

To: Mike Noonan, Unit Chief THP NO. 4-08-23/TUO-2 - McKee Hill THP

From: Candace Gregory, Southern Region Chief

\*\*\*\*\*SECTION I\*\*\*\*\*

Review Team Recommendations:

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

Reviewed by: WDS  
 Dist. by: CAA  
 Dist. Date: 10/1/08  
 2 - TCU PS  
4 TO  
5A TLO  
 ARCH LTO  
RPF OMG  
 INSP BOE  
 OTHER: \_\_\_\_\_  
 FPS \_\_\_\_\_  
 Status: PHI

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: September 9, 2008 FILING DATE: September 12, 2008

PHI MUST BE CONDUCTED BETWEEN FILING DATE AND September 22, 2008

DATE(s) PHI CONDUCTED: September 22, and September 23, 2008 INSPECTION NO: 1

PHI/DIRECTORS DETERMINATION DATE EXTENDED BY MUTUAL CONSENT:      YES

REVIEW BASED UPON PREVIOUS VISIT: DATE

RPF: Michael Fascilla (209) 532-7141 FIELD HOURS: 24 OFFICE HOURS: 24

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 DFG REGION: 4 WQ REGION: 5A INSPECTOR: Frese

AGENCIES REQUESTING TO ATTEND PHI:

Regional Water Quality Control Board:  
Central Valley (Region 5)

Department of Fish and Game Region:  
Rancho Cordova (Region 2)

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

- (916) 358-2301 Rhianna Lee
- (916) 358-2900 Tim Nosal
- (916) 358-2916 Sandra Jacks

Lahontan (Region 6)

Fresno (Region 4)

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

- X (209) 588-1879 Dan Applebee
- (559) 243-4014x238 Lisa Gymer

REVIEW TEAM:

- X Review Team Chair (559) 243-4153 Bill Solinsky
- Forest Practice Manager (559) 243-4114 Mike Bacca
- Archaeologist (559) 243-4119 Linda Pollack
- Archaeologist (916) 261-1108 Gerrit Fenenga
- X Archaeologist (916) 651-3289 Tony Overly
- X Geologist (916) 322-4853 Bill Short
- Geologist (916) 327-2903 John Schlosser

OTHER AGENCIES: \_\_\_\_\_

Phone; Individual

PHI-EZ Version 8.2 (2/04/99)

4-08-23/TUO-2 - McKee Hill THP

First Review Date: September 9, 2008

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. First review responses, with a cover page including the THP/NTMP number, date, an errata sheet for replacement pages to the plan, and the RPF of Record's Signature and RPF number, can be submitted by e-mail to FresnoReviewInbox@fire.ca.gov (The maximum size of the e-mail cannot exceed 2 MB). Failure to send a copy of these responses to the Fresno office may result in delays of THP approval.

1. Item #14(a) indicates that there are 277 acres as part of the plan for operational non-harvest activities. The Botanical Survey Maps and the Archaeological Coverage Map show the operational have not been surveyed. Please state under Item #38 that the operational area shall be surveyed for all resources that may be potentially effected during operations, including but not limited to wildlife, botanical, and archaeology.
2. It is indicated on page 103 in Section III that there are four (4) regeneration units in excess of 20 acres for tractor yarding Please change Item #14(c) on page 10 to state "Yes".
3. Item #14(c) on page 10 states that Unit 4851 contains 23 acres although the THP Map on page 34, and the discussion on page 103 state the unit contains 24 acres. Please revise.
4. Item #14(c) on page 10 and the discussion on page 103 states that Unit 5555 contains 22 acres, although the THP Map on page 34 and the discussion on page 104 shows this unit having 23 acres. Please revise.
5. Item #14(d) states harvest trees within the selection and retention areas will be marked with blue paint, and trees to be retained individually within the AP units will be marked with orange paint. Please also state "which is visible from two sides" as per 14 CCR 895.1 definition of Marking.
6. The plan area is adjacent to Class I and Class II watercourses, and the discussion on page 167 indicates that there is habitat present for the Mountain yellow-legged frog (*Rana muscosa*). In 2003 the U.S. Fish and Wildlife Service determined that listing yellow-legged frogs in the Sierra Nevada was warranted but was precluded by higher priority actions. Please identify under Item #32 the Mountain yellow-legged frog and describe the provision for the protection.
7. As per 14 CCR 1034(x)(1), please provide at least one map that shows the "Logging Area" or "THP Boundary" versus "Project Boundary".

8. The THP Maps on pages 32 through 39 provide little difference in identification with shading between the Visual Retention and WLPZ Selection areas. Please revise the maps to show a distinct difference of the legend symbol between the two areas.
9. Please identify in the legend of the THP Maps on pages 32 through 39 "AP visual Retention" instead of just Visual Retention since the silviculture method is an Alternative Prescription.
10. Item #24 identifies six (6) proposed temporary roads that will be constructed or reconstructed, although just "Road, Temporary" is shown. Please show the all new constructed roads as proposed on a THP Map as per 14 CCR 1034(x) (4).
11. Please show all appurtenant roads on the THP maps as per 14 CCR 1034(x) (4).
12. The plan area is within the North Fork Stanislaus Hydrologic Area of the Stanislaus River as stated on page 133. The lower portions of the Stanislaus River is listed under Section 303(d) of the Federal Clean Water Act. As per 14 CCR 898, "When assessing cumulative impacts of a proposed project on any portion of a waterbody that is located within or downstream of the proposed timber operation and that is listed as water quality limited under Section 303(d) of the Federal Clean Water Act, the RPF shall assess the degree to which the proposed operations would result in impacts that may combine with existing listed stressors to impair a waterbody's beneficial uses, thereby causing a significant adverse effect on the environment."

