Threatened) Evolutionary Significant Units (ESUs) for watershed presence. The THP area is within the range of the Chinook Salmon (Federally Threatened) ESU for offshore presence. The RPF has specified protection measures within the proposed THP which meet or exceed acceptable standards of aquatic habitat protection [Ref. 2021 CA FPRs].

THP Sections IV and V provide analysis of the potential impact of this THP on species of wildlife known to inhabit the THP area and surrounding biological assessment area. A CDFW Wildlife Biologist attended the PHI and has provided recommendations in support of THP mitigation and did not find any lacking protection measures or surveys for fish and wildlife. The Department finds the proposed timber operations in combination with protection measures will not have a significant impact on biological resources as mitigated in the THP.

SIGNIFICANT ENVIRONMENTAL CONCERNS AND RESPONSES

1. PUBLIC COMMENT #21PC-000000496 – from Jennifer Merchant, The Sea Ranch Association, July 20, 2021

Please accept this letter into the record regarding the Proposed Gualala Redwood Timber Spruce Timber Harvest Plan (THP), as resubmitted to CalFire on July 9, 2021. The Sea Ranch Association reviewed the plan and its estimated cumulative impacts and wants to convey our concerns over several sections of the plan. While we are looking at several issues and will be submitting a more detailed version later, we wanted to file this preview letter today with the intention of it being considered during the PHI scheduled for tomorrow, July 21, 2021. We also want to note that we just learned of the PHI today.

TSRA is a homeowner's association that oversees a distinctively designed subdivision of over 1,800 developed single-family residences, over 400 vacant lots and more than 3,000 acres of Commons,

which includes unique geologic features, redwood and pine forests, grassy meadows, rare plants, marine and land-based wildlife and recreation facilities, including parks, over 50 miles of trails and developed recreation facilities, stables, barns and historic buildings, and operation of sewer and water resources along a 10 mile stretch of northern Sonoma County coastline.

By virtue of their desire to own a residence at The Sea Ranch, property owners agree to a set of jointly-held values, the key tenet of which is "living lightly with the land." The Association has an active fuels management program, which is implemented to maintain wildlife habitat, scenic resources, and fire safety.

The Association believes our neighboring property owner has the right to harvest its property consistent with laws of the state of California and local zoning code. Our goals, however, are that this commercial activity occurs with little to no impact on the Association's values and resources. We are aware that climate change conditions are now imposing new challenges upon us and require us to be very protective of our natural resources, including clean water and clean air. The proposed THP is immediately adjacent to the Hot Spot, a valuable redwood forest and an important TSRA asset. For these reasons, we request the following considerations and changes to the proposed Spruce THP.

Visual Impacts and Noise

The Sea Ranch Association recently submitted a letter to GRT requesting certain mitigations related to scenic impacts and noise. TSRA has requested extension of a 300-foot buffer to the northern end of the proposed project area to limit scenic impacts to views from portions of the Hot Spot, nearby trail network and single-family residence.

The Hot Spot is a very popular recreation area for Sea Ranch residents to picnic, hike, swim, paddleboard, kayak and share in quiet enjoyment of nature. Looking into the cut over area will distract from that experience. A no tree cut buffer could be established along the boundary to mitigate potential negative impacts.

Noise during logging will be heard by residents whose homes are along the northern and eastern boundary of the Sea Ranch. No such buffer is proposed in the Perhaps logging operation could be limited to between 8:00 AM and 5:00 PM. Prohibition of logging on weekends, when many Sea Ranch property owners is also requested.

Sea Ranch Water Source- Gualala River Aquifer and Sedimentation

Erosion and sedimentation caused by earth disturbance from logging upstream have the potential to reduce the quality of the water drawn from the aquifer in the West Fork of the Gualala River. TSRA owns rights and draws from an aquifer directly north of the Hot Spot. Very recent sedimentation studies in the Gualala River watershed related to similar logging operations do show chronic underestimation of the sediment loads.

A recent study undertaken by Greg Kamman in support of the Friends of the Gualala River's comments regarding an adjacent proposed logging operation points to significant increases in sedimentation of the Gualala River due to various disturbances caused by logging operations. TSRA suggests that this same analysis can be applied to the proposed Spruce THP and has grave concerns about the exceedance of TMDL allocation for man-made sedimentation and the potential

impacts to the aquifer's drinking water source, especially given climate change has significantly limited rainwater capture and storage over the past decade.

Additionally, the hydrology study cited to assess estimated GRT planned water use for its logging operations in comparison to available water-based on Gualala River flows from 2010 is insufficient. The region is currently experiencing an unprecedented drought, so utilizing data from 11 years ago to demonstrate water availability today does not adequately address current river flows or resource availability. Especially critical during a drought, drinking water for humans and natural water sources for wildlife should be prioritized over water used for logging operations.

We ask that further analysis on to assess potential TMDL impacts to the Gualala River Aquifer drinking water source be undertaken by GRT and provided to TSRA for analysis before further consideration or approval of the proposal.

Wildlife and Endangered Species

We believe, as was pointed out by the CDFW, that the surveys for the spotted owl are inadequate. Observation should have been made within the proposed timber harvest area at the frequency required by CDFW. Likewise, a survey should be conducted for the possible presence of bald eagle, osprey, and marbled murrelet nests. Recent data also shows the presence of Coho salmon DNA in the area. Finally, the THP proposes skid trails around and near the snag ponds. Snag ponds are habitats for endangered frogs.

Flora

We look forward to seeing the plant survey report that was promised in July 2021 but not apparently available for public review and comment. We are concerned about the possible presence of listed species (rare, threatened, or endangered). CalFire indicates the promised report on plants will be examined during a period 10 days prior to approval of the THP. We do not think this will be enough time for people outside of CDFW to review the report and prepare an evaluation.

Archaeological Remains

Archaeological surveys along the Gualala River found up to 54 sites with midden deposits and lithic tools in the South Fork area, 4 of them classified as larger villages. It is possible that other archaeological remains exist in the proposed harvest area.

Increased Fire Hazard to Sea Ranch Property

The proposed logging will allow more sunlight to reach the ground in the logged over area and beneath the tree canopy on Sea Ranch along the boundary. This will result in the drying out of surface fuels both within and adjacent to the logged area. As a result, fire hazard will be increased. Within the proposed logging area the reduction in tree canopy cover will reduce the quantity of fog drip normally occurring in the area. This will also result in lower moisture content in forest fuel raising the fire hazard. Fires ignited in this area of lower fog drip could burn onto Sea Ranch property.

Edge Effects on the Environment along Sea Ranch Boundary

As indicated above, removal of a portion of the tree canopy in the timber harvest area will allow more solar radiation to reach the ground beneath the tree canopy along the boundary of the logged area. This will result in drying of the soil and the exposure of understory plants to higher light intensities. Studies of the effects of logging on unlogged adjacent redwood stands have shown a shift in under

story flora because of drying of the soil and increased light intensity (Russell, W., Jones, C., 2002. The effects of timber harvesting on the structure and composition of adjacent old-growth coast redwood forest. Landscape Ecology 16, 731-741; Russell, W. 2008. The influence of timber harvest on the structure and composition of riparian forests in the Coastal Redwood region. Forest Ecology and Management 257 (2009) 1427-1433.)

Economic Impacts

TSRA is undertaking analysis of a significant offer to sequester carbon in its forests. The GRT proposal, like its dozens of other logging projects to the east, have potential for significant degradation of our forests by drying them, or even easing fire racing westward, fueled by diablo winds and dried out logged forests, reducing their economic value and ability to support the state's climate change goals.

RESPONSE: Please see responses to “General Concerns” 1-6 above and responses to the other individual public comment letters.

The following are additional responses to this specific public comment letter:

Archeological resource review and protection have been approved by the Department and are confidential in nature. An Archaeological Pre-Harvest Inspection (PHI) was conducted by Ben Harris, CAL FIRE Coast Area Archaeologist, on July 14, 2021 (PHI report page 7). There were no outstanding archeological notifications or mitigations.

The Department has not found anything in the THP record for this Plan which would indicate that proposed operations as mitigated will have a negative impact on neighbors' health or safety, property values, or the economic well-being of the community. The THP will help support local businesses, employee local residents, and the sale of the timber will result in payment of yield taxes to the state's general fund, which goes to pay for such things as roads, schools, and social programs.

2. PUBLIC COMMENT #21PC-000000497 – from Chris Poehlmann, Save Our Annapolis Road, July 20, 2021

The undersigned and others in the community are concerned by the potential cumulative impacts of these two THPs as presently proposed and submitted. We ask CalFire to reject the 1-21-00076-SON plan as submitted and require the mandated mitigations for the impacts outlined below.

Due to the failure of repeated efforts to find the date of the proposed PHI with research online, calls and emails to Calfire, we are disappointed to find that the PHI will be held tomorrow 7/21/21 as we just were informed of this today.

We are submitting this preliminary list of concerns regarding the Spruce THP and will forward more detailed comments before the end of the public comment period. We are sending these comments in today that focus primarily on the visual impacts analysis on this plan and its failure to mitigate for visual impacts to Annapolis road and the surrounding area using a reasonable description of the visual assessment area in this plan. We hope that this reaches the PHI review team and they will be aware of these concerns and pay special attention to the views at the site and the considerable adjacent border of the THP to Annapolis Road. This adjacency brings up a number

of concerns of the local community and users of this well travelled road. A preliminary list of those concerns are:

- 1.) Visual Impacts
- 2.) Wildfire hazards along the road
- 3.) Improper silvicultural prescription for these near roadside areas

1.) VISUAL IMPACTS

From the Forest Practice Rules:

"It is the Board's intent that no THP shall be approved which fails to adopt feasible mitigation measures or alternatives from the range of measures set out or provided for in these rules which would substantially lessen or avoid significant adverse impacts which the activity may have on the environment. The THP process substitutes for the EIR process under CEQA because the timber harvesting regulatory program has been certified pursuant to PRC Section 21080.5."

It is also clear from the Forest Practice Rules that it is the intent of the Board that any cumulative impacts to visual resources are included in FPR regulations and need to be mitigated by THP applicants. The required cumulative impact analysis for every THP must demonstrate consideration of cumulative impacts in six categories: watershed resources, soil productivity, biological resources, visual resources, and vehicular traffic impacts.

"Appendix: Technical Rule Addendum # 2:

E. VISUAL RESOURCES: The visual assessment area is generally the logging area that is readily visible to significant numbers of people who are no further than three miles from the timber operation. To assess visual cumulative effects: 1. Identify any Special Treatment Areas designated as such by the Board because of their visual values. 2. Determine how far the proposed timber operation is from the nearest point that significant numbers of people can view the timber operation. At distances of greater than 3 miles from viewing points activities are not easily discernible and will be less significant. 3. Identify the manner in which the public identified in 1 and 2 above will view the proposed timber operation (from a vehicle on a public road, from a stationary public viewing point or from a pedestrian pathway)."

From the FPRs regarding Cumulative Impacts:

"In conducting an assessment, the RPF must distinguish between on-site impacts that are mitigated by application of the Forest Practice Rules and the interactions of proposed activities (which may not be significant when considered alone) with impacts of past and reasonably foreseeable future projects.

