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: 1-20-00065 HUM
SUBMITTER: Deanna and David W. Thrift Trust
(Deanna Thrift – Trustee)
COUNTY: Humboldt
END OF PUBLIC COMMENT PERIOD: June 8, 2020
DATE OF RESPONSE AND APPROVAL: July 8, 2020

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: File, RPF, Unit, Timber Owner, Timberland Owner, and Plan Submitter
(https://caltreesplans.resources.ca.gov/caltrees/caltrees.aspx)
PUBLIC NOTIFICATION

This proposed Timber Harvesting Plan (THP) was used to inform the public of and determine if there were any concerns with the THP. The following actions were taken for this notification:

- 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 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 THP review process are found in Statute law in the form of the Forest Practice Act (FPA) 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).

The Forest Practice Rules (FPRs) 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 of Forestry and Fire Protection (The Department / CAL FIRE), 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 or representative 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 THP 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 Registered Professional Forester (RPF) along with the Review Team member’s PHI Report. The RPF responds to the recommendations, and forwards them 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 his responses to the regional office. Once the responses have been determined to satisfy recommendations Second Review is considered closed. There is an additional 10 days for which the public comment period is open.

After the close of public comment the Department then has 15 days to determine final compliance with the FPRs and generate an Official Response to any significant environmental points raised from the public, if such comments have been submitted. 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 determination is made if the THP is in conformance to the Rules of the Board of Forestry and Fire Protection. If a THP is found to be in compliance with the Forest Practice rules and regulations, 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, RPF must meet with the Licensed Timber Operator (LTO) to discuss the THP (14 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 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.
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. LTO and RPF 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, criminal or civil action may be taken. Depending on the outcome of the case and the forum 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 timber harvesting operations are complete, as defined under 14 CCR 895, a completion and stocking 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. Then depending on silvicultural, the stocking standards of the rules must be met within 6 months or in certain cases within five years. A stocking report must be filed and inspected to certify that the requirements have been met.

**FOREST PRACTICE TERMS**

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<td>FPRs</td>
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<td>Watershed Assessment Area</td>
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[sic] Word used verbatim as originally printed in another document. May indicate a misspelling or incorrect word usage

**PUBLIC COMMENT SUMMARY**

During the open public comment period for this THP as described above, there were three letters received by email to CAL FIRE Region Headquarters in Santa Rosa. These letters brought up various concerns that are addressed in this Official Response (OR). Original text taken directly from the public comment letters are grouped by subject matter and presented as italicized text in the outlined concerns and responses below. A copy of the original letters sent to the Department are included at the end of this OR and are also viewable through the Department’s online Forest Practice Database CalTREES.
**CalTREES instructions:** navigate to [https://caltreesplans.resources.ca.gov/caltrees/caltrees.aspx](https://caltreesplans.resources.ca.gov/caltrees/caltrees.aspx) Click the search icon at the top of the page, then type the THP# in the Record Number box (county identifier not needed). Select the THP Number under the Document Number column for the “Timber Harvest Plan” Type. Then click on the orange triangle to the right of “Records Info” dropdown and select “Attachments”. The Public Comments are labeled under “Record Type” and are in pdf format, usually with a “PC” label.

**BACKGROUND**

**Humboldt County is considered an agriculture county, which includes timber.**

Humboldt County Zoning regulations (Title III Land Use and Development) support the fact that landowners in the county may have to interact with the presence of agriculture activities. From Section INL#316.2-4(A); Added by Ord. 1662, Sec. 1, 11/27/84; Amended by Ord. 2075, 5/30/95; Amended by Ord. 2138b, Sec. 1, 1/14/97):

Section 313 43.2.4.1- Humboldt County is an agricultural county with many areas planned and zoned for agricultural operations. The presence of farms, ranches and timberland yields significant aesthetic and economic benefits to the health and welfare of the residents of the County. In accordance with the findings in subsection 43.2.2, this County’s agriculture must be protected, including in areas where it is near residential development. This is accomplished in part by the adoption of subsection 43.2.3, which provides that properly conducted agricultural operations will not be deemed a nuisance.

