



DEPARTMENT OF FORESTRY AND FIRE PROTECTION

Sonoma-Lake-Napa Unit
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July 31, 2020

JAMIE PUSICH
 2501 N. State Street
 Ukiah, CA 95482

Pending Agency Recommendations

PREHARVEST INSPECTION REPORT

Harvest Document: **1-20-00084-SON**
 Inspection Date: **07/24/2020**
 Inspection Number: **1**
 Inspector Name: **Kim Sone**

PHI/DIRECTORS DETERMINATION DATE EXTENDED BY MUTUAL CONSENT: **Yes**
 (If yes, please include documentation provided by the RPF as an attachment to the report)

Reviewed On Previous Visit:

Field Hours: **10**Office Hours: **40**

Agencies that Attended the Preharvest Inspection

Agency	Notes
Other	Jamie Pusich (RPF for NRCM)
WQ	Izaak Russo (in place of James Burke)
CDFW	Carolyn Buesch (Julie Coombes DFW assistant)
CGS	Kevin Doherty
County	Greg Guensch Russian River County Sanitation District
Other	Jesse Weaver (landowner rep) Redwood Empire Sawmills
CDFW	Julie Coombes

DETAILS OF PREHARVEST INSPECTION

- Was the PHI able to be started within the initial 10 day period? **No**
 Inspector Observations: **Mutually agreeable date exceeded the 10 day period. Closest available date was July 24, 2020 (four days after the 10 day period).**
- List any personnel who were contacted but could not attend the PHI: **Jim Burke from WQ could not attend the PHI; however Izaak Russo from WQ attended in his place.**
- a. Was the Notice of Intent properly posted at the timber harvesting site? **Yes**

If "NO", Describe: **NOI posted at the entrance to the property on both Mays Canyon Road and Neeley Road (both roads are public roads).**

b. Does the Notice of Intent accurately describe the proposed silviculture, Plan area, nearest perennial watercourse, legal description, and timberland owners? Yes

If "NO", Describe:

4 Is the proposed plan:

a. Outside of the boundaries of any active Plan? Yes

b. If "No", does the overlap area have an approved completion and stocking report? NA

If "NO", Describe:

PROJECT AND TIMBER STAND DESCRIPTION

5. Has the Plan accurately described the physical conditions at the plan site (soils & topography information, vegetation & stand conditions, watershed & stream conditions?)[14 CCR §1034(gg)] Yes

If "NO", describe:

6. What is the zoning for the proposed harvest area [Government Code § 51104(g)]? TPZ

7. Are timber stands correctly described in the Timber Harvest Plan? Yes

Inspector Observations:

8. Have timber site classes been correctly identified and accurately depicted [14 CCR §1034(x) (12)]? Consider even-aged regeneration method limitations, and differences in minimum stocking requirements. Yes

Inspector Observations:

9. Are the Plan maps and associated diagrams accurate and sufficiently clear to allow for review/implementation of the Plan? Yes

Inspector Observations:

SILVICULTURE

10. Are the silvicultural methods appropriate for existing stand conditions? Yes

Inspector Observations:

11. For even-aged management: If a "regeneration step" harvest is proposed (Clearcut, Seed Tree Seed Step, Shelterwood Seed Step), will the provisions of 14 CCR § § 913.1, 933.1, 953.1(a) (1-7) be met? NA

Inspector Observations: **Even aged management is not proposed**

12. For uneven-aged management: Will the prescription ensure the the establishment and/or maintenance of a balanced stand structure, and establishment of new reproduction? Yes

Inspector Observations:

13. If Group B species are proposed for management [14 CCR § 912.7, 932.7, 952.7(d)]: Does the proposed prescription maintain relative site occupancy between Group A and Group B species? Yes

Inspector Observations: **No herbicide treatment is proposed**

14. Comments or general observations regarding silviculture:

MAXIMUM SUSTAINED PRODUCTION OF HIGH QUALITY WOOD PRODUCTS

15. Does the Plan comply with goals of 14 CCR § 913.10, 933.10, 953.10 to restore, enhance, and maintain the productivity of the state's timberlands? Yes