The RPF preparing a THP shall conduct an assessment based on information that is reasonably available before submission of the THP. RPFs are expected to submit sufficient information to support their findings if significant issues are raised during the Department's review of the THP.

Identification of Resource Areas: The RPF shall establish and briefly describe the geographic assessment area within or surrounding the plan for each resource subject to be assessed and shall briefly explain the rationale for establishing the resource area. This shall be a narrative description and shall be shown on a map where a map adds clarity to the assessment."

This plan as submitted proposes logging operations directly adjacent to the public county road called Annapolis Road and must be mitigated to address any effects on the visual assessment area for the significant numbers of people using this well traveled scenic road. A simple application of setbacks to the harvest boundaries for visual buffers is the needed mitigation.

Annapolis Road is one of Sonoma County's and the local community's treasured scenic roads that not only services the community for access to the coast and inland, but is also well known in northern California tourism as a scenic route featuring healthy conifer/redwood forest and a lush understory. It is recovering after decades of over-harvesting and poor management, such as damaging management techniques and selectively targeting the largest trees in each harvest cycle. Canopy percentages are now approaching more adequate levels and the resulting views from the road give the traveler an idea of what pre-commercial harvesting viewsheds were like, even though the present trees are of course far from the size of those that were here in the 19th century with the arrival of the first wave of logging.

It is well travelled by local residents and is a favorite recreational route for local and visiting bicyclists and driving tourists to the county. It is officially designated a county emergency escape route and one of the few county roads providing access to and from the coast and inland areas. It provides a scenic drive to access the Gualala River which has a Wild and Scenic River designation from the state.

As proposed with their harvesting on the road's edge, these plans will have severe impacts on the visual viewshed of Annapolis Road and will add to the cumulative impacts from past and future plans. Noteworthy in these past impacts is a plan directly adjacent to Annapolis Road that was recently completed by the same landowner with unfortunate viewshed impacts. This was the "Hazel" THP, 1-19-00051-SON. This plan dramatically impacted the viewshed from Annapolis Road uphill from the "Twin Bridges" area and will remain an eyesore to those using the road for years to come. A simple alteration of THP boundaries could have preserved the now former recovered forest views. (Photos of what can be now seen from the side of the road are attached below.)

Therefore, the proposed boundaries of this THP need to be adjusted to protect the viewshed the public now enjoys. An adequate, simple visual buffer zone added to the harvest boundaries would be the solution called for to address the proposed roadside harvesting. Additionally, the plan submitter needs to define the overall visual resource area and propose changes to comply with the FPRs in Rule Addendum #2. These changes must be guided by the following FPR assessment instructions:

"Identification of Resource Areas The RPF shall establish and briefly describe the geographic assessment area within or surrounding the plan for each resource subject to be assessed and shall briefly explain the rationale for establishing the resource area. This shall be a narrative description and shall be shown on a map where a map adds clarity to the assessment."

Adequately done, this submitted analysis would include a collection of pertinent photographs that would show how any proposed correcting mitigations would be viewed from Annapolis Road and by drivers making their way in both directions.

2.) WILDFIRE HAZARDS ALONG THE ROAD

This public paved road is well travelled and presents a significant ignition risk for starting a wildfire. Recent harvesting in the area has left dangerous amounts of slash and combustibles in its wake

and those are also next to the road. See the photos of the Hazel THP attached. The PHI will give and opportunity to observe this firsthand.

The management of this THP area and those nearby have concentrated on the harvesting of the commercially valuable largest trees and as a rule the average DBA and average stand characteristic is dominated by smaller trees that are much more susceptible to devastating destructive fires, no where like the fire history that redwoods have been able to evolve with and prosper from. Fire starts, aided by slash and vegetation growth prompted by loss of canopy from harvesting are now one of the biggest threats to forest recovery and public safety. Allowing harvesting along the road with the resulting brush growth from more sunlight and also allowing any slash to remain anywhere near the road is a recipe for a disastrous wildfire that could envelope not only Sea Ranch but the forest and communities to the east. The rugged terrain of this area would make it highly difficult to fight such a fire. The THP boundaries and the slash treatments need to be changed to address this threat.

3.) PROPER SILVICULTURAL PRESCRIPTIONS

Due to the severe wildfire threats with the state of the forest undergrowth, climate conditions, recent historic low rainfall, it is imperative that the plan address adopting the proper silvicultural prescription of shaded fuel breaks for significant portions of the roadside THP. With the ignition risk presented by the considerable commercial and private traffic on this well travelled road it is vital to have the best prescription to address wildfire. It will be in the best interests of the ownership of GRT and the public and county that the shaded fuel break prescription is applied to proper setback areas in the selection prescription to address the needed reduction to wildfire risks.

Thank you for your consideration of these issues during and after the PHI. Regards,

Chris Poehlmann for SOAR

Some photos are added here to point out the scenic features of the present road and visual assessment area.

Please place these photos into the file for 1-20-0076-SON Spruce THP regarding cumulative impacts on visual resources from past, present, and foreseeable future plans.



Annapolis Road, Spruce THP straight ahead, Twin Bridges and the Shep's Opening THP to the right and the Sea Ranch and coast to the left.



Looking uphill on Annapolis Road, Spruce THP to right, Hazel THP straight ahead at the next turn



A view of the recent Hazel THP taken standing on Annapolis road



Hazel THP from Annapolis Road, proposed Spruce THP directly behind on Annapolis Road



The proposed Spruce THP to left, harvest boundary on road. Note pink flagging.



Spruce THP old growth stump inside



View downhill, Spruce to left, Hazel THP at curve in distance.



Spruce THP on left

RESPONSE: Please see responses to “General Concerns” 1-6 above and responses to the other individual public comment letters.

The photos included in the Public Comment letter show no evidence of single tree selection silviculture as proposed with the Spruce THP, nor any potential impact on visual resources from the Spruce THP. Flagging along roads is not evidence of trees to be harvested but are of the Plan boundary. The past “Hazel THP” as referenced incorporated Group Selection silviculture, which is not being proposed with this Plan.

A photo record to supplement the cumulative impacts and visual resource assessment is not required in a THP by the FPRs.

3. PUBLIC COMMENT #21PC-000000525 – from Neil Moran, Chairman, The Sea Ranch Association Board of Directors, August 18, 2021

Please accept this letter as an update to our letter of July 20, 2021. We request that this letter be considered as an amendment to our original letter because of new information we have received following the submission of our letter on July 20, 2021.

TSRA is a homeowner's association that oversees a distinctively designed subdivision of over 1,800 developed single family residences, over 400 vacant lots and more than 3,000 acres of Commons, which includes unique geologic features, redwood and pine forests, grassy meadows, rare plants, marine and land-based wildlife and recreation facilities, including parks, over 50 miles of trails and developed recreation facilities, stables, barns and historic buildings, and operation of sewer and water resources along a 10 mile stretch of northern Sonoma County coastline.

By virtue of their desire to own a residence at The Sea Ranch, property owners agree to a set of jointly-held values, the key tenet of which is "living lightly with the land." We recognize the right of our adjacent property owners to harvest timber responsibly but are concerned that timber harvest operations do not impair ecosystem processes and populations of plants, wildlife and fish on lands adjacent to The Sea Ranch. Our goal is that this commercial activity occur with little to no impact to the Association's values and resources. The proposed THP is immediately adjacent to the Hot Spot, a valuable redwood forest and an important TSRA asset. It is used by residents at The Sea Ranch, their guests, and members of the general public for nature study and recreational activities in large part because of its scenic value framed by the characteristics of its redwood forest.

A further concern we have is conducting of timber harvesting in this year of severe vegetation dryness and drought. The state of California has placed 99.3% of Sonoma County, including The Sea Ranch and the adjacent area proposed for logging in the 04 "Exceptional Drought" category

<https://www.drought.gov/states/california/county/sonoma>. This circumstance increases fire risk and has implications for the survival of native plants and wildlife. We believe that the "Exceptional Drought" will exacerbate the impacts of many of the concerns we have identified below. We are also aware that climate change conditions are now imposing new challenges upon us and require us to be very protective of our natural resources, including clean air and water.

We request the following considerations and changes in the proposed Spruce timber harvest plan in order to better understand the environmental and recreation impacts and mitigate them:

1. Visual Impact and Noise

The Sea Ranch Association is requesting extension of a 300-foot buffer to the northern end of the proposed project area to limit scenic impacts to views from portions of the Hot Spot, nearby trail network and single family residences. We reiterate that request to provide a buffer, as an alternative that can reduce direct and cumulative impacts to the Hot Spot from the Spruce and other THPs.

The Hot Spot is a very popular recreation area for Sea Ranch residents to picnic, hike, swim, paddleboard, kayak and share in quiet enjoyment of nature. Looking into the cut over area will distract from that experience. A no tree cut buffer could be established along the boundary to mitigate potential negative impacts.

Residents at The Sea Ranch use the River Beach Road and the Hot Spot Loop trail to enjoy the redwood forest and to reach the picnic area and South Fork of the Gualala River (Fig. 1). The visual experience of using the southern portions of the road and trail will be impacted by the proposed timber harvest. The impact will be like the impact of GRT logging of their Hazel THP adjacent to the Annapolis Road as documented by photograph below (Fig. 2). In accessing the visual impact in the Spruce THP, GRT did not make an assessment from either the River Beach Road or the Hot Spot Loop trail. Moreover, the THP did not assess the cumulative effect of several harvest operations that are next to the Hot Spot and directly across the river from the Hot Spot. (Fig. 3).

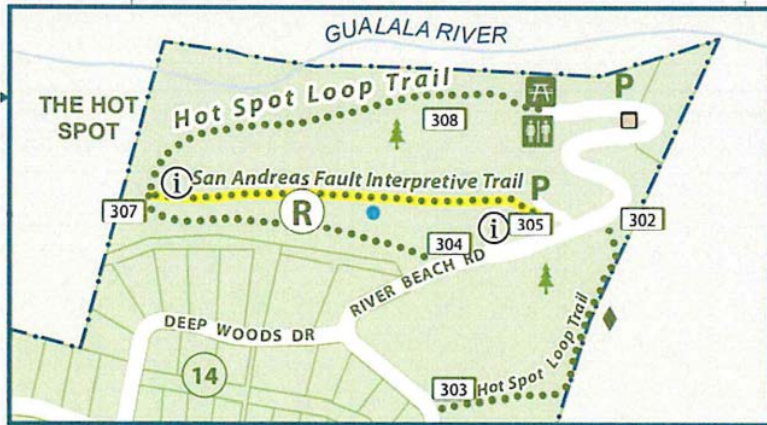


Figure 1. Hot Spot Recreation Area and Access Road



Figure 2. GRT's Hazel THP from the Annapolis Road (photo by S.O.A.R.)