Please check the following web page and include within the cumulative impacts assessment a list the stressors and discuss how this project as proposed will not combine with the listed stressor to have a significant impact on the 303(d) listed waterbody. A complete list of these impaired waterbodies is found at [http://www.waterboards.ca.gov/water\\_issues/programs/tmdl/docs/303d\\_lists2006/epa/r5\\_06\\_303d\\_reqtmtdls.pdf](http://www.waterboards.ca.gov/water_issues/programs/tmdl/docs/303d_lists2006/epa/r5_06_303d_reqtmtdls.pdf).

13. In Section IV on page 183 the plan states that the "use of herbicides could occur anywhere from preharvest to ten years post harvest", and on page 185 provides to possibility to use herbicides "as a preharvest treatment". Please provide a site specific discussion regarding a preharvest herbicide treatment, since certain constraints are known, including timing, type of application, and type of herbicides to be used.
14. Please indicate in Cumulative Impacts discussion if rodenticides may be use or not as part of this project.
15. Site Preparation Addendum, p. 11 - It is unclear if broadcast burning is proposed. (DFG #1)

16. Item 35, p. 27, Oak Retention - As little as 19 square feet of oak basal area per 40 acres is proposed for retention (1 oak  $\geq$  16" diameter / 3 acres) while the FPR's recommend 400 sq. ft. / 40 acres; and the watershed (and presumably the entire Biological Assessment Area) is said to currently contain an average of approximately 219 sq. ft. / 40 acres. How will the proposed oak retention prescription achieve the recommended oak stocking levels after harvest and over time? (DFG #2)
17. Peak Flows, p. 144 - Is the THP area comparable to the USA THP study site in elevation, topography, vegetation, soils, and precipitation regime? (DFG #3)
18. Biological Resources Cumulative Effects, p. 154 - How will special habitat features associated with large, old trees be maintained over time (e.g. hollow boles, large cavities, mistletoe brooms, multiple tree tops, etc.)? (DFG #4)
19. Mountain Yellow-Legged Frogs, p. 167 - MYLF larvae (tadpoles) are fully aquatic and require up to 4 years to metamorphose into adults. Larvae and adults overwinter in pools which are deep enough to remain partially unfrozen. Could proposed water drafting negatively impact aquatic larvae and overwintering individuals by reducing stream flows or pool volumes? (DFG #5)
20. Herbicides, p. 187 - The discussion of Atrazine states that the chemical is slightly toxic to amphibians and their eggs. Is there potential for use of this chemical to negatively impact MYLF or their larvae or eggs? (DFG #6)

**CDF Inspector - respond to the following questions:**

- a. Please evaluate the in-lieu practices. *The proposed in-lieu practices were evaluated during the preharvest inspection (PHI). Additional mitigation measures were recommended at some of the sites. Please refer to the PHI report for more information on these sites.*
- b. Check the boundary for sites -1159, -954, -956, and McKee Hill #1 to determine if they are accurately mapped. Does the equipment exclusion zone need to be extended to protect possible subsurface materials? (ARCH #1) *Sites 1159, 954, and 956 were evaluated during the PHI. These sites were mapped appropriately, and the protection measures on the ground were appropriate. One additional site was discovered within 100 feet of the plan area during the PHI. Please refer to the PHI report for more information.*
- c. Please contact Mr. Dan Applebee ([dapplebee@dfg.ca.gov](mailto:dapplebee@dfg.ca.gov)) at (209) 588-1879 to arrange a mutually agreeable PHI date. *Dan Applebee was notified, and attended the PHI on 9/22/2008 and 9/23/2008.*
- d. Please notify Mr. Chris Cochran at (916)464-4820 ([cmcochrane@waterboards.ca.gov](mailto:cmcochrane@waterboards.ca.gov)) of the PHI date. *Chris Cochran was notified, but did not attend the PHI.*

- e. Please notify Mr. Bill Short at (916) 322-4853 ([Bill.Short@conservation.ca.gov](mailto:Bill.Short@conservation.ca.gov)) of the PHI date. *Bill Short was notified, and attended the PHI on 9/22/2008.*
- f. Please notify Mr. Tony Overly [Tony.Overly@fire.ca.gov](mailto:Tony.Overly@fire.ca.gov) at (916) 651-3289 of the PHI date. *Tony Overly was notified, but was not able to attend the PHI.*
- g. Please notify Mr. Bill Solinsky ([Bill.Solinsky@fire.ca.gov](mailto:Bill.Solinsky@fire.ca.gov)) at (559) 243-4153 of the PHI date. *Bill Solinsky was notified, and attended the PHI on 9/22/2008.*

/s/ Solinsky

4-08-23/TUO-2 - McKee Hill THP

TO: Candace Gregory, Southern Region Chief

DATE: 9-26-08

FROM: Mike Noonan 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:

The following people attended the preharvest inspection (PHI) on September 22, 2008:

Mike Fascilla-Sierra Pacific Industries (SPI)  
Tim Tate- SPI  
Bill Short- California Geological Survey (CGS)  
Lisa Gymer- California Department of Fish and Game (DFG)  
Dan Applebee- DFG  
Bill Solinsky- California Department of Forestry and Fire Protection (CDF)  
Adam Frese-CDF

The following people attended the PHI on September 23, 2008:

Mike Fascilla-SPI  
Tim Tate- SPI  
Lisa Gymer-DFG  
Dan Applebee-DFG  
Adam Frese- CDF

b. Personnel contacted regarding the preharvest inspection:

The following people were contacted regarding the PHI, but were not able to attend:

Chris Cochrane- Regional Water Quality Control Board  
Tony Overly- CDF Archaeologist

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

Yes       No (explain below)

A Notice of Intent was posted in a conspicuous location on Forest Road 5N02, a public road.

