DEPARTMENT OF FORESTRY AND FIRE PROTECTION
NORTHERN REGION HEADQUARTERS
135 Ridgway Avenue
Santa Rosa, CA 95401
707-576-2959
Website: www.fire.ca.gov

Official Response to Significant Environmental Points Raised During the Timber Harvesting Plan (THP) Evaluation Process

From the Director of the California Department of Forestry and Fire Protection (CAL FIRE)

THP Number: 1-25-00091-HUM

Submitter: Humboldt Redwood Company LLC

County: Humboldt

End of Public Comment Period: October 10, 2025

Date of Official Response/Date of Approval: October 30, 2025

The California Department of Forestry and Fire Protection (CAL FIRE) serves as the lead agency, among an interdisciplinary review team of specialists from other governmental agencies, in the review of Timber Harvesting Plans (THPs) to ensure compliance with environmental statutes and regulations. As a part of this review process, CAL FIRE accepts and responds to public comments. This document is the Director's response to significant environmental points raised during the evaluation of the above-referenced THP. 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, will not be addressed.

THP Review Process

The laws that govern the THP review process are found in the Forest Practice Act, which is contained in the Public Resources Code (PRC) and in the rules of the Board of Forestry and Fire Protection (the Forest Practice Rules) which are contained in the California Code of Regulations (CCR).

The Forest Practice Rules are specific 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:

- THP contents and the THP 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, it undergoes an interdisciplinary 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), and the California Geological Survey (CGS), as well as a representative of county government when the county government so requests, the California Coastal Commission for plans in the coastal zone, and the California Department of Parks and Recreation for plans that may affect values in publicly owned parks (14 CCR § 1037.5(a)). Once submitted the Director determines if the plan is accurate, complete, and in proper order, and if so, files the plan (14 CCR § 1037). In addition, the Review Team determines whether a preharvest inspection (PHI) is necessary, and what areas of concern are to be examined during the inspection (14 CCR § 1037.5(g)(1)).

If the plan is accepted for filing, and a PHI is determined to be needed, the PHI is conducted to evaluate the adequacy of the THP. All agency personnel who comprise the interdisciplinary 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 mitigations and/or recommendations may be formulated to provide greater environmental protection. These recommendations are forwarded to the RPF along with the Review Team member's PHI Report. The RPF will respond to the recommendations made and forward the responses to the Region office and Second Review Team Chair.

A Second Review Team meeting is held where members of the interdisciplinary 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 the Review Team examines all field inspection reports, considers comments raised by the public, and discusses 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 those responses to the regional office in Santa Rosa.

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 interdisciplinary Review Team, and the RPF's responses to questions and recommendations made during the review period. Following consideration of this material, a decision is made to approve or deny a THP.

If a THP is approved, timber operations may commence, provided that the conditional requirements for commencement of timber operations in the plan and the rules have been satisfied. 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, the 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 § 4604(a), inspections of completed work pursuant to PRC § 4586, erosion control monitoring per PRC § 4585(a), and stocking inspection as per PRC § 4588.

The contents of the THP, the Forest Practice Act and the Forest Practice 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.

The general means of 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. Timber operator and RPF licensing action may also be pursued. Most forest practice violations are correctable and the Department's enforcement program assures correction. Where non-correctable violations occur, criminal, civil, or administrative action is usually taken. Depending on the outcome of the case and the venue in which the case is heard, some sort of environmental corrective work is usually done. This is intended to offset non-correctable adverse impacts.

Once harvesting operations are finished, a completion 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. Depending on the silvicultural system used, the stocking standards of the rules must be met immediately or in certain cases within five years. A stocking report must be filed to certify that the requirements have been met.

CEQA Compliance

THPs, as activities that involves the issuance to a person a permit by one or more public agencies, satisfy the definition of a Project (PRC § 21065) pursuant to the California

Environmental Quality Act (CEQA)(PRC § 2100 *et seq.*) and, as such, are subject to the provisions and requirements of CEQA. The THP review and approval process, as described above and within the Forest Practice Act and Rules, is a certified regulatory program, as described within CEQA (PRC § 21080.5 & 14 CCR § 15251(a)), and the THP satisfies the requirements in CEQA for the preparation of an Environmental Impact Report (*Ebbetts Pass Forest Watch v. California Dept. of Forestry and Fire Protection (2008)* 43 Cal. 4th 936, 944 (*Ebbetts Pass II).*).

Although a THP differs from an EIR due to the prescriptive requirements of the FPRs, a THP still must still comply with all other elements of CEQA, including an evaluation of the project's contribution to potential cumulative impacts (See 14 CCR §§ 898, 912.9, & *East Bay Mun. Util. Dist. v. Dep't of Forestry & Fire Prot.* (1996) 43 Cal.App.4th 1113, 1127 (*EBMUD*).). The FPRs require those impacts to "be assessed based upon the methodology described in Board Technical Rule Addendum Number 2 ["Cumulative Impacts Assessment"]... [and] be guided by standards of practicality and reasonableness" (14 CCR § 898). The FPRs limit the assessment "to closely related past, present and Reasonably Foreseeable Probable Future Projects within the same ownership and to matters of public record" (14 CCR § 898). CAL FIRE must also "supplement the information provided by the... Plan submitter when necessary to ensure that all relevant information is considered." (14 CCR § 898) "[CAL FIRE], as lead agency, shall make the final determination regarding assessment sufficiency and the presence or absence of significant adverse Cumulative Impacts... based on a review of all sources of information provided and developed during review of the Plan" (14 CCR §§ 912.9 & Technical Rule Addendum Number 2).