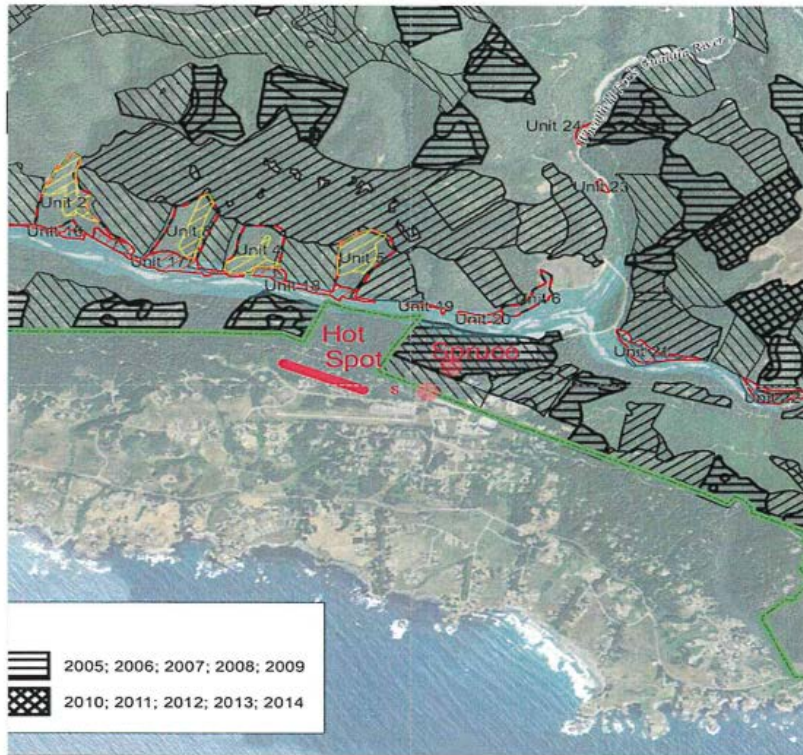


Figure 3. Recent GRT logging operations surround the Hot Spot forested recreation resource

There is no discussion of the combined effect of all of this logging surrounding the Hot Spot, in terms of its recreational and viewshed/aesthetic resources, as well the potential for increasing temperatures due to the increased removal of trees. The Association believes these impacts can be reduced and mitigated by establishing a 300-foot buffer along the northern boundary of the proposed logging area.

Noise during logging will be heard by residents whose homes are in the vicinity of the proposed logging operations. We ask that logging operations be limited to between 8:00 AM and 5:00 PM on weekdays and no logging operations be conducted on weekends, when many Sea Ranch residences are full of residents, their guests and visitors.

2. Increased Fire Hazard

The proposed logging will reduce fog drip, increase solar radiation of the ground surface, increase the amount of fine woody fuels and result in the establishment of exotic grasses and annual herbaceous species. These changes will increase the fire hazard of the logged over area. The reduction in fog drip and increased solar radiation reaching the ground surface will result in lower fuel moisture content. Glebocki documented a reduction in fuel moisture content in all fuel categories except the 100 hour fuels in thinned vs. un-thinned redwood stands (Glebocki, 2015 - <https://scholarworks.calstate.edu/downloads/d217qr75v?locale=en>). He also reported that fine fuels in thinned stands increased by 56%. The presence of dried annual grasses and other annual herbaceous species increase the risk of ignition.

Fires starting in the logged over area could spread onto Sea Ranch property and endanger homes and other structures. In recent years, fires ignited east of the first ridge inland from the

coast have been driven by easterly winds over the ridge and down to the ocean. While this letter was being written (August 17, 2021) the area east of The Sea Ranch was placed under a Red Flag Warning. This is likely to be the first of several Red Flag Warnings to occur in the vicinity of The Sea Ranch during the current fire season.

The increased fire hazard due to the proposed logging scheduled to take place once the THP is approved, can be mitigated by avoiding logging during Red Flag Warnings and during days when the fire hazard is high and winds are blowing from the east. The fire hazard can also be mitigated by chipping and spreading of logging slash rather than piling and burning as proposed in the THP on page 188.

3. Edge effects along Sea Ranch property boundary with proposed timber harvest

As indicated above, removal of a portion of the tree canopy in the timber harvest area will allow more solar radiation to reach the ground beneath the tree canopy along the boundary of the logged area. This will result in drying of the soil and the exposure of understory plants to higher light intensities. Studies of the effects of logging on unlogged adjacent redwood stands have shown a shift in understory flora because of drying of the soil and increased light intensity (Russell et al., 2000 https://www.fs.fed.us/rm/pubs/rmrs_p015_3/rmrs_p015_3_128_136.pdf)

The effects can also be mitigated through the above-requested 300-foot buffer along the northern portion of the proposed THP site, along the border with the Hot Spot area. The Hot Spot supports certain plant species that are only found in this area of The Sea Ranch.

4. Water Drafting, The Sea Ranch Water Source, Impacts on the Environment

The THP states that it will remove an estimated 25,000 gallons of water per day from the Gualala River for a period from April through November, or for a period of approximately 8 months. [THP at 53-54]. The THP also states that summer river flow rates at the drafting site are regularly 1-2 cubic feet per second (cfs). The THP relies on a 2010 O'Conner Environmental, Inc. (OEI) report¹ to claim that it does not expect that its water removal will cause any substantial adverse effects on the downstream habitat.

The average baseflow (summer low flow) estimates presented in the OEI report represent the average daily flow rate for the July through September period for the years (2006-2009) as derived by OEI. However, based on analysis of USGS river streamflow records representative of the drafting site, it is important to point out that there is typically a continuous decrease in summer baseflow rates during the July through September dry season. Thus, an average flow rate for the July through September period is higher than a large percentage of the actual flow rates that occur during the latter portion of the summer period.

Figure 4. plots hydrographs of mean daily flow on the USGS's South Fork Gualala River near the Sea Ranch stream flow gauge (USGS gauge number 11467510) for the past decade (water years 2012 through mid-August 2021), illustrating the receding flow rates through the summer months. This gauge is located approximately ½-mile downstream of the proposed THP water drafting site. This plot also indicates that river flow rates over the past decade routinely fall well below 1-2 cfs during the summer, especially in dry years. Of particular note are the current (2021) low summer flow rates that are well below the drafting rate of 0.67 cfs (300 gpm). Thus, the use of a

full summer (July- September) flow rate by OEI in their hydrologic analysis grossly overestimates the amount of water actually delivered to the proposed water drafting site during the August and September periods. During this time, when flows are at their lowest, river pools become disconnected (esp. during dry years such as 2021) posing the greatest potential for pumping impacts on pool water levels and associated aquatic habitat.

The THP and OEI also fail to evaluate the effects of climate change and/or other causes for long-term changes in river flows. The OEI river flow estimates at the drafting site (1-2 cfs) are dated and don't reflect the current trend of declining summer baseflow rates in the Gualala River.

Figure 5. plots average September flow rates on the South Fork Gualala River for the USGS's current gauge near Sea Ranch and now abandoned gauge for the South Fork Gualala River near Annapolis (USGS gauge number 11467500). The Annapolis gauge was located approximately 0.2-miles upstream of the near Sea Ranch gauge and summer flow rates are essentially identical between them. This data plot indicates a clear trend of declining average September flow rates on the South Fork Gualala River at the THP water drafting site.

It is important to note that the average September flow rates during most years after 1990 are very near or lower than the typical water drafting rate reported in the THP. Neither the THP or OEI provide an analysis on the potential impacts of the Spruce THP water drafting on river flow or the cumulative impacts of concurrent water drafting proposed for other THPs (discussed further below).

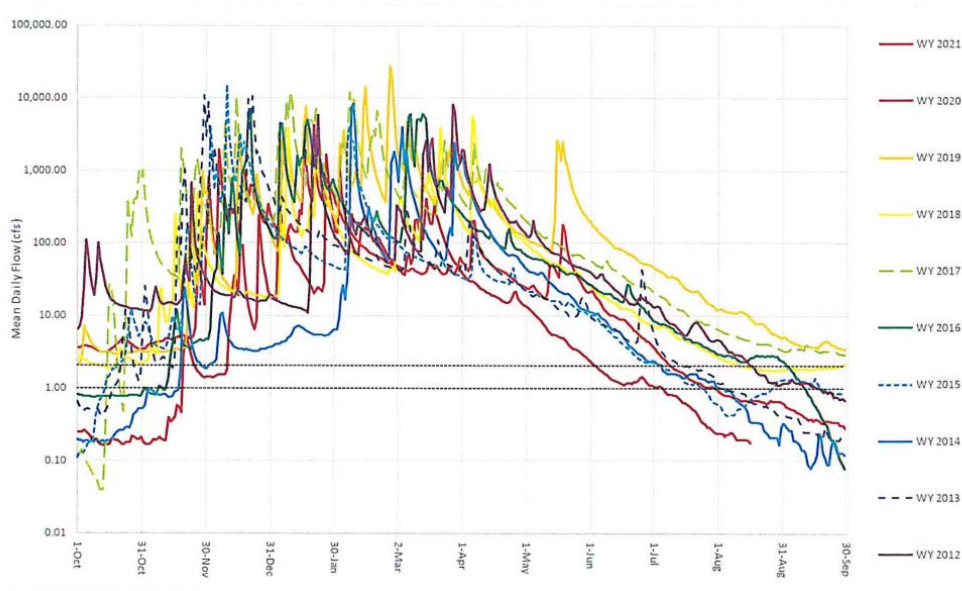


Figure 4. Mean daily flow at the USGS gauge 11467510 South Fork Gualala River near the Sea Ranch, California, for water years 2012 through August 16, 2021. Horizontal dotted lines indicate flow rates of 1.0 and 2.0 cfs.

On August 16, 2021 the USGS flow gauge reported flow on the drought-stricken South Fork Gualala River, near Sea Ranch, began to dip consistently below an alarming 0.2 cubic feet per second for the first time this year. The previous minimum for this date was over twice this - 0.47 cfs.