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

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:

The project description provided on pages 81 and 82 of the plan is consistent with observations made during the PHI.

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)
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)

The entire plan area has been appropriately classified as Site I timberland.

SILVICULTURE

9. Are the silvicultural methods prescribed appropriate for stand conditions?  
 Yes     No (explain below)

The plan proposes 545 acres of the visual retention alternative prescription, 47 acres of clearcutting, and 35 acres of selection. The 35 acres of selection consists of the watercourse and lake protection zones (WLPZ).

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
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

The selection areas are expected to comply with the stocking standards of 14 CCR 953.2(a)(2)(A) immediately upon completion of operations. No additional mitigation measures were recommended regarding silviculture in the proposed selection areas.

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

Black oaks will be reduced in some units, where the growth of planted, shade intolerant conifers would be inhibited. A minimal amount of oak was observed within the proposed even aged units, and within the general area, during the PHI. Oaks were generally observed near the edges of lava caps, and within rock outcrops. In Unit 5031, an approximate three acre area had

been designated as a wildlife retention area (WRA). Many oaks will be retained within the unit as a result of this WRA. Additionally, single oaks had been designated for retention within the unit. In general, proposed harvest units appeared to contain much less than 10 square feet of basal area per acre. Observations made during the PHI are consistent with information provided on page 27 of the plan, which estimates less than one square foot of basal area per acre of oak within the proposed plan area. Due to the lack of oak within the area proposed for harvest under this timber harvesting plan (THP), it is appropriate to retain oaks within the units to maintain the existing hardwood component. During the PHI it was recommended to retain all the oaks within proposed harvest units, unless specific units could be identified by the RPF where hardwoods need to be reduced to facilitate the establishment and growth of conifers. I did not observe any proposed even age units with enough oak to inhibit regeneration efforts; however, I did not visit every unit during the inspection. Prior to Second Review, the RPF shall revise the plan to specify all oaks will be retained within the proposed units, with the exception of specific units, identified by the RPF, where oaks must be reduced to provide for the establishment and growth of conifer regeneration. If units are identified where oaks must be reduced, the RPF shall specify the amount of oak to be retained within these units (CDF PHI recommendation #1)

13. Comments/general observations regarding silviculture. The proposed silviculture is appropriate. Even aged regeneration units harvested under other THPs were seen during the PHI. Oaks, snags, aggregations of merchantable conifers, down woody debris, live culls, etc were seen within harvested units. These features retained within harvest units provide for structural diversity. Plantations observed within the area were healthy and growing rapidly. Plantations observed adjacent to Units 5356 and 5379 were approximately 15 feet in height. Proposed even aged units are not contiguous to even aged units with regeneration less than five years old, or less than five feet tall. The RPF has identified five even aged regeneration units that exceed the maximum twenty acre size limit. Unit 4581 is 23 acres in size, Unit 4875 is 24 acres in size, Unit 4956 is 25 acres in size, and Unit 5555 is 22 acres in size. With the exception of Unit 4956, the proposed oversized units comprise logical logging units, bounded by roads, property lines, plantations, watercourses, and lava caps. Unit 4956 was relatively flat, and the ridge on the southwest boundary was not well defined. Reducing the unit's size to twenty acres was discussed during the PHI. There is a Class II watercourse to the west of the unit, and a small lava cap area. Leaving an "island" west of the Class II and the lava cap to be harvested at a later date is possible, but may require skidding through a plantation or crossing the Class II during a future harvest. I did not observe the northernmost portion of the unit. The unit is bounded on the east side by plantation. The plan proposes several mitigation projects, and additional road abandonment was recommended during the PHI. I recommended the RPF reference these off site mitigation measures as additional justification for Unit 4956. I do not foresee any problems from this proposed oversized unit. Prior to Second Review, the RPF shall revise the justification for oversized unit 4956 to include off-site mitigation work (CDF PHI recommendation #2).

Trees were marked within the Class I WLPZs, and a sample of the mark was evaluated during the PHI. The mark within the WLPZs appeared to comply with the minimum standards of the Forest Practice Rules. The mark, where evaluated, seemed to concentrate on the larger diameter

trees, although trees from a range of diameter classes were designated for harvest. In many cases, the large diameter trees were in poor condition.

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)

*Many of the stands proposed for even aged management have been selected through multiple times, and consist primarily of shade tolerant white fir. The proposed harvest is expected to enhance the productivity of these sites by harvesting stands with declining vigor, and growing new stands of thrifty, vigorous trees.*

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)

*This plan uses MSP option (a). The plan provides for the production of high quality timber products, makes provisions for effective conifer regeneration, and considers other forest values, such as water quality, wildlife, and protection of archaeological resources.*

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

*Trees within the WLPZ were designated for harvest with blue paint. Trees within even aged regeneration units were designated for retention with orange paint, or groups were designated for retention with blue and yellow flagging.*

- 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. The proposed harvest area has been tractor logged in the past, and is well suited for ground based yarding equipment. In most instances, the existing skid trail and landing network may be reused. The plan proposes an exception to 14CCR 954.2(j), which prohibits site preparation on slopes over 40%. The plan proposes the use of excavators for site preparation on slopes between 40% and 50%. The plan contains isolated areas of steep slopes where this exception would be applied. This exception has been proposed in several other SPI plans I have inspected. Where I have seen this practice implemented, it has been successful. I did not recommend any additional mitigation measures regarding the proposed exception.

