

To: Bill Holmes, Unit Chief THP NO. 4-07-43/ELD-21 - Girard THP

From: Candace Gregory, Southern Region Chief

RECEIVED

*****SECTION I*****

AUG 15 2008

Review Team Recommendations:

- PHI XX - Complete entire PHI form, Sections I, III, and IV
- PHI Optional - Email Review Team Fresno ASAP if PHI is scheduled
- Focused PHI - Complete Sections I, III, and IV

Reviewed by: [Signature]
 Dist. by: [Signature]
 Dist. Date: 8/15/08

<input checked="" type="checkbox"/> RPT	PS
<input checked="" type="checkbox"/> FPE 2	TO
<input checked="" type="checkbox"/> WO SA	TLO
<input checked="" type="checkbox"/> ARCH	LTO
<input checked="" type="checkbox"/> RPF	DMG
<input type="checkbox"/> INSP	BOE
OTHER: <u> </u>	
FPS	
Status: <u>PHI</u>	

NOTE: All responses to the preharvest inspection and the preharvest inspection report are due at Southern Region Office no later than the Friday before the second review. Please e-mail completed form to FresnoReviewTeam@fire.ca.gov. If this cannot be accomplished, it is the inspector's responsibility to contact the RPF and secure an extension and notify the Southern Region Office of the extension.

FIRST REVIEW DATE: December 4, 2007 FILING DATE: December 7, 2007

PHI MUST BE CONDUCTED BETWEEN FILING DATE AND December 17, 2007

DATE(s) PHI CONDUCTED: August 7, 2008 INSPECTION NO: 1

PHI/DIRECTORS DETERMINATION DATE EXTENDED BY MUTUAL CONSENT: X YES

REVIEW BASED UPON PREVIOUS VISIT: DATE

RPF: Richard Wade (530) 644-2311 FIELD HOURS: 11 OFFICE HOURS: 15

DFG REGION: 2 WQ REGION: 5A INSPECTOR: DeBenedet

AGENCIES REQUESTING TO ATTEND PHI:

Regional Water Quality Control Board: Department of Fish and Game Region:

Central Valley (Region 5)

- (916) 464-4630 Marty Hartzell
- X (916) 464-4820 Chris Cochrane
- (559) 445-6278 Anthony Toto

Rancho Cordova (Region 2)

- (916) 358-2892 Tina Bartlett
- (916) 358-2900 Tim Nosal
- X (916) 358-2916 Sandra Jacks

Lahontan (Region 6)

- (530) 542-5426 George Cella
- (530) 542-5417 Doug Cushman

Fresno (Region 4)

- (209) 588-1879 Dan Applebee
- (559) 243-4014x238 Lisa Gymer
- (559) 243-4014x236 Margarita Gordus

REVIEW TEAM:

- X Review Team Chair (559) 243-4153 Bill Solinsky
- X Forest Practice Manager (559) 243-4114 Mike Bacca
- Archaeologist (559) 243-4119 Linda Pollack
- X Archaeologist (916) 261-1108 Gerrit Fenenga
- X Geologist (916) 322-4853 Bill Short
- Geologist (916) 327-2903 John Schlosser

OTHER AGENCIES: _____ Phone; Individual

REVIEW TEAM QUESTIONS

RPF - Please provide the following information prior to the PHI (if a PHI is required) and have the information available in writing for the CDF inspector prior to the PHI. Please also send a copy of your response to these questions to the review team in Fresno. Failure to send a copy of these responses to the Fresno office may result in delays of THP approval.

1. Please provide the USGS Quadrangle name(s) and date(s) under Item #8 as per 14 CCR 1034(g) (1).
2. Item #14(i) (b) provides the general methods of site preparation to be used, and identifies mechanical and potential broadcast burning as the methods. Please also include chemical treatment if there is a possibility of use as site preparation.
3. Please include in the Winter Operations Plan under Item 23(d) (11) the 14 CCR 895.1 definition of "Hard Frozen Conditions" for use by the LTO as the Saturated Soil Conditions definition ends with "Soils or road and landing surfaces that are hard frozen are excluded from this definition."
4. Item #30 indicates that lopping will be used for fire hazard reduction within 100' of the USFS roads and the definition of "Lopping for Fire Hazard Reduction" has been provided. In addition for the benefit of the LTO, please cite the 14 CCR 895.1 definition for "Lopping (for the Southern Forest District)", which states "Severing limbs from the exposed sides of the unutilized portion of trees so that portions of the severed limbs are in contact with ground."
5. The maps on pages 34 and 35 indicate "Appurtenant Roads", "50' Fire Protection Zones", and "100' Fire Protection Zones", which are not easily discernable perhaps due to the scale. Please provide revised maps with symbols that clearly distinguish the differences.
6. Item #30 indicates that public roads are located within the THP boundary. Please show the public roads as required per 14 CCR 1034(x) (4).
7. As per 14 CCR 1035.4, the PRF/Plan Submitter is identified under Item #13(c) to be the responsible person to notify the Department of start up of timber operations. Additionally, as per 14 CCR 1035.4, please include under Item #38 that notification shall be directed to the appropriate ranger unit and the Department's designated personnel, which is:

Cal Fire Area Forester
11600 Highway 49
Sutter Creek, CA 95685
Phone: (209) 267-5229
Fax: (209) 267-0616

8. The maps on pages 24 through 29 have symbols that provide reference such as "Non Timber", "Plantation", and "Non Operational" that appear not to be appurtenant to the plan. Please remove unnecessary information as not to distract from appurtenant information.
9. As per 14 CCR 1034(x)(1), "Boundaries of logging area (shall be shown on quadrangle map or its equivalent)". The shaded "THP Area" shown on the maps (pages 21, 22, 23, 30, 31, 32, 33, 34 and 35) become faded after mutable copies, and a linear designation around the actual boundary would better identify the plan area. Please provide on at least one map the THP Boundary or Boundaries of Logging Area with an associated map symbol in the legend.
10. Section II, Item 26 d (page 13): Included within the THP, the Department of Fish and Game (DFG) received your notification (on 12/3/07) of lake or streambed alteration pursuant to Fish and Game Code 1611. This THP review process is to be used to meet the DFG CEQA review requirements under Fish and Game Code section 1611.

In order for the DFG to begin the process of issuing a Streambed Alteration Agreement (Agreement) the following shall occur:

- a) Send payment covering all the fees associated with the SAA to:
Department of Fish and Game
1600 Program
1701 Nimbus Rd., Suite A,
Rancho Cordova, CA 95670
- b) Include a copy of Items 1-13 of the THP with the payment.

Once the DFG has received payment for the projects associated with the 1611, the timeline for issuing an Agreement to the applicant will begin. In general, the applicant should receive a draft agreement within 90 days after the receipt of fees. Upon notification that CalFire has approved the THP and all SAA fees have been received, the DFG will finalize the Agreement. Any work described as part of the 1611 notification is not authorized to begin until the applicant has received the finalized Agreement.

Visit the Streambed Alteration Agreement section of the DFG website at www.dfg.ca.gov/habcon/1600 for further guidance with this process, review of the 1600 code, and understanding of the timelines. (DFG #1)

11. Will the diversion of water to the water holes be permanent?
(WQ #1)

The RPF provided responses to the First Review Questions prior to the PHI.

CDF Inspector - respond to the following questions:

- a. Please evaluate stand conditions and the appropriateness of the proposed silviculture method.

Stands observed during the PHI are as described in the THP and the proposed silvicultures are appropriate.

- b. Please evaluate stand characteristics, including size, age, and density, in relation to adjacent stands and available diversity of habitats post-harvest.

The stands characteristics included in this THP are similar to adjacent stands that are not proposed for harvest in this THP. This piece of SPI ownership is surrounded by a much larger USFS ownership. There will not be a decrease in diversity of habitats due to the structure present in surrounding USFS stands, remnant SPI stands, and structural elements left as a result of the proposed silvicultures.

- c. Please contact Ms. Sandra Jacks at (916) 358-2916 to arrange a mutually agreeable PHI date.
- d. Please contact Chris Cochrane (916) 464-4820 to arrange a mutually agreeable PHI date.
- e. Please notify CGS Bill Short (916) 322-4853 of the PHI date.
- f. Please notify Cal Fire Archaeologist Gerrit Fenenga (916) 261-1108 of the PHI date.
- g. Please notify Mike Bacca at (559) 243-4114 of the PHI date.
- h. Please notify Bill Solinsky at (559) 243-4153 of the PHI date.

Sandra Jacks, Chris Cochrane, Bill Short, Gerrit Fenenga, Mike Bacca, and Bill Solinsky were all notified of the PHI date.