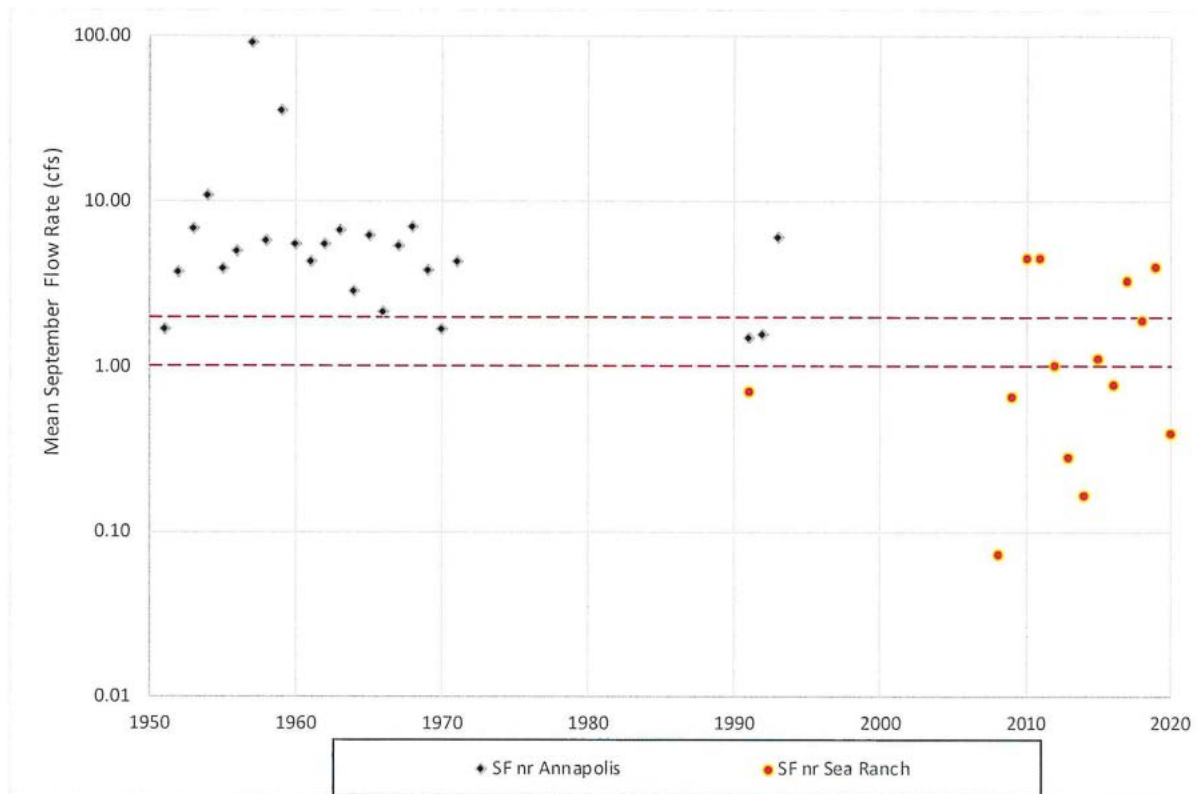


Figure 5. Average September flow at the USGS gauge 11467510 South Fork Gualala River near the Sea Ranch and 11467500 South Fork Gualala River near Annapolis using available data from 1050 through 2020. Horizontal dashed lines indicate flow rates of 1.0 and 2.0 cfs.

In 2021, we face a much different environment than in 2010, particularly given the dynamics of ever-increasing climate change, now considered an emergency and crisis. We experience this in our community with ever-persistent and severe drought, rising temperatures and extended wildfire season each year. Communities are without water, such as in the town of Mendocino, where wells are drying up and potable water for drinking, bathing, cleaning and other domestic uses, must be trucked or railed in.

Statewide, and here in Sonoma County, bonafide water rights are being restricted, if not entirely cut off, to farming and larger agriculture operations, which has a direct effect on our local and statewide food supply. Our fisheries and other aquatic resources are declining, and salmonids are unable to reach their upstream spawning habitats due to increasingly low flows within our river systems. These are ecological concerns which affect everything we do. The THP fails to consider any of this as it summarily concludes, without analysis, that the drafting of 25,000 gallons per day is not expected to have a substantial adverse impact on downstream habitat. It does not provide a relevant current-day analysis. Nor does the THP provide an analysis on potential impacts to groundwater supplies from water drafting. It is assumed that a water right is required for the water drafting diversion, either directly from the river or from the subterranean stream that hosts the shallow groundwater in the valley bottom alluvium. Per California Division of Water Rights requirements, annual water diversion reports are due on July 1st. In order to determine the overall amount of water being diverted and better evaluate the potential impacts

of water drafting on ecological and water resources, we request that GRT provide annual water diversion reports associated with water THP water drafting on the Gualala River.

The Kashaia Band of the Pomo Band of Indians recently notified The Sea Ranch that its intake at the Gualala River will be dry by mid-September and has asked for support in water and infrastructure resources. How can the State of California accept water draws out of the Gualala River for logging operations while human health and safety has reached a point of dire impact?

Additionally, the THP fails to provide the most basic information about related water drafting projects. The THP is not clear about what is happening with water drafting for its harvest plans. First it states that Gualala Redwood has four THPs (including this Spruce THP) which "may be drafting from the South Fork Gualala River at several different locations"; then it states "this location may be used under different THPs." *Id.* (emphasis added) This information is inconsistent in at least three ways: it is not clear as to (1) how many and which water drafting locations will operate within the Spruce THP time frame, (2) the amounts those other three THPs will be drafting, and (3) whether the "different THPs" comprise more than the three other THPs.

With respect to the three other THPs that are drafting water, the THP provides no identifying information about that water drafting, including their relevant permit numbers, location(s), operations, time frame, or importantly, what amount of water each is taking from the Gualala River, over what period of time, and at what location. That information is minimally required to be able to evaluate the potential for cumulative effects, which the THP fails to provide. Moreover, because the THP is not clear as to whether there are more than the three unidentified THPs which now or will be drafting water, that information must be clarified to understand the full scope of water removal from the Gualala over the relevant time frame.

The Sea Ranch requests that GRT adopt an alternative to water drafting for its dust abatement, to mitigate any impacts from water-drafting and reduction of water supply from the Gualala River. Increasingly, businesses and agriculture are adopting alternatives to water drafting for dust abatement. Given the historic drought conditions, and lack of water, it is not ecologically feasible to continue to draw water from the Gualala River. The cumulative effect over time may be significant as we face successive years of drought, which by all estimates will increase. Several years ago, the Central Valley agriculture community began facing the need to utilize alternatives to water to prevent dust and air pollution.

There are alternative means to provide dust abatement, such as with Earthbind or Landlock materials, described in the enclosed attachments. TSRA requests that such mitigation is required in lieu of using water. GRT has done much to improve its roads, and now is the time to provide the resources to ensure that precious water resources are not a component for dust abatement. This would be a long-term investment, necessary to protect regionally-shared resources.

The Sea Ranch is concerned about what impact all of this water drafting and any sediment from the Spruce and other THPs to the Gualala River, may have on its water wells located downstream. The THP states that they are not expected to be negatively impacted "considering the mitigation measures in place and the fact these draw from subsurface waters." THP at 46. The THP does not then identify what are the mitigation measures that apply to protect the wells, nor does it articulate its reasoning that there is no impact because the wells draw from subsurface wells. In

the absence of this information, as well as understanding the scope of water drafting, we remain concerned about the short and long-term effect the harvesting can have on our water supplies.

5. Impacts to Flora and Wildlife

TSRA believes, as was pointed out by the CDFW, that the surveys for the spotted owl as discussed in the THP are inadequate. Observation should have been made within the proposed timber harvest area at the frequency required by CDFW. Likewise, surveys should be conducted for the possible presence of bald eagle, osprey, and marbled murrelet nests.

The THP recognizes this inadequacy but does not remedy it. Instead, it states that the final NSO surveys have not been completed, and their results will be submitted after plan approval as an amendment to the THP. [THP at 61] In the absence of this required information, the THP once again failed to provide a complete THP project description and environmental setting, with adequate information about the plan area and resources. Submission of an amendment after project approval is not appropriate and reveals that the THP that was released for public review was not complete in its project and environmental impact analysis, as required by both the Act and CEQA. This has prevented adequate public review.

Similarly, the THP fails to include the survey information necessary to determine the presence or absence of protected plant species, stating that information will be submitted only after approval as an amendment to the plan. [THP at 68] As stated above, this is not allowed; adequate and accurate information must be included in the THP for review by CalFire, other agencies and the public.

While we look forward to seeing the NSO survey and plant survey report that have not been made available for public review and comment, we ask that the Plan not be approved until those materials are submitted and available for public review, including provision of a reasonable period of time to comment. We believe the plan must be denied in their absence. We are concerned about the possible presence of listed species (rare, threatened, or endangered). CalFire indicates the promised report on plants will be examined during a period 10 days prior to approval of the THP. We do not think this will be enough time for people outside of CDFW to review the report and prepare an evaluation.

6. Economic Impact

TSRA is currently analyzing a significant financial offer to partner with a company to enroll a portion of its forested commons, including the Hot Spot, in California's carbon sequestration program. The GRT proposal, like its dozens of other logging projects to the east, have potential for significant degradation of our forests by drying them, or even easing fire racing westward, fueled by diablo winds and dried out logged forests, reducing their economic value and ability to support the state's climate change goals.

The study referred to above concerning edge effects (Russell et al., 2000 - https://www.fs.fed.us/rm/pubs/rmrs_p015_3/rmrs_p015_3_128_136.pdf) also identified crown dieback in tree adjacent to the edge of the harvested area up to a distance of 120 meters. This loss crown canopy will reduce the capacity of trees on Sea Ranch property to sequester carbon and represents an ecological and economic loss to The Sea Ranch.

7. Analysis of Cumulative Impacts

Key to any THP is a valid cumulative impacts analysis, particularly in terms of understanding the effects of past, present and future projects. This requires, at a minimum, a disclosure of past, present and future projects, and an analysis of the impacts of those projects in relation to the impacts of the Spruce THP to understand what the cumulative effects of this logging proposal in relation to other projects. The THP does include a cumulative impacts analysis, but does not provide information necessary to understand and evaluate the potential for significant cumulative environmental effects from this THP and related projects.

Above, we identify our concerns about the failure to identify and evaluate the cumulative impacts of the THP on the Hot Spot, from water drafting, and potentially on The Sea Ranch wells.

We are also concerned about the failure of the THP to provide a description of current WAA and BAA conditions in relation to past and present logging, and what they will looklike after the Spruce THP is harvested. It does not provide an understanding of what might be the impact of existing conditions combined with the Spruce THP on the overall forest structure and future. While other THPs are identified, the THP does not disclose the conditions of those other areas, with the harvest completed or to be completed.

From what one can see from outside the ownership, in conjunction with maps which show the numerous THPs surrounding the Spruce THP, it does appear that much of the remaining overall forested area will be removed. With the Spruce THP, the trees are relatively small, with average size at only 24.6" DBH. [THP at 98] The Spruce THP intends to remove most of the larger of these trees located outside of the WLPZs, leaving only 20% of the 75 square foot basal area with trees which are 18" DBH or greater. [THP at 12] From the information provided, it appears that 63% of the existing basal area will be removed, and for trees equal to or greater than 18" DBH, 91% of the basal area will be harvested. [THP at 118] A lot of tree cover will be gone. Yet, there is no real analysis of what this may mean in conjunction with all other THPs, past, present and in the future.

The THP fails to identify future harvesting plans. The THP lists logging plans covering a 20-year period, including a 5-year period into the future. It does not identify any THPs which are likely to come forward in the next 5 years, claiming instead the only "future" THP is this Spruce THP. [THP at 138] This suggests a fundamental misunderstanding of the cumulative impacts analysis, as the proposed project can be considered a present-day project (to be done in 2021, commenced upon approval and completed within one season [THP at 109]), whereas future projects are just that- those that are planned or can be anticipated in the future. The THP advises that harvest entries "are planned ahead of time." [THP at 109] If GRT is saying that there will be no harvest entries planned within the WAA or BAA for the next 5 years, it must state this so that it is enforceable. Otherwise, it must disclose what harvest entries are being planned to be submitted within the next five or more years.

Nor does the THP evaluate the potential cumulative impacts of its gravel mining, which also may have an impact on The Sea Ranch water wells. The THP discloses that GRT "may" initiate application renewal for its permit to allow continued mining over the next 10-year period to conduct gravel extraction on the mainstem South Fork Gualala River and the Wheatfield Fork. [THP at 144] It provides no analysis of the effects of its past, present and/or probable future gravel mining

activities, particularly given the ever- increasing climate crisis effects on our waterways. Rather, it claims that the extent of impact is unknown. [THP at 150] As the plan submitter is also the gravel miner, it has a duty to disclose its operations and provide an analysis of the effect of those operations. To merely claim that some say it is good, and others say it is not good, is insufficient for purposes of a cumulative impacts analysis.