Two areas were observed where skid trails had intercepted and diverted Class III watercourses. One of these areas was identified by the RPF, the other was discovered during the PHI. THP Map Point 8.5 is a skid trail that has diverted a Class III watercourse. The surface of the trail consists of cobble. The plan proposes to dip out the crossing, construct a berm on the downhill side of the crossing, and construct waterbreaks on the skid trail. The channel above the skid trail is not confined, and capturing the channel with one berm will be difficult. Breaching the berm on the outside edge of the skid trail in more than one location would be more effective in capturing the Class III. There is a large cedar stump on the edge of the trail where one dip should be located, and another dip should be located on the trail approximately 50-feet below the cedar stump. Prior to Second Review, the RPF shall revise the plan to specify at Map Point 8.5, run-off shall be directed across the skid trail at the large

cedar stump, and approximately 50 feet below the large cedar stump (CDF PHI recommendation #3).

The Class III watercourse below Map Point 19.13 is intercepted by a skid trail. This diversion was not addressed in the plan. In order to ensure this diversion is corrected, the plan should address this point. Prior to Second Review, the RPF shall revise the plan to specify erosion controls shall be constructed on the skid trail below Map Point 19.13, to correct the diversion of the Class III watercourse (CDF PHI recommendation #4).

#### 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

The plan proposes the construction of five temporary roads, and reconstruction of one 1,200 foot road segment. These roads are shown on the THP maps as temporary roads, but not proposed roads. The proposed roads consist of short spurs, less than 300 feet in length. The proposed 1,200 feet of reconstruction will not be conducted. Please see the discussion below for more information on this road segment. While reviewing First Review Team Questions, the RPF agreed to revise the THP maps to show the location of the proposed roads on the THP maps.

As a result of the PHI, three additional road segments were recommended to avoid WLPZ road segments, and to improve a watercourse crossing. Please refer to the discussion below for more information.

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

At Map Point 19.26, the plan proposes to open and reconstruct a WLPZ road that was abandoned under the Grizzly Boy THP (4-97-127/Tuo-11). The road surface was ripped, and scattered conifer regeneration was observed along the road. The road and landing are in close proximity to the watercourse. Use of this road, and a landing within the WLPZ of the South Fork of Griswold Creek would facilitate down hill skidding in Unit 5222. The distance between the midslope road above the WLPZ and the outer edge of the WLPZ was only 206 feet where measured during the inspection. Geologist Bill Short found a bench between the midslope road and the WLPZ where a short road segment and landing could be constructed to facilitate yarding, and eliminate the need for the abandoned WLPZ road and landing. The new road would have an approximate 15% grade, and would be approximately 200 feet long. Construction of the new road and landing is a better alternative, because it minimizes disturbance within the WLPZ of Griswold Creek, and will allow vegetation to continue to grow on the abandoned road and landing surfaces. Prior to Second Review, the RPF shall revise the

plan to delete the WLPZ road at Map Point 19.26, the WLPZ landing at Map Point 19.8, and the temporary crossing at Map Point 19.7. The RPF shall revise the plan to address the proposed road and landing below the midslope road in the northwest portion of Unit 5222 that was reviewed during the PHI (CDF PHI recommendation #5).

THP Map Point 19.20 consists of an existing road crossing at the confluence of two watercourses. The road crosses both watercourses, and provides access to units 4855 and 4873. An old landing is located on the east side of the crossings. The landing is poorly drained, and a gulley was observed from the landing to one of the crossings. A better location to cross was observed just upstream, where only one channel would be crossed rather than two channels, the crossing could be at a right angle to the channel, and the channel could be crossed with minimal reshaping of the channel and banks. The new crossing would require the construction of approximately 250 feet of new road, which primarily follows the prism of an existing road or skid trail. The new crossing and road would allow for the abandonment of the existing crossings and WLPZ road, and is a better long term crossing. Prior to Second Review, the RPF shall revise the plan to include the new crossing upstream from Map Point 19.20, and the new road construction. The new crossing shall be a permanent rocked ford, using the specifications provided on page 62 of the plan. The entire road width shall be rocked for 25 feet on either side of the crossing prior to log haul. The existing road and crossings shall be abandoned by constructing a barrier at the intersection on the northwest side of the watercourse. The landing on the east side of the watercourse shall be cross drained, directing runoff to the north, and away from the abandoned crossings prior to October 15, the year the road is used (CDF PHI recommendation #6).

At THP Map Point 19.10, the existing road is immediately adjacent to the South Fork of Griswold Creek. We discussed abandoning this road segment, and constructing a new road outside of the WLPZ from Map Point 19.15, approximately 350 feet northeast toward the crossing at Map Point 19.1. Abandoning the existing road would minimize the potential for sediment delivery to the watercourse, and would allow vegetation to become established on the abandoned road bed which, in time, would contribute shade and filter strip properties. The Class III crossing at Map Point 19.6 would be removed, and a 36-inch diameter culvert would be installed at the new crossing upstream. Based on the size of the channel, a 36-inch diameter culvert is appropriate. The Class III crossing at Map Point 19.5 does not cross the road at a right angle, but runs down the road to the northeast. Moving the outlet of this crossing approximately 60 feet to the south will direct runoff straight across the road, and away from the abandoned road segment. Abandonment of this existing WLPZ road segment will be an environmental benefit, and is effective off site mitigation for the oversized, even age unit 4956. Prior to Second Review, the RPF shall revise the plan to specify the WLPZ road segment at Map Point 19.10 shall be abandoned from Map Point 19.15, approximately 350 feet toward Map Point 19.1. A bypass road shall be constructed outside of the WLPZ. The culvert at Map Point 19.16 shall be removed, and a 36-inch diameter culvert shall be installed at the new crossing upstream. The outlet of the Class III crossing at Map Point 19.15 shall be re-aligned approximately 60-feet to the south to direct the Class III across the road at a right angle. Road abandonment shall consist of blocking both ends of the abandoned road, constructing waterbreaks, and placing logging slash or straw mulch on the abandoned road surface (CDF PHI recommendation #7).

