



DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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Date: June 14, 2023
 Ref: 1-23-00046-HUM

One comment was received by the California Department of Forestry and Fire Protection (CAL FIRE) on April 20, 2023, regarding Timber Harvesting Plan (THP) 1-23-00046. A list of abbreviations is provided to aid in understanding the Department's responses.

CAL FIRE	California Department of Forestry and Fire Protection	NCRWQCB	North Coast Regional Water Body Control Board
CCR	California Code of Regulations	PRC	Public Resources Code
CGS	California Geological Survey	RPF	Registered Professional Forester
CDFW	California Department of Fish & Wildlife	THP	Timber Harvesting Plan
LTO	Licensed Timber Operator	WLPZ	Watercourse and Lake Protection Zone
DWS	Domestic Water Source	PHI	Pre-Harvest Inspection

CONCERNS:**1: Domestic Water Source**

Section 26- We are concerned about the protection of our domestic water source. Surveyors noted the watercourse extending about 8 feet above (to the east of) the collection point but failed to note that it continues much farther up the slope. Moist ground, stretches of minor channelization, and indicative vegetation such as *Arailia californicum* and *Trillium* extend well above the marked point. Moist ferns extend 10 feet beyond the WLPZ marking flags directly above the collection point and a wet patch of *Oxalis* that seems to delimit the true area of concern is just short of the flagging to the south east of the collection point. The slope at the appropriate point from which to measure looks to be over 30% and therefore needs a larger "inner zone" in addition to starting the measurements much farther up the hill.

2: Selection Silviculture: Section 14 b.- We want to ensure that all remaining stands are "leaving trees that are representative of the best phenotypic quality of the preharvest stand." (Group selection requirement 3). Please require that all trees are marked before approval. Require that everywhere subject to Group Selection meets postharvest stocking requirement #1 and has 75 sq ft conifer basal area remaining instead of just 2/3s.

RESPONSE 1:**Domestic Water Source Concerns:**

Ms. McKaskle responded by letter to the DWS notification letters mailed by the RPF on January 4th, 2023. The response from Ms. McKaskle dated January 25th 2023 identified a spring intake and concrete tank utilized as a domestic water source located inside the THP area. The RPF followed up with Ms. McKaskle by phone and confirmed the location of the domestic water source. Section II Item 28(c1) and 28(c2) page 53 of the THP describe the correspondence with Ms. McKaskle and the measures taken to ensure protection of the

domestic water source. The RPF identified the location of the domestic water sources in the field and mapped the DWS location. The THP documents the location of the DWS on page 53 and provides a THP map detailing the location on page 62. The RPF informed the LTO of the DWS location and applied Class I WLPZ protection measures to the location as described by the California Forest Practice Rules. The THP describes the Class I WLPZ protection measures on page 42 for the Domestic Water Source including WLPZ Class I buffer distances and post-harvest tree retention requirements.

The review team evaluated the domestic water source during the first review of the THP and assessed the protection measures provided in the THP during the Pre-Harvest field inspection conducted on April 24, 2023. The CAL FIRE first review report dated April 13, 2023, directed a first review question to the RPF from the NCRWQCB regarding the domestic water source. The RPF responded to the question on April 17, 2023. The question and response are provided below.

14. (WQ) *Please consider identifying any other infrastructure associated with the DWSs, such as waterlines on the THP maps, and providing directions to the LTO on measures that to be implemented to ensure the system and resource is protected during harvesting activities. Such measures can include directing the LTO to contact the landowner at least 5 days prior to operations so any necessary water transfers can occur, turning off gate valves at tanks prior to moving water lines, moving water lines from skid trails and road prior to activities, etc. If you have questions, please contact RWB staff.*

RPF Response: *After reaching out to the neighbor, she described the watersources and tank and informed us they are the domestic watersources at her cabin. The watersources, water line, and concrete tank were personally identified on the ground to the L TO, prior to THP submission, to ensure that infrastructure is not damaged during timber operations. Standard Class I watercourse and lake protection zones and rules will be applied with a WLPZ flagged around each source. The watersources, tank, and waterlines are not extensive and easily identified on the ground. Additional mapping beyond the watersources and tanks shown is not necessary for protection.*

A PHI with review team representatives from CAL FIRE, CGS and CDFW occurred on April 24th, 2023. The DWS was assessed by the review team during the PHI and found to be in conformance with the THP and the California Forest Practice Rules. The CAL FIRE Inspector provided the following observations of the Domestic Water Source on page 6 of the PHI report dated May 6th, 2023.

"There is only one fully functional domestic water supply on the property. The adjacent landowner submitted a letter of concern about the protection of their domestic water supply. During the PHI the watercourse protection around the domestic water supply was evaluated and it appeared to be flagged appropriately. The harvest tree mark in the area was conservative and the areas around the spring where tractors or cable operations could take place near the WLPZ were minimized by ground features and the harvest mark."

The interdisciplinary review team consisting of CAL FIRE, NCRWRB, CGS and CDFW conducted a thorough review of the DWS and provided recommendations addressed by the RPF. The RPF addressed the concerns the landowner has regarding the domestic water source by documenting the location and protection measures in the THP, establishing Class I WLPZ protection measures and giving clear direction to LTO about the location. The protection measures included in the THP appear sufficient to avoid impact to the domestic water source.

RESPONSE 2:

Group Selection Silviculture Concerns

Group Selection silviculture is a regeneration method utilized for uneven management. The goal of uneven aged management is to establish a multi-aged, balanced stand structure while promoting the growth of a wide range of diameter classes. The RPF is responsible for ensuring that the trees designated for retention are representative of phenotype of the stand and meet the retention parameters of Group Selection as defined by the California Forest Practice Rules. There is no requirement to mark the entire stand prior to approval for selection silviculture. However, the FPR's require the RPF and or their supervised designee to mark at least 10 percent of the harvest area as a sample mark prior to the PHI. A sample mark of the Group Selection stand was established prior to the PHI and evaluated by the review team during the PHI inspection. The inspector observations of the sample mark included in the PHI report on page 2 state:

"The selection harvest mark was evaluated during the PHI and found to be in conformance with the THP and the FPRs."

The remaining portion of the Group Selection stand is required to be marked by the RPF or their supervised designee prior to operations. A completion inspection will be conducted by the CAL FIRE inspector after harvesting operations are complete to ensure the stocking standards of Group Selection silviculture have been met as defined by the California FPR's.

Please consider this letter as the Department's "Official Response to Significant Environmental Points Raised during Public Review of THP 1-23-00046-HUM. The Timber Harvest Plan and associated reports described in this letter can be found on the CALTREES website at <https://caltreesplans.resources.ca.gov/caltrees/Default.aspx>. The plan was found in conformance with the Forest Practice Act on June 14, 2023, and approved on that date.

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