TO: Candace Gregory, Southern Region Chief

DATE: 8-15-08

FROM: Bill Holmes Unit Chief

*******SECTION II*******

Check items that are applicable to the proposed THP.

YES	NO	NA	
X	/	/	- Silvicultural method appropriate?
X	/	/	- Does site index appear correct?
X	/	/	- EHR accurate?
/	/	X	- Unstable areas properly indicated?
X	/	/	- Winter operations appropriate (if proposed)?
/	/	X	- If winter operations are proposed in the future, should the amendment be considered "substantial"?
X	/	/	- Watercourse classifications accurate?
X	/	/	- Watercourse protection adequate?
/	/	X	- Meadow and wet area protection adequate?
X	/	/	- Road locations feasible?
X	/	/	- Erosion control adequate?
X	/	/	- THP map and addenda accurate?
X	/	/	- Are domestic water supplies adequately protected?
X	/	/	- Archeological information complete?

If any of the above answers are answered NO, provide explanation in PHI report.

/	X	/	- Special Treatment Area required?
/	X	/	- Does THP overlap an existing THP, or is stocking or completion outstanding on all or a portion of the proposed plan?
/	X	/	- Wild & Scenic River affected?
/	X	/	- Is THP adjacent to a state or national park? If so, was park contacted to attend preharvest inspection?
X	/	/	- Will a response to concerns be required from the RPF prior to approval to mitigate potential impacts?
/	X	/	- T & E plant or wildlife species affected?

PREHARVEST INSPECTION REPORT

1. Did weather conditions interfere with conducting the PHI?

Yes No

2. a. Personnel attending the preharvest inspection were:

Steve DeBenedet (CAL FIRE)
Mike Bacca (CAL FIRE)
Dan Stapleton (SPI)
Robert Fecko (SPI)
Kevin Roberts (SPI)
Sandra Jacks (DFG)

b. Personnel contacted regarding the preharvest inspection:

Mike Bacca (CAL FIRE)
Bill Solinsky (CAL FIRE)
Gerrit Fenenga (CAL FIRE)
Rich Wade (SPI)
Chris Cochrane (CVRWQCB)
Tim Nosal (DFG)
Sandra Jacks (DFG)
Bill Short (CGS)

3. Was Notice of Intent properly posted at timber harvesting plan site (14 CCR 1032.7)?

Yes No (explain below)

SPI representatives mistakenly forgot to post the NOI at the time of THP submission as per the requirements set forth in 14 CCR 1032.7(g).

The posting of the NOI at a conspicuous location is a necessary component in the commencement of the Public Comment process. After discussing the situation with the SPI representatives, it was agreed that the NOI would be posted immediately and the new effective date for the commencement of the Public Comment period shall be August 7th, 2008.

(Recommendation 1)

4. If timber operations including road and landing construction or skidding will occur on adjacent ownerships, have the adjacent owners been added to the Timber Harvesting Plan and Notice of Intent as additional timberland owners?

YES NO (explain below) N/A

A small section of seasonal road construction is proposed on USFS ground to access Unit 270. The Department does not have jurisdiction over activities on Federal ground and all agreements for such activities are between SPI and the USFS.

PROJECT DESCRIPTION

5. Has the project area been accurately described within the THP as per 14 CCR 1034 (jj)?

Yes No If no, summarize below:

TIMBER STAND DESCRIPTION

6. Is the proposed harvest area zoned Timber Production Zone by the county [933.1(a)(7)]?

Unknown Yes No

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

Yes No (list corrections below)

*In Section III of the THP under the Addendum to Item 14 discussion, the RPF states that the existing stand composition over the entire project area is estimated to contain 2% California black oak. This PHI covered an extensive portion of this THP and it's associated watersheds. Very few California black oaks were observed by the Review Team. Prior to Second Review, the RPF shall re-evaluate the assessment of the California black oak component associated with this THP and revise the THP as necessary.
(Recommendation 2)*

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 No (explain below)

SILVICULTURE

9. Are the silvicultural methods prescribed appropriate for stand conditions?

Yes No (explain below)

10. For even-aged management: If a "regeneration step" harvest is proposed, will the provisions of 14 CCR 953.1(a) be met?

Yes No N/A

Under item 14(c) of the THP, the RPF proposes to increase maximum acreage limitations on four of the units associated with this proposed THP. For justification, the RPF uses the criterion of 14 CCR 953.1(a)(2)(c) which calls for "a more natural logging unit by taking maximum advantage of the topography". In reviewing the four units proposed for acreage increases, only unit 129 had substantial evidence to support this criterion.