25. Comments/general observations regarding roads and landings. The

proposed timber harvesting plan contains many projects to improve existing roads and watercourse crossings. Many of these proposals were evaluated during the preharvest inspection. The plan also proposes the use of several existing landings that encroach on the WLPZ of watercourses, or are bisected by Class III watercourses. The in-lieu landings were evaluated during the inspection. The plan places appropriate seasonal restrictions on the use of these landings, as well as effective soil stabilization measures. In general, vegetation was not established on the existing landings, and re-use of the landings is a better alternative than construction of new landings. Also, as noted in the plan, the topography limits opportunities to construct new landings. The plan also provides for the development or improvement of drafting sites to provide for road maintenance during operations. Proposed drafting sites were also evaluated during the inspection. The following discussion focuses on the map points where additional mitigation measures were recommended during the PHI.

Map Point 13.2 consists of an existing 24-inch diameter culvert, with a perched bedload of cobble above the inlet. The plan proposes to maintain this crossing by removing the bedload for approximately 25-feet above the inlet of the culvert, and constructing an overflow dip on the road below the crossing. To improve the effectiveness of the overflow dip, it was recommended to slope the road toward the overflow dip. Prior to Second Review, the RPF shall revise the plan to specify the road shall be outsloped at Map Point 13.2 (CDF PHI recommendation #8).

THP Map Point 13.16 is an existing Class III crossing. The area around the culvert has been armored with rip-rap in the past, but not up to the road surface. Minor erosion was observed above the rip-rap, where run-off concentrates. The extent of the rip-rapping is unknown, because side cast material has covered up some of the rock. The plan calls for armoring the edge of the existing down drain. Because the extent of the rock is unknown along this fill slope, and this down drain serves as the critical dip if the culvert were to plug, it was recommended to armor the entire down drain. Prior to Second Review, the RPF shall revise the plan to specify the down drain at Map Point 13.16 shall be armored with rip-rap from the road surface to the channel (CDF PHI recommendation #9).

THP Map Point 8.3 consists of a 30-inch diameter culvert. Additional rock armoring of the fill slope was recommended to minimize the potential for erosion at this site. There is a lot of large, native rock in the vicinity that could be used to armor the fill slope. Prior to Second Review, the RPF shall revise the plan to specify the fill slope shall be armored with large, native rock at Map Point 8.3 (CDF PHI recommendation #10).

THP Map Point 19.14 consists of an existing 24-inch diameter culvert used to cross a Class III watercourse. The road has an approximate 15% grade at this location, and if the culvert were to fail, the watercourse would be directed down the surface of the road. A critical dip down grade from the culvert would carry the watercourse across the road in the event of a culvert failure. Prior to Second Review, the RPF shall revise the plan to specify a critical dip shall be constructed on the road downgrade from the culvert at Map Point 19.14 (CDF PHI recommendation #11).

THP Map Point 8.9 consists of an existing 48-inch diameter culvert at a Class II watercourse crossing. A large pool has formed at the outlet of the culvert, and back eddying from the watercourse has the potential to cause erosion at the outlet of the culvert. Placing large (24-inch plus) rock at the bottom of the pool is expected to minimize the potential for further erosion at this site. The plan calls for excavation of bed load material at the inlet of the culvert, and armoring of a lead out on the outside edge of the road. The bed load material consists primarily of cobble, and it would be appropriate to use this material to armor the lead out. Prior to Second Review, the RPF shall revise the plan to specify large rock, 24-inches in diameter and greater, shall be placed in the pool below the outlet of the culvert at Map Point 8.9, in the area between the existing boulders (CDF PHI recommendation #12).

THP Map Point 13.14 consists of an existing 54-inch diameter culvert on a Class II watercourse. As with the culvert at Map Point 8.9, pooling at the outlet of the culvert has the potential to erode the outlet of the culvert. Also, the inlet of the culvert is not seated properly, and water is piping under the culvert. The channel above the culvert is flat, and carries run off through a meadow area. It appears the piping can be corrected by using cement, clay, or rock to seal the inlet. Prior to Second Review, the RPF shall revise the plan to specify the inlet of the culvert at Map Point 13.14 shall be sealed to prevent further piping, and the pool at the outlet of the culvert shall be armored with large rock, greater than 24-inches in diameter (CDF PHI recommendation #13).

THP Map Point 18.14 is an existing ford on the North Fork of Griswold Creek. Rock on the road surface on the south side of the crossing has been dispersed, and needs to be re-rocked for approximately 40 feet. The road grade is fairly steep between the crossing, and the landing above. Re-rocking the approach prior to log haul would make it difficult for trucks to climb this road segment. Rocking the road segment after log haul, but prior to winter period is appropriate. During the inspection, we discussed using native rock on the road surface. There is an abundance of native rock at this location, and it would be appropriate to use this rock to armor the road surface. Prior to Second Review, the RPF shall revise the plan to specify the southern approach to the crossing at Map Point 18.14 shall be rocked for approximately 40 feet after log haul, but prior to the winter period (CDF PHI recommendation #14).