Technical Rule Addendum Number 2 (TRA #2) provides a comprehensive checklist that RPFs must follow for the cumulative impacts assessment. First, the THP must "establish and briefly describe the assessment area within or surrounding the Plan for each resource subject [to be assessed] and shall briefly explain the rationale for establishing the resource area" (14 CCR §§ 898, 912.9, & TRA #2). The resource subjects to be evaluated range from Watershed to Biological to Greenhouse Gases to Wildfire Risk and Hazard (14 CCR § 912.9(c)). The planning watershed maps distributed by CAL FIRE must be used to evaluate impacts absent explicit approval by the Director. The THP must identify and briefly describe "past, present, and Reasonably Foreseeable Probable Future Projects," and describe "any continuing significant adverse impacts from past land use activities within the assessment area(s) that may add to the impacts of the proposed project" (14 CCR § 912.9). Finally, the Appendix to TRA #2 provides extensive guidelines for the RPF's evaluation of whether the THP will "cause or add to significant adverse Cumulative Impacts".

Background

Timber Harvesting Plan (THP) 1-25-00091-HUM proposes to harvest timber on 77.2 acres of Humboldt Redwood Company Timberland using commercial thinning, variable retention, and no harvest silvicultural methods. The THP was originally received by CAL FIRE on June 19, 2025 and accepted for filing on July 26, 2025. The review team, comprised of members

representing CAL FIRE, CDFW, CGS, and the NCRWQCB, conducted a review referred to as first review prior to filing. During first review, each agency had the opportunity to draft questions addressing environmental concerns relative to the agency's expertise for the RPF to address. A Pre-Harvest Inspection (PHI) was scheduled for July 8, 2025 and the RPF responded to the first review questions prior to the PHI on July 1, 2025. The PHI was conducted July 8, 2025 and attended by representatives of CAL FIRE and CGS. Additional correspondence occurred following the field inspection. The PHI Report was finalized on July 17, 2025. The Final Interagency Review (aka Second Review) occurred on September 18, 2025. The RPF responses to First Review and the PHI were addressed and clarified at the Final Interagency Review. The Second Review Chair requested eight revisions to the THP during the meeting. The Second Review Chair requested an additional two revisions to the THP on September 26, 2025. Responses to all ten Second Review recommendations were completed by the RPF by September 26, 2025. The Second Review Chair accepted the RPF responses to Second Review on September 30, 2025. The public comment period then ended on October 10, 2025. This Response to address public concerns was completed on October 30, 2025.

Public Notification

The following actions were taken to inform the public of the proposed Timber Harvesting Plan (THP) and to provide an opportunity to the public to voice concerns with the THP:

- A "Notice of the Intent to Harvest Timber" (NOI) was posted near the plan site prior to the submission of the THP.
- Copies of the NOI were mailed to adjacent landowners and to the office of the County Clerk, for posting at the customary place for posting environmental affairs, within two working days of the submission of the THP.
- A Notice of Submission (NOS) was posted at the Department's local office and at the regional office in Santa Rosa, and copies of the NOS were sent to the County Planning Department and to the organizations and individuals on the Department's list for notification of THP submissions.
- A Notice of Filing (NOF) was posted at the Department's local office and at the regional office in Santa Rosa, and a copy of the NOF was sent to the office of the County Clerk, for posting at the customary place for posting environmental affairs.

Public Comment Summary

During the public comment period for this THP as described above, there were two public comment letters received at the CAL FIRE Region Headquarters in Santa Rosa. These public comments brought up concerns that are addressed in this Official Response (OR). General concerns are grouped by subject matter and followed by the Department's response. A copy of the original letters sent to the Department are viewable through the Department's online Forest Practice Database CalTREES.

CalTREES Instructions:

Navigate to https://aca-prod.accela.com/caltrees/Default.aspx and click the search icon at the top of the page, then type the Plan # in the Record Number box (county identifier not needed). Under the Document Number column, select the Plan Number for the "Timber Harvest Plan" Type. Below the "Record Details" should be a list of attachments for the Plan. (Note: if there are a substantial number attachments, or attachments with large file sizes, it may take some time to load) The Public Comments are labeled under "Record Type" and are in pdf format, usually with a "PC" label.

Public Comments

Concern #1: Water Quality/Erosion/Sedimentation (PC1, PC2)

Response:
Potential effects of the proposed operations on sediment delivery and water quality within the North Fork Mattole River watershed were evaluated under the Forest Practice Act, the Forest Practice Rules, and CEQA. The analysis considered both project-specific and cumulative sources of sediment, taking into account watershed characteristics such as slope, soil erodibility, and drainage density. The Long Ridge planning watershed (CalWater v2.0 #1112.300602) provides the geographic framework for this assessment.

The plan includes a comprehensive set of erosion-control and road-management protection measures designed to minimize sediment delivery to watercourses. These measures are described in Section II (Items 18–26) and include seasonal operating limitations, stabilization of disturbed soils, use of existing road alignments where feasible, surfacing and out-sloping of active roads, and installation of rolling dips and waterbars at spacing determined by the Erosion Hazard Rating (EHR). Heavy equipment is excluded from Watercourse and Lake Protection Zones (WLPZs) associated with Class II watercourses and from Equipment Exclusion Zones (EEZs) associated with Class III watercourses. Disturbed areas are to be treated before the onset of the Winter Period (November 15 – April 1).

