

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

Timber Harvesting Plan number: 1-21-00107 HUM "Fox Camp"
Plan Submitter: Humboldt Redwood Company, LLC.
County: Humboldt
End of Public Comment Period date: September 27, 2021
Date of Official Response and conformance: December 16, 2021

The California Department of Forestry and Fire Protection (CAL FIRE) serves as the lead agency in the review of Timber Harvesting Plans (THP). 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 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,



James Strong
Forester II, Forest Practice
RPF #2689

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

Public Notification

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

- Notification of the receipt of a timber harvesting plan was sent to the adjacent landowner(s).
- 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.
- A "Notice of the Intent to Harvest Timber" was posted near the plan site.

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 their responses to the regional office in Santa Rosa.

The representative of the Director of the Department of Forestry and Fire Protection 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 determination is made if the THP is in conformance to the Rules of the Board of Forestry and Fire Protection.

If a THP is determined to be in conformance with the Rules of the Board of Forestry and Fire Protection, 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 may require corrective action, to civil penalties, 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 seeks to ensure correction. Where non-correctable violations occur, civil or criminal action is often taken. Depending on the outcome of the case and the venue in which the case is heard, some sort of environmental corrective work may be required. 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 and Abbreviations

14 CCR	14 California Code of Regulations	MSP	Maximum Sustained Production of High Quality Timber Products
BAA	Biological Assessment Area Title	NSO	Northern Spotted Owl
BA/Ac	Square Feet Basal Area/Acre	OR	Official Response to Public Comment
CAL FIRE	Calif. Dept. of Forestry & Fire Protection	PALCO	Pacific Lumber Company
CCC	California Coastal Commission	PCA	Pest Control Advisor
CDFW	California Department of Fish and Wildlife	PHI	Pre-Harvest Inspection
CEQA	California Environmental Quality Act	PRC	Public Resources Code
CESA	California Endangered Species Act	WAA	Watershed Assessment Area
CGS	California Geological Survey	RMZ	Riparian Management Zone
DBH/dbh	Diameter Breast Height	RPF	Registered Professional Forester
EEZ	Equipment Exclusion Zone	RTQs	First Review Team Questions
EIR	Environmental Impact Report	RWB	North Coast Regional Water Quality Control Board
EPA	US Environmental Protection Agency	SOD	Sudden Oak Death
ESA	Federal Endangered Species Act	SYP	Sustained Yield Plan
FSC	Forest Stewardship Council	THP	Timber Harvesting Plan
FPR	California Forest Practice Rules	TMDL	Total Maximum Daily Load
HCP	Habitat Conservation Plan	WLPZ	Watercourse & Lake Protection Zone
HRC	Humboldt Redwood Company, LLC	USFWS	U.S. Fish and Wildlife Service
LTO	Licensed Timber Operator		

Note: All references to PALCO in historical documents and guidance materials are now the property of HRC.
 Note: References to the Department of Fish and Game are now the California Department of Fish and Wildlife.

SIGNIFICANT ENVIRONMENTAL CONCERNS AND RESPONSES

BACKGROUND

Timber Harvesting Plan (THP) # 1-21-00107-HUM “Fox Camp” proposes to harvest timber on 312.4 acres of privately owned timberland using selection, group selection, variable retention, and Special Treatment Area (STA) silviculture. The THP was received by CAL FIRE on July 13, 2021, and accepted for filing on July 22, 2021. The PHI was held on August 3rd, 2021. Agency personnel attending this PHI were: Joelle Geppert, NCRWQCB; Sara Gallagher, CGS; Jeff Smith, Louis Schipper and Shane Beach from HRC; and Tim Myers, CAL FIRE. The Final Interagency Review (aka Second Review) occurred on September 16, 2021. The Second Review Chair made no recommendations during the meeting and recommended the Plan for approval. The public comment period then ended on September 27, 2021. The initial deadline for the Director’s Determination Deadline (DDD) was set for October 18, 2021, per 14 CCR § 1037.4. An extension was granted extending the DDD several times, in order to address public comments and generate the Official Response (OR) to concerns brought up by the public.

Public Comment Summary

During the open public comment period for the THP, there were 766 letters received at the CAL FIRE Region Headquarters in Santa Rosa. The letters that were submitted raised concerns that have been addressed in the body of this response. All the public comments were in the form of emails.

The public comments and responses to public comments below were organized to address the issues discussed in those letters. *Italicized text in Times New Roman Font* is original text taken directly from the public comment letters, THP language, Forest Practice Rule quotes, Inspector Reports, and other quotation sources.

All of the letters contained similar general concerns relating to the same topic. These general concerns are in the section **General Concerns** and separated by topic. Responses to these general concerns are numbered such as GC1, GC2, etc.

Numerous letters expressed multiple issues and are several pages long. Where multiple concerns are provided in a public comment letter the concerns were identified and the response presented in an orderly format. Some of the public comments are addressed specifically by the comment letter number (i.e. 19PC-00186.)

General Concerns

There were a total of 766 public comments; 706 of the public comments followed a form letter. Twenty six of the comments followed a different, although similar form letter. This means a letter is presented to a number of individuals, and those individuals agree with the form letter, and individually send it in as a public comment. Some individuals send in the whole form letter. In other cases, an individual might remove some of the concerns from the form letter. And lastly, some individuals add a concern or two to the form letter. Additionally, there were 34 other public comments. One comment was sent in by the same individual 5 different times, but with some slight changes or different attachments. One comment was addressed in a separate confidential Official Response.