Section 313 43.2.4.2 - This section further requires sellers of real property to give notice of this ordinance and its provisions to buyers of real property located in Humboldt County. The notice shall be in substantially the following form:

"You are hereby notified that if the property you are purchasing is located close to agricultural lands or operations, you may be subject to inconvenience or discomfort from the following agricultural operations: cultivation and tillage of the soil; burning of agricultural waste products; lawful and proper use of agricultural chemicals including, but not limited to, the application of pesticides and fertilizers; and production, irrigation, pruning, growing, harvesting and processing of any agricultural commodity, including horticulture, timber, apiculture, the raising of livestock, fish, poultry, and commercial practices performed as incident to or in conjunction with such agricultural operations, including preparation for market, delivery to storage or market, or to carriers or transportation to market. These operations may generate, among other things, dust, smoke, noise and odor. If you live near an agricultural area, you should be prepared to accept such inconveniences or discomfort as a normal and necessary aspect of living in a county with a strong rural character and a healthy agricultural sector. For information concerning where agricultural operations are in relation to your property, you may contact the Planning Division of Humboldt County Community Development Services. For questions concerning specific kinds of agricultural operations in your area, including their use of fertilizers and pesticides, you should contact the Humboldt County Agricultural Commissioner. This Notice is given for informational purposes only and nothing in the Ordinance or this Notice should be deemed to prevent you from complaining to any appropriate agency or taking any other available action to remedy any unlawful or improper agricultural practice."
SIGNIFICANT ENVIRONMENTAL CONCERNS AND RESPONSES

CONCERN #1: Harvesting of large trees

I understand there are other big trees in the SE corner of the proposed logging site on your property, mostly fir but also other species such as western red cedar and at lease [sic] one hemlock. These trees are major contributors to the sequestration of carbon and as such are instrumental to the very health of our planet and therefore should be left standing. The intrinsic value of these large trees should warrant more consideration then the monetary value in the decision to leave them in place and not removed by the chainsaw.

Please leave these trees standing.

A central concern is the southeast corner of the THP area. Although I understand that the silviculture proposed may meet the Forest Practices rules, we are asking for a high level of retention in this area, or full retention. There are trees larger than 24 inch DBH, and some more than 36 Inch DBH, in this area. Some of them are in immediate proximity to Fickle Hill Road. Removal of these trees would have an adverse impact on visual values. Also, if some of the large trees are cut in this area, which is on the ridge and subject to high winds, what would ensure that the remaining trees would be windfirm? What measures could mitigate any of these potential adverse impacts?

RESPONSE: The CAL FIRE Inspector included the following on the PHI report dated 5/12/2020:

"The timber stand is as described in the plan. The stand is uneven aged ranging from regeneration to 50 plus year old conifer. The mark observed is in compliance with the Forest Practice Rules and the THP."

Additionally, the inspector concluded that silvicultural methods selected were appropriate for existing stand conditions, and that for uneven-aged management, the prescription should ensure the establishment and/or maintenance of a balanced stand structure, and establishment of new reproduction.

Furthermore the inspector addressed the public comment letter in the report by stating; "The letter writer Barbara Barratt was concerned about "large trees" and carbon sequestration. The RPF provided information required by the Forest Practice Rules in regards to carbon sequestration on pages 107-114. The PHI team walked the THP adjacent to Fickle Hill assessing the trees marked for harvest and hazard abatement area. Several large trees greater that 36" DBH were observed. The large trees observed were not marked for harvest as they were "wolf trees", having large branches and in some cases multiple tops. These trees do not have economic value due to defect and will be left on the landscape."