Inspector Observations:

16. Does the plan assure that growing stock will be harvested in a manner which prevents significant delays in reaching or maintaining MSP? [14 CCR § 913, 933, 953(a)] Yes

Inspector Observations:

17. Does the Plan comply with the MSP requirements of 14 CCR § 913.11, 933.11, 953.11? (Check Appropriate Option)

Option A Option B Option C Does not comply

Notes :

Will the post-harvest stand:

- a. Obviously satisfy minimum stocking requirements (countable trees only)? [PRC § 4528(b)] Yes

- b. Contain the required number of seed trees? (if required) Yes

- c. Contain seed trees of full crown, capable of seed production and representative of the best phenotypes available in the preharvest stand? [14 CCR § 913.1, 933.1, 953.1(c)(1)(A)] Yes

- d. Contain leave trees that are uniformly distributed across the treatment areas? Yes

- e. Contain a species mixture similar to the pre-harvest stand? (A "no" answer may be used to indicate high-grading or species conversion). Yes

- f. Have average stand diameters that are larger than the pre-harvest stand or improve stand health (for thinning operations)? [14 CCR § 913.3, 933.3, 953.3(a)] Yes

If "No" or proposed thinning operation is for stand health, explain: **Transition method is proposed for stand health to transition from an even aged stand structure to an uneven aged stand structure**

18. If a regeneration and/or site preparation plan has been submitted, is it sufficient to ensure prompt regeneration of the site? Yes

Inspector Observations: **Site prep is not required to meet stocking, however a site prep plan is included on THP page 15. This plan may be implemented to improve regeneration of sites.**

19. Stand Information was verified by: Ocular

Notes:

20. a. Stands have been marked as follows:

Cut Tree Leave Tree Whole Area Marking Waiver

Inspectors Observations: **There is a STA for the scenic Highway 116. Pursuant to 14CCR 895.1, the STA is required because the THP is located within 200 feet of a state designated scenic highway. The proposed silviculture is unevenaged management (selection, group selection and transition). The scenic corridor of Highway 116 is associated with the Russian River. The Core Zone of the Russian River is a no harvest area. The remainder of the WLPZ that is proposed for harvest is comprised of 50-80% canopy retention and single tree selection as evaluated during the PHI. The elements of the scenic corridor will be retained through the unevenaged management prescriptions. It is important to note that the plan area is zoned TPZ where the county has identified that timber harvesting is expected. The plan identifies 0.25 acres of no harvest area near specific unstable areas. During the PHI, several trees were observed that had orange marking paint identified for retention. The plan shall be revised under THP Item 38 to identify the orange marking paint designation for retention.**

- b. Was the mark representative and sufficient to evaluate the prescription(s)? Yes

Inspector Observations:

- 21 a. If the plan contains Aspen, Meadow and Wet Area Restoration, are the measurable standards contained in the plan sufficient to document success? NA

Notes:

- b. Are pictures of the pre-harvest Aspen, Meadow and Wet Area Restoration included in your report? NA

If no, how will monitoring data for the Board be provided?

22. Comments or general observations regarding MSP:

HARVESTING OPERATIONS

23. Have exceptions or alternative practices been fully explained and justified? Yes

Inspector Observations: **Exceptions are proposed and were evaluated during the PHI. No alternatives are proposed. Justification for exceptions are in conformance with the Forest Practice Rules.**

24. If tractor operations proposed on: [14 CCR § 914.2, 934.2, 954.2(f)(1)]

- Slopes >65%
- Slopes >50% with HIGH or EXTREME EHR
- Slopes >50% that lead without flattening to sufficiently trap sediment before reaching a watercourse or lake

- a. Is such use appropriate? Yes

Inspector Observations: **Use of existing skid trails on slopes steeper than 65% and areas with slopes between 50 and 65% with a moderate EHR are proposed. These areas are mapped and were evaluated during the PHI. It is recommended that these areas be waterbarred at the High EHR spacing.**

