



## DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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



Date: August 3, 2020  
 Ref: 1-20-00087-HUM

Eric Storm  
 Eric.storm@fmail.com

Dear Mr. Storm:

You submitted an email to the California Department of Forestry and Fire Protection (CAL FIRE) on June 23, 2020 regarding Timber Harvesting Plan (THP) 1-20-00087-HUM, located on Humboldt Redwood Company LLC property. A list of abbreviations is provided for your benefit in understanding the Department's responses.

CAL FIRE	California Department of Forestry and Fire Protection	PRC	Public Resources Code
CCR	California Code of Regulations	RPF	Registered Professional Forester
CEQA	California Environmental Quality Act	THP	Timber Harvesting Plan
LTO	Licensed Timber Operator	WLPZ	Watercourse and Lake Protection Zone

### Public Comment # 20PC-00191:

I find it backwards and a relic of the past that we are still forced to live with this kind of logging. The erosion dangers in and of itself should be enough cease and desist, but the effects to wildlife and old growth trees makes this operation extremely threatening to our way of life as a community and threatening to future generations.

[Eric Storm; June 23, 2020]

**Response:** This THP has been designed to mitigate potential erosion impacts. THP Section II, Item #18, provides enforceable standards and mitigations to prevent erosion, including provisions for mulching and grass seeding. Also, this THP includes a Winter Period Operating plan on pages 23 and 24 that limits logging operations from October 15 – May 1. THP Section II also provides watercourse protection measures for watercourses within the THP area.

THP Section II, Item #32, provides enforceable protection measures for listed plants and wildlife. In addition, Humboldt Redwood Company has a Habitat Conservation Plan designed to protect and conserve Northern Spotted Owls on the company's property.

Please refer to THP Section II, Item #34, page 75, which indicates that no old growth trees or late successional forest stands are proposed for harvest:

*No Late Succession Forest (LSF) stands meeting the definition of 14 CCR 895.1 exist within the harvest area or are proposed for harvest. The THP area consists of thrifty growing, primarily even-age 55-70 year old stands of second growth redwood and Douglas fir forest. Scattered residual old growth trees occur infrequently within the second growth stand in two localized areas within units 2 and 3. These two areas total less than 12 acres combined.*

*Per HRC's old growth conservation policy no old growth trees are proposed for harvest including:*

- 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.*

*On-site inspections of the THP area and examinations of HRC GIS. maps and aerial photos have been conducted. Based upon thorough assessment. Late Succession Forest Stands are not associated with this proposed project.*

CAL FIRE believes that this THP will properly mitigate for erosion, and protect wildlife and old growth trees. CAL FIRE believes that approval of this THP is appropriate.

Please consider this letter as the Department's "Official Response to Significant Environmental Points Raised during Public Review of THP 1-20-00087-HUM." The plan was found in conformance with the Forest Practice Act on August 3, 2020 and approved on that date.

Sincerely,



Dominik Schwab  
Forester III, Forest Practice  
RPF #2823

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