The plan identifies and prescribes treatment for existing and potential significant erosion sites in accordance with 14 CCR § 923.1, including repair of legacy crossings and stabilization of road segments where hydrologic connection could occur. These actions are expected to yield a net reduction in controllable sediment sources. As calculated within Sections II, III, and V, the potential sediment delivery from the proposed operations is 26 cubic yards, and the plan proposes treatment and stabilization actions which will reduce the sediment potential by 30 cubic yards, resulting in a net benefit of 4 cubic yards of eliminated potential sediment delivery.

Riparian and near-stream vegetation will be retained to provide shade, maintain channel stability, and support aquatic habitat. Watercourse and Lake Protection Zones have been designated as no-harvest, consistent with 14 CCR § 916.9(g), which governs canopy retention and bank protection. Retention of this vegetation helps to filter surface runoff, maintain cool water temperatures, and reduce the potential for fine-sediment delivery. To further protect water quality, the plan requires that sidecast and fill materials within proximity to watercourses be stabilized or removed prior to completion of operations.

Cumulative watershed effects are analyzed in the plan's Cumulative Impacts Assessment, which integrates slope, soil, and canopy-cover data to determine potential sediment and hydrologic responses. The analysis concludes that, with implementation of the required protection measures, the plan will not contribute to a significant cumulative effect on water quality, including downstream estuarine areas.

A Pre-Harvest Inspection (PHI) was conducted on July 8, 2025 by CAL FIRE and the California Geological Survey (CGS). The PHI report documents field verification of identified erosion sites, road-drainage conditions, and prescribed protection measures. CGS confirmed that these measures, when applied as described, are adequate to maintain slope stability and minimize sediment transport to watercourses.

Although commenters reference high background sedimentation rates within the North Fork Mattole, those rates largely reflect historical land use and geomorphic conditions rather than current timber operations. Implementation of the plan's road upgrades and sediment-reduction measures is expected to further improve existing conditions by reducing sediment delivery from controllable sources.

Based on the analysis and prescribed protection measures and the findings of the PHI, CAL FIRE concludes that the proposed operations are not expected to cause or contribute to significant adverse effects on water quality, erosion, or sedimentation. The project therefore complies with the Forest Practice Rules governing the protection of beneficial uses of water.

Concern #2: Downstream Flooding and Public Safety (PC1, PC2)

Response:
The Long Ridge planning watershed (CalWater v2.0 #1112.300602) that encompasses this THP represents a small upland sub-basin relative to the North Fork's 42-square-mile drainage area. The potential for cumulative hydrologic change from the proposed operations to influence peak flows was evaluated within this context, and site-specific protection measures were applied consistent with the Forest Practice Rules and further described below.

The cumulative watershed-effects analysis contained in Section IV (Cumulative Impacts Assessment) evaluates hydrologic parameters including slope, soil permeability, canopy retention, and drainage density.

To maintain pre-harvest vegetative conditions, no-harvest zones have been prescribed for riparian and near-watercourse areas. These retained areas maintain canopy interception, promote infiltration, and limit overland flow, moderating flood peaks and sustaining base flows. These practices are consistent with the watercourse and lake-protection objectives established under 14 CCR § 916.9(g).

Section II, Item 24 prescribes hydrologic-disconnection measures consistent with 14 CCR § 923.5 *et seq*., including out-sloping, rolling dips, and waterbars spaced according to the plan's Erosion Hazard Rating (EHR) as well as the physical hydrological disconnection of roads and watercourses. These measures prevent the rapid concentration of runoff along road prisms and reduce the potential for downstream surge flow or diversion onto hillslopes. Together with the cumulative watershed analysis above, these road-drainage improvements ensure that peak-flow conditions remain consistent with pre-harvest baselines.

The PHI was conducted on July 8, 2025 by CAL FIRE and CGS. The PHI Report documents CAL FIRE's recommendation for upgrading several existing culverted crossings and CGS's recommendation for stabilizing mapped unstable areas. Both recommendations were incorporated into the plan prior to approval. CGS concluded that, with these measures implemented, the proposed operations are not expected to increase slope instability or concentrated runoff.

Although commenters reference regional climate projections predicting wetter winters, the Forest Practice Rules require operational limitations during such conditions. 14 CCR § 914.7 restricts tractor operations and soil-disturbing activities during the Winter Period (November 15 to April 1) unless conditions are dry and protective measures are in place. The RPF's prescribed operating season coincides with the driest portion of the year, further reducing flood-related risk.

Based on the hydrologic analysis in Section IV, field verification by CAL FIRE and CGS, and implementation of erosion-control measures consistent with the Forest Practice Rules, CAL FIRE concludes that the proposed operations will not measurably increase peak flows or exacerbate downstream flooding. Public-safety impacts related to flooding are therefore less than significant under 14 CCR § 898.2(d) and CEQA Guidelines § 15091.

Concern #3: Northern Spotted Owl Habitat Impacts (PC1, PC2)

Response:
Potential impacts of the proposed operations on the Northern Spotted Owl (NSO, *Strix occidentalis caurina*) were evaluated under the Forest Practice Act, the Forest Practice Rules, and the Humboldt Redwood Company Habitat Conservation Plan (HCP). The HCP provides the governing framework for NSO protection on HRC timberlands and is recognized by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) as satisfying federal take-avoidance and mitigation requirements under Section 10(a)(1)(B) of the Endangered Species Act.

Consistent with 14 CCR § 919.9(d), the plan references the HRC HCP as the applicable regulatory mechanism for NSO protection in lieu of the statewide USFWS "Attachment A" guidance. Under the HCP, NSO surveys are conducted annually following the HCP's approved survey protocol. These surveys must be current prior to the commencement of timber operations in any area containing suitable NSO habitat, ensuring that no active activity centers are disturbed during the breeding season (February 1 – August 31).