As referenced in the PHI report the following is discussed for carbon sequestration starting on page 107 of the Plan:

The Forest Carbon Plan provides guidance and input to tile Natural and Working Lands Implementation Plan described in the California's 2017 Climate Change Scoping Plan. The Forest Carbon Plan describes a significant deficit in forest management in California, both on private lands and nonfederal public
forestlands. To address the forest health resiliency needs on a state wide basis on nonfederal lands, the plan states forest treatments need to increase to 500,000 acres per year to make an ecologically significant difference at the landscape scale. The plan further describes the treatments to include those that generate revenue from harvest materials, such as commercial thinning and regenconcration harvests. As a non-industrial forestland owner in California, in spite of the high cost of regulation, operations, and fluctuating markets, the Timberland Owner is doing their part towards achieving the state wide goal of managing an increasing number of acres to improve forest health and resiliency.

Carbon dioxide (CO2) is considered the greenhouse gas (GHG) that has the greatest effect on the dynamic of global warming due to the fact that it composes the vast majority of the releases by human activities. There are two basic ways carbon emissions are reduced. First is efficiency, where technology or conservation reduces carbon emissions through the use of less energy (electricity, fuel, heat, etc.) to accomplish an activity. Second is storage, which can be accomplished through geologic or terrestrial sequestration.

Forest activities can result in emissions through harvesting, wildfire, pest mortality and other natural and anthropogenic events. However, forestry is a net sink for carbon, the primary greenhouse gas. Plants absorb CO2 from the air, and use the carbon as a building block of plant tissue through the process of photosynthesis. The most recent draft Greenhouse Gas Inventory shows the forestry sector to be a net sink with emissions of 6.1 MMT CO2 EQ. and emissions reductions of 21 MMT CO2 EQ (Bernis, 2006).

The forest sector offers the ability to reduce emissions through a suite of possible activities: 1) substitute wood products for more energy-intensive products, 2) reduce consumption of energy in growing timber, harvesting, and wood processing, 3) reduce biomass burning (wildfires), 4) afforest marginal croplands, 5) reduce conversion of forestland to non-forest use, 6) improve forest management, 7) reduce harvest, 8) increase agro-forestry, 9) plant trees in urban areas, 9) other combinations (Joyce and Nungesser, 2000). This proposed TIIP uses several of the activities which are considered to have the effect of reducing the overall forest emissions and improving the storage of GHGs. The harvest will add to the carbon stored in wood products, while at the same time increase the rate of carbon storage by maintaining a healthy, fast-growing forest. Forest management may result in a reduced risk for wildfire, and will maintain maximum sustained productivity of quality forest products. By maintaining timber management there is a reduced risk of deforestation through conversion of the land to non-forest uses.

This plan, alone or in combination with other harvest plans in the watershed, ownership, Humboldt County, or State of California is not expected to have an adverse impact on global warming. Carbon from trees harvested will be sequestered for decades or longer in the form of the wood products cut from the logs. Importantly, additional carbon will be sequestered in the future as newly planted, sprouting, and growing crop trees occupy and grow on the site. The total emissions for the entire project area is 5.36 Metric Tonnes of CO2 per acre while the net sequestration is 221.39 Metric Tonnes of CO2 per acre.

Based on the Green House Gas Calculator, and the Project Sequestration Summary on page 114, it was determined that the proposed selective harvest will have an immediate short term impact on both sequestered carbon and carbon contributed to the atmosphere through harvest. Through the calculations, it is indicated that the carbon stocks will be recovered from this initial harvest in 6 years. These calculations include live tree carbon (including growth), harvested wood products and landfill waist as indicated. Reduction of timberlands reduces the carbon absorption that trees provide. However, with the requirements of CalFire to maintain defensible space and in conjunction with thinned stands from the forestry operations, a reduction in wildfire hazards is obtained thus reducing the potential for catastrophic emissions.

At the protect 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 CCARB 2008). When considering the impacts of this project on climate it is doubtful that a measurable change could be detected, even at the micro climate level.