It should be noted that 14 CCR 953.1(2) allows for an increase in unit size if "substantial" evidence can be provided. Substantial evidence was not provided for the proposed increase of acres in units 261, 265, or 270, nor did topography appear to be a substantial limiting factor in determining the boundaries of these units.

Furthermore, in reviewing all of the criterion available to use as an acreage increase justification as described in 14 CCR 953.1(2)(A-E), it does not appear that substantial evidence is available to justify the acreage increase of units 261 or 265. SPI representatives made

some compelling arguments that an increase in acreage was justified for unit 270, however, the reasons for justification made during the PHI were not those stated in the THP and topography was not a substantial element evident in their argument.

Prior to Second Review, the RPF shall adjust the acreage on units 261 and 265 so that they do not exceed the maximum acreage limitations of 20 acres as per 14 CCR 953.1(2). Additionally, the RPF shall either reduce the acres in unit 270 to the maximum of 20 acres or provide substantial evidence that an increase in acreage is justified. Substantial evidence may be provided by using one or more of the criterion stated in 14 CCR 953.1(2) (A-E).
(Recommendation 3)

11. For uneven-aged management: Are enforceable mitigation measures needed to ensure the establishment and/or maintenance of a balanced stand structure, and establishment of new reproduction?

No Yes (explain below) N/A

12. If Group B species are proposed for management [14 CCR 952.7(c)]: Will the site occupancy of Group A species be reduced relative to Group B species?

No Yes N/A

13. Comments/general observations regarding silviculture.

The silvicultures proposed in this THP are selection, sanitation-salvage, and an alternative prescription most like a clearcut. Examples of visual retention elements to be retained within the alternative prescription area and the proposed sanitation-salvage areas were evaluated and both silvicultures matched the description in the THP. Selection is to be applied within the WLPZs; however, the WLPZs were not flagged or marked prior to the PHI.

MAXIMUM SUSTAINED PRODUCTION OF HIGH QUALITY WOOD PRODUCTS

14. Does the THP comply with goals of 14 CCR 953.10 to restore, enhance, and maintain the productivity of the state's timberlands?

Yes No (explain below)

15. Will any growing stock be harvested in a manner which significantly delays reaching or maintaining MSP [14 CCR 953]?

No Yes (explain below)

16. Does the THP comply with the MSP requirements of 14 CCR 953.11?

Yes No (explain no answer to option "C" below, and explain yes or no answer if using option A or B)

Will the post-harvest stand:

- a. Obviously satisfy minimum stocking requirements (countable trees only)?

- Yes No N/A
- b. Contain required numbers of seed trees (if required)?
- Yes No N/A
- c. Contain leave trees that are of good form (at least 30% live crown ratio with pointed tops) and that are capable of good future growth capacity?
- Yes No N/A
- d. Leave trees are uniformly distributed throughout the area?
- Yes No N/A
- e. Contain a species mixture similar to preharvest and/or favoring high-value species?
- Yes No N/A
- f. Post-harvest average stand diameters are larger than preharvest (for thinning prescriptions)?
- Yes No N/A
- g. A regeneration and site preparation plan has been submitted, where required, that is sufficient to ensure prompt regeneration of the site?
- Yes No N/A
- h. Stand information was verified by:
- Ocular Sample Plots Cactos/Cryptos
- Other (explain below)
- i. Stands have been marked as follows (including stump mark if necessary):
- All Trees None Percent N/A
- Cut Tree Leave Tree
- Was the mark representative and sufficient to evaluate the prescription?
- Yes No N/A
- j. Will additional marking, to be approved by CDF, be required prior to the start of operations?
- No Yes (explain below)

HARVESTING OPERATIONS

17. Are exceptions or alternative practices proposed that are not fully explained and justified? If yes, discuss potential impacts and recommendations below:

No Yes (explain below) N/A

18. Are tractor operations proposed on: [14 CCR 934.2(f)(1)]?

- a. No Yes Slopes >65%
- b. No Yes Slopes >50% with a HIGH or EXTREME EHR?
- c. No Yes Slopes >50% that lead without flattening to sufficiently trap sediment before reaching a watercourse or lake?

If yes to a, b, or c above:

d. Is such tractor use appropriate?

Yes No (explain) N/A

e. In your opinion, has the RPF met the standards of 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 954?