Information regarding NSO habitat and survey results is provided in Section II, Item 32 (Biological Resources). This section describes habitat conditions, identifies suitable nesting, roosting, and foraging habitat, and documents that no known NSO activity centers occur within the plan boundary. The plan maintains structural retention and no-harvest buffers that preserve connectivity of suitable habitat across the ownership, consistent with HCP conservation objectives.

The Biological Assessment Area (BAA) used for the cumulative impacts analysis is defined in Section IV as the same as the Watershed Assessment Area (WAA), plus any areas outside the WAA within 1.3 miles of the THP. The analysis identifies past and foreseeable harvests in adjacent ownerships and concludes that implementation of this plan, when combined with other projects, will not eliminate or substantially reduce available NSO habitat within the assessment area.

The CAL FIRE Pre-Harvest Inspection (PHI) was conducted on July 8, 2025 and included review of Item 32 and field verification of described habitat protection measures. The PHI report (Listed Species Section) confirms that the plan properly implements NSO protection measures under the HCP and that no additional conditions or modifications were warranted. The Review Team concurred that the plan provides appropriate protection for NSO habitat consistent with applicable state and federal requirements.

Although commenters express concern that continued harvesting could increase vulnerability to barred-owl competition or temperature-related habitat degradation, these

regional stressors are being addressed through federal recovery planning and are not unique to the proposed operation. The plan's retention of late-seral components, no-harvest riparian buffers, and implementation of seasonal timing restrictions ensure that operations will not contribute to additional loss or fragmentation of suitable NSO habitat.

Based on the analysis and protection measures described above, CAL FIRE concludes that the proposed operations will not result in significant direct or cumulative impacts to the Northern Spotted Owl. The plan complies with the Forest Practice Rules and the HRC Habitat Conservation Plan governing NSO protection.

Concern #4: Carbon Sequestration Loss and Climate Change (PC1, PC2)

Response:
Potential impacts related to greenhouse-gas (GHG) emissions and carbon sequestration from the proposed timber operations were evaluated in Section IV (Cumulative Impacts – Greenhouse Gas Impacts) of the THP. The plan quantifies expected short-term emissions from timber operations and contrasts them with long-term carbon storage achieved through sustained forest growth and wood-product utilization. The assessment concludes that operations conducted under this plan will not result in significant cumulative GHG impacts.

The THP explains that carbon sequestration on Humboldt Redwood Company (HRC) timberlands is maintained through a repeating harvest cycle in which harvested areas are promptly regenerated and retained stands continue to accumulate biomass. When trees are harvested, a substantial portion of stored carbon remains sequestered in long-lived wood products and buildings. Regenerating stands then resume carbon uptake, offsetting operational emissions over time. (Ref: Section IV, pp. 186–188)

Quantitative assessment within Section IV indicates that the combined effects of harvest emissions, wood-product storage, and regrowth yield a net increase in long-term carbon storage. The plan demonstrates that sequestration achieved by ongoing growth across the ownership substantially exceeds the short-term emissions generated by harvesting, equipment operation, and transportation. (Ref: Section IV, pp. 189–196)

In addition to the THP's project-specific analysis, implementation of the Forest Practice Rules provides regulatory assurance that timber operations avoid or minimize greenhouse-gas impacts. These include provisions requiring the maintenance of forest productivity through balancing growth and harvest (14 CCR § 913.11), silvicultural objectives designed to ensure continuous forest cover and long-term productivity (14 CCR § 913), and minimum stocking standards that maintain forest density and long-term carbon-storage potential (14

CCR § 912.7). Together, these rules and the THP's protection measures ensure that carbon stocks remain stable or increasing across the ownership.

Although commenters express concern that "pro-forestation" or extended-rotation management might achieve greater carbon sequestration, CEQA requires evaluation of the proposed project in relation to feasible protection measures and cumulative effects, not a statewide comparison of management philosophies. The THP demonstrates that, under its prescribed silvicultural system and regeneration plan, forest-carbon stocks remain stable or increasing over the planning horizon.

Based on CAL FIRE's review of the plan and the analysis provided in Section IV, the greenhouse-gas assessment is accurate and appropriate. The project will not result in a significant adverse cumulative impact related to carbon sequestration or climate change, and no further modification to the plan is required.

Concern #5: RPF Accuracy and Professional Conduct (PC1, PC2)

Response:
The comments express concern that the Registered Professional Forester (RPF) preparing the plan has exhibited inaccuracies or lack of transparency in the presentation of information. While CAL FIRE has reviewed these assertions, they do not constitute environmental concerns subject to evaluation under the California Environmental Quality Act (CEQA) or the Forest Practice Act.

Under the Forest Practice Act and Forest Practice Rules, CAL FIRE's review is focused on determining whether the submitted Timber Harvesting Plan (THP) complies with applicable environmental protection standards, adequately discloses site conditions, and contains feasible protection measures to avoid or reduce potential environmental impacts. The RPF's signature on a THP constitutes a professional certification that the plan complies with all applicable statutes and regulations and that the information presented is, to the best of the RPF's knowledge, true and correct.

CAL FIRE is charged with independently reviewing every THP for conformance with the Forest Practice Act, the Rules, and CEQA. During this process, CAL FIRE conducts both desk review and on-site inspection of the proposed operations. Any inconsistencies, omissions, or errors identified during review are formally communicated to the RPF through written correspondence and field inspection reports. These mechanisms ensure that all deficiencies are addressed before plan approval.

To the extent that a member of the public believes a violation of the Professional Foresters Law has occurred, such concerns may be submitted directly to the Executive Officer of the

Board of Forestry and Fire Protection, which has jurisdiction over investigation and disciplinary action related to professional licensing.