- b. In your opinion, has the RPF met the standards of 14 CCR § 914.2, 934.2, 954.2(f)(3) with a clear explanation, and justification as to why the application of the standard rule is either not feasible, or would not comply with 14 CCR § 914, 934, 954? Yes

Inspector Observations:

25. If tractor operations are proposed on slopes between 50 & 65% with MODERATE EHR but are not limited as specified in the rules (limited to existing tractor roads that do not require reconstruction OR to new tractor roads that have been flagged by the RPF prior to use [14 CCR § 914.2, 934.2, 954.2(f)(2)(i) & (ii)]), answer "a" & "b" below:

- a. Is such use appropriate? Yes

Inspector Observations: **see note above (24a)**

- b. In your opinion, has the RPF met the standards of 14 CCR § 914.2, 934.2, 954.2(f)(3) with a clear explanation, and justification as to why the application of the standard rule is either not feasible, or would not comply with 14 CCR § 914, 934, 954? Yes

Inspector Observations: **see note above (24a)**

26. Did the RPF flag tractor roads prior to the PHI as required by 14 CCR § 914.2, 934.2, 954.2(f)(3)? Yes

Inspector Observations:

27. Have Special Treatment Areas been adequately disclosed and mitigated in the Plan? [ref. 14 CCR §895.1] *Note: Special Treatment Area Prescriptions are considered a specific silviculture which must be included under item #14 (Nest buffers for non T&E species do not require a special treatment area)

Yes

Inspector Observations: **STA is stated in the THP for the scenic corridor of Highway 116. It is recommended that the RPF identify this STA under Item 14 of the THP.**

28. Comments or general observations regarding harvesting operations:

ROADS AND LANDINGS

29. Have all Plan roads and landings (including appurtenant roads) been correctly located and classified on Plan maps? Yes

Inspector Observations:

30. Do all exceptions or alternative practices meet the standards outlined in the rules for exceptions or alternative practices? NA

Inspector Observations:

31. Are proposed construction, reconstruction, and/or abandonment methods and mitigations as described in the Plan sufficient to protect resource values? Yes

Inspector Observations: **A small segment of road reconstruction is proposed (approximately 90 feet).**

32. Comments or general observations regarding roads and landings: **Road use is limited to existing roads with a small exception of reconstruction for approximately 90 feet. Landings are limited to existing landings. Four existing WLPZ landings are proposed for use. These landings are located on existing roads at considerable distances from any watercourses. See watercourse section in this PHI report. There are two public roads maintained by the County of Sonoma that will be utilized for hauling. Most of the logs will be hauled out on Mays Canyon Road. Some of the logs will be hauled out Neeley Road. THP Item 38 page 84 states that log truck drivers shall drive at a reduced speed through residential areas. It is recommended that Item 38 Section II be revised to state that the speed limit shall be posted on both Neeley and Mays Canyon Roads.**

The posted speed limit shall not exceed 20mph. Specific to Neeley Road, a pilot car shall lead all log truck traffic from the THP area to Hwy 116. If there is a school bus stop on Neeley Road where logs will be hauled, please include the school busing hours under Item 38 Section II.

Also, please revise Item 38 Section II to include the days and hours of operation that log trucks will be hauling on both public roads.

Jack Bushgem from Sweetwater Springs Water District was contacted by the Inspector prior to the PHI to discuss the District's infrastructure on Neeley Road. Neeley Road is a public road. There are no use restrictions in place that would limit the hauling of logs by the landowner.

There is no Forest Practice Rule limiting the use of public roads for Sonoma County. If the landowner voluntarily enters into an agreement with the Water District, then such agreement should be incorporated into Section II of the THP prior to second review.

Map Point 1 was addressed during a pre-consultation with Maggie Robinson from WQ prior to THP submittal. WQ recommendations are included in the THP. WQ also attended the PHI. The portion of the watercourse crossing that is located on the landowner's property will be addressed as described under Map Point 1 in Section II.

Portions of this watercourse crossing is located on County property. According to the RPF, the County has been advised about the ongoing maintenance issues surrounding this map point.

WATERCOURSE PROTECTION

33. Have watercourses been correctly described and classified within the Plan? [Include Class II-S (standard) and Class II-L (large) for watersheds with anadromous salmonids.] Yes

Inspector Observations: **There are no Class II-L's located within the plan area.**

34. Do all in-lieu or alternative practices proposed meet the standards outlined in the rules for in-lieu or alternative practices? Yes
 Inspector Observations: **In-lieu practices were evaluated and meet the standards in the Forest Practice Rules.**
35. a. Are proposed protection measures for watercourses, lakes and wet areas adequate to protect the beneficial uses of water, native aquatic and riparian species, and the beneficial functions of the riparian zone? Yes
 b. Are proposed protection measures adequate for areas near and areas with the potential to directly impact watercourses and lakes for sensitive conditions? Yes
 c. Will the objectives and provisions of 14 CCR § 916, 936, 956 (a-d) be met? Yes
 Inspector Observations:
36. a. Are the identified truck road crossings properly designed and correctly located? Yes
 Inspector Observations: **WQ and CGS made a few recommendations specific to map points in the THP. Please see CGS and WQ PHI reports.**
 b. Is the stabilization treatment sufficient to avoid downstream impacts? Yes
 Inspector Observations:
37. Have all crossings been accurately described and have appropriate mitigations been prescribed to protect the integrity of the crossing (e.g. installation of critical dips where diversion potential exists, armoring inlet, outlet and/or fill material etc.) Yes
 Inspector Observations:
38. Were locations of proposed heavy equipment use in any WLPZ/ELZ clearly described in the plan or flagged and marked on the ground prior to the PHI (including crossings of class III watercourses)? [14 CCR § 916.4, 936.4, 956.4(c)(1)] Yes
 Inspector Observations: **The WLPZ skid trails were evaluated during the PHI. Please revise Item 27 Section II to state that WLPZ skid trails shall be slash packed regardless of slope for further stabilization measures.**
39. Are winter operations appropriate? Yes
 Inspector Observations:
40. If winter operations are proposed, do the mitigation measures proposed adequately protect the beneficial uses of water? Yes
 Inspector Observations:
41. Have all domestic water supplies been accurately identified and adequately protected? Yes
 Inspector Observations:
42. Comments or general observations regarding watercourse protection: **Water Quality attended the PHI; please see WQ PHI report for watercourse protection and recommendations. THP page 95 identifies the active spray area maintained by the Russian River County Sanitation District Treatment Plant. The spray areas were evaluated during the PHI. The County releases treated wastewater on the forestland owned by Redwood Empire Sawmills. This treated wastewater is released via sprinkler systems onto the plan area. Some of the spray fields are on the ridgetop but most are within the floodplain of the Russian River which is a 303d listed impaired waterbody. The recycled water is used as irrigation onto the plan area forestland between the months of May thru September. During the winter months (October thru May), recycled water is discharged directly into the Russian River.**

Trespass is of considerable concern throughout the plan area. As observed during the PHI, numerous homeless encampments consisting of makeshift homes are located predominantly within the watercourses themselves. Illegal campfires, raw sewage, excess garbage, vandalism, illegal dumping are pronounced within these areas. Many of these dwellings were occupied during the PHI.

GEOLOGY AND EROSION HAZARD RATING

43. Have soils within the Plan area been correctly classified? Yes

Inspector Observations:

44. a. Has the erosion hazard rating for soils within the operating area been correctly calculated, as per Technical Rule Addendum #1? Yes

Inspector Observationse:

- b. Have erosion hazard ratings been correctly shown on the Plan map, as per 14 CCR § 1034 (x) (8)? Yes

Inspector Observations:

45. Are the proposed erosion control methods (e.g. waterbreak spacing and/or treatments for exposed soil) adequate to reduce soil loss? Yes

Inspector Observations: **Specific to Item 21(h) and (j), please revise THP page 28 to state that on the exception skid trails waterbars shall be installed to the high EHR spacing to provide further stabilization measures.**

46. Have unstable areas been properly identified? Yes

Inspector Observations: **See CGS PHI report**

47. If operations are proposed on unstable areas, are the proposed operations appropriate and properly mitigated? Yes

Inspector Observations:

48. Comments or general observations regarding watercourse protection: **CGS attended the PHI. Please see CGS PHI report for further information on geology recommendations.**

HAZARD REDUCTION

49. a. Does the plan accurately disclose any current forest insect or disease problems? Yes

- b. Do the mitigation measures contained in the plan limit the spread of forest insects or disease? Yes

Inspector Observations:

50. Consider the areas fire hazard severity rating, fire history, expected fire behavior, and resources at risk: Yes

Will proposed treatments be sufficient to reduce fire hazard and provide defensible space around buildings and along roads?

Inspector Observations:

51. If operations are proposed for the purposes of specifically reducing fire hazard or risk of ignition (fuelbreaks, biomass removal), will the proposed hazard reduction methods be effective for the purposes of reducing damage to the natural environment, or to other resources? NA

Inspector Observations:

52. Comments or general observations regarding hazard reduction: There is significant trespass throughout the plan area. Many active homeless encampments were observed during the PHI. The Inspector witnessed actively burning warming fires within the homeless encampments during the PHI. There is a current significant fire threat from these fires. The proposed timber harvesting will treat some of the fire hazards. Through the implementation of the THP, the fire threat will be reduced by treating the horizontal and vertical continuity of the fuels. The road system currently is in poor condition and access is limited. Through implementing the THP, the road system will be brought up to Forest Practice Rule standards and many problematic areas within the road system will be addressed and made passable. For example, the PHI began at Map Point E. The multiagency review team was in attendance evaluating this map point. This team included Greg Guensch Russian River Sanitation District who evaluated Map Point E with CGS to discuss his desire for the unstable area to be repaired for continued access for the District's maintenance of the spray fields. Furthermore, PGE also utilizes this road for utility maintenance. Due to the road failure, the road has not been passable for three years. The proposed road repair will benefit the landowner for access, but also the Sanitation District and PGE, as well as provide an overall benefit for emergency access in the event of a fire incident.

ARCHAEOLOGY

NOTE: IF CONFIDENTIALITY IS REQUIRED OF YOUR RESPONSE, PLEASE PROVIDE THE RESPONSE ON A SEPARATE PAGE MARKED "CONFIDENTIAL".

53. Does the RPF's archeological survey appear adequate based upon spot checks of potentially sensitive areas? Yes
Inspector Observations:
54. If sites are present, are the archeological site descriptions and/or site records accurate with regard to site size, content, and mapped location? Yes
Inspector Observations:
55. If sites are present, is the proposed archeological site protection adequate to prevent significant adverse impacts? Yes
Inspector Observations:
56. Comments or general observations regarding archeology: The THP has been reviewed by a CAL FIRE Archaeologist. A focused PHI was conducted on July 28, 2020 for archaeology.

WILDLIFE

57. Have all state or federal (T&E) listed species present in the Plan area been accurately disclosed and mitigated (excluding Northern Spotted Owl and anadromous salmonids)? Yes
Inspector Observations:
58. Have any required CESA or FESA consultation occurred? NA
Inspector Observations:
59. Have impacts to wildlife and plants (including listed and non-listed species), been correctly assessed within the Plan and appropriate protection provided? Yes
Inspector Observations:
60. Have all Late Successional Forest Stands been disclosed? [14 CCR § 919.16, 939.16, 959.16] NA
Inspector Observations: No late successional forest stands exist within the plan area
NA

61. If Late Successional Forest Stands are present and proposed for harvesting, do your observations support a conclusion that such harvesting would not significantly reduce the amount and distribution of late succession forest stands, or their functional wildlife habitat value such that it constitutes a significant adverse impact of the environment as defined in 14 CCR §895.1?
Inspector Observations:
62. Does the plan accurately disclose any components that would be associated with Late Successional Forest Stands (e.g. large living and/or dead trees, large downed woody debris, decadent and/or deformed trees) that require disclosure and analysis in the cumulative impacts discussion? [Ref: Shintaku 2005 "Large Old Trees Memo"]
Inspector Observations: NA
63. Is the proposed plan within a watershed(s) with listed anadromous salmonids?
Inspector Observations: Yes
If "Yes", does the entire "ASP" rules package apply, or only the "Road Rules"
Full ASP Rules X Upstream ASP only
64. Estimate percentage of canopy cover:
- | | | | | |
|---------------------|------------|------------|--------------|-----------|
| Class I inner zone | Preharvest | <u>100</u> | Post Harvest | <u>80</u> |
| Class I outer zone | Preharvest | <u>0</u> | Post Harvest | <u>0</u> |
| Class II inner zone | Preharvest | <u>90</u> | Post Harvest | <u>70</u> |
| Class II outerzone | Preharvest | <u>0</u> | Post Harvest | <u>0</u> |
65. Will the post-harvest stand in the WLPZ provide for large wood recruitment that improves or maintains salmonid habitat on Class I and Class II large watercourses?
Inspector Observations: Yes
66. Will the post-harvest stand in the WLPZ retain the 13 largest conifer trees per acre (7 outside the coastal anadromy zone), live or dead, on each acre that encompasses the core and inner zones?
Inspector Observations: Yes
67. Are proposed erosion control and soil stabilization measures for sediment control adequate to protect salmonid habitat in the following areas?
- a. Operations in the WLPZ (roads, landings, or tractor operations)? Yes
Inspector Observations:
- b. Watercourse crossings (permanent and temporary)? Yes
Inspector Observations:
- c. Winter operations? Yes
Inspector Observations:
- d. Site preparation Yes
Inspector Observations:
68. Are protection measures adequate to deal with adverse impacts from significant rain events, even during the non-winter period? Yes
Inspector Observations:
69. Are protection measures adequate to prevent significant adverse impacts on downstream flows from water drafting operations? NA
Inspector Observations:
70. Is the Plan located within the range of the Northern Spotted Owl?
If "N/A", skip to question 71 Yes

Take avoidance option: "a/f" (SORP) "b" "c"
 "d" (HCP/ITP) "e" (TA) "g"

a. Does the NSO habitat definitions (USFWS or FPR) used in the plan accurately reflect vegetation conditions? Yes

Inspector Observations:

b. Are the retained habitat quantities depicted on the Plan maps accurate? Yes

Inspector Observations:

c. Do the protection measures for the activity center(s) appear adequate and in conformance with the rules? Yes

Inspector Observations::

d. Evaluate the proposed NSO call points. Are call point(s) distribution and Location adequate? Yes

Inspector Observations: **DFW evaluated NSO call points and habitat; see DFW PHI report.**

71. Comments or general observations regarding wildlife and fisheries: **There was discussion between CAL FIRE and DFW regarding the NSO surveys. Further NSO protocol level surveys shall be submitted and incorporated into the plan prior to second review in order for further evaluation by DFW and CAL FIRE. See DFW PHI report for further information regarding NSO. Please submit additional NSO surveys to be incorporated into the THP prior to second review.**

CUMULATIVE IMPACTS

72. Are the defined resource assessment areas appropriate? [Ref Technical Rule Addendum #2] Yes
 [N/A for Modified THP]

Inspectors Observations:

73. Has the RPF correctly assessed the potential for significant cumulative impacts upon resource values within the defined assessment areas? Yes

Inspectors Observations:

74. Has the RPF accurately listed all known past/present/future projects within the assessment area? [Including other CEQA projects that have a similar effect on the environment] Yes
 If "No", explain:

Inspectors Observations:

75. If there are waterbodies within or downstream of the proposed Plan that are listed as water quality limited under Section 303(d) of the Federal Clean Water Act, has the RPF assessed for impacts that may combine with existing listed stressors to impair beneficial uses of the waterbody? Yes

Inspectors Observations:

76. Comments or general observations regarding Cumulative Impacts: **The RPF shall revise the THP to add a discussion regarding fog drip to the Cumulative Impacts Assessment.**

77. Other comments or concerns not covered elsewhere in the report:

78. Response to any Public Comment received prior to the conclusion of the PHI, if any: **Much of the public comment submitted prior to the conclusion of the PHI focuses on herbicide treatment. The THP has been revised and no herbicide treatment is proposed as part of the THP. Other concerns are related to floodplain issues, agency review, impact to tourism, the 2019 February floods, pristine forestland, scenic corridor, public comment response, wildlife, covid, landslides, wildfire risk, road construction, and old growth trees. These issues were evaluated during the review of this plan and during the PHI by a multi-agency review team consisting of CAL FIRE, DFW, CGS, and WQ. The plan does not propose the harvesting of old growth trees and no road construction is proposed. Unstable areas will be avoided; see CGS PHI report for geology. Also see DFW PHI report for wildlife concerns. The condition of the watercourses within the plan area are described in this PHI report. Single-tree selection is prescribed in the floodplain area which consists of a 39-acre alluvial flat adjacent to the Russian River. The proposed silviculture was evaluated during the PHI and complies with the Forest Practice Rules. Within the Class I (Russian River) Inner Zone A, zone width of 30 to 150 feet, 80% of the overstory canopy shall be retained, thereby significantly limiting the amount of timber harvesting. Within the Class I Inner Zone B, zone width between 150 feet to the WLPZ flagging (which varies to as far away as 900 feet from the Russian River), 50% overstory canopy shall be retained. This further limits the amount of allowable timber harvesting. Furthermore, the 13 largest conifers on each acre of Inner Zones A and B must be retained, which was verified during the PHI. As evaluated during the PHI, no large old growth or late successional stands are proposed for harvest. During the PHI, it was observed that wildlife trees were marked for retention. THP page 14 identifies the retention trees and the characteristics that led to their retention for wildlife habitat. Most of the THP area is within the STA for the scenic corridor of Highway 116. This was evaluated during the PHI. The core zone of the Russian River is a no harvest area. The remaining area consisting of selection, group selection and transition is anticipated to result in minor effects to the aesthetics of the forest stands that can be visible from Highway 116. However these areas will be difficult to discern post harvest considering the retention standards mandated by the Forest Practice Rules. The property is zoned TPZ. Such zoning is dedicated to the growing and harvesting of timber. Pursuant to 14CCR 897(a), there is a legal presumption that timber harvesting is expected to and will occur on such lands. This plan is reviewed by a multagency review team consisting of CGS, WQ, DFW, CAL FIRE, and the County Sanitation District. Their recommendations have been incorporated into this plan. Considering the mitigation and proposed prescriptions, significant adverse impacts to the community (such as tourism) is not anticipated. Many of the comments indicate that the plan area is pristine wildland. Portions of the plan area were harvested previously (2002, 2001, and 1998). The plan area, as seen during the PHI, is heavily infiltrated with occupied and abandoned homeless encampments. Many of these encampments are located within sensitive watercourses. Raw sewage, debris, bottles, trash cans, propane tanks, cardboard, wood, carpets, plastic, drip line, etc are scattered throughout the roads and watercourses located within the plan area. The Russian River Sanitation District lies directly adjacent to the plan area. Their spray fields are located within the plan area as depicted on map page 95. These sites were evaluated during the PHI. During the summer months the recycled water is sprayed onto the forestland of the THP. During the winter months, the water is discharged into the River.**

79. a. Are other agency recommendations in agreement with those in your report?

Yes

If "No", explain:

80. Comments or general observations to other and public concerns: **(PHI Item 78 continued) The plan area does not propose any new road construction. Unstable areas were evaluated by a geologist with CGS; please see CGS PHI report. The plan must abide by state and county regulations. Any covid safety requirements mandated by the County public health department must be followed. An official response is required to be prepared by the Department. The official response is written after the public comment period has closed and prior to plan determination.**

CAL FIRE PHI RECOMMENDATIONS

Conformance Determination: In conformance if recommendations are agreed upon

PHI map attached as part of the recommendation? **Yes**

Supplemental materials provided (CD's, aerial photos, etc) **No**

RPF: Please respond to each recommendation provided below and indicate: (1) Whether or not you concur with the recommendation and (2) Provide any necessary revisions or documentation.

No.	Review Agency	Recommendation
1	CAL FIRE	Regarding Mays Canyon and Neeley Roads (both public county maintained roads), the speed limit shall be posted and shall not exceed 20 mph. Please revise Item 38 Section II to state that the 20 mph speed limit shall be posted.
2	CAL FIRE	Specific to Neeley Road, please revise Item 38 Section II to state that a pilot car shall lead all log truck traffic from the plan area to Highway 116. If there is a school bus stop on Neeley Road where logs will be hauled, please include school busing hours under Item 38 Section II.
3	CAL FIRE	Under Item 38 Section II please include the days and hours of timber operations that log trucks will be hauling on both Neeley and Mays Canyon Roads.
4	CAL FIRE	Please revise Item 27 Section II to state that in-lieu WLPZ skid trails shall be slash packed regardless of slope percentage.
5	CAL FIRE	Please revise Item 21(h) and (j) Section II (page 28) to state that exception skid trails shall be waterbared to the high EHR standards.
6	CAL FIRE	As a follow-up to First Review Question #2 (resubmittal), please check mark Special Treatment Area on page 10. This identifies that the plan area is located within a STA.
7	CAL FIRE	Please revise Item 38 Section II to indicate that orange marked trees are marked for retention.
8	CAL FIRE	Considering no Class II-L watercourses are located within the plan area, please revise Item 26 in Section II and page 126.
9	CAL FIRE	Please revise the Cumulative Impacts Assessment to include a discussion regarding fog drip.
10	CAL FIRE	Please revise the THP to include the additional NSO surveys discussed during the PHI prior to second review.

The following questions were generated by the interagency review team to be answered on the PHI by agency staff.

CAL FIRE Inspector - evaluate the following questions:

No.	Review Agency	Question
1	CGS	Please evaluate proposed operations at mapped unstable areas. Are additional mitigations necessary to minimize adverse impacts to slope stability, erosion, and public safety? (past plans include THP 1-02-179 MEN, THP 1-01-012 MEN, THP 1-98-253 MEN)

No.	Review Agency	Question
2	Barry Miller	<p>CDFW would like to examine:</p> <ul style="list-style-type: none"> • Clarr wildlife tree • WLPZ Skid Trails in Inner Zone B • WLPZ Landings, L1-L4 • Reconstructed permanent road segment located at Map Point E • Wet areas and seeps • Trespass issues & proposed remediation • Harvest units with proposed hardwood management (Tanoak & Madrone removal) • 1600 map points: 1, 24 • Potential 1600 map points: 3, 8, 10, 12, 13, 15, 17 • Map points: 2, 6, 7, 9, 11, 16, 22, 23 • Unstable Features: D, E • Class I crossing on Mays Canyon Road • Wildlife Tree marking
3	Carolyn Buesch	<p>CDFW would like to examine:</p> <p>Clarr wildlife tree</p> <ul style="list-style-type: none"> • WLPZ Skid Trails in Inner Zone B • WLPZ Landings, L1-L4 • Reconstructed permanent road segment located at Map Point E • Wet areas and seeps • Trespass issues & proposed remediation • Harvest units with proposed hardwood management (Tanoak & Madrone removal) • 1600 map points: 1, 3,8,10,13,24 • Potential 1600 map points: 12, 15, 17 • Map points: 2, 6, 7, 9, 11, 16, 22, 23 • Unstable Features: D, E • Class I crossing on Mays Canyon Road • Wildlife Tree marking • Waterlines in spray fields • Ditch relief culverts • Invasive plant removal • Osprey nest from public comments
4	CGS	<p>Please evaluate proposed operations at mapped unstable areas. Are additional mitigations necessary to minimize adverse impacts to slope stability, erosion, and public safety? (past plans include THP 1-02-179 MEN, THP 1-01-012 MEN, THP 1-98-253 MEN)</p>

Inspector Answers:

No.	Answer
1	
2	
3	
4	

cc: RPF, PS

To view harvesting documents, please visit: <https://caltreesplans.resources.ca.gov/caltrees/>