Yes No (explain) N/A

19. Will tractor operations be limited to existing tractor roads that do not require reconstruction on slopes between 50 and 65% where the EHR is moderate [14 CCR 954.2(f)(2)]?

Yes No (answer a & b below) N/A

a. Is such tractor use appropriate?

Yes No (explain) N/A

b. In your opinion, has the RPF met the standards of 14 CCR 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 934?

Yes No (explain) N/A

20. Did the RPF flag tractor roads prior to the PHI as required by 14 CCR 954.2(f)(3)?

Yes No (explain below) N/A

21. Comments/general observations regarding harvesting operations.

ROADS AND LANDINGS

22. Have all THP roads and landings and all appurtenant roads been correctly located and classified on the THP map?

Yes No (explain below) N/A

23. Are any exceptions or alternative practices proposed that do not meet the standards outlined in the rules for exceptions or alternative practices?

No Yes (explain below) N/A

24. Are proposed construction methods and mitigations as described in the THP sufficient to protect resource values?

Yes No (explain below) N/A

25. Comments/general observations regarding roads and landings.

*Approximately 460 feet of seasonal road which includes a class-III watercourse crossing is proposed to be constructed for access to unit 270. During the PHI, SPI representatives expressed their wishes to slightly change the location of this road so that it extends more easterly into the unit and does not require the crossing of the class-III watercourse. Operations will still entail the crossing of the class-III watercourse by means of a tractor crossing. The location of the new road was evaluated and impacts from operations were considered. The new location of the road is acceptable for on site conditions and the within the scope of that allowed in the Forest Practice Rules. Prior to Second Review, the RPF shall change the THP map and references in the THP to accurately describe the placement of the proposed seasonal road associated with unit 270.
(Recommendation 4)*

WATERCOURSE PROTECTION

26. Have watercourses been correctly described and classified within the THP?

Yes No (explain below) N/A

The class-III watercourse in unit 270 and all of the class-II watercourses associated with the DFG 1600 permit were evaluated and determined to be appropriately classified.

27. Are there any in-lieu or alternative practices proposed that do not meet the standards outlined in the rules for in-lieu or alternative practices?

No Yes (explain below) N/A

28. Are proposed protection measures for watercourses, lakes and wet areas adequate to protect the beneficial uses of water and riparian habitat?

Yes No (explain below) N/A

29. Are watercourse crossings necessary, appropriate and properly located?

X Yes No (explain below) N/A

Project points 1-7 are described in the THP under item 26 as class-II watercourse crossings or the construction of new waterholes. These projects were evaluated by the Review Team during the PHI. The RPF's proposed construction and mitigations were appropriate. In some cases, additional opportunities for increased resource protection and operational flexibility were discussed. As a result of those discussions, the following items shall be addressed in the THP prior to Second Review:

- At project point 1, the RPF has proposed a 60" squash pipe to upgrade an existing class-II watercourse crossing. Although the proposed 60" squash pipe is sized adequately for 100 year flood flows, it is too large a pipe for the shallow stream channel at this location. After discussion, it was agreed that at project point 1, a rocked low water crossing shall be installed instead of the originally proposed 60" squash pipe.
(Recommendation 5)
- Also at project point 1, commercial lodgepole pine was observed to be in the project area that would most likely need to be removed to facilitate proposed operations. The removal of this commercial species is not discussed in the DFG NOTIFICATION OF LAKE OR STREAMBED ALTERATION document that is included at the end of Section II of this THP. In order to accurately describe the impacts of the proposed projects, the RPF shall revise language in the DFG NOTIFICATION OF LAKE OR STREAMBED ALTERATION for project point 1 and other project points in which commercial species are to be removed.
(Recommendation 6)
- At project point 4, the RPF has proposed the construction of an off-channel waterhole in a class-II watercourse. A discussion took place as to whether an in-channel waterhole may be appropriate at this location but there was no conclusion as to which one would be better. It was agreed that at project point 4, an in-channel waterhole may be constructed as an option to the originally proposed off-channel waterhole.
(Recommendation 7)
- At project point 5, the RPF has proposed the installation of a 60" CMP to replace a plugged 30" CMP in a class-II watercourse. In evaluating this project, it was observed that there is an incised erosion gully that runs diagonally away from the associated watercourse that is the result of diversion created by the plugged 30" CMP. Much of this erosion gully is within the WLPZ associated with the class-II watercourse. The new project will alleviate future diversions and the erosion gully does not appear to present an imminent threat to nearby water resources. Additional stabilization to the erosion gully may be achieved by placing earthen material into the gully and countering the slope to pre-erosion gully conditions. Therefore, at project point 5, the spoils removed as a result of the watercourse crossing installation may be placed in the adjacent erosion gully located in the WLPZ to re-contour the slope to pre-erosion gully conditions.
(Recommendation 8)
- At project point 7, the RPF has proposed the construction of an off-channel waterhole on the downstream side of the associated