We have organized these public comment letters and addressed the similar concerns as “General Concerns”. What is below are the general concerns with a few samples of the concerns from the public comment letters that capture the essence of these general concerns. We then give our response. The examples from the public are denoted by the last number of the public comments. For instance, a quote from 21PC-000000559-#13 simply has a 13 at the end. The public comments that are quoted are summarized below:

21PC-000000559-#1 =1
21PC-000000559-#5 =5
21PC-000000559-#7 =7
21PC-000000559-#9 =9
21PC-000000559-#12 =12
21PC-000000559-#13 =13
21PC-000000559-#25 =25
21PC-000000559-#32 =32
21PC-000000559-#34 =34
21PC-000000559-#39 =39
21PC-000000559-#41 =41
21PC-000000559-#44 =44
21PC-000000559-#48 =48

The general concerns are addressed first, followed by more specific and/or individual concerns afterwards.

GENERAL CONCERNS (GC) 1-9.

GC1: Late Seral Forest. Includes logging previously unentered primary forest stands; lack of public disclosure; logging of old growth forests; logging of late seral forest; lack of accurate assessment of stands. Specific concern examples are below:

*Please reconsider logging this very important stretch of old growth. With everything happening in our global ecosystem today, every loss of tree life could be straw the breaks the camels back. Morality aside, continued logging of vital ecosystems *will* make this beautiful planet uninhabitable as I'm sure you already know. Please reconsider. Additional Concerns: Unlogged Forest- Logging of Douglas fir and hardwood forest that has never been logged and the non-disclosure by Humboldt Redwood Company of such stands inside the plan area. 1*

Humboldt Redwood Company is not playing by the rules. It has not disclosed stands of original growth trees which should be protected, and it has not adequately assessed the increased fire danger to nearby residents and to Humboldt Redwood State Park 9

Salutations CALFIRE (hang in there), I am writing regarding the Fox Camp THP 1-21-107-HUM. It appears this THP is directed at cutting down Redwood OLD GROWTH. Approval of the Fox Camp THP will negatively impact the critical Old Growth and surrounding forest environment. Please require a more thorough EIR, before any approval; mitigation is the minimum required-- let's do better than minimum. Thank you for your serious consideration; I look forward to hearing from you.? 25

First of all, it has been discovered that the THP includes forested lands that have never been logged before. This was not property disclosed by HRC, and the virgin growth areas should be excluded from the permitted harvest. 39

Response to GC1: Late Seral Forest

The public has raised concerns that the timber operations proposed in the THP will harvest old growth forest stands that have never been harvested, and that there is a lack of public disclosure of the proposed timber operations in the THP. The public is also concerned that the stands proposed for harvest have not been accurately evaluated and assessed. The harvesting of late seral forest is also a concern.

The terms late seral forest, old growth trees, and old growth forest as stated in the THP are not synonymous. Old growth trees are defined in THP Section II, Item #34, page 78 to be:

1. *“Any redwood tree, 48" dbh and larger, established prior to 1800.*
2. *Any Douglas-fir tree, 36" dbh and larger, established prior to 1800.*
3. *Any tree established prior to 1800 (conifer or hardwood), regardless of diameter size, with a preponderance of species-specific old growth characteristics.*
4. *In addition to above, HRC retains any tree (conifer or hardwood), established prior to 1800, that cannot be replaced in size or ecological function within 80-130 years, regardless of diameter or presence of old growth characteristics (generally most applicable to areas of exceptionally low site, for example - serpentine soils, site five, and shallow rocky outcroppings.”*

Late Seral Forest is defined in THP Section III, page 143:

“Late seral forest: areas with trees over 24 inches dbh and that have begun to develop a multi-storied structure. It occurs in some redwood stands as young as 40 years but usually in stands more than 50 years old. (Late seral includes forests classified under the California WHR system as late-successional types 5M, 5D, and 6). (FEIS/EIR 3.9.1.3, page 3.9-17 and 7. Glossary, page 7-5)”

THP page 78 states that no late successional forest, as defined by the FPRs, is proposed for harvest and no old growth trees are proposed for harvest.

THP Section II, Item #34, page 78, indicates that Late Seral Forest, as defined in the HCP, is proposed for harvest. THP Section III, page 144, indicates approximately 155.64 acres of HCP late seral is proposed for harvest.

THP Section III, page 144, provides a table which discloses that 155.64 acres of Late Seral Forest will be harvested, and that the percentage of Late Seral Forest in the Bear Mattole Watershed Assessment Area (WAA) due to this THP (in combination with other THPs in the WAA) will be reduced from 28.27% to 27.82%. This percentage of Late Seral Forest retained in the WAA exceeds the minimum 10% required by the HCP.

Regarding the assessment of the THP area, an evaluation of the habitat in the THP area was conducted prior to the submittal of the THP. THP page 78 states *“On-site inspections and examinations of HRC G.I.S. maps and aerial photos have been conducted. Based upon thorough assessment, Late Succession Forest Stands are not associated with this proposed project”*.

Based on this assessment, THP page 107 provides a description of the forest stands within the plan area related to Late Seral Forest:

“The THP is comprised of four harvesting units with varying stand compositions consisting of different combinations of mid-seral and late seral type...”

The timber within the proposed THP is comprised primarily of evenaged Douglas-fir (55-70 years old) and scattered decadent (120-250 years old) Douglas-fir. The average Douglas-fir basal area ranges from 20 to 240 square feet of conifer species per acre in all the stands. The stand component consists of approximately 1 to 100 dominant, codominant, and predominant Douglas-fir trees per acre. The stand component consists of approximately 1- 150 hardwood trees per acre ranging from 8” to 40” DBH. Hardwoods are scattered throughout all the units.

The areas of the THP were entered with tractors in the 1950s specifically looking for high grade peeler logs.”

Given the harvesting that occurred in the THP area during the 1950’s and 1960’s the forest stands are not considered unentered, previously unharvested virgin old growth forest.