The existing in-lieu landing at Map Point 13.23 encroaches approximately 30 feet into the WLPZ, rather than 20-feet as described in the plan. The watercourse bank near the intersection of the road and the landing is steep, with little vegetative cover. The majority of the landing surface within the WLPZ will consist of decked logs, rather than equipment use. It was recommended to establish a berm which will define the outside edge of the landing and direct road run off away from the watercourse. Extending the berm approximately 30 feet to the south of the landing will prevent runoff being directed into the Class II watercourse. Prior to Second Review, the RPF shall revise the plan to disclose the landing at Map Point 13.23 extends approximately 30-feet into the WLPZ. The RPF shall revise the plan to specify a berm, at least 24-inches in height, shall be constructed approximately 20-feet from the Class II, to define the outside edge of the landing, and prevent run off from being directed toward the

watercourse. The berm and a drainage ditch shall extend approximately 30-feet to the south of the landing to direct run off away from the Class II watercourse (CDF PHI recommendation #15).

A skid trail entering the in-lieu landing at Map Point 8.4 is within the equipment limitation zone (ELZ) of a Class III watercourse. This trail segment could easily be moved outside of the ELZ, which would minimize the potential for sediment delivery to the watercourse. No other mitigation measures were recommended at this in-lieu landing. Prior to Second Review, the RPF shall revise the plan to specify the skid trail within the ELZ at Map Point 8.4 shall be re-routed to avoid the ELZ. Prior to commencement of timber operations, the RPF shall flag the location of the new trail outside of the ELZ (CDF PHI recommendation #16).

Map Point 18.9 is an existing landing within the WLPZ of a Class I watercourse. The landing is located on an alluvial flat, and is within approximately 50-feet of the watercourse. The plan proposes to use two existing skid trails within the WLPZ at this location. The plan states brow logs will be placed at the lower edge of the landing, but does not specify a distance. I recommended the language be revised to clarify the brow logs shall be placed a minimum of 50-feet from the watercourse. Alternatives to the in-lieu skid trails were considered. The eastern spur is located at the base of a steep slope. There is not an opportunity to build a trail between the road and the WLPZ. End-lining logs up to the seasonal road, and skidding down the road back to the landing is not a good option. This practice would not be efficient, and it would turn the road to powder. The existing trail within the WLPZ is stable, on flat ground, and a large berm is located between the trail and the watercourse which minimizes the potential for sediment delivery. There is an approximate 150-foot segment of this trail near the landing that is approximately 15 feet from the watercourse. Construction of a berm along this segment would minimize the potential for sediment delivery to the watercourse. The western skid trail spur is just below the existing road. This area is relatively flat. While use of the skid trail would be convenient, it is not necessary. This skid trail segment within the WLPZ should not be used for timber operations. Prior to Second Review, the RPF shall revise the plan to specify brow logs shall be placed on the edge of the landing a minimum of 50-feet from the edge of the watercourse at Map Point 18.9. The plan shall specify a berm shall be constructed on the outside edge of the in-lieu trail segment for approximately 150-feet to tie in with the existing berm. The plan shall be revised to prohibit use of the in-lieu skid trail to the west of the landing at Map Point 18.9 (CDF PHI recommendation #17).

Waterhole Number 3 is located along Beaver Creek, just upstream from the bridge on Forest Road 5N02. The approach to this drafting site is on an alluvial flat. The approach was dusty, and it appeared that fine material could be delivered to the watercourse. Rocking the approach would minimize the potential for sediment delivery at this location. Prior to Second Review, the RPF shall revise the plan to specify the approach to Waterhole Number 3 shall be rocked with clean, 2 to 3 inch drain rock approximately 50 feet in length, to the first dip (CDF PHI recommendation #18).

THP Map Point 7.5 consists of an existing waterhole in a wet area next to the road. An old 18-inch diameter pipe drains a watercourse and

overflow from the waterhole across the road. This pipe has failed in the past. The berm separating the waterhole from the road has also failed in the past. The plan proposes to enlarge the waterhole, and replace the existing culvert with a 24-inch diameter culvert. Improvement of the waterhole will be beneficial. Just above the culvert, pine needles and other debris have been piled up in the channel by the runoff, and have the potential to divert the watercourse. While improving the waterhole, this debris should be removed, and the channel should be defined. The road is somewhat outsloped near the culvert, but the drainage needs to be improved to ensure water will be directed straight across the road if the culvert were to fail. There is an elevation difference of approximately 3 feet between the waterhole, and the inlet of the culvert, and a potential for runoff from the waterhole to downcut. Rocking the overflow channel between the top of the waterhole and the inlet of the culvert will minimize the potential for erosion at this site. Prior to Second Review, the RPF shall revise the plan to specify the debris shall be removed from the channel above the culvert at Map Point 7.5, and the channel shall be defined. The overflow channel between the waterhole and the inlet of the culvert shall be armored with rip-rap, and the existing dip in the road shall be improved to serve as a critical dip for the new culvert (CDF PHI recommendation #19).

Map Point 19.17 is a proposed waterhole on the South Fork of Griswold Creek. The plan proposes to excavate an approximate 20-foot by 20-foot area, about 8-feet deep. This site is in a flat next to the watercourse. The banks of the watercourse are vertical, and approximately four to five feet in height. The watercourse channel is wide, with very little structure or pooling. The plan proposes a berm between the drafting pad and the waterhole. According to the RPF, this hole has been used in the past. This is not a maintained waterhole because river cobble fills the hole in. During the PHI, two other alternatives were considered. The first alternative was an off channel waterhole adjacent to the proposed in-channel site. The second alternative was an off channel waterhole about 100 feet upstream from the proposed site. The off channel waterholes were not used because the RPF thought filling the waterholes would be problematic. Erosion of the steep banks next to the watercourse at the proposed drafting site was the primary concern at this site. Using the excavated bed load material to armor the steep banks was recommended. This would also direct the watercourse away from the steep banks. The watercourse provides habitat for Mountain yellow-legged frogs. Timing restrictions are appropriate to protect the Mountain yellow-legged frogs. Dan Applebee of DFG will provide RPF Fascilla with appropriate timing restrictions, which will be incorporated into the plan prior to Second Review. Dan Applebee requested to be notified prior to construction of this waterhole. Prior to Second Review, the RPF shall revise the plan to specify the excavated bed load material at Map Point 19.17 shall be used to armor the vertical banks of the watercourse. The RPF shall revise the plan to include direction on timing of use of this waterhole to avoid potential impacts to Mountain yellow-legged frogs. The RPF shall revise the plan to state the Department of Fish and Game shall be notified prior to construction of this waterhole (CDF PHI recommendation #20).