class-II watercourse crossing. This heavily vegetated area has moderately steep side slopes and the watercourse channel is approximately 20 feet below the intended road from which water tender operations would occur. There is no shoulder on the down stream side of the road; therefore, water tenders performing drafting operations would most likely obstruct the through traffic of log hauling operations. The attention of the Review Team was then focused on the upstream side of the watercourse crossing where it was observed that there was a wide turnout on the road with a much less elevation difference between the road and watercourse channel. In considering the operational benefits as well as the ability to construct the waterhole with less environmental disturbance and impact, the proposed waterhole at project point 7 shall be placed on the upstream side of the associated class-II crossing.

(Recommendation 9)

- DFG and SPI representatives discussed current language that is now being included in all DFG 1600 permits that states specific mitigations concerning the construction of waterholes. This THP was submitted in 2007 and the most recent language has not been included as part of this THP. SPI representatives acknowledged the use of the current language in their most recent plans and are receptive to incorporating that language into this plan. DFG will be submitting a separate PHI report for this plan that states the specific language and mitigation measures discussed. Prior to Second Review, the RPF shall incorporate into the THP specific mitigation measures related to waterhole construction that is to be provided by DFG in a separate PHI report.

(Recommendation 10)

- There are two waterholes identified on the THP maps that are not associated with any of the proposed projects in this THP. These waterholes are aquatic resources that have a potential to be impacted by operations. Prior to Second Review, the RPF shall identify the waterholes in item 26 of Section II and reference the protection measures associated with waterholes that is included in the DFG 1600 permit located at the end of Section II.

(Recommendation 11)

a. Are watercourse crossings to be used when water is present?

No Yes (explain below)

This plan proposes to use existing haul roads that cross class-II and class-III watercourses. These crossings are well designed culvert and rocked low water crossings. The presence of water at these crossings is likely to exist during the winter period. Adherence to the Forest Practice Rules and mitigations specified in item 23 of the THP will prevent the roads and/or crossings from being used under saturated soil conditions, thus preventing road material in amounts sufficient to cause a turbidity increase into the watercourse associated with this crossing.

30. Are winter operations appropriate?

Yes No (explain below) N/A

31. If winter operations are appropriate, are additional mitigations needed to protect the beneficial uses of water?
 No Yes (explain below) N/A
32. Have the downstream domestic water supply notification requirements been properly met (14 CCR 1032.10)?
 Yes No (explain below) N/A
33. Is this THP in a watershed declared "sensitive" by the Board of Forestry?
 No Yes (If yes, provide discussion below.)
34. Comments/general observations regarding watercourse protection.

During the PHI, portions of the haul road adjacent to project points 5 and 6 were observed to most likely be within the WLPZ once it is flagged. 14 CCR 1034(x)(16) states that the location of roads within a WLPZ shall be mapped. Prior to Second Review, the RPF shall identify and map all segments of road that are within a WLPZ. (Recommendation 12)

GEOLOGY, EROSION HAZARD RATING & HAZARD TREATMENT

35. Have soils within the THP area been correctly classified?
 Yes No (explain below) N/A
36. Has the erosion hazard rating for soils within the operating area been correctly calculated, as per Technical Rule Addendum #1?
 Yes No (explain below) N/A
37. Are operations proposed on unstable areas not fully explained and justified in the THP?
 No Yes (explain below) N/A
38. Are proposed hazard reduction mitigations sufficient to prevent buildup of insect populations thus preventing the spread of disease?
 Yes No (explain below) N/A
39. Will proposed hazard reduction mitigations be sufficient to reduce risk to nearby structures and provide defensible space around buildings and along roads?
 Yes No (explain below) N/A
40. Comments/general observations regarding geology, EHR and hazard treatment.

ARCHAEOLOGY

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

41. Does the RPF's archaeological survey appear adequate based upon spot checks of potentially sensitive areas?

Yes No (explain below) N/A

42. If sites are present, are the archaeological site descriptions and/or site records accurate with regard to site size, content, and mapped location?