THP pages 107-108 also provides information regarding the average tree diameter proposed for harvest, canopy closure, trees per acre, and stocking of the stands in the THP. In addition,

page 108 provides a description of soils, topography, and watershed and stream conditions, and these descriptions are in compliance with 14 CCR 1034(gg).

A PHI was conducted on the THP area on August 3, 2021. The CAL FIRE PHI report did not raise any concerns about the proposed timber harvesting, or impacts to old growth or late seral stands. The CAL FIRE Inspection Report noted all Late Successional Forest Stands had been disclosed and would not be affected. It also stated that any components associated with Late Successional Forest Stands were accurately disclosed in the plan. CAL FIRE believes that an accurate assessment of the THP area has been conducted prior to plan submittal, and that the stands proposed for harvest have been properly described and disclosed in the THP. CDFW had two questions at First Review, and no further questions at PHI, or Second Review.

HRC has an approved Habitat Conservation Plan and an approved Incidental Take Permit. CAL FIRE has evaluated the THP, and believes that the THP area has been properly evaluated for old growth and late seral conditions, and properly discloses timber operations in late seral forest. CAL FIRE also believes that the THP provides appropriate protection measures for old growth trees.

The public also raised concerns that the THP will not be in compliance with Forest Stewardship Council (FSC) guidelines, specifically the management of High Conservation Value areas, and cited a complaint submitted to the FSC. High Conservation Value Forest is a term used by the Forest Stewardship Council, an independent auditing/certification service for the timber industry that is not associated with state or federal regulators. The inclusion of any FSC standards in a THP is not a state or federal regulatory requirement. The inclusion of any FSC standards in a THP is based upon agreements between the FSC and the timberland owner. CAL FIRE does not determine whether the FSC standards are appropriate or not, and strictly evaluates the THP based upon state and federal regulations. However, if these standards are included in the THP, they will be enforced by CAL FIRE.

GC2: Climate Change includes Greenhouse gases, carbon sequestration and global warming. Specific concern examples are below:

According to the majority of the global scientific community we have less than 10 years to avert the worst effects of climate change. This logging plan will contribute to climate change by releasing greenhouse gas and in no way mitigates the greenhouse gases that will be released from the operation in time to assist with averting the worst climate change scenarios. 48

We are on the midst of a climate crises. What will you do to make a difference? 34

Second, the replacement of mature trees with a tree farm will only increase our risk of fire in a time where climate change fueled wildfires threaten our entire state. We are headed in the wrong direction. 39

It cites outdated climate science. We now know that the rate of change is much faster, and the proposed new growth will not keep up with it. For these reasons, I oppose the logging plan HRC proposes. I also oppose it because I have lived in Northern California for most of my eighty-six years, have spent a fair amount of time camping and hiking in it, and I don't want to see more of our forests, owls and salmon disappear. 9

Climate Change- Effect of ongoing climate change on the future growth and survival rates of natural forest and re-planted areas is not being considered. HRC is citing outdated climate science. CALFIRE has consistently sided with HRC, agreeing with the company that there are many decades left to sequester the greenhouse gases this kind of logging will release. 1

Response to GC2: Climate Change

The THP includes a climate change overview located in Section IV starting at page 202, which describes how proposed operations will impact climate change. A summary of topics covered in this climate change analysis include:

- CEQA analysis related to climate change.
- An analysis on carbon sequestration, emissions and land use resulting from forest management and project effects on climate change.
- Effect of Climate Change on Timberlands

The THP evaluates the effect of ongoing climate change on the future growth and survival rates of natural forest and re-planted areas in the section titled “Effects of Climate Change on Timberlands.” This discussion is on page 206.

The THP includes worksheets for each silviculture system on Project Carbon Accounting, which uses the Greenhouse Gas Emissions Calculator (GHG Calculator) to account for carbon sequestration and emissions. The GHG Calculator spreadsheet is a tool intended for use in assessing the short-term and long-term greenhouse gas sequestration and emissions resulting from timber harvest activities. The estimated quantity of carbon sequestration is determined from the estimated growth of trees onsite and from carbon stored in wood products and landfills. The calculation of carbon dioxide emissions includes harvested wood that does not end up in wood products or landfills, plus non-biological emissions associated with site preparation, timber falling, yarding, loading, trucking and milling.

Step 7 of the GHG Calculator requires the input of the “Estimated hardwood basal area harvested/treated per acre.” This is where the release of greenhouse gas through the herbicidal treatment of hardwoods is accounted for in the THP. The GHG Calculator makes the assumption that when treated trees are left onsite an immediate emission occurs.

There have not been attempts to measure the amount of below ground carbon stored in tree roots as part of this THP. The tree roots are not to be harvested and will be left where they are. Redwoods sprout from the existing root systems and those roots will not only be left in place, they will feed the next generation of trees. Actually measuring the amount of underground biomass would likely create ground disturbances far exceeding the overall timber harvesting plan.

After reviewing the Cumulative Impacts Assessment for global warming in the THP, evaluating the estimates the RPF used in the GHG Calculator, and considering the requirements outlined in the Forest Practice Rules it has been determined that the proposed project as presented will not cause or add to significant cumulative climate change impacts within the assessment area.