The THP is completely lacking in its understanding of the effects of the increasing and very real climate crisis. It is no longer credible to claim, as the THP does, that the rate and direction of climate change remains very uncertain. [THP at 181] To the contrary, the United Nation's International Panel on Climate Changes 2018 report makes clear that the rate and direction of climate change and its impacts are real, increasing, and must be addressed by 2030 if we are to avoid catastrophe. We must have a "sharp decline in greenhouse gas emissions by 2030" to prevent the world's average temperature from rising above an increase of 1.5 degrees Celsius. Increasing temperatures above this threshold could force world ecosystems to collapse. IPCC Global warming of 1.5°C, 2018.

An even more recent report, issued on August 9, 2021, sounds the "code red for humanity." See IPCC, 2021: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Pean, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzel, E. Lonnoy, J. B. R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekci, R. Yu and B. Zhou (eds.)]. Cambridge University Press.

It is without question that human influence has warmed the atmosphere, ocean and land. "This report tells us that recent changes in the climate are widespread, rapid, and intensifying, unprecedented in thousands of years," Ko Barrett, vice chair of the IPCC and senior adviser for climate at the National Oceanic and Atmospheric Administration. Climate change "is already affecting every region on earth in multiple ways," Barrett said. "There's no going back from some changes in the climate system." Extreme weather events, once considered very rare, are now and will become regular, and we will experience loss of life and habitat and ecology due to these extreme temperatures. The uncertainty which the THP relies on is no longer credible. We enclose the Summary Report for Policy Makers, and the citation list for all the materials issued by the IPCC on August 9, for your access to review and consider in deliberating on the harvest proposal as presented in this THP.

If the United Nations reports are not enough to require changes in this THP, then consider on-the-ground reality here in Sonoma County and California, for which there are many models of predictability as to what we are experiencing and can expect with the increased heat, lack of water and moisture, increased tree mortality rates, predictable wildfire conditions, etc. Surely those in forestry management must easily recognize that the rate and intensity of climate change impacts on our forests are escalating faster and more intensely with each year. To ignore this is to ignore reality.

The Forest Practice Act requires that logging in this state occur in a manner that protects all resources "for this and future generations." Pub. Res. Code section 4512(c). Given the stark reality of the climate crisis today, CalFire must consider how it manages forestlands to do this. We request that the THP provide the kind of credible analysis needed to understand

what impacts it may contribute to the climate crisis, and what steps it can implement to mitigate those impacts.

The THP pays lip service to our climate crisis, without considering whether the addition of this Spruce THP within a WAA that has already been significantly harvested is appropriate, particularly in terms of securing the much-needed carbon sequestration that trees can provide to mitigate the effects of climate change. While the THP utilizes the CalFire GHG calculator [THP at 179], its discussion does not provide or evaluate current-day data, and existing impacts and predictable conditions of the extensive harvests which are in process or completed, leaving a largely exposed landscape. The loss of existing and increased potential carbon sequestration as a consequence of the harvesting operations is not evaluated.

The THP claims an equivalence between the loss of this important carbon sequestration with the carbon to be stored in lumber. [THP at 179] Such a simple equivalence, as claimed in the THP, does not exist. "A reexamination of the fundamental assumptions underlying these projections indicates long-term mitigation benefits related to product substitution may have been overestimated 2- to 100-fold." Mark E. Harmon, "Have product substitution carbon benefits been overestimated? A sensitivity analysis of key assumptions," 2019 Environ. Res. Lett. 14 065008. (Enclosed).

To justify removing what it can of the larger trees, the THP claims the younger trees will capture carbon more rapidly, and that older trees sequester carbon at a declining rate as compared to younger trees. [THP at 180] While younger trees sequester carbon at a rapid rate, the rate of carbon sequestration "increases continuously with tree size." "Thus, large, old trees do not act simply as senescent carbon reservoirs but actively fix large amounts of carbon compared to smaller trees; at the extreme, a single big tree can add the same amount of carbon to the forest within a year as is contained in an entire mid-sized tree." N. L. Stephenson, et al., Rate of tree carbon accumulation increases continuously with tree size, Nature, Vol. 507, 6 March 2014 www.nature.com/doi/10.1038/nature12914. (Enclosed). The THP has not evaluated the impact of the loss of carbon sequestration of its related harvesting operations in this WAA and BAA.

8. Alternatives Analysis

In addition to the alternatives mentioned above to provide a buffer for the Hot Spot area, to use an alternative to water for dust abatement, and to chip and spread of logging slash the Sea Ranch believes an appropriate alternative is for Gualala to implement "proforestation" for this THP. The THP's intent is to create a "healthier stand" with adequate regeneration. According to the 2018 Legislative Analyst Office Report, "Improving California's Forest and Watershed Management," California needs to develop 'healthy' forests - those forests which have a preponderance of larger older trees. April 2018 LAO Report, at p. 19. "Proforestation" allows existing forests to grow intact to their ecological potential. This fulfills the intent of the Act and can help mitigate the impacts of logging, with the consequential feedback loop that can cause forests to gradually deteriorate given climate change. "Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement, water and air quality, flood and erosion control, public health benefits, low impact recreation, and scenic beauty." Moomaw WR, Masino SA and Faison EK (2019) Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. Front. For. Glob. Change 2:27. doi:

10.3389/ffgc.2019.00027. (Enclosed). This approach would be consistent with its goals to provide healthier forests, while protected our natural resources, as required by the Act. And it would serve to mitigate the cumulative impacts from the past logging practices in conjunction with the harvesting which would be able to go forward with proforestation within the Spruce THP. We need this for our environment and we need this for the health of our state as we do what we can to face the impacts of the climate crisis.

9. General Concern over Inconsistencies in the THP

The Sea Ranch is concerned about missing and/or inconsistent information in the THP, which deprives the public of disclosure of the full scope of the THP as a project under the Forest Practice Act (Act) and CEQA. The following document the basis upon which to deny approval of the THP. These omissions and inconsistencies must be corrected and the THP as corrected must be made available for public comment, to provide adequate review as required by the Act and CEQA.

Archaeological Information. The THP does not include information documenting pre-filing requirements. The Forest Practices Rules require that at least three things be documented for review: that the plan submitter provide (1) written notice to Native Americans of THP preparation, (2) written notice to Native Americans of the presence of discovered Native American cultural resources, and (3) the name(s) of the current and any past archaeological surveyors and their qualifications. Rule 929.1. None of this is in the THP. [THP at 7, 71] This information is not confidential and should have been included. This is important, because, as we have previously noted, local archaeological surveys along the Gualala River document up to 54 sites with midden deposits and lithic tools in the South Fork area, 4 of them classified as larger villages. While the location of sites are kept confidential, it is necessary to establish that proper notices and disclosures have been provided.

Sudden Oak Death. The THP fails to include accurate final destination information to establish effective mitigation to prevent spread of Sudden Oak Death (SOD). The THP is located in a declared Zone of Infestation for pests and forest disease and assumes existence of Sudden Oak Death within the Plan area due to dead tanoak. [THP #15 at 17, 98] While the THP lists a number of places to which the SOD "host material" will be transported, it expressly states that the final destination for the SOD host material may change after plan approval and promises only that it would not be moved outside of the regulated area without amendment of appropriate state and federal permits to this THP." *Id.* at 18 (emphasis added). Host material is identified as "saw logs, burl, chip logs, veneer, fuel or firewood." *Id.* In the absence of the actual final destination list, the THP is incomplete. As just one example, the host material "veneer" is a composite manufactured product, which can be shipped across the country. According to Dun & Bradstreet Business Directory, the company profile for Pacific States (of which Gualala Redwood is a subsidiary) states that it "distributes wood products all the way to the Atlantic states." https://www.dnb.com/business-directory/company-profiles.pacific_states_industries_incorporated.fe669535d68fadad8e1a247f016ed077.html (as of August 2, 2021). Manufactured veneer, as well as other materials, could easily be shipped outside the regulated area. Submission of a subsequent amendment after the THP

approval is not appropriate and effectively admits that the THP as presented does not provide a stable project description, or effective mitigation. This deprives the public of an opportunity for review of a complete and stable project, as required by both the Forest Practice Act (Act) and CEQA. The THP should have disclosed the final destination for all host material, to provide a complete project description and enforceable mitigation to prevent the spread of SOD.

Moreover, the THP is inconsistent in its representation about how it intends to prevent the spread of SOD. It states that "[o]perations will be conducted during the dry season." THP at 19. However, the THP includes a winter operations plan, with timber operations to occur during the extended wet weather period from October to May 1, with timber falling, use of ground-based equipment, and use of logging roads and landings during the wet season. [THP at 31, 32] These operations during the wet season can spread SOD, which the THP does not discuss. Notification of Lake or Streambed Alteration: Water Drafting. The THP includes a Notification to Cal. Dept. of Fish and Wildlife (DFW) for the water drafting incidental to the THP. [THP at 80] This Notification is incomplete because it fails to include documents. It states that it encloses an unidentified "a biological study [which has] been completed for the project site." [THP at 84] The Notification does not "enclose" or identify any biological study. Similarly, the Notification states that it encloses one or more technical studies which have been done for the project or project site, yet no such studies are identified or provided with the Notification.[THP at 85]

Tractor Roads. The THP states that new tractor roads will be constructed and tractor road use will not be limited to existing tractor roads. [THP at 28, # 19-21(e)(f)] However, elsewhere the THP answers "no" to the question whether "any roads will be CONSTRUCTED?" [THP at 37, # 24(a)]; see also [THP at 156] ("There are no proposed roads in this Plan.") Moreover, the THP fails to identify the location, details, use, or manner of construction for these new tractor roads. Forest Practices Rules 914.2.

Slash Treatment. The THP fails to accurately state whether piling and burning will be used for slash treatment. The THP states there will not be piling and burning of slash treatment [THP at 59, 60]; elsewhere it states that "[t]he plan provides for piling and burning as a hazard reduction at landings when warranted or necessary." [THP at 188]

In summary, in addition to requiring GRT to adequately address the shortcomings outlined above regarding Cumulative Impacts and Alternatives Analysis in Sections 8 and 9, above, TSRA requests the following mitigations be required 'to protect the Association's environmental, recreation and economic resources:

- 1) 300-foot buffer on northern boundary of Spruce THP project area and TSRA Hot Spot*
- 2) Limit logging operations only to Monday through Friday, 8 am to 5 pm*
- 3) Require use of alternative dust abatement that excludes use of water draw from the Gualala River*
- 4) While not a preferred outcome, if water resources are deemed acceptable to CalFire, require that they only be used when the flow exceeds 5cfs*
- 5) Specify that logging operations should begin and end only outside seasonal threat of wildfire*

- 6) *Chip and spread logging slash to reduce fire hazard*
- 7) *Pause final consideration of the Spruce THP only following the ability of agencies and the public to adequately review the plant survey*

Thank you for taking our comments into consideration. The Association formally requests that a written response be prepared and sent to the attention of its CommunityManager, Jennifer Merchant, at jmerchant@tsra.org.