Yes No (explain below) N/A

43. If sites are present, is the proposed archaeological site protection adequate to prevent significant adverse impacts?

Yes No (explain below) N/A

*The Girard TS-1 archaeological site was observed to be 25 feet outside of a proposed unit boundary and no protection measures have been provided for this site within the Confidential Archaeological Addendum associated with this THP. 14 CCR 969.1(c)(11) states that the Confidential Archaeological Addendum shall include a "description of any specific enforceable protection measures to be implemented both within the site boundaries and within 100 feet of the site boundaries". Since this site is within 25 feet of proposed timber operations, the RPF shall revise the Confidential Archaeological Addendum for this THP and incorporate the necessary information and protection measures for the Girard TS-1 site.
(Recommendation 13)*

44. Comments/general observations regarding archaeology.

WILDLIFE, FISHERIES, AND PLANTS

45. Are any state or federal (T&E) listed species or habitat present in the THP area?

No Yes (explain below)

46. Is a CESA or FESA consultation required? If questionable, contact DFG for assistance.

No Yes (explain below)

47. Have impacts to wildlife and plants, including listed and non-listed species, been correctly assessed within the THP and appropriate protection provided?

Yes No If not, discuss and list recommendations below:

48. Is late successional forest present on this THP (14 CCR 959.16)?

No Yes (explain below)

49. If late successional forest is present and proposed for harvesting, will such harvest significantly reduce the amount and distribution of late succession forest stands, or their functional wildlife habitat value so it constitutes a significant adverse impact of the environment as defined in Section 895.1?

No Yes (explain below) N/A

50. Are coho salmon considerations applicable to this plan?

No (Go TO 59) Yes **If yes, answer questions 51-58.**
Explain all No and N/A responses in
Comments/General Observations.

51. Are proposed protection measures (zones and widths) for all watercourses adequate for the protection of coho salmon habitat?

Yes No N/A

52. Is proposed total vegetation retention in the first 25 feet of the WLPZ of the post-harvest stand sufficient to provide shade cover over watercourses and maintain water temperatures? What is the percentage of shade cover over Class I and II watercourses?

Percentage of Shade Cover:

Yes No Preharvest Post Harvest

53. If water temperatures were taken during the PHI or temperature information was supplied by the RPF, is water temperature relative to coho habitat within the preferred temperature range?

Yes No N/A

54. Will the post-harvest stand in the WLPZ provide for adequate recruitment of large woody debris on Class I and II watercourses?

Yes No N/A

55. Are proposed erosion control and soil stabilization measures for the following adequate to protect coho habitat?

a. Operations in the WLPZ (roads, landings, or tractor operations)?

Yes No N/A

b. Watercourse crossings (permanent and temporary)?

Yes No N/A

c. Winter operations?

Yes No N/A

d. Site preparation?

Yes No N/A

56. Are protection measures adequate to deal with adverse impacts from significant rain events, even during the non-winter period?
 Yes No
57. Are protection measures adequate to prevent significant adverse impacts on downstream flows from water drafting operations?
 Yes No N/A
58. Will chemical treatments (herbicides, pesticides, or road treatments) be applied?
 No Yes If yes, answer a.
- a. Is an adequate buffer provided to assure nutrient sources are not supplied to watercourses?
 Yes No

59. Comments/general observations regarding wildlife and fisheries.

The Department of Fish and Game (DFG) has completed a biological review for this THP. As part of that review, DFG biologist, Sandra Jacks, attended the PHI. Potential aquatic and terrestrial impacts were evaluated, which included in depth waterhole development discussions. No potential significant impacts to wildlife resources were observed.

CUMULATIVE IMPACTS

60. Are resource assessment areas appropriate?
 Yes No (explain below) N/A (for modified THP)
61. Has the RPF correctly assessed the potential for significant cumulative impacts upon resource values within the assessment areas?
 Yes No (explain below) N/A
62. Has the RPF accurately listed all known past/present/future projects within the assessment area?
 Yes No (explain below) N/A

*****SECTION III*****

OTHER CONCERNS

63. Are there other concerns which are not covered under the subject areas listed above in PHI Report Items 1-62?

 No X Yes (explain below)