GC3: Herbicides includes glyphosate toxicity concerns, practice of hack and squirt, and transfer to watercourses and domestic water sources. Specific concern examples are below:

I call for deeper analysis in the paperwork as to varieties of herbicides proposed for use. The POEA surfactant makes a certain kind of Roundup considerably more toxic than the already quite toxic glyphosate bearing Roundup. There are new varieties also called Roundup some of which feature five herbicides including Agent Orange component 2,4D necessarily with dioxin contaminant. We at least more detail in regards to likely formulations proposed for use in the headwaters of the main drainage of the wildest coast in the Lower 48 States. Also need analysis of the synergistic effects of using some herbicides together, as well as analysis of the likely impact of each active and each inert ingredient within herbicide formulations on all aquatic species of the area as well as upon species that visit riparian and other aquatic areas.44

The plan proposes using GLYPHOSATE—a known carcinogen. 41

HRC plans to use toxic herbicides, such as glyphosate, which has contributed to the fire danger along with the buildup of dead trees and shrubs 32

Furthermore, the toxicity of the proposed herbicides in the plan area, including glyphosate, is not addressed, even though recent jury verdicts have awarded millions of dollars to victims of glyphosate exposure who developed cancer. 13

Response to GC3: Herbicides

A summary on Chemical Contamination and herbicide use for vegetation management is in Section IV of the THP pages 169-176.

Within the THP there is a discussion on glyphosate on page 175, which discusses the chemical composition, how it works and process for breaking down in the environment which is included below:

“Glyphosate, the active ingredient in the over the counter herbicide Roundup, is used to control grasses, herbaceous plants including deep rooted perennial weeds, brush, and some broadleaf trees and shrubs. It is applied to foliage, is absorbed by leaves, and rapidly moves through the plant. It acts by preventing the plant from producing an essential amino acid. Aminomethylphosphonic acid is the main breakdown product. It is generally not active in soil and is not usually absorbed from the soil by plants. It remains unchanged in the soil for varying lengths of time, depending on soil texture and organic-matter content. The half-life of Glyphosate can range from 3 to 130 days. The surfactant in roundup has a soil half-life of less than one week. The main breakdown product of the surfactant is carbon dioxide. Glyphosate dissolves easily in water. The potential for leaching into groundwater is low as it is strongly adsorbed by soil particles. It does not evaporate easily.”

Imazapyr is also discussed on page 174:

Imazapyr is registered for forestry and right-of-way uses. Imazapyr is a non-selective, systemic plant growth inhibitor. This chemical is biologically active in plants at low concentrations. The plant rapidly takes up Imazapyr, where it inhibits an enzyme essential to plant growth. This enzyme is not present in

other organisms. In forestry dissipation studies, reported values for the half-life of Imazapyr range from 14 to 44 days in forest litter, 19 to 34 days in forest soils, and 12 to 40 days on plants. Imazapyr is water soluble and does not readily bind to organic material in soils. Therefore, it is classified as highly mobile and can travel through soil with water and enter groundwater. It can also move with runoff and enter surface water. Its low application rates minimize potential impacts on surface or groundwater. Based on lab and field studies Imazapyr is practically non-toxic to fish, birds and bees on a short term (acute) basis. Imazapyr does not appear to bioaccumulate in animals and is classified as practically non-toxic to mammals on a short-term basis. We have reviewed DPR and EPA's research and testing for impacts pertaining to Imazapyr. Given the scientific and toxicological information in conjunction with the DPR and EPA testing and label restrictions, HRC finds that Imazapyr use would not pose a significant human health hazard nor produce any significant adverse environmental impacts when used in accordance to label or other regulatory restrictions and when used in the typical manner during reforestation.

On March 28, 2017 the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment determined that Glyphosate will be added to the list of chemicals known to the State to cause cancer for the purposes of The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65). Proposition 65 warnings are placed on products to provide consumer information. The chemical is still legally available for use. The THP has a thorough explanation of how herbicides are regulated.

The concern mentions recent court cases where juries have found in favor of plaintiffs who claim to have cancer caused by glyphosate. Those court cases were decided by juries based on the facts specific to those cases, do not establish and law or binding legal precedent, and, at any rate, pending appeal.

Use of frilling or also known as "hack and squirt," is proposed for use within the project area where stands are dominated by hardwoods and will be used to reduce site occupancy and help facilitate site preparation and the establishment of Douglas-fir. Application of herbicides used during frilling are not allowed within the watercourse protection zone associated with Class I, II, or III streams. Domestic water supplies receive the watercourse protection measures given to Class I fish bearing streams. Measures to prevent transfer of herbicides to watercourse are discussed in the THP on pages 172-174. One measure identified in the THP for avoiding transfer to watercourse is as follows:

"All required buffers near watercourses and wetlands will be carefully avoided. (As a point of clarification, HRC would like to define "required buffers" referenced in item 7 to include watercourse protection zones outlined within the Habitat Conservation Plan. The HCP buffers are significantly greater than the label requirements for stream protection. In addition, "carefully avoided" means no herbicide will be directly applied in these buffers. Therefore, when we say required buffers, we mean those required by either the Planning Agreement or pesticide label, and we utilize whichever gives the most protection.)"

The THP discloses the use of herbicides, including Glyphosate and Imazapyr. The Department of Pesticide Regulation allows for the use of Glyphosate and Imazapyr and all application will be by a licensed operator. Measures are provided to restrict the use of the herbicide within buffers from watercourses and these buffers are the greater of the protections from the Forest Practice Rules, the Habitat Conservation Plan or the herbicides label. The THP has therefore been found in conformance with the Forest Practice Rules in regard to the assessment of the use of herbicides,

and the Department finds that no significant environmental impacts will result from the application of herbicides as contemplated in the THP.