[Note: The remainder of 21PC-000000525 is an article about carbon benefits by Mark Harmon which can be found online and is uploaded to the CalTREES website]

RESPONSE: Please see responses to “General Concerns” 1-6 and responses to the other individual public comment letters.

The following are additional responses to this specific public comment letter:

The Cumulative Impacts Assessment is included in the THP § IV pp. 137.1-193. This section includes information on past, present, and foreseeable future planned projects from 2011-2026 in both the Watershed Assessment Area and the Biological Assessment Area, including tables showing silviculture by project and area (pp. 138 and 142, respectively) and maps showing the distribution of these past projects by silviculture type (pp. 141 and 143, respectively). According to 14 CCR § 895.1, Reasonably Foreseeable Probable Future Projects,

“means Projects with activities that may add to or lessen Impact(s) of the proposed THP including but not limited to: 1) if the project is a THP on land which is controlled by the THP submitter, the THP is currently expected to commence within but not limited to 5 years, or 2) if the project is a THP on land which is not under the control of the THP submitter, the THP has been submitted or on-the-ground work including THP preparation has materially commenced, or 3) if the project is not a THP, and a permit is required from a public agency, and the project is under environmental review by the public agency, or 4) if the project is one which is under-taken by a public agency, the agency has made a public announcement of the intent to carry out the project.”

There is no requirement for a landowner to plan (or know where they will be planning) projects five years into the future. The Cumulative Impacts Assessment of Past, Present, and Future projects assesses all known projects; the lack of additional future projects may mean that there are no other projects that will occur in the Assessment areas in the next five years, or it may mean that the Plan Submitter does not yet know whether and/or where projects will occur in the next five years.

The Cumulative Impacts Assessment includes past gravel mining on the South Fork Gualala River and Wheatfield Fork, stating the average gravel extraction over the past decade (THP § IV pg. 144) and advising that this may continue. The plan submitter is uncertain regarding the future of gravel mining, and at present does not hold a permit for gravel removal (personal communication, John Bennett, GRT Forest Manager). Assessment of the effect of gravel mining on The Sea Ranch wells would occur in a separate permitting process that is beyond the scope of this THP.

The CAL FIRE inspector concluded the following for cumulative impacts from page 10 from the PHI report:

The RPF has applied the Forest Practice Rules (FPRs) in a manner consistent with the intent of the Forest Practice Act. The THP provides a reasonable balance between timber harvesting and resource protection. The potential cumulative impact of this THP on resource values was reviewed and evaluated during the PHI. With the addition of mitigation specified by the RPF, CAL FIRE, & CDFW, the RPF's response to THP Item #13(b) is reasonable.

Per 14 CCR § 1032.10, a Request for Information on Domestic Water Supplies informing downstream landowners within 1,000 feet of the THP area was sent out August 20, 2020, and it (as well as responses to it and a public notice) is included in Section V (pages 304-314). In response to this letter, the Sea Ranch Water Company replied, "The Sea Ranch Water Company operates two groundwater wells in the area directly downstream of the proposed THP that are part of the Gualala River aquifer...We do not anticipate that the wells will be affected by the THP operations provided that best management practices for mitigation of impact are followed." (THP § V pg. 307).

The CAL FIRE inspector concluded the following from page 6 of the PHI report:

No Domestic Water Supplies (DWS) were identified on the THP area. A pair of 100-ft wells, locally identified as a "hot spot", are located approximately 500-ft northwest of the northern THP boundary, near the South Fork Gualala River. [Email Communication from TSRA Counsel, 09/02/2020]. The Gualala Redwoods Timber (GRT) northern property line extends in a northeast-southwest direction, perpendicular to the slope. On the surface, the TSRA wells are hydrologically disconnected from the THP location. Significant effects on groundwater supplies resulting from the selective harvest of redwood timber have never been demonstrated.

The study referenced in the "Economic Impact" portion of the comment ("Edge Effects and the Effective Size of Old-Growth Coast Redwood Preserves", Russell et al 2000) does not directly apply to the project being analyzed for the following reasons: 1) the study concerned the effects of clearcut harvests, while the THP is planned to be single tree selection harvest; and 2) the Hot Spot is a previously-harvested stand (in other words, it is not old growth). The Spruce THP is a similar silviculture prescription that has occurred on the site three times since 1990 (THP § IV pg. 174). The called for 300-foot buffer is arbitrary and unnecessary, given the consistent management of the plan area and plan area zoning.

According to the plan submitter, the Kashia water source is upstream of the THP by several river miles and will not be affected by water drafting for timber operations (personal communication, John Bennett, GRT Forest Manager). No comment was received from the Kashia Band of Pomo Indians related to this THP.

The Greenhouse Gas Assessment is found in THP § IV pp 176-187. The assessment includes the use of Cal Fire's Greenhouse Emissions calculator. The Department agrees that the impacts and/or benefits of the project are properly described and analyzed in regards to climate change concerns, as summarized on page 197:

At the project scale, the beneficial impacts on carbon sequestration and the project-related CO₂ emissions related to global warming are negligible and undetectable at the global scale. The CO₂ emissions from vehicles used to implement the project over several weeks or months are dwarfed by the CO₂ emissions from other routine daily activities engaged in by all Californians such as a single morning commute for even one city. Also, impacts from transportation will be further mitigated by the implementation of new standards for diesel engines recently adopted by the CARB (CARB 2008). When considering the impacts of this project on climate it is doubtful that a measurable change could be detected, even at the microclimate level.

The Alternatives Analysis (THP § III pp. 102-114) includes the consideration of several different types of silviculture (pg. 106), as well as of a “No Project Alternative” (pp. 106-107). The discussion of the term “Proforestation” in the Alternatives Analysis is not required by the FPRs or CEQA, especially considering that this terminology evidently refers to practices that are either encompassed in the “No Project Alternative”. According to the Plan Submitter,

[t]he selection of harvest trees for this plan focuses on suppression, damage, defect, and spacing of residuals. This is intended to open up the dense clone groups, and space out residual future harvest trees. The prescription is also intended to harvest trees which will never be more merchantable than they are at present- those which are expected to have reduced growth and increased defect as time goes on due to damage to their boles and/or leader. (THP § III pg. 98).

The CAL FIRE inspector concluded the following about the proposed silviculture from page 3 of the PHI report:

The proposed regeneration methods meet the intent of Public Resource Code (PRC) 4513 by meeting the goal of maximum sustained production of high-quality timber products. This is the 4th uneven-aged harvest entry & the stand contains approximately 200 sq ft of conifer basal area. Consideration for no harvest of the unit was made. Given the current age, structure, and composition of the timberstands, forgoing management does not meet the intent of PRC 4513.

The THP includes estimates of post-harvest stocking, based on, “[b]asal area plots...taken after timber marking,” (THP § III pg. 118) which show that the expected average diameter of all trees in the stand and trees ≥18” dbh will increase post-harvest, belying the comment that the treatment will be focused on just removing the largest trees.

Information on Sudden Oak Death (SOD) can be found in THP § II pp. 17-19 and THP § III pg. 98. Host debris for SOD is generally considered to be leaves, twigs, and branches (CA Oak Mortality Task Force 2014). Processed wood such as veneer would not be considered SOD host material. The THP includes the following binding requirements:

- (2) Firewood in the form of cut rounds or split bolts shall not be transported out of the regulated area.

(3) Material smaller than 4" in diameter must be moved in a closed container except split firewood bolts.

(5) The LTO shall inspect all log trucks before they leave the harvest area and remove all debris and tops less than 4" in diameter of host plant species including limbs, twigs, and leaves. (THP § II pp 18-19).

While there is a winter operations plan, it is predicated on conditions being dry: "Ground based yarding shall be done only during dry rainless periods and shall not be conducted when saturated soil conditions that may produce significant sediment discharge are present." (THP § II pg. 32).

The Confidential Archaeological Addendum contains the written notice to Native Americans of THP preparation (THP § VI pp. 358-359) and the name(s) of the current and any past archaeological surveyors and their qualifications (THP § VI pg. 329). The plan submitter has met all requirements for documentation and consultation regarding cultural and historical resources per 14 CCR §§ 929.1, 929.2, 929.3, 929.4, 929.4, and 929.7. These materials are considered confidential.

To clarify the difference between tractor and truck roads, per 14 CCR § 895.1, "Tractor Roads means constructed trails or established paths used by tractors or other vehicles for Skidding logs. Also known as 'skid trails.'" With the exception of Tractor roads/skid trails in WLPZs, the Plan Submitter is not required to map or otherwise designate where skidding will take place. WLPZ skid trails are included on the "Yarding and WLPZ Facilities" Map (THP § II pg. 74). The question "Will any road(s) be CONSTRUCTED?" on THP pg. 37, on the other hand, refers to truck or haul roads, which are governed by the requirements found in 14 CCR § 923.

4. PUBLIC COMMENT #21PC-000000538 – from Chris Poehlmann, Save our Annapolis Road (SOAR), on August 24, 2021

SOAR is comprised of concerned individuals in the community on the coast and other parts of Northern California who use and enjoy Annapolis Road and its relative freedom from visual impacts due timber harvesting adjacent to the road. The undersigned and others in the community are concerned by the potential cumulative impacts of 1-20-00144-SON "Shep's Opening", 1-19-00051-SON "Hazel" THP along with the Spruce THP as presently proposed and submitted. We ask CalFire to reject the 1-21-00076-SON plan as submitted and require the mandated mitigations for the impacts outlined below before approval.

We are sending these comments in today that focus firstly on the visual impacts analysis on this plan and its failure to mitigate for visual impacts to Annapolis road and the surrounding area using a reasonable description of the visual assessment area in this plan. We hope that this reaches the team a for the second review and they will remember their visit during the PHI and the scenic resources at the site and the considerable adjacent border of the THP to Annapolis Road. This adjacency brings up a number of concerns of the local community and users of this well travelled road. A preliminary list of those concerns are:

- 1.) Visual Impacts*
- 2.) Wildfire hazards along the road*
- 3.) Improper silvicultural prescription for these near roadside areas*

4.) Outdated data used to support requested water drafting

1.) VISUAL IMPACTS

From the Forest Practice Rules:

"It is the Board's intent that no THP shall be approved which fails to adopt feasible mitigation measures or alternatives from the range of measures set out or provided for in these rules which would substantially lessen or avoid significant adverse impacts which the activity may have on the environment. "

It is also clear from the Forest Practice Rules that it is the intent of the Board that any cumulative impacts to visual resources are included in FPR regulations and need to be mitigated by THP applicants. The required cumulative impact analysis for every THP must demonstrate consideration of cumulative impacts in six categories: watershed resources, soil productivity, biological resources, visual resources, and vehicular traffic impacts.