CAL FIRE has determined that the THP meets the filing and content requirements of 14 CCR §§ 1034 and 1037, and that it has been reviewed and accepted in conformance with the Forest Practice Act and Rules. No further action or modification to the plan is required in response to this comment.

Concern #6: Request for No Project Alternative (PC1, PC2)

Response:
The comments recommend selection of the "No Project" alternative to avoid potential environmental impacts such as erosion, sedimentation, downstream flooding, and loss of carbon storage.

Under the California Environmental Quality Act (CEQA) and the certified regulatory program administered through the Forest Practice Act, every Timber Harvesting Plan (THP) must evaluate a reasonable range of feasible alternatives, including a No Project Alternative, as required by 14 CCR § 15126.6(e) and 14 CCR § 898(a). CAL FIRE's timber-harvesting regulatory program has been certified under PRC § 21080.5 to serve as a functional equivalent of an Environmental Impact Report (EIR). As such, each THP must disclose feasible alternatives that could avoid or substantially lessen significant environmental effects while still achieving the objectives of the project and ensuring sustained timberland productivity.

The No Project Alternative, described on page 106 of the THP, explains that selection of this alternative would avoid the potential for environmental impacts associated with the project but would meet none of the timber production, road maintenance, or silvicultural objectives of the project. The alternative would not achieve the management objectives for maintaining the property's timber productivity, improving existing infrastructure, or promoting stand health through silvicultural treatment. For these reasons, the No Project Alternative was determined by the RPF to be infeasible relative to the project's objectives.

CAL FIRE's review determined that the discussion of alternatives within the plan is consistent with CEQA and Forest Practice Rule requirements, including evaluation of the Project as Proposed, the No Project Alternative, the Alternative Land Use, Public Acquisition and/or Conservation Easement Alternative, Alternative Project Timing or Location, and Alternative Silviculture. The analysis provides sufficient detail to permit a reasoned comparison among alternatives and supports the conclusion that the project, as proposed,

will not result in significant adverse effects when conducted under the prescribed protection measures.

Accordingly, CAL FIRE finds that the alternatives analysis included in the plan satisfies the requirements of CEQA, PRC § 21002, and 14 CCR § 898, and that no additional evaluation or modification is necessary in response to this comment.

Concern #7: Salmonid Habitat and Fisheries Impacts (PC1)

Response:
The comment expresses concern that the proposed operations could contribute to downstream sedimentation, elevated water temperatures, and degradation of salmonid habitat in the lower North Fork Mattole River and estuary.

This THP lies within the Long Ridge planning watershed (CalWater v2.0 #1112.300602), which drains to the North Fork Mattole River approximately eight miles upstream from its confluence with the mainstem. The THP area does not contain fish-bearing (Class I) watercourses; however, it includes Class II and Class III watercourses that are hydrologically connected to downstream habitat utilized by anadromous salmonids. Protection measures applied to these watercourses are designed to prevent sediment delivery and maintain hydrologic function consistent with the Forest Practice Rules.

Within the THP, Class II watercourses are afforded Watercourse and Lake Protection Zones (WLPZs) that function as no-harvest buffers to protect water quality and aquatic habitat. The retention of riparian vegetation within these WLPZs provides canopy shading that helps maintain stream temperatures and supports downstream habitat for aquatic species. Class III watercourses are protected by Equipment Exclusion Zones (EEZs), which restrict equipment entry into the channel but allow limited harvesting under specific operational constraints. Section II, Item 26 describes these protections, which include exclusion of heavy equipment from all watercourses, maintenance of vegetative cover, and prevention of sidecasting or fill within WLPZs and EEZs.

The RPF identified existing and potential erosion sources and prescribed site-specific treatments and road-improvement measures consistent with 14 CCR §§ 923.1 and 923.5, including hydrologic disconnection, outsloping, and installation of rolling dips and waterbars at intervals appropriate for the site's Erosion Hazard Rating. These protection measures are designed to prevent sediment delivery to watercourses and maintain hydrologic stability throughout the year, including additional operational limitations during the Winter Period (November 15 to April 1) when soil saturation and runoff potential are highest.

The CAL FIRE PHI report (July 8, 2025) documents that recommendations were made during the inspection—specifically the replacement of certain culverts and additional protection of unstable areas—and that these recommendations were subsequently incorporated into the THP. The PHI report also confirmed that the proposed WLPZ and EEZ protection measures were appropriate for the site and consistent with the objectives of the Forest Practice Rules for safeguarding water quality and aquatic resources.

Although the comment references degraded conditions within the North Fork Mattole estuary, those impacts occur far downstream of the THP area and are the cumulative result of legacy sediment inputs throughout the basin. The THP's limited scale, absence of in-channel disturbance, and implementation of modern road and erosion-control standards ensure that operations conducted under this plan will not measurably contribute to downstream estuary conditions.

CAL FIRE has determined that the protection measures proposed within this plan conform to the Forest Practice Rules and adequately address both direct and cumulative effects on water quality and aquatic habitat. The Department finds no substantial evidence that the project would result in a significant adverse effect to salmonid habitat or fisheries resources.

Additionally, please see the response to Concerns #1 and #2.

Concern #8: Geological Instability and Natural Hazards (PC1)

Response:
The comment expresses concern that the Mattole River watershed has a naturally high degree of mass wasting and surface erosion and that the THP area may be vulnerable to instability due to steep slopes, unstable soils, and high rainfall.