#### WATERCOURSE PROTECTION

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

Yes       No (explain below)       N/A

Watercourse classification was evaluated during the PHI. Watercourses observed during the PHI were appropriately classified.

Two Class III watercourses were observed in Unit 5222 that are not on the THP maps. 14 CCR 1034(x)(9) requires the location of all watercourses with Class I, II, III, or IV waters to be shown on the THP map. Prior to Second Review, the RPF shall revise the THP maps to show the location of the two Class III watercourses in Unit 5222 (CDF PHI recommendation #21).

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

The plan proposes the use of several in-lieu landings, and two in-lieu skid trails. These proposals were evaluated during the PHI, and some additional mitigation measures were recommended to minimize the potential for adverse impacts. These landings and skid trails were discussed earlier in this report.

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

The plan does not propose any exceptions to the standard WLPZ widths. One WLPZ measured during the PHI was not in compliance with the minimum widths required by the Forest Practice Rules. I told RPF Fascilla the flagging needed to be revised prior to operations, and I would check WLPZs for compliance on future inspections.

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

Yes       No (explain below)       N/A

Several watercourse crossings will be used to facilitate the proposed timber operations. The plan proposes effective mitigation measures to minimize the potential for sediment delivery at these crossings. In some instances, additional mitigation measures were recommended during the PHI to provide additional protection. Please see the discussions provided earlier in this report for additional mitigation measures recommended at specific crossings.

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

No       Yes (explain below)

Measures such as temporary pipes or large rock shall be used at crossings where water is present to prevent trucks from hauling through flowing water.

30. Are winter operations appropriate?

Yes  No (explain below)  N/A

*The plan proposes operations during the winter period, and places appropriate limitations on operations during the winter period. Site specific features, such as the in-lieu landings, will not be used during the winter period. This plan is located at a relatively high elevation, and the proposed plan area is fairly remote. It is not likely that timber operations will occur on this plan during the winter period.*

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

*The Forest Service is the only landowner within 1,000 feet downstream of the proposed plan area. Correspondence with the Stanislaus National Forest has been provided on paged 204 through 206 of the plan.*

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. *The plan proposes many improvements to the existing road system and existing crossings. These improvements are expected to have an environmental benefit by minimizing the potential for sediment delivery to watercourses.*

*Segments of Griswold Creek observed during the PHI had wide, shallow channels, with little structure such as pools or large woody debris.*

#### GEOLOGY, EROSION HAZARD RATING & HAZARD TREATMENT

35. Have soils within the THP area been correctly classified?

Yes  No (explain below)  N/A

*The soil description provided in the plan is consistent with information in "Soil Survey, Stanislaus National Forest Area, 1981."*

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

*The plan area has been assigned an erosion hazard rating of "moderate", which is consistent with observations made during the PHI.*

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

The plan proposes hazard reduction measures consistent with the Forest Practice Rules. Logging slash shall be lopped within 100 feet from the edge of the public roads, and within 50-feet from the edge of private roads open to the public. Page 24 of the plan provides clear instructions to the LTO, and lists roads and units where hazard reduction is required.

The plan requests a mechanism to obtain an extension to the April 1 deadline regarding disposal of landing piles. The language in the plan is similar to that of other approved timber harvesting plans. No additional mitigation measures were recommended regarding the treatment of logging slash.

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. Most of the erosion problems observed during the inspection were associated with Class III watercourses being diverted by skid trails or roads. Road and skid trail drainage should be improved by use and subsequent installation of erosion controls.

#### 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

The RPF's survey effort appears to be appropriate. One new site was discovered by the RPF during plan preparation. An additional prehistoric site was discovered during the PHI, within 100 feet of Unit 5031. Prior to Second Review, the RPF shall revise the Confidential Archaeological Addendum to include a primary record for the site discovered near Unit 5031 during the PHI (CDF PHI recommendation #22).

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

A spot check was conducted for some of the sites. The sites appeared to be accurately mapped and described. The flagged perimeters of the sites were appropriate.

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

Yes       No (explain below)       N/A

Sites observed during the inspection were provided appropriate protection measures. The flagged boundaries are equipment exclusion zones, and timber will be felled away from the sites.

44. Comments/general observations regarding archaeology. Three sites were visited specifically to determine if protection measures were appropriate. A few other sites were observed during the PHI, but not looked at as closely.

#### 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)

The proposed plan area contains habitat for the Northern Goshawk. There is an historic Northern Goshawk nest site adjacent to the plan area, on Forest Service property. This area was visited during the PHI, and goshawks were heard in the stand. White wash was also observed. The plan provides protection measures for the Northern Goshawk, a Board of Forestry sensitive species.

Mountain yellow-legged Frogs were observed within the proposed plan area during the PHI. Mountain yellow-legged frogs are discussed in the plan, but Section II of the plan does not include protection measures for this species. First Review Team question #6 requires Section II be revised to include protection measures. Protection measures discussed during the PHI consisted of the standard WLPZ protection measures, and maintaining water levels during drafting operations.

Specific units have been identified to be surveyed for the California spotted owl. The plan provides protection measures for this species should they be discovered.