"Appendix: Technical Rule Addendum # 2:

E. VISUAL RESOURCES: The visual assessment area is generally the logging area that is readily visible to significant numbers of people who are no further than three miles from the timber operation. To assess visual cumulative effects: 1. Identify any Special Treatment Areas designated as such by the Board because of their visual values. 2. Determine how far the proposed timber operation is from the nearest point that significant numbers of people can view the timber operation. At distances of greater than 3 miles from viewing points activities are not easily discernible and will be less significant. 3. Identify the manner in which the public identified in 1 and 2 above will view the proposed timber operation (from a vehicle on a public road, from a stationary public viewing point or from a pedestrian pathway)."

From the FPRs regarding Cumulative Impacts:

"In conducting an assessment, the RPF must distinguish between on-site impacts that are mitigated by application of the Forest Practice Rules and the interactions of proposed activities (which may not be significant when considered alone) with impacts of past and reasonably foreseeable future projects.

The RPF preparing a THP shall conduct an assessment based on information that is reasonably available before submission of the THP. RPFs are expected to submit sufficient information to support their findings if significant issues are raised during the Department's review of the THP.

Identification of Resource Areas: The RPF shall establish and briefly describe the geographic assessment area within or surrounding the plan for each resource subject to be assessed and shall briefly explain the rationale for establishing the resource area. This shall be a narrative description and shall be shown on a map where a map adds clarity to the assessment."

This plan as submitted proposes logging operations directly adjacent to the public county road called Annapolis Road and must be mitigated to address any effects on the visual assessment area for the significant numbers of people using this well traveled scenic road. A simple application of setbacks to the harvest boundaries for visual buffers is the needed mitigation.

Annapolis Road is one of Sonoma County's and the local community's treasured scenic roads that not only services the community for access to the coast and inland, but is also well known in northern

California tourism as a scenic route featuring healthy conifer/redwood forest and a lush understory. It is recovering after decades of over-harvesting and poor management, such as damaging management techniques and selectively targeting the largest trees in each harvest cycle. Canopy percentages are now approaching more adequate levels and the resulting views from the road give the traveler an idea of what pre-commercial harvesting viewsheds were like, even though the present trees are of course far from the size of those that were here in the 19th century with the arrival of the first wave of logging.

It is well travelled by local residents and is a favorite recreational route for local and visiting bicyclists and driving tourists to the county. It is officially designated a county emergency escape route and one of the few county roads providing access to and from the coast and inland areas. It provides a scenic drive to access the Gualala River which has a Wild and Scenic River designation from the state.

Annapolis road was recently adopted by a group in the Adopt-a-Road Program administered by Sonoma County. Approximately 17 miles of Skaggs Springs Road was adopted by an Annapolis based group honoring Alice Caldwell, a recently deceased Annapolis resident and similarly another Annapolis based citizens group honoring Arnita Miller adopted Annapolis Road from its intersection at Highway 1 for ~14 miles to the Clarks Crossing bridge where the 17 miles stretch begins on Skaggs Springs/Stuarts Point Road.

The organizing involved in these efforts and the time and energy involved with the application process in addition to the long term pledge to collect litter and maintain the beauty of this long section of road is a clear indication of the affection and appreciation of the natural beauty of Annapolis Road and east towards Healdsburg.

Photographs do not lie. Please look closely at the example of the proposed impacts on visual resources posed by the Spruce THP. That example is the Hazel THP completed recently using a similar silvicultural prescription as Spruce's and right up to the road's edge and directly across the road from Spruce. CalFire's mandate in its role to enforce all of the aspects of the Forest Practice Rules obligates it to have its staff that reviews THPS to be aware of and respectful of the need to enforce the rules that require protection of the visual resources in the area of a THP. This includes an assessment area that extends out to three miles from the site of the plan. This assessment area obviously includes the plan's border directly adjacent to a paved road used by the public most effected by any unmitigated impact to visual resources.

As proposed with their harvesting on the road's edge, these referred to plans will cumulatively have severe impacts on the visual viewshed of Annapolis Road and will add to the cumulative impacts from past and future plans. Noteworthy in these past impacts is this plan directly adjacent to Annapolis Road that was recently completed by the same landowner with unfortunate viewshed impacts. This was the "Hazel" THP, 1-19-00051-SON. This plan dramatically impacted the viewshed from Annapolis Road uphill from the "Twin Bridges" area and will remain an eyesore to those using the road for years to come. A simple alteration of THP boundaries could have preserved the now former recovered forest views. (Photos of what can be now seen from the side of the road are attached below.)

Therefore, the proposed boundaries of this THP need to be adjusted to protect the viewshed the public now enjoys. An adequate, simple 200 foot visual buffer zone added to the harvest boundaries would be the solution called for to address the proposed roadside harvesting.

Additionally, the plan submitter needs to define the overall visual resource area and propose changes to comply with the FPRs in Rule Addendum #2. These changes must be guided by the following FPR assessment instructions:

"Identification of Resource Areas The RPF shall establish and briefly describe the geographic assessment area within or surrounding the plan for each resource subject to be assessed and shall briefly explain the rationale for establishing the resource area. This shall be a narratedescription and shall be shown on a map where a map adds clarity to the assessment."

Adequately done, this submitted analysis would include a collection of pertinent photographs that would show how any proposed correcting mitigations would be viewed from AnnapolisRoad and by drivers making their way in both directions.

There are recent determinations by CalFire that address the need to mitigate impacts to visual resources. The "Blackberry" THP, 2-21-00026-SIS is a good example.

Below is a portion of the Official Response (OR) which addresses the analysis of visual impacts of this plan and is an excellent example of how CalFire responded to its duty to enforce the FPRsand to make sure that impacts to visual resources were addressed, recognized and mitigated for. SOAR expects that the CalFire THP review team will also step up to this regulatory role and similarly takes the visual impacts of the Spruce THP seriously.

(From CalFire's OR on the Blackberry THP, page 4.)

General Discussion and Background

The following summary is provided for some of the over-arching concerns expressed in public comment. Specific issues raised within comments will be addressed in the next section.

Visual Impacts Evaluation and Mitigation

All timber harvesting plans must address the potential impacts the project could have on visual resources. Specifically, Technical Rule Addendum #2, Item E specifies the following:

E. VISUAL RESOURCES: The visual assessment area is generally the logging areathat is readily visible to significant numbers of people who are no further than threemiles from the timber operation. To assess visual cumulative effects:

- 1. Identify any Special Treatment Areas designated as such by the Board because oftheir visual values.*
- 2. Determine how far the proposed timber operation is from the nearest point that significant numbers of people can view the timber operation. At distances of greaterthan 3 miles from viewing points activities are not easily discernible and will be lesssignificant.*
- 3. Identify the manner in which the public identified in 1 and 2 above will view the proposed timber operation (from a vehicle on a public road, from a stationary publicviewing point or from a pedestrian pathway).*

The RPF preparing the THP recognized that there would be visual concerns for this THP both from the residents of Dunsmuir but also from tourists who visit and drive on Interstate 5. In the original submission of the plan, the RPF included a robust analysis of the potential visual impacts from the proposed plan. This discussion is included on pages 113-122.10 of the plan and detail the potential visual impacts both from stationary locationswithin the city and also at points along I-5. Initial

measures were offered in the original plan to offset potential impacts. Once the plan was submitted, CAL FIRE recognized that visual concerns were going to be an important part of the plan review. CAL FIRE Inspector Pete Feller and Unit Forester Steve Wilson reviewed the initial submission and informed the RPF that an examination of visual impacts would be a significant portion of the field review during the preharvest inspection. Members from the CAL FIRE Redding Review Team were also requested to attend the field inspection to provide input on the potential visual impacts and any additional mitigation measures.

The entire first day of the preharvest inspection was dedicated to review of potential visual impacts. Views from the city of Dunsmuir, and along Interstate 5 were reviewed. Past projects visible from Dunsmuir were also discussed. It was noted that past plans visible to the city had been expected to "green up" (i.e. become less visually noticeable) much sooner than what was currently being observed. All of these discussions were considered by the CAL FIRE inspector when writing his report.

The complete OR on the Blackberry THP is attached below.

2.) WILDFIRE HAZARDS ALONG THE ROAD

This public paved road is well travelled and presents a significant ignition risk for starting a wildfire. Recent harvesting in the area has left dangerous amounts of slash and combustibles in its wake and those are also next to the road. See the photos of the Hazel THP attached. The PH will give an opportunity to observe this firsthand.

The management of this THP area and those nearby have concentrated on the harvesting of the commercially valuable largest trees and as a rule the average DBH and average stand characteristic is dominated by smaller trees that are much more susceptible to devastating destructive fires, nowhere like the fire history that redwoods have been able to evolve with and prosper from. Fire ignition events, aided by slash, vegetation growth prompted by loss of canopy from harvesting are now one of the biggest threats to forest recovery and public safety. Allowing harvesting along the road with the resulting brush growth from more sunlight conducive to the growth of fine fuels with a lower moisture content. Also, allowing any slash to remain anywhere near the road is a recipe for a disastrous wildfire that could envelope not only Sea Ranch but the forest and communities to the east. The rugged terrain of this area would make it highly difficult to fight such a fire. The THP boundaries and the slash treatments need to be changed to address this threat.

3.) PROPER SILVICULTURAL PRESCRIPTIONS

Due to the severe wildfire threats with the state of the forest undergrowth, climate conditions, recent historic low rainfall, it is imperative that the plan address adopting the proper silvicultural prescription of shaded fuel breaks for significant portions of the roadside THP. With the ignition risk presented by the considerable commercial and private traffic on this well travelled road it is vital to have the best prescription to address wildfire. It will be in the best interests of the ownership of GRT and the public and county that the shaded fuel break prescription is applied to proper setback areas in the selection prescription to address the needed reduction to wildfire risks.

4.) OUTDATED DATA USED TO SUPPORT REQUESTED WATER DRAFTING

Due to the submission of data in support of the requested level and location of water drafting from the river, this THP application is out of compliance to FPRs and needs to have current data

submitted. The flows observed in the outdated 2010 data radically overestimate the actual present flows that have been running significantly lower this year and the past five years at least.

Drafting based on this non-current data poses the risk of take of endangered and threatened fish species in the river.

Some photos are added here to point out the scenic features of the present road and visual assessment area. Please place these photos into the file for 1-20-0076-SON Spruce THP regarding cumulative impacts on visual resources from past, present, and foreseeable future plans.

[The photos referenced in this comment are the same as included in 21PC-000000497 above]

[Note: the remainder of 21PC-000000538 is the OR for 2-21-00026-SIS which can be viewed through CalTREES]

RESPONSE: Please see responses to “General Concerns” 1-6 and responses to the other individual public comment letters.

The following are additional responses to this specific public comment letter:

The comparison of the Spruce THP’s visual impact (and CAL FIRE’s handling of the visual assessment) to that of the Blackberry THP (2-21-00026 SIS) is not appropriate and actually tends to favor the Spruce THP. In the case of the Blackberry THP, the harvest area was to have evenaged management in view of Interstate 5, which is a significantly more traveled thoroughfare than Annapolis Road, which, the Spruce THP notes, sees fewer than 500 trips per day on average. (THP § IV pg. 175).