GC4: Wildfire assessment includes fire danger, fire resistance of retained forest, fire risk assessment. Specific concern examples are below:

Fire danger will be greatly exacerbated by this THP's Proposed: 1. Major logging; 2. Injecting hardwoods with herbicides; 3. Converting old forest to monoculture conifer plantations (all the same age – all the same species is a recipe for catastrophic fire as Sierra Pacific Industries plantations indicated near Paradise, California); 4. Creating major disturbances which attract flammable pioneer brush species which prompt some land managers to poison such vegetation – all of which is quite flammable. I see a threat to both the Mattole River watershed as well as to Humboldt Redwoods State Park visitors from increased fire danger due to plans for heavy logging and converting diverse forests into a monoculture tinderbox.
44

The replacement of large, fire resistant trees with more flammable, crowded tree plantations undermines fire resiliency. Lack of assessment of flammability and fire danger to nearby residents. This project is next to Humboldt Redwood State Park and the increased fire danger that will result from this logging threatens the habitat within the park as well as park visitors.
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Fire Danger- Increase in fire danger due to a buildup of dead shrubs and trees due to herbicide use. This is a threat to community safety as well as ecological health.

Fire Resistance- The replacement of large, fire resistant trees with more flammable, crowded tree plantations.

Fire Risk Assessment- Lack of assessment of flammability and fire danger to nearby residents. This project is next to Humboldt Redwood State Park and the increased fire danger that will result from this logging threatens the habitat within the park as well as park visitors. 12

Response to GC4: Wildfire assessment

The wildfire assessment begins on page 212 of the THP. A section of the Wildfire Risk and Assessment is a consideration of the existing and probable future fuel conditions. The concern about the increased fire danger due to herbicide use is addressed in the THP:

“The existing fuel conditions within the THP area includes both vertical and horizontal continuity of live and dead fuels. The stand type in the THP most resembles a two tier stand that has an overstory of residual second growth conifer and hardwoods and a mid-level canopy of second and third growth conifer and hardwood regeneration and moderately dense ground cover consisting of grass and brush. There is dead fuel located sparingly throughout the THP area in the form of snags and down woody debris. Through management of the stand using unevenaged management the future fuel conditions will be modified.”

The RPF continues:

“Additionally, the practice of logging creates and maintains fuel breaks in the form of skid trails, cable corridors and truck roads whose presence contributes to a reduction of vertical and horizontal continuity. Also during the course of logging operations, a generous volume of limbs, tops and other miscellaneous woody debris are brought from the woods to the landing which results in a reduction of fuel materials in the woods. Once on the landing the generated fuels can be managed in a controlled setting by piling and burning the material. Alternatively, the material may be spread and compacted which reduces the vertical continuity of the material.”

The area is within a High Fire Hazard Severity Zone. The THP area has associated wildfire risks as it exists preharvest. These risks would only tend to increase with no action. The question becomes if those risks increase or decrease with the implementation of the THP. Of consideration is what activities occur during a timber operation. The RPF states:

"Forestry staff visit the timberlands regularly to inspect active logging operations to insure logging operations are in compliance with the Forest Practice Rules. During these inspections, the condition and location of fire tools along with the fire prevention practices of contractors is observed. Forestry staff is looking for things such as adequate clearings around yarder blocks, spark arresters on chainsaws, proper maintenance of equipment, and establishment of fire breaks around all slash piles. Prior to logging operations, a meeting is held with the LTO to discuss plan specific information and to address important fire prevention issues such as access, fuel moisture, water sources, and company policies regarding smoking and warming fires. During logging operations there is equipment available on site or elsewhere on the ownership in relatively close proximity that is suitable for the construction of fuelbreaks or to support CalFire in fire suppression activities.”

Forest Practice Inspectors with CAL FIRE will also check for fire safety related items as part of inspections of the THP. Every CAL FIRE Forest Practice Inspector is a fully trained Company Officer capable of commanding initial response to a wildfire.

Removing fire from the equation is neither possible, nor desirable. The public comments use the phrase “large fire resistant trees” alluding to the knowledge that fires are an inevitable part of the natural landscape. Some would say that a better choice of words would be “fire resilient trees” as no tree is fire resistant. Fire behavior is dependent on many variables and under the right conditions any tree will burn. The availability of fuel to burn is one factor that lends itself to management activities. The THP addresses some of the fuel conditions and how they will be affected under each of the silvicultural methods implemented.

“The use of selective logging (unevenaged management) will significantly reduce the amount of surface and ladder fuels. Selective logging will individually select trees for harvest. In many cases the overly dense, poor health and poor form trees are harvested to release the dominant and codominant conifers and promote conifer regeneration in the understory. The retention of healthy conifers will improve the overall stand health and provide for a more fire- resistant stand. Similarly, the selection of individual trees from the stand matrix will reduce vertical and horizontal continuity within the stand as trees with intermingling crowns are thinned to provide additional resources for the retained trees.”

Roads within the THP area are addressed by the RPF in the wildfire assessment:

“The road network located on HRC lands is well situated to provide access for fire suppression resources. The road network begins at the gates that lead to HRC property. Gates are generally left open during the day while active logging operations are occurring which allows access for fire suppression resources. Gate openings are wide and allow access for large pieces of logging equipment and will also service fire suppression trucks, equipment and personnel. A large portion of the road network are rock surfaced permanent roads that are capable of providing year-round access for logging operations and fire suppression resources. The remaining dirt surface roads that access active THP areas will be maintained as open and usable during the time of year when fire hazard is at its greatest.”

The wildfire risk assessment addresses factors relating to wildfire risk. The discussion is in conformance with the Forest Practice Rules. The Department finds the potential for increased wildfire risks is less than significant.