The Forest Practice Act and Rules require the identification and protection of unstable areas to prevent significant adverse effects from slope failure and surface erosion. In accordance with 14 CCR § 1034(x)(1), known unstable areas or slides are mapped within the plan. Additionally, 14 CCR §§ 912.9 and 898 direct CAL FIRE to ensure that project and cumulative effects from slope instability are analyzed and mitigated to a level of less-than-significant impact.

The THP identifies unstable areas and prescribes specific protection measures in Section II, Item 38 (Special Instructions or Constraints), with related cumulative effects discussed in Section IV (Cumulative Impacts). These measures include the prohibition of ground-based equipment use on unstable areas, as described in Section II, Item 21(a), and the implementation of site-specific drainage facilities and erosion-control features—such as

outsloping, rolling dips, and cross-drains—to disperse runoff and prevent concentrated flow that could lead to slope instability or sediment delivery to watercourses.

A Professional Geologist, working within the scope of their license, evaluated the proposed operations and provided a geologic assessment contained in Section V (Geology Report and Maps). This report was reviewed and field-verified by a California Geological Survey (CGS) geologist during the interdisciplinary PHI (July 8, 2025). Recommendations from both the Professional Geologist and CGS, including refinements to drainage facilities and protection of identified unstable slopes, were incorporated into the final approved plan prior to Second Review. Included within the assessment was the identification of an existing haul road located on the margins of a dormant landslide that was inactive. No restrictions on the use of this road were recommended.

The THP's prescribed protection measures are consistent with Board of Forestry standards for minimizing slope instability and conform to CEQA's general mandate that environmental impacts be avoided or substantially reduced where feasible (CEQA Guidelines § 15021(a)(2)). Implementation of these measures, verified through CAL FIRE's inspection and compliance program during operations, ensures that the Forest Practice Rules and all prescribed protection measures are properly followed, thereby minimizing the risk of slope instability, debris sliding, or other forms of mass wasting.

CAL FIRE has determined that the THP's geologic and erosion analysis is accurate and appropriate and that the plan's measures conform to the requirements of the Forest Practice Act and Rules. No potentially significant cumulative impacts related to slope instability or geologic hazards are expected to occur as a result of the proposed operation.

Concern #9: Red Tree Vole Habitat Loss (PC1)

Response:
The comment expresses concern that the proposed operation will diminish potential habitat for the red tree vole, a prey species for the Northern Spotted Owl, and that historical survey practices or agreements to avoid vole nest trees are not evident in this plan.

The red tree vole is not a state- or federally-listed threatened or endangered species, nor is it designated as a sensitive species under the California Forest Practice Rules. However, CAL FIRE reviews all THPs for potential effects to wildlife, including species that contribute to the ecological functions supporting listed species such as the Northern Spotted Owl.

The Humboldt Redwood Company (HRC) property operates under a federal Habitat Conservation Plan (HCP) approved by the U.S. Fish and Wildlife Service (USFWS), which establishes take-avoidance and habitat protection standards for covered species, including

the Northern Spotted Owl. Habitat elements that support prey species, such as structural diversity and residual conifer retention, are maintained through implementation of the HCP and Forest Practice Rules, ensuring long-term ecosystem function. Under this HCP framework, CAL FIRE's review confirms compliance with required retention and habitat protection measures rather than requiring separate species-specific survey protocols for non-listed wildlife.

Section IV (Cumulative Impacts) of the THP includes an assessment of wildlife resources and identifies that forest structure, canopy closure, and large woody-debris recruitment will be retained at levels consistent with the Humboldt Redwood Company HCP standards. These HCP-based retention requirements maintain habitat elements that inherently support prey species, including arboreal rodents such as the red tree vole, while also sustaining overall ecosystem diversity and function.

During the Pre-Harvest Inspection (PHI) conducted on July 8, 2025, CAL FIRE inspectors reviewed proposed retention areas and confirmed that the plan includes sufficient structural retention and riparian protection to maintain habitat connectivity and diversity. No evidence of red tree vole activity or nest structures was observed during field inspection, and no additional recommendations were warranted regarding this species.

CAL FIRE has determined that the THP accurately evaluates potential wildlife impacts and provides appropriate protection measures through adherence to the HCP and the Forest Practice Rules. The proposed operations will not significantly diminish red tree vole habitat or interfere with the prey base dynamics of the Northern Spotted Owl.

Additionally, please see the response to Concern #3.

Concern #10: Inadequate Fish & Wildlife Participation (PC1)

Response:
The comment expresses concern that the California Department of Fish and Wildlife (CDFW) did not appear to participate in the review of the plan and that species information is presented in generalized terms without adequate survey detail or documentation of CDFW input.

Under the Forest Practice Act and Rules, CAL FIRE administers a certified regulatory program (PRC § 21080.5) that fulfills the functional equivalent of CEQA review. Timber Harvesting Plans (THPs) are evaluated through an interdisciplinary review process that includes formal invitation of other Responsible and Trustee Agencies—specifically the California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and California Geological Survey (CGS)—as members of the Review Team (14

CCR § 1037.5). Each agency is provided the opportunity to review the plan, submit written recommendations, and attend the Pre-Harvest Inspection (PHI).

For this plan, CDFW was invited to participate in both the interdisciplinary review and the PHI in accordance with 14 CCR § 1037.5(a); though, CDFW did not provide written recommendations nor attend the PHI conducted on July 8, 2025. The PHI was attended by CAL FIRE and CGS, whose representatives inspected proposed harvest areas, protection zones, and wildlife habitat elements. Wildlife-related observations were made during the PHI and reviewed by CAL FIRE as part of the biological assessment process.