- In Section III of the THP, under the Addendum to Item 25 discussion, it is stated that "temporary roads constructed and/or used during the winter period shall have waterbreaks installed prior to the end of the day if there is a 30% or higher chance of rain before the next day, as forecasted by the National Weather Service and, further, shall be blocked prior to weekends or other shutdown periods". This is enforceable language that is not currently located in Section II of the THP. Prior to Second Review, the RPF shall include in Section II of the THP the enforceable language regarding waterbreak and road blockage procedures that is currently located in Section III.
(Recommendation 14)
- Under item 14 in Section II of the THP, the RPF states that 3 square feet of basal area per acre will be retained in the alternative prescription units, but in the alternative prescription discussion in Section III the RPF states that 2 square feet of basal are per acre will be retained. For plan consistency, the RPF shall revise the description of oak retention in Sections II and III so that the information is consistent.
(Recommendation 15)
- Under item 14 in Section II of the THP, the RPF states that hardwoods may be used to meet an enforceable quantifiable retention standard established as part of the alternative prescription. This statement constitutes the management of hardwoods and subsequently the management of type B species. Therefore, the RPF shall either remove the reference that hardwoods may be used to meet an enforceable quantifiable retention standard for hardwoods or check the "Yes" box in item 14(f) to indicate that group B species are being proposed for management within this THP.
(Recommendation 16)

64. Was a focused PHI conducted?

 X No Yes If yes, note general comments and observations below in Item 66.

RESPONSES TO PUBLIC CONCERNS

65. Has the public raised concerns regarding the proposed harvest? If yes, list concerns and provide responses below:

 X No Yes (explain below)

66. Comments/general observations to other and public concerns.

*****SECTION IV*****

PHI REPORT RESPONSE

Registered Professional Forester's response to the CDF preharvest inspection recommendations for:

THP or Amendment # 4-07-043 ELD Date 8-15-08

CDF RECOMMENDATIONS --In Conformance.
TO REVIEW TEAM: --Not in Conformance - Denial Recommended.
 X --In Conformance if Recommendations Agreed Upon.

 Yes X No -- PHI map attached as part of the recommendations.

PHI Recommendations

1. The new effective date for the commencement of the Public Comment period shall be August 7th, 2008.
2. The RPF shall re-evaluate the assessment of the California black oak component associated with this THP and revise the THP as necessary.
3. The RPF shall adjust the acreage on units 261 and 265 so that they do not exceed the maximum acreage limitations of 20 acres as per 14 CCR 953.1(2). Additionally, the RPF shall either reduce the acres in unit 270 to the maximum of 20 acres or provide substantial evidence that an increase in acreage is justified.
4. The RPF shall change the THP map and references in the THP to accurately describe the placement of the proposed seasonal road associated with unit 270.
5. At project point 1, a rocked low water crossing shall be installed instead of the originally proposed 60" squash pipe.
6. The RPF shall revise language in the DFG NOTIFICATION OF LAKE OR STREAMBED ALTERATION for project point 1 and other project points in which commercial species are to be removed.
7. At project point 4, an in-channel waterhole may be constructed as an option to the originally proposed off-channel waterhole.
8. At project point 5, the spoils removed as a result of the watercourse crossing installation may be placed in the adjacent erosion gully located in the WLPZ to re-contour the slope to pre-erosion gully conditions.
9. The proposed waterhole at project point 7 shall be placed on the upstream side of the associated class-II crossing.
10. The RPF shall incorporate into the THP specific mitigation measures related to waterhole construction that is to be provided by DFG in a separate PHI report.

11. The RPF shall identify the waterholes in item 26 of Section II and reference the protection measures associated with waterholes that is included in the DFG 1600 permit located at the end of Section II.
12. The RPF shall identify and map all segments of road that are within a WLPZ.
13. The RPF shall revise the Confidential Archaeological Addendum for this THP and incorporate the necessary information and protection measures for the Girard TS-1 site.
14. The RPF shall include in Section II of the THP the enforceable language regarding waterbreak and road blockage procedures that is currently located in Section III.
15. The RPF shall revise the description of oak retention in Sections II and III so that the information is consistent.
16. The RPF shall either remove the reference that hardwoods may be used to meet an enforceable quantifiable retention standard for hardwoods or check the "Yes" box in item 14(f) to indicate that group B species are being proposed for management within this THP.

RPF RESPONSE:

- _____ I agree to the above recommendation(s) and include the recommendation(s) and/or attachment(s) as part of the plan.
- _____ I agree to the above recommendation(s) with the following exceptions as noted and explained below.
- _____ I agree to an extension of the date of plan determination. Such extension is granted to _____ (Date).

_____ Date
 RPF Signature