Botanical resources were considered, and the plan includes protection measures for sensitive plants.

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:

See above.

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. *Snags will be retained within proposed harvest units unless they pose a safety hazard, or are merchantable timber. Hardwood retention was discussed in the silviculture portion of this report.*

#### CUMULATIVE IMPACTS

60. Are resource assessment areas appropriate?

X Yes \_\_\_ No (explain below) \_\_\_ N/A (for modified THP)

The Watershed Assessment Area (WAA) consists of the Upper Griswold Creek planning watershed. Griswold Creek is a tributary of the North Fork of the Stanislaus River. First Review Team question #12 notes the lower portions of the Stanislaus are listed as water quality limited under Section 303(d) of the Federal Clean Water Act, and requested the RPF provide additional information to assess how the proposed timber operations may combine with existing listed stressors to result in an adverse, cumulative impact. Pollutants/stressors listed for the lower portions of the Stanislaus River are Diazinon and Group A pesticides associated with agriculture, mercury associated with mineral extraction, and unknown toxicity from an unknown source.

The Biological Assessment Area (BAA) consists of the Upper Griswold Creek planning watershed, plus a one mile radius around the proposed timber harvest area.

The Recreational Assessment Area (RAA) consists of the proposed timber harvest area, plus the area within 300 feet of the proposed timber harvest area.

The Soil Productivity Assessment Area (SPAA) consists of the proposed timber harvest area.

The Visual Assessment Area (VAA) for this plan consists of the Watershed Assessment Area because the proposed plan area is remote, and will not be

visible to a significant number of people less than three miles away.

The Vehicular Traffic Assessment Area (VTAA) consists of public and private roads leading from the proposed harvest area to Highway 4.

The proposed assessment areas are consistent with other approved plans, and the Forest Practice Rules.

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

The RPF has evaluated the potential for significant, adverse cumulative impacts on pages 116 to 201 of the timber harvest plan. I agree with the RPF's conclusion that the proposed timber harvest operations are not likely to result in a significant, adverse cumulative impact.

The plan proposes appropriate silvicultural systems that will maintain or enhance the productivity of the site. Features such as residual conifers, oaks, snags, and downed logs will be retained within even aged regeneration units to provide for diversity in the stand structure, and to retain trees with characteristics favorable to wildlife.

The plan considers potential impacts to wildlife species and sensitive plants, and includes appropriate protection measures to avoid impacts, or minimize them to a level of insignificance.

Roads and watercourse crossings will be improved as a result of the proposed timber harvest. Improving the existing roads and crossing will result in an environmental benefit by minimizing potential sources of sediment delivery to watercourses. As a result of the proposed timber harvest operations a WLPZ road segment will be abandoned, Class III watercourse diversions will be corrected, and multiple minor erosion features will be corrected by rock armoring etc.

The plan places appropriate limitations on winter operations.

The proposed plan area provides minimal public recreational opportunities. The proposed harvest area is within the state game refuge, so hunting is not allowed. The proposed timber harvest operations are not likely to adversely effect public recreation.

The proposed timber harvest area is remote, and will not be visible to a significant number of people. Ridges screen the public's view of the harvest area. Additionally, the proposed visual retention alternative prescription retains merchantable conifers, snags, and oaks in the units to soften the effects of the even aged regeneration. The proposed timber harvest operations are not likely to result in a significant, adverse cumulative impact to visual resources.

Forest roads, Boards Crossing Road, and Highway 4 have historic precedent for the transportation of forest products. The proposed timber harvest operations are not likely to result in a significant, adverse cumulative impact to vehicular traffic.

62. Has the RPF accurately listed all known past/present/future projects within the assessment area?

Yes       No (explain below)       N/A

Past, present, and future projects are addressed on pages 116 through 120 of the plan.

\*\*\*\*\*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       Yes (explain below)

64. Was a focused PHI conducted?

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:

No       Yes (explain below)

On September 19, 2008 the Review Team forwarded me an e-mail from Susan A. Robinson of Ebbetts Pass Forest Watch. The e-mail contained an aerial photo of the proposed plan area. The photograph depicts harvested even age units near the proposed plan area that appear to be bare. The e-mail states a concern that past timber harvest plans have produced many clearcuts in the area, and the entire area is going toward contiguous plantations over time. Public comment letters on previous plans have stated a concern that plantations are generally sterile, and do not provide favorable wildlife habitat. Several harvested even age units were observed during the preharvest inspection, and I have seen many harvested units during various inspections. Plantations observed in the area of the photograph during the PHI ranged from well established plantations with trees over 15 feet tall, to recently harvested units containing trees less than three feet tall. While ponderosa pine is the primary species planted, plantations contain a variety of species such as Jeffrey pine, sugar pine, incense cedar, Douglas-fir, California red fir, white fir, and giant sequoia. Black oak, snags, large woody debris, dispersed merchantable conifers, and groups of merchantable conifers were observed in units harvested under other plans. In addition to retention of residual trees, oaks, snags, logs etc.; factors such as snow and wind damage, mortality from insects, and disease such as mistletoe will continue to develop favorable wildlife characteristics within the plantations over time. Besides the retention of residual trees within individual harvest units to provide for structural diversity, features such as watercourse and lake protection zones (WLPZ) for Class I and Class II watercourses, and equipment limitation zones (ELZ) for Class III watercourses provide for diversity as well. During the PHI it was noted that the understory species observed in an unharvested stand were seen in a harvested even aged regeneration unit on the other side of the road.

66. Comments/general observations to other and public concerns. Please see the discussion above.

\*\*\*\*\*SECTION IV\*\*\*\*\*

PHI REPORT RESPONSE

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

THP or Amendment # 4-08-023/TUