

From: Coombes, Julie@Wildlife <Julie.Coombes@wildlife.ca.gov>
Sent: Tuesday, December 29, 2020 7:25 PM
To: Jamie Pusich; Santa Rosa Review Team@CALFIRE
Cc: Jesse Weaver; Sampson, Richard@CALFIRE; Sone, Kim@CALFIRE; Doherty, Kevin@DOC; Longstreth, David@DOC; Buesch, Carolyn@Wildlife; David Fowler; Russo, Izaac@Waterboards; Burke, James@Waterboards; Adair, Randi@Wildlife
Subject: Additional CDFW Comments for 2nd Review RE: THP # 1-20-00084 SON "Silver Estates" - 2nd Review Recommendations and RPF Responses

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

Hi Jamie, et. al.,

Carolyn and I have reviewed your responses sent on 12/16/2020 and have identified three recommendations that were not fully addressed, along with six additional items that came up while reviewing the updated THP pages. Seeing as 2nd review is scheduled for next Monday after the long holiday weekend, there may not be sufficient time to make the changes and provide revised pages. If that is not possible, we can just discuss these outstanding items during the 2nd review call. Our hope was to provide as much comment as possible prior to the meeting so the call is more focused and productive, and so everyone is prepared.

Recommendations not fully addressed from CDFWs email dated 12/2/2020:

1. CDFW Recc #1, Sect. II NSO Protection Measures.

a. Page 78, #4(a) states "...and no logs are yarded through the core area." This statement does not address the creation of new cable roads or corridors or skid roads or trails in the core use area. Please consider revising to encompass all of the possibilities spelled out in Attachment A.

>>CDFW Comment: The revised page 78, dated 12/7/2020, still does not address new cable roads & corridors, new skid roads & trails. Please revise #4(a) on page 78 to specifically state in the parentheses after 'Limited Timber Operations': new cable roads, cable corridors, skid roads, skid trails.

b. Page 79.2, Road Use, #1 states "Following an activity center search (2012 NSO Protocol) on or after May 15, the NSO is determined to be absent, non-nesting, or nest failed, or;" Attachment A, page 7 says that protocol level surveys are used to determine that either NSO are non-nesting or that nesting has failed, it does not specify 'absence'. Considering the language of Attachment A, and that no NSO detections during surveys does not equate to NSO being absent in the area (an absence of evidence is not evidence of absence), please revise this statement.

>>CDFW Comment: The revised page 79.2, dated 12/7/2020, does not appear to have any changes made to this section. Please remove the word "absence" from this sentence as it is not mirrored in the language in Attachment A, and no NSO detections during surveys does not equate to NSO being absent in the area.

2. CDFW Recc #6, NSO Consultation, Survey Data, etc.

a. The map on 385.12 shows the discovery of an osprey nest in the plan area during a stand search conducted on 8/17/2020. Section II, Item 32(a), page 79.4 of the

THP does not appear to address this nest in the protection measures section for osprey. Additionally, this nest should be included on the operations map.

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>>CDFW Comment: There appears to be a misunderstanding about this recommendation. In response revisions were made to the THP incorporating the osprey nest located along Neeley road, whereas this recommendation was directed at a new nest found within the THP boundary as indicated on the stand search map/notes conducted on 8/17/2020 (page 385.12). This additional osprey nest, located downslope of NSO call station 5, should be identified on the appropriate maps and the nest should be included in the osprey discussions in Section II, Item 32(a) and on page 138. Specifically, in Section II, protection measures should be described, including retention of the nest tree and screen trees, whether surveys will be conducted prior to operations or if occupancy will be assumed with the appropriate seasonal buffers.

If occupancy is to be assumed, please include the following language in Section II, "No timber operations will take place within the 500-foot buffer zone of the nest tree from March 1 to August 1, on any year of operations. Additional consultation with CDFW shall be required if the locations and boundary lines of the harvest area are modified, or if CDFW received any new information regarding osprey occurrences near the proposed harvest."

Should the survey option be chosen, please include the following language in Section II, "The RPF, or his supervised designee, or a consulting wildlife biologist who are familiar with identifying ospreys and their nests shall visit the known nest locations in the THP area twice, with surveys two weeks apart, during the period of March 15 through April 15 of an operating year to search the area to determine if ospreys are nesting prior to the start of operations. If the nest is determined to be unoccupied, operations may occur within the buffer zone after April 15. If an occupied osprey nest is found, no timber operations shall occur within 500 feet of the nest site until August 15, or until two weeks after fledging has occurred and the nest is determined to be no longer occupied. All survey data shall be submitted to CDFW 10 days prior to the start of operations. Additional consultation with CDFW shall be required if the locations and boundary lines of the harvest area are modified, or if CDFW received any new information regarding osprey occurrences near the proposed harvest."

Additional recommendations/comments as of 12/29/2020:

1. Section II, Item 14(d), Timber Marking, pages 12-13. The NSO surveys conducted during July 2020 resulted in a new NSO AC being discovered in the southeastern corner of the THP area. As a result, a no-harvest core area was designated around that AC location. During the PHI the review team did not traverse across the entire core area and therefore CDFW is not aware if trees were marked for harvest in the core area prior to the core area delineation. If trees are marked for harvest in the core area, CDFW recommends the THP be revised to state the harvest mark will be blacked out or otherwise altered to indicate no harvest.
2. Section II, Item 32(a), NSO, page 78. The RPF responses dated 12/16/2020 stated in response to CDFW #1 (h) "There are no Road Use Exceptions proposed in this THP." There appears to be another location on page 78 that references road use exceptions, please delete the reference to road use exceptions and Section V in the 'Exceptions to Attachment A:' paragraph located between 3(b) and 4.
3. Section II, Item 32(a), NSO, page 79. The statement after #5, "For NSO AC's where reproductive status has been determined to be nesting:" does not include instances of nesting unknown or nesting presumed according to the protocol. Please consider revising this statement to specifically include unknown nesting and presumed nesting.

4. Section II, Item 32(a), NSO, page 79.2. Under Road Use #3 it states, "After July 9 until the end of the breeding season road use...". This statement is missing an 'and' between "July 9" and "until the end...". Please revise.
5. Section II, Yarding Methods Map, page 92. The yarding methods map dated 10/20/2020 includes the NSO AC & buffers, the revised yarding methods map dated 12/7/2020 omitted the NSO AC & buffers. Please revise this map to include the AC & buffers.
6. Section II, Maps, pages 88-93.1. The NSO AC (SON0000, placeholder name), located in the southeast corner of the THP, is identified on the majority of the THP maps along with the core area and 1000-foot buffer. The 0.25-mile noise disturbance buffer described in Section II, Item 32(a), is not shown on any of the maps. Given the road use restrictions associated with this buffer, please include this buffer on the silviculture, yarding and appurtenant road maps at a minimum.

Please let us know if you have any questions or concerns, due to the upcoming holiday both Carolyn and I are available this week up until mid-day, Thursday Dec 31st. We will talk with you all on Monday morning in the new year.

Happy Holidays & Happy New Year,
Julie Coombes

Please note that I am working remotely. If you would like to conduct business via phone, please send an email with a number you can be reached at and a preferred time.

Julie Coombes

(she/her/hers | [what's this?](#))

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From: Jamie Pusich <jpusich@ncrm.com>

Sent: Wednesday, December 16, 2020 3:40 PM

To: Santa Rosa Review Team@CALFIRE <SantaRosaReviewTeam@fire.ca.gov>

Cc: Jesse Weaver <jweaver@resawmill.com>; Sampson, Richard@CALFIRE <Richard.Sampson@fire.ca.gov>; Sone, Kim@CALFIRE <Kim.Sone@fire.ca.gov>; Doherty, Kevin@DOC <Kevin.Doherty@conservation.ca.gov>; Longstreth, David@DOC <David.Longstreth@conservation.ca.gov>; Coombes, Julie@Wildlife <Julie.Coombes@wildlife.ca.gov>; Buesch, Carolyn@Wildlife <Carolyn.Buesch@Wildlife.ca.gov>; David Fowler <dlfowler@sonic.net>; Russo, Izaac@Waterboards <Izaac.Russo@Waterboards.ca.gov>; Burke, James@Waterboards <James.Burke@waterboards.ca.gov>

Subject: THP # 1-20-00084 SON "Silver Estates"- 2nd Review Recommendations and RPF Responses

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Good Afternoon Review Team,

Attached are the 2nd Review Recommendations and RPF Responses for THP# 1-20-00084 MEN "Silver Estates".

Please let me know if you have any questions, comments, or concerns.

Thank you,

Jamie Pusich

Jamie B. Pusich

Forester, RPF #3043

North Coast Resource Management, INC

Phone: (707) 489-5219



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