GC 5. Forest Conversion Specific concern examples are below:

Replacing mixed hardwood/conifer forest with planted Douglas fir saplings constitutes conversion of natural forest to tree plantations. HRC cites anecdotal evidence about the regeneration of faster growing redwood stands to defend their logging of slower growing Douglas fir and hardwoods. This THP is largely hardwoods and Douglas fir. Forest regeneration speed and success is uncertain as climate change progresses. 7

I am concerned that the overall conversion of the forest - replacing mixed hardwood/conifer forest with planted Douglas fir saplings - constitutes an abandonment of our natural forest in favor of tree plantations. This is not something the people of California would choose to do. 13

Response to GC5: Forest Conversion

The THP is not a conversion from natural forest to tree plantations. Stocking standards are incorporated into the THP for trees that will be retained following timber operations. The silvicultural methods being employed are Selection, Group Selection and Variable Retention. For each of these methods, the THP incorporates stocking standards for retained trees. These retained trees, natural native forest, will remain on-site immediately following harvesting. Tree planting will occur within the Variable Retention harvest areas and may occur in areas that are poorly stocked or in Group Selection openings.

The harvesting methods and tree retention in this THP is in compliance with the California Timberland Productivity Act of 1982 (Government Code Section 51100-51104) and the Forest Practice Rules.

GC6: Soil Stabilization includes erosion, landslides, unstable soil conditions, erosion and sediment transfer to watercourses. Specific concern examples are below:

Erosion- Intensive logging and road building is proposed on unstable slopes in an area with very high seismic activity and numerous landslides. The fact that this is being proposed upslope

from watercourses threatens the survival of juvenile salmon and rainbow trout/steelhead in streams below this logging operation. 12

Intensive logging and road building is proposed on unstable slopes in an area with very high seismic activity and numerous landslides. The fact that this is being proposed upslope from watercourses threatens the survival of juvenile salmon and rainbow trout/steelhead in streams below this logging operation. 7

Finally, what about erosion? Intensive logging and road building are proposed on unstable slopes in an area with very high seismic activity and numerous landslides. The fact that this logging operation is being proposed upslope from streams & watercourses threatens the survival of juvenile salmon and rainbow trout/steelhead who live there. 13

Response to GC6: Soil Stabilization

In the THP the RPF describes soil stabilization measures in Section II, Item 18, which outline how bare mineral soil will be treated within watercourse protection zones, spacing of waterbreaks on roads, skidtrails and cable yarding corridors that have a potential to channelize runoff into a watercourse. Several specific protection measures described in the plan include:

- “- Within RMZs and EEZs, areas where mineral soil, exceeding 100 contiguous square feet in size, have been exposed by forestry activities, shall be treated with effective erosion control measures.*
- Within RMZs and EEZs, mineral soils exposed by forestry activities on hillslopes greater than 30 percent, excluding those areas described above, shall be treated with effective erosion control measures.*
- Overhanging or unstable concentration of slash, woody debris, and soil along the down slope edge or face of landings shall be removed or stabilized when they are located on slopes over 65 percent, or on slopes over 50 percent and within 100 feet of a standard width WLPZ.”*

In addition, the THP proposes stream side protection zones that range between 50-150 feet wide, depending on stream classification, that will retain between 50-65% tree canopy closure to protect water quality from sedimentation and other adverse impacts like increased water temperature. These stream side protection zones are equipment exclusion zones, which prevent heavy equipment from operating close to watercourses. This THP proposes to retain all large woody debris located within stream side protection zones to increase stream structure for fish and contribute to soil stabilization and sediment filtration.

Referring to page 238 of the THP is a narrative titled “Sediment Reduction from Roads and THP Sediment Production” which is in compliance with Humboldt Redwood Company’s Habitat Conservation Plan (HCP) section 6.3.3.3.2. Here is where sediment delivery to watercourses is addressed:

“For this THP, there is an estimated 54 cubic yards of sediment which may be delivered to watercourses as a result of timber operations. To mitigate the sediment production from this THP, a total of 2 road mitigation work sites were chosen, which total 61 cubic yards of sediment (see Section II attachments under the Work Order and Road Specifications Map). The upgrading of the mitigation sites chosen for this THP will result in a net sediment savings of 7 cubic yards.”

Item 24(c) on page 29 of the THP indicates there is road work associated with an unstable area. Pages 265-300 of the THP include a Geologic Evaluation of the THP area prepared by a licensed Professional Geologist. On page 276 the Geologist concluded:

“It is our opinion that if the desired road segments are constructed in compliance with the road work order, there is a low probability that the proposed activities and subsequent uses will have a significant impact on the regional slope stability or water quality of down slope waterways.”

The recommendations from a Professional Geologist have been incorporated into the THP.

A Professional Geologist from the California Geological Survey (CGS) evaluated ground-based yarding and new road construction relative to slope stability and erosion and possible increased rates of sediment delivery to Fox Camp Creek, a Class I watercourse. The summary of the PHI report had no recommendations for the RPF.

The Mattole River is on California’s 303(d) impaired water list due to elevated sedimentation and temperature. There is an established Total Maximum Daily Load (TMDL) for sediment and temperature. The TMDL determines the “allowable” amount of sediment and temperature. From page 19 of the TMDL:

“This TMDL is set equal to the loading capacity of the Mattole River. It is the estimate of the total amount of sediment, from both natural and human-caused sources, that can be delivered to streams in the Mattole River watershed without exceeding applicable water quality standards. We are assuming that there can be some increase above the natural amount of sediment and not adversely affect fish. We postulate this because fish populations were thriving throughout the North Coast when there was some sediment from human activities. For the Mattole River, the sediment TMDL is set equal to 125% of natural sediment delivery, based on our past experience determining TMDLs for other North Coast watersheds.”

https://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/mattole_river/110707/mattole.pdf.