The mitigation chosen in the case of the Blackberry THP was to switch to Selection silviculture. The silviculture of the Spruce THP, including the areas nearest to Annapolis Road, is single tree Selection (THP § II pp. 11-16). The silviculture was prescribed by a qualified Registered Professional Forester, and CAL FIRE agrees that the prescribed silviculture is appropriate for the stand in question. (see response to general concern 1 above). Additionally, the THP has provisions for the treatment of slash within 100 feet of Annapolis Road to reduce fire hazards. (THP § II pg. 59). The commenter calls for a shaded fuel break near Annapolis Road. This prescription is generally understood to be a treatment reducing fuel loading while spacing tree crowns to prevent or slow fire spread. The proposed Selection silviculture, by thinning the stand, functionally serves this purpose. The main differentiation between the Selection silviculture and a shaded fuel break is that Selection may leave a denser stand than desirable for a shaded fuel break which would have a higher impact on visual resources. Combined with the slash treatment required in THP Section II, the proposed Selection silviculture is expected to decrease fire hazard along Annapolis Road and not contribute significantly to impacts on the visual resources.

5. PUBLIC COMMENT #21PC-000000572 – from Jennifer A. Merchant, Community Manager, The Sea Ranch on September 9, 2021

The Sea Ranch has reviewed the Second Review Team meeting request for further information, the Gualala Redwood response, and the August 31, 2021 Second Review Team recommendation for approval of THP 1-21-00076-SON, a timber harvest plan proposed by the Gualala Redwood Timber

LLC (Gualala) which is adjacent to The Sea Ranch. Please consider this letter as further comment by The Sea Ranch Association for review of THP 1-21-00076-SON (Spruce THP).

Second Review Questions

The Second Review Team process did identify two of our August 18, 2021 comments for response by Gualala. While we appreciate that public acknowledgement prior to final decision on the THP, we note that they illustrate that the THP as submitted and reviewed was not accurate. Other incorrect statements have not been addressed. The consequence of these kinds of errors is that the public is denied its opportunity to comment upon a stable proposed THP project. TSRA made an effort to identify inconsistencies and inaccuracies based on the THP itself; there may be other mistakes that have been overlooked, as obviously those we identified were overlooked by CalFire until very late in the process with Second Review.

TSRA believes that all other TSRA comments which have not been identified by the Second Review require action and, at a minimum, changes and/or response by Gualala prior to a decision on the THP by CalFire. We reiterate all comments previously submitted and request timely written response by CalFire.

Water Drafting

CalFire identified water drafting for response, as the THP was unclear as to what total amount of water drafting and location(s) would occur in relation to ongoing and proposed logging operations. [THP at 53-54]. In response, Gualala states that 25,000 gallons per day is the maximum amount of water drafting from all of its drafting sites, and that the Spruce THP would only draft 2,000 gallons per day. Gualala submitted revised pages of the THP to show this. The edited pages do state that 25,000 gallons per day from the drafting sites along the Gualala River (rather than the Valley Crossing site). However, the THP still has not provided information relevant to an understanding of the individual and overall effect Gualala's water drafting may have, particularly given the current critical drought system. The THP fails to disclose what other THPs are currently drafting water, their drafting amounts, and location(s) of drafting. In the absence of this disclosure, TSRA is not able to determine the potential for significant environmental effects associated with Gualala's water drafting.

Slash Treatment & Fire Hazard

CalFire also requested that Gualala clarify whether it intended to pile and burn slash as the THP was internally inconsistent about what would happen. Gualala now states that its statement on THP 188 to do pile and burning was in error, and that statement has been removed. However, while that removes one provision, it does not address or evaluate the wildfire hazard potential which exists from past and proposed future logging.

The initial THP page 188 and as revised states unequivocally that: "Hazardous fuels are live and dead vegetation that has accumulated and increases the likelihood of unusually large wild land fires." The discussion which follows focuses on harvesting of trees, and then, at the bottom of that page speaks to the issue of the slash from logging. Here the THP states that slash can accumulate in significant piles at landing sites. Rather than promise that this will not occur on the Spruce THP, Gualala simply states that accumulation of slash "it is not anticipated" and refers to "current practice observed" to claim that landing slash is put back into the woods. [THP at revised 188].

However, hazardous fuels exist on Gualala lands. The "current practice observed" shows a very different picture than as represented in the THP. As the photographs here illustrate, Gualala allows slash in significant piles to accumulate, leaving very dry and flammable piles of material from its logging, exposing lands to the west to wildfire.

Photos of slash piles along the north border of the Hot Spot (Aug. 16, 2021):



The THP has not been forthright about what Gualala leaves onsite, and it has not considered and evaluated the potential for wildfire given past logging slash piles which exist along the eastern ridge above The Sea Ranch. As a consequence neither the individual nor the cumulative effects of this THP in relation to wildfire potential has been adequately disclosed or evaluated. No logging under the Spruce THP should occur until these existing conditions are fully remedied and mitigated.

Additionally, it is well-known that the winds along this ridge shift westerly in the months of September and October. These can be stronger winds than experienced at other times. The potential for wildfire from any activity and conditions that present wildfire risk are enhanced by these westerly winds. We are concerned that the proposed timber harvest will result in drier, more hazardous ground fuels and the slash piles will become a source of flaming embers that will be blown onto Sea Ranch property. CalFire must consider this recognized pattern and make sure that no activities occur, or conditions exists, which could ignite fire given the potential for these winds to carry fire well beyond Gualala Redwoods lands.

Additional Comments

TSRA is quite concerned about what appears to be a CalFire practice to allow plan submitters such as Gualala to delay submission of necessary information until after a plan has been approved. We are aware that the failure by Gualala to provide completed botanical surveys with the THP is not an isolated instance, in that CalFire is allowing this post-hoc, post-decision submission to occur in other THPs as well. We enclose a copy of a July 2021 letter submitted by several conservation groups to the California Secretary of Natural Resources concerning this ongoing practice. As the letter points out, not only does this deprive consulting agencies with the ability to have all the necessary information for review and comment on a given THP, but equally deprives the public of its right to review a complete THP. This kind of information is necessary to be able to understand the complete project and its setting, and to evaluate the potential for significant environmental impacts from the proposed THP and any past, present and future projects. It cannot be assumed that any such survey will not provide significant new information that may affect what mitigation and other measures are necessary to protect environmental resources.

Further, it is insufficient to allow this information to be submitted as an amendment after the fact. First, it means that the scope of the full project and its potential for impacts has not been reviewed prior to decision. Second, it constitutes a post-hoc decision, intending to rationalize an underlying approval. There is absolutely no guarantee, much less a potential, for public and other agency

review of any such "amendment" when logging is allowed to proceed 10 days after submittal of a final survey.

The practice in this THP as well as others violates the California Environmental Quality Act and the Forest Practice. We request that you provide specific response to this issue, as presented in the attached enclosure by the conservation organizations and here.

Finally, TSRA does not believe that the THP adequately considers, much less evaluates, the potential for impact on its Hot Spot area immediately adjacent to the Gualala River and the Spruce THP. In particular, as identified in our previous letter, we are concerned about increased levels of noise during timber harvesting, impact on the visual quality of the Hot Spot trails and roads, and edge effects impacting biological habitats and economic values.

On behalf of our 2,000 residential property owners, their families and guests, The Sea Ranch Association Board of Directors continues to urge CalFire to require a full analysis as identified in our August 18, 2021 letter

[Note: The remainder of 21PC-000000572 is a general concern letter on the practice of how CAL FIRE handles botanical survey amendments and is available in its entirety through CalTREES]

RESPONSE: Please see responses to "General Concerns" 1-6 and responses to the other individual public comment letters.

The following are additional responses to this specific public comment letter:

Edits and clarifications to THPs following Second Review (final interagency meeting as described under 14 CCR 1037.4) is normal. None of the included revisions were considered significant new information and were minor corrections to the THP.

The THP includes assessment of the project in relation to the "Hot Spot" in its Recreation Assessment (THP § IV pg. 174) and Visual Assessment (pp. 174-175). As the THP notes, "[o]n January 8, 2021, the Sea Ranch Manager, a Board Member, and their consulting forester visited the THP area adjacent to the Hot Spot with the RPF. The area visited had already been fully marked. This visit was intended to demonstrate the effect of the planned harvest to the visual resource present, and gain insight from the Sea Ranch about any concerns they might have about the proposed harvest. (THP § IV pg. 175). CAL FIRE agrees that the Cumulative Impacts Assessment provides appropriate evaluation and mitigation for Visual and Recreation resources.

The CAL FIRE inspector concluded the following from page 10 item 78 of the PHI report:

Visual resources: THP Section IV, Cumulative Impacts Assessment, Visual Assessment, provides an analysis of the visual effects of this THP. Portions of the THP area visible to the public, whether from TSR Airport zone, the hiking trail down to the South Fork Gualala River "Hot Spot", or from Annapolis Road, will retain the same post-harvest appearance of a forested landscape. The THP area is designated by Sonoma County as Timber Production Zone (TPZ), where the expectation is that trees will be harvested periodically to supply the public with the variety of wood products that they expect to be available for home construction and at their local retail outlets.

The inclusion of surveys after Plan approval as amendments, but before the commencement of operations, is standard practice in California Forestry, and has not been found to be in conflict with the FPRs or CEQA. These amendments are evaluated and determined by the Department to be minor or substantial deviations per 14 CCR 895.1.

REFERENCES

2021 California Forest Practice Rules and Forest Practice Act. Available on 03/23/2021 at https://bof.fire.ca.gov/media/3qebuoma/2021-forest-practice-rules-and-act_final.pdf

Sonoma County Right to Farm Ordinance, Chapter 30, Article II. Available on 03/23/2021 at https://s30428.pcdn.co/wp-content/uploads/sites/2/2019/09/Sonoma_County_Right_to_Farm_1.pdf

California Oak Mortality Task Force. "Sudden Oak Death Guidelines for Forestry." July 2014. <https://www.suddenoakdeath.org/wp-content/uploads/2014/12/forestry-08-10-with-new-2014-map.pdf>

SUMMARY

The preharvest inspection held on July 21, 2021, concluded that the Plan was found to be in conformance after the successful completion of the agreed upon recommendations, which were incorporated into the Plan prior to approval.

The Second Review meeting held on August 25, 2021, concluded that the THP had certain significant cumulative impacts which were identified but were mitigated, and found to be in conformance with the Act and the Rules of the Board of Forestry and Fire Protection. It was recommended for approval on August 31, 2021.

The Department has reviewed the concerns brought up through the public comment process and has replied to them by this Official Response. This process has not demonstrated any new significant points that would warrant a recirculation of the Plan pursuant to 14 CCR § 1037.3(e), or a recommendation of nonconformance pursuant to 14 CCR § 1054. The THP states in Section I, under Item 13(b) "After considering the rules of the Board of Forestry and Fire Protection and the mitigation measures incorporated in this THP, I (the RPF) have determined that the timber operation will not have a significant adverse impact on the environment". The Department finds that the RPF has sufficiently documented that there shall be no unmitigated significant impacts to the identified resources under this THP.

It is the Department's determination that this THP, as proposed, is in compliance with the FPRs and has been through a detailed multi-agency review system. The discussion points and mitigation measures included in the THP have been found to be appropriate to address the concerns brought up by the public comment process. The conclusions reached by the Department and the other state resource agencies are based on decades of professional experience associated with the review of similar harvest plans.