Although CDFW did not provide comment for this particular plan's review, CAL FIRE's interdisciplinary process ensures that all biological resources are evaluated under the same environmental standards. Section II, Item 32 (Biological Resources) and Section IV (Cumulative Impacts) document habitat conditions, listed-species protections, and consistency with the Humboldt Redwood Company Habitat Conservation Plan (HCP). CAL FIRE independently reviewed these sections for adequacy and confirmed that applicable protection measures for listed species and aquatic habitat have been included.

CAL FIRE retains exclusive authority to regulate timber operations on non-federal lands (PRC §§ 4513 and 4582.7) and is responsible for ensuring that plans conform to CEQA and the Forest Practice Rules. The Department conducts both desk and field review to verify accuracy of submitted information and the inclusion of prescribed protection measures. Interagency participation, while valuable, is not required for CAL FIRE to complete its independent evaluation or to approve a THP.

Accordingly, CAL FIRE has determined that the absence of CDFW comment does not indicate a deficiency in the environmental review process. The plan's analysis of biological resources and inclusion of HCP-based protection measures provide sufficient basis for CAL FIRE's finding under 14 CCR § 898 that potential impacts to fish and wildlife have been adequately disclosed and reduced to a less-than-significant level.

Concern #11: Climate Refugia and Wildlife Corridors (PC1)

Response:
CAL FIRE recognizes the commenter's concern about maintaining habitat complexity, refugia, and broad-scale movement pathways along the coastal belt. Within the scope of this THP, potential effects to wildlife use of the area and habitat continuity have been evaluated under Section II, Item 32 (Biological Resources) and in Section IV (Cumulative Impacts – Biological Resources) of the THP. Those sections address species presence,

habitat conditions, and whether project activities could contribute to fragmentation or edge effects at the assessment-area scale.

The PHI confirms that biological information was appropriately disclosed and that listed/non-listed wildlife considerations were addressed in the plan. It also documents that cumulative impacts were assessed consistent with Technical Rule Addendum No. 2 and found adequate for the defined assessment areas.

At the site scale, the plan maintains structural elements important to wildlife (e.g., residual overstory structure, snags/down wood where applicable, and near-water vegetation retention). The Forest Practice Rules recognize these features as providing shade, cover, and movement opportunities, especially in riparian settings (e.g., near-water vegetation provides shade, vertical diversity, and migration corridors). These functions are preserved through standard watercourse protection measures and equipment limitations prescribed in the plan.

Regarding broader "Redwoods to the Sea" connectivity and climate-refugia concepts raised by the commenter: those are landscape-scale planning themes that extend beyond the footprint of an individual THP. Under CEQA's "rule of reason," this plan evaluates whether its activities would substantially interfere with wildlife movement or eliminate important linkages within the plan's Biological Assessment Area and Cumulative Effects Assessment Areas. Based on the plan's retention, avoidance measures, and limited spatial extent relative to the assessment areas described in Section IV (Cumulative Impacts – Biological Resources), the project is not expected to create new barriers to movement or remove essential corridors at the assessment-area scale. The PHI record supports the adequacy of those cumulative-effects evaluations for biological resources.

With the prescribed protection measures and the scale of operations relative to the assessment areas identified in Section IV (Cumulative Impacts – Biological Resources), the THP avoids significant interference with wildlife movement or loss of habitat linkages in the project's assessment area. The administrative record reflects adequate disclosure and analysis of biological resources and cumulative effects.

Concern #12: Yarding Method - Tractor vs. Skyline (PC2)

Response:
The comment expresses concern that the use of tractor yarding on steep or erosion-prone ground will cause greater soil disturbance, greenhouse gas emissions, and sedimentation compared to cable systems, and questions why cable yarding was not required.

Yarding systems are described in Section II, Item 16 (Yarding Systems) and shown on the Yarding System Maps located at the end of Section II. Tractor yarding is proposed for only Unit 3, which contains the mildest slopes within the plan area and no identified unstable areas. Cable yarding systems are prescribed for Units 1 and 2, which contain steeper terrain and areas of higher erosion hazard.

The selection of yarding systems within a Timber Harvesting Plan (THP) is made by the Registered Professional Forester (RPF) based on slope, soil stability, access constraints, and silvicultural objectives. The Forest Practice Rules provide explicit limitations for the use of tractor yarding under 14 CCR § 914.2 (Operations) and require implementation of erosion-control protection measures sufficient to prevent significant adverse effects to soil stability and water quality.

During the July 8, 2025 Pre-Harvest Inspection (PHI), the interdisciplinary review team—including representatives from CAL FIRE and the California Geological Survey (CGS)—evaluated the tractor unit in the field and confirmed that slopes within Unit 3 did not exceed the limits described in 14 CCR § 914.2 and that no unstable areas were present. The PHI report concluded that the proposed yarding methods were appropriate for site conditions and consistent with the Forest Practice Rules.

Under CEQA (PRC § 21002) and the Forest Practice Act (PRC §§ 4512–4513), a more costly alternative is not required if the selected method avoids significant environmental impacts through feasible protection measures. Cable yarding may be infeasible or unnecessary where the topography, soil type, or residual stand structure allow for effective soil and water protection using ground-based systems.

CAL FIRE's review determined that tractor operations under this THP are consistent with the Forest Practice Rules and that the prescribed protection measures are sufficient to prevent significant adverse effects related to soil disturbance or sedimentation.

Concern #13: Variable Retention Implementation (PC2)

Response:
The comment suggests that dispersed variable retention would be preferable to aggregate variable retention for maintaining higher rates of residual stand growth and carbon sequestration.