In regards to the visual impact of the timber harvesting, page 106 discusses the following:

The THP area is visible from several adjacent private ownerships which are not readily accessible, two public road systems (county and Highway 101), and the town of Bayside, CA. The activity is visible from a small number of rural residences (7 - 8) which are less than 1 mile away. The proposed harvest should maintain enough canopy to minimize visual effects and relieve most aesthetic concerns.

The majority of the large trees in question will most likely be retained.

CONCERN #2: Hours of timber operations

Being a bordering neighbor to the THP, we are concerned with the hours of operation stretching to Saturdays from 8-5. Given that the operations are expected to last at least 6 weeks this summer, operations on Saturday will negatively affect our experience on our property on the days on which we intend to be enjoying our yard, property, adjacent forests, and general enjoyment of the area. We are essential workers and work long hours during the week to come back to our home to enjoy and decompress from this current pandemic. Our free days in the summers (Saturdays and Sundays) will be spent outside with our young daughter, who avidly loves the outdoors. However, this will be difficult with the loud noise and activity of timber operations occurring well within earshot and even with the view of where we had hoped to spend our time for the entirety of the summer.

We ask that you limit operations on Saturdays to 1 or at most 2 Saturdays during the active operations, so that our enjoyment and use of our own property is not hampered by the THP operations.

RESPONSE: The Plan has been revised to include the following in Section II, Item 38, page 79, limiting timber operations as a courtesy to local residents:

This THP is located amidst several residential parcels. In order to mitigate for potential noise impacts, timber harvest operation hours shall be limited to 7:00 am to 5:00 pm, Monday through Friday, and 8:00 am to 1:00 pm on the 1st and 3rd Saturday of each month. No operations shall occur on the 2nd, 4th, or 5th Saturday of each month. No timber operations shall occur on Sundays or holidays: New Year’s Day, Martin Luther King Jr.’s Birthday, Presidents Day, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving Day, and Christmas Day.

Please also see the “Background” section above describing Humboldt county as a protected agriculture county for timber harvesting.

CONCERN #3: Logging truck traffic safety

I and other neighbors are concerned about safety impacts from traffic associated with this plan. We do appreciate that the RPF incorporated restrictions on hours of operations, and has added some limitations on hauling during commuter hours. There are unresolved concerns about ingress and especially egress from the THP area. Fickle Hill Road, which forms one boundary of
the THP area, has significant turns, including a hairpin turn, and limited visibility along this stretch of road. All the truck roads on the plan use Fickle Hill Road as the haul route. Even with proposed signage noting truck traffic, it seems like significant potential for accidents from vehicles associated with the THP. How could this be mitigated?

RESPONSE: The Plan has been revised to include the following in Section II, Item 38, page 80, limiting log truck traffic as a courtesy to local residents:

Loaded log trucks shall not be allowed to haul on Fickle Hill Road west of the THP between 7:50am-8:20am and 5:00pm-5:30pm, Monday through Friday through the entire operating season.

Additionally, the traffic assessment in Section IV of the Plan on page 106 provides the following discussion:

The traffic assessment area includes portions of Fickle Hill Road, Union Street, Old Arcata Road, West End Road, Alder Grove Road, Highway 101; and Highway 299, Blue Lake Boulevard, and Maple Creek Road, depending on the mill destination.

Logging trucks will be utilizing public roads for transport of wood products. Log hauling should not create additional hazards because all of the above-mentioned roads have been historically utilized as haul roads by other landowners for many decades. Road maintenance is on-going on these public highways but not directly related to the transportation of wood products. Log truck traffic created by this operation will be minimal (5-10 loads per day) and should not significantly increase log hauling traffic in the area or road maintenance concerns. It should be noted that there are proposed log truck traffic restrictions stipulated in Section II, Item 38.

During the PHI there was no noted concerns brought up by the Review Team about any traffic safety.

Please also see the “Background” section above describing Humboldt county as a protected agriculture county for timber harvesting.

SUMMARY

The Preharvest inspection held on 5/07/2020 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 at signing.

The Second Review meeting held on 5/21/2020 concluded that the THP had certain significant cumulative impacts which were identified but were mitigate, and found to be in conformance with the Act and the Rules of the Board of Forestry. It was recommended for approval.

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.
Warning: this message is from an external user and should be treated with caution.

I'm not very fluent in the use of a computer, but I did want to forward to you a letter I am sending to Deanna Thrift regarding her proposed logging application as referenced above in the Subject line.

Thank you for bearing with me in this transfer of my letter.

Barbara Barratt
6949 Fickle Hill Road
Arcata, CA 95521

Dear Deanna (Thrift),

Having lived on Fickle Hill for almost 50 years now I always delight seeing the big Douglas fir tree at the 5.5 mile mark on my way home. It gives credence to the belief in the beauty of Mother Nature and the vigor and strength of nature's creations. I understand there are other big trees in the SE corner of the proposed logging site on your property, mostly fir but also other species such as western red cedar and at least one hemlock. These trees are major contributors to the sequestration of carbon and as such are instrumental to the very health of our planet and therefore should be left standing. The intrinsic value of these large trees should warrant more consideration than the monetary value in the decision to leave them in place and not removed by the chainsaw.

Please leave these trees standing.

Sincerely yours,

Barbara Barratt
Warning: this message is from an external user and should be treated with caution.

To whom it may concern:

I'm writing this letter on behalf of myself and husband, Mourad Gabriel.
We reside at 85 Vista Lane, a neighboring property to the THP. I would like to voice our initial concern with the THP as described in the notices as well as conversations with the forester, Eric Taft. Being a bordering neighbor to the THP, we are concerned with the hours of operation stretching to Saturdays from 8-5. Given that the operations are expected to last at least 6 weeks this summer, operations on Saturday will negatively affect our experience on our property on the days on which we intend to be enjoying our yard, property, adjacent forests, and general enjoyment of the area. We are essential workers and work long hours during the week to come back to our home to enjoy and decompress from this current pandemic. Our free days in the summers (Saturdays and Sundays) will be spent outside with our young daughter, who avidly loves the outdoors. However, this will be difficult with the loud noise and activity of timber operations occurring well within earshot and even with the view of where we had hoped to spend our time for the entirety of the summer.

We ask that you limit operations on Saturdays to 1 or at most 2 Saturdays during the active operations, so that our enjoyment and use of our own property is not hampered by the THP operations.

Though I may not be able to be present on the call for the meeting today at 9am, I hope that my concerns are heard. I will follow up with a more formal letter to ensure our voices are heard.

Thank you for considering,

Greta Wengert and Mourad Gabriel
Warning: this message is from an external user and should be treated with caution.

To CalFire,

I am writing in regards to THP# 1-20-00065 HUM on behalf of myself and Jacoby Creek Protection Association.

I and other neighbors are concerned about safety impacts from traffic associated with this plan. We do appreciate that the RPF incorporated restrictions on hours of operations, and has added some limitations on hauling during commuter hours. There are unresolved concerns about ingress and especially egress from the THP area. Fickle Hill Road, which forms one boundary of the THP area, has significant turns, including a hairpin turn, and limited visibility along this stretch of road. All the truck roads on the plan use Fickle Hill Road as the haul route. Even with proposed signage noting truck traffic, it seems like significant potential for accidents from vehicles associated with the THP. How could this be mitigated?

A central concern is the southeast corner of the THP area. Although I understand that the silviculture proposed may meet the Forest Practices rules, we are asking for a high level of retention in this area, or full retention. There are trees larger than 24 inch DBH, and some more than 36 Inch DBH, in this area. Some of them are in immediate proximity to Fickle Hill Road. Removal of these trees would have an adverse impact on visual values. Also, if some of the large trees are cut in this area, which is on the ridge and subject to high winds, what would ensure that the remaining trees would be windfirm? What measures could mitigate any of these potential adverse impacts?

Thank you for your attention to these concerns.

Sincerely,
Elizabeth Finger