The Registered Professional Forester followed the Forest Practice Rules section 14 CCR 898:

When assessing cumulative Impacts of a proposed project on any portion of a waterbody that is located within or downstream of the proposed timber operation and that is listed as water quality limited under Section 303(d) of the Federal Clean Water Act, the RPF shall assess the degree to which the proposed operations would result in Impacts that may combine with existing listed stressors to impair a waterbody's beneficial uses, thereby causing a significant adverse effect on the environment. The plan preparer shall provide feasible mitigation measures to reduce any such Impacts from the plan to a level of insignificance, and may provide measures, insofar as feasible, to help attain water quality standards in the listed portion of the waterbody.

Pages 165 to 183 of the THP is the Watershed Resources Assessment. This section references the 303(d) status, the TMDL, past activities and current practices. This THP will result in the net sediment reduction of 7 cubic yards.

The THP addresses potential concerns relating to soil stabilization and proposes measures to address those concerns. A professional geologist has contributed to the THP, and a CGS geologist attended the preharvest inspection with no further recommendations. The THP conforms to the Forest Practice Rules with respect to soil stabilization. The Department finds that there will be no significant environmental impacts or contribution to significant cumulative impacts due to sedimentation as a result of this THP.

GC7: Proximity to Redwood State Park includes the Mattole watershed, proximity to the Park. Specific concern examples are below:

The areas slated to be logged and herbicided lie directly adjacent to Humboldt Redwood State Park, within the ancestral territory of the Bear River Band. Please protect our forests and wildlife and do not allow this plan to be accepted. 5

This project is next to Humboldt Redwood State Park and the increased fire danger that will result from this logging threatens the habitat within the park as well as park visitors. 12

This project is next to Humboldt Redwood State Park, so the logging threatens the habitat within the park as well as park visitors. I urge you to fully consider all the issues before you make a decision on this THP. The people & animals of this region and all the neighboring regions that depend on the health of this unusual biome & habitat are depending on you to fully consider ALL the issues. 13

Response to GC7: Proximity to Redwood State Park

The THP discloses that the THP is adjacent to the Park and discloses that the portions of the THP meet the criteria of 14 CCR 895.1 Special Treatment Area (STA) (b) "Within 200 feet of national, state, regional, county or municipal park boundaries". The THP discloses on page 10 that 26.2 acres of ground fall within this 200-foot STA. The plan describes the silviculture that is being proposed within this 200-foot band, as well as additional mitigation measures. On June 9th, 2021 two State Park representatives (the forester and the roads supervisor) visited the area of the plan adjacent to Humboldt Redwood State Park, made recommendations that were incorporated into the plan and stated the following:

The prescription for the STA's as proposed (75 square feet of conifer basal area retention, and no group openings larger than .25 acres within 200 feet of the Park forest lands) should have no significant impacts to State Park lands. Parks has no concerns with the prescription as described.

The letter from the State Park representative is in CalTrees for reference, but it does not make any recommendations above and beyond what is already required by HRC under their various agreements. Regarding the concern about increased fire danger to the Park, please see response to GC4. Additionally, it should be noted that improved access, which this plan provides, is always a vital element towards fire suppression efforts. CALFIRE considers the proximity of this project to Redwood State Park to have been adequately addressed.

GC8: The Northern Spotted Owl (NSO) concern includes comments regarding owl displacement and concerns of a dying population. Comments regarding the NSO from Public Comments 1, 4, 6, 7, 8, 10, 12, 13, and 14 were all the identical in regard to the NSO.

Northern Spotted Owl habitat - Logging is proposed around multiple NSO nest sites. Logging near nests is likely to displace owls. NSO population continues to decline throughout the Pacific Northwest. 4

Response to GC8: NSO

It is unclear what the commenter means by stating the logging is “around multiple NSO nest sites. There are three NSO activity center within 1.3 miles of the THP. One has NSO protection level one and the other two have protection levels 3 (page 249). The protection measures for the different levels comes from HRC’s NSO HCP and are described in Section II of the THP from pages 67-69. These protections to the NSO have been in place for many years, have been reviewed by multiple agencies, includes monitoring, and by all measures appear to be effective.

The THP demonstrates thorough consideration for wildlife and protections for endangered species and habitat. The THP operates under an approved Habitat Conservation Plan (HCP), has thorough biological and botanical scoping for species of concern and habitat, and provide for surveys for Northern Spotted Owl and Golden Eagle. Protection measures are incorporated into the plan. Protections and tree retention within watercourses adds to the retention for wildlife corridors. In Section II, Item 3; Section III Plan Addendum to Item 32; and Section IV, 6.3 Biological Resource Assessment; the RPF discloses the sensitive or endangered species present, or likely present, within the project area and what protection measures each species will receive. Please refer to the sections of the THP mentioned above for specific protections and mitigation measures. The California Department of Fish and Wildlife did not attend the PHI. They did provide questions in First Review of the Timber Harvesting Plan and have not raised additional concerns.

Please see the General Comments sections, GC1: Late Seral Forest and GC3: Herbicides. The THP has demonstrated protection for Northern Spotted Owls through the use of surveys to find owls and protection measures for both owls and habitat. There are many examples within the redwood region where Northern Spotted Owls are known to be nesting in second growth trees. After reviewing the THP, evaluating the section II and III discussions surround NSO, and considering the requirements outlined in the Forest Practice Rules it has been determined that the proposed project as presented will not result in the take of NSO.

GC9: The impact of hardwood management on the Northern Spotted Owl (NSO) includes comments that hardwood removal will impact the NSO through acorn reduction, and critical habitat loss.

In addition, many species rely on hardwoods such as tanoak to survive. For instance, many prey species of the northern spotted owl eat acorns from tanoak. This plan area contains multiple northern spotted owl nest sites. Even if the nest sites themselves are not harvested, decimating the oak population around those sites will reduce the viability of the area for northern spotted owls by reducing their prey population. 21PC-00000562

Response to GC9: The long term stated strategy of HRC is to return the landscape to something more like its original condition, prior to the harvesting impacts of the last 100 years. This would be an uneven-aged, predominantly Douglas fir stand, rather than the current stand that is heavy to tan oak, due to prior mismanagement. A predominantly uneven aged Douglas fir forest is widely considered preferable and superior habitat for the NSO, than a forest heavy to tan oak.

It should also be noted that HRCs frilling efforts at managing tan oak, focuses on tan oak, as opposed to the true oaks that are considered a more natural, and pre-European part of the ecology. Additionally, besides the protection measures previously mentioned in response to GC8, there are also high value wildlife trees retained throughout the THP as outlined on page 77 of the THP. This would include the large tan oaks that provide the majority of acorn production. For instance, HRC's HCP in 6.11.2.2 states that all live hardwoods over 30 inches DBH, unless they constitute a safety hazard, to a maximum of two per acre.

Lastly, it should be noted that the primary prey for the NSO is the dusky footed rat, which primarily feeds on brush species as opposed to acorns. This is mentioned as a point of interest, rather than a definitive argument. After reviewing the THP, evaluating the Section II and III discussions regarding NSO, and considering the requirements outlined in the Forest Practice Rules, it has been determined that the proposed project as presented will not result in the take of NSO.

Specific Public Comment Letters

Public Comment 21PC-00000559-PC38: *Public comment in Italics*, response immediately after in plain text.

Dear Reviewers, the plan submitter has provided a very extensive document in the Cumulative Impacts Assessment. Have you checked all the references? One (and this is just a sample) caught my attention when referring to Beschta 1987 claiming that a warmer watercourse provides benefits to salmonids and the aquatic habitat. I read Beschta's study and it was a meta study, in that he recounts numerous studies and what the researchers found. He does not comment on the importance of these studies. One study did report that increased temperature increased production of food for fish. However, he brings up other studies which show that when that increased food production occurs, the fish have already gone to cooler waters (when available). In other words, the increased water temperature is clearly not of benefit to fish species.

The commentor goes on to point out that Beschta's study, and later studies by Beschta, show that warmer waters are not generally a benefit to salmonids and aquatic habitats. What the commentor seems to miss is the context in which the THP uses the Beschta study. The THP does not use the study to justify that warmer waters provide benefits to salmonid habitat, as the commentor suggests. To the contrary, the THP correctly references the Beschta study by stating that tree cover can minimize or avoid water temperature increase. The commentor, perhaps misunderstanding the THP, questions if the Review Team has read all the referenced material. Referenced material is checked to see if it is appropriate. Cal Fire has determined that this comment has been properly and adequately addressed in the THP.

Public Comment 21PC-00000559-PC53: *Public comment in Italics*, response immediately after in plain text.

With that in mind, and looking at just this one false claim by the THP submitter in regard to stream temperatures and fish survival: What are the temperatures in Fox Camp and Rattlesnake Creeks at various times of the year, and especially when fish are present there or downstream of the proposed harvest? How will you know whether execution of this THP is impacting listed fish species? How will you monitor stream and upslope soil temperatures? Are you simply going to take the plan submitter's word that impacts to the fish from temperature is not a significant possibility and accept as truth that increased temperatures are a benefit to the fish? The public has informed you that the claim that increased water temperatures is of benefit to fish is false. The claim the plan submitter based this false claim on was from a noted fisheries biologist who in all his other studies concludes the opposite of what is claimed by the plan submitter.

Here the commentor claims the plan is going to damage, destroy or negatively impact fish habitat. Please see GC6: Soil stabilization. The THP proposes stream side protection zones that range between 50-150 feet wide, depending on stream classification, that will retain between 50-65% tree canopy closure to protect water quality from sedimentation and other adverse impacts like increased water temperature. The THP has retained trees, with some of the largest trees to be maintained.

This THP is operating under an approved HCP. THP's that operate under a HCP that include salmonoid protections demonstrate compliance with 14 CCR 916.9(w)(4). The THP has incorporated the stream protection measures prescribed in the HCP. The Watershed Assessment was evaluated and meets the requirements of The Board of Forestry and Fire Protection – Technical Rule Addendum #2.

Cal Fire has determined that this comment has been properly and adequately addressed in the THP

Public Comment 21PC-00000562: *Public comment in Italics*, response immediately after in plain text.

Another serious issue with the environmental review of this project thus far is the failure to adequately consider the impacts of road construction to watercourses. Road construction is the leading cause of erosion and sedimentation of the North Coast's salmon bearing streams. In turn, sedimentation is one of the leading causes of the current endangerment of our native fish species including coho salmon, rainbow trout, and steelhead. Rattlesnake Creek is an important

coldwater stream that provides habitat for these species. The plan proposes to construct new roads in areas with high seismic activity which means that they are incredibly likely to erode into watercourses. This sedimentation will compound the situation caused by the current drought in Northern California.

Here the commentor states that proposed road construction has not been evaluated on this THP. Please see response to General Concern 6 regarding Soil Stabilization. This THP is proposing 4,496 feet of seasonal road construction. Additionally, there are 670 feet of seasonal road proposed for reconstruction. These roads were inspected on PHI on Aug 8, 2021, and only minor mapping clarifications were recommended by the Cal Fire inspector.

The plan has been reviewed by multiple agencies and the roads proposed both meet and exceed the standards put forth by the FPRs. HRC has road building standards that are stricter than the FPRs and they are outlined on pages 33- 46 of the THP. These standards are included in Section II of the THP and are enforceable measures in the event they are not followed. Considering the plans size at 312.4 acres the amount of new road construction is considered normal and reasonable. Lastly please see response to GC 6.

Cal Fire has determined that this comment has been properly and adequately addressed in the THP.