The Timber Harvesting Plan (THP) describes the silvicultural system under Section II, Item 14 (Silvicultural Methods). The plan proposes the Variable Retention (VR) silvicultural system, which is classified as a Special Prescription under the Forest Practice Rules. This method

retains structural elements from the pre-harvest stand to provide for habitat, soil stability, and long-term forest structure while allowing regeneration of a new age class within harvested portions of the stand.

Within the THP, the Registered Professional Forester (RPF) selected an aggregate retention pattern based on existing forest structure, access, slope configuration, and operational feasibility. Aggregate retention concentrates residual trees in groups while allowing limited harvesting within those areas, provided that post-harvest conditions meet the retention standards of 14 CCR § 913.4(d)(3)(H). This configuration maintains microclimatic buffering, localized wildlife habitat, and soil protection functions while facilitating safe and efficient operations under site-specific conditions.

The THP does not explicitly describe evaluation of a dispersed retention alternative; however, the plan explains that the aggregate configuration was selected to balance retention objectives with yarding feasibility, slope stability, and the ability to maintain long-term structural elements within the residual stand. Retention aggregates were sited to optimize recruitment of large woody debris and snags while maintaining habitat continuity across operational corridors.

Under 14 CCR § 913.4(d), the Variable Retention system may use either aggregate or dispersed retention, provided that the layout meets structural and ecological objectives. The plan's configuration conforms with 14 CCR § 913.4(d)(3)(B) regarding maximum harvest area and § 913.4(d)(3)(E) regarding the spatial arrangement of retention aggregates within each harvest unit.

CAL FIRE's review found that the silvicultural prescription and retention layout meet the requirements of the Forest Practice Rules and are consistent with the ecological objectives of the Variable Retention system. The proposed aggregate retention design provides sufficient post-harvest habitat complexity and canopy cover to avoid significant adverse effects on biological or carbon sequestration functions.

Concern #14: Public Access to THP Documents (PC2)

Response:
The comment expresses concern that access to Timber Harvesting Plan (THP) documents was restricted during the public comment period due to CalTREES website outages, potentially limiting public participation.

The California Timber Regulation and Environmental Evaluation System (CalTREES) is an online portal managed by CAL FIRE to provide public access to THPs and associated

documents. While CalTREES serves as a primary access tool, it is not the exclusive means by which plans are made available for public review. In accordance with 14 CCR §§ 1032.9 and 1037.3, the Notice of Submission and Notice of Filing identify physical and electronic locations where the plan and supporting materials can be obtained throughout the review period.

The public comment period for this plan extended from June 26, 2025, through October 10, 2025, for a total of 105 days, which exceeds the minimum 30-day requirement established by 14 CCR § 1037.4. During this period, the THP and all supporting documents were available through the CAL FIRE Region office and the Humboldt-Del Norte Unit office, even during brief CalTREES maintenance outages.

Temporary maintenance or downtime of the CalTREES system does not invalidate the public review process or the adequacy of public access. Notices provided to stakeholders and system users specify when updates or maintenance are scheduled, and alternative means of review are available upon request. CAL FIRE ensures compliance with the Forest Practice Rules by maintaining public access to all filed plans and associated materials throughout the statutory review period.

CAL FIRE has determined that the required public review opportunities were fully provided for this THP, and that public access to documents met and exceeded the regulatory standards for availability and duration.

Concern #15: Inadequate Cumulative Impact Analysis (PC1)

Response:
The comment asserts that the Timber Harvesting Plan (THP) misrepresents cumulative impacts and overstates watershed recovery, suggesting that logging has contributed to sediment accumulation and habitat degradation within the North Fork Mattole watershed.

The Forest Practice Act and Rules require that every THP evaluate both direct and cumulative impacts across multiple resource subjects, including watershed, soils, biological resources, and recreation. This analysis must consider the effects of the proposed project in combination with past, present, and reasonably foreseeable future projects, consistent with 14 CCR §§ 898 and 912.9 and Technical Rule Addendum No. 2 (Cumulative Impacts Assessment).

The THP includes a comprehensive cumulative impact assessment located in Section IV (Cumulative Impacts). This section addresses sediment, slope stability, hydrology, water temperature, biological resources, and watershed conditions across the Long Ridge planning watershed (CalWater v2.0 #1112.300602). The assessment incorporates available

data on watershed condition, including the history of sediment sources and current stabilization measures, and concludes that the proposed operations will not make a significant incremental contribution to cumulative watershed effects.

Protection measures prescribed throughout Section II are designed to avoid sediment transport, maintain hydrologic function, and protect downstream beneficial uses of water. The THP includes ongoing road maintenance, hydrologic disconnection of drainage facilities, and no-harvest Watercourse and Lake Protection Zones (WLPZs) along all Class II watercourses.

The plan acknowledges that legacy sediment and past land use have contributed to downstream channel aggradation and estuarine sedimentation. However, current Forest Practice Rules and site-specific prescriptions under this plan are designed to avoid new sediment inputs and to continue the process of watershed recovery. The plan's cumulative watershed analysis indicates that forest conditions and erosion potential are stable under the proposed silvicultural and operational practices.

CAL FIRE's review determined that the cumulative effects assessment complies with the Forest Practice Rules and that the plan appropriately analyzed potential interactions between this project and other timber operations within the watershed. The cumulative effects were found to be less than significant, and no further protection measures were required.

Summary and Conclusions
All concerns raised were reviewed and addressed. Along with the framework provided by the Forest Practice Act and the Rules of the Board of Forestry, the Department has determined that there will be no significant adverse impacts resulting from the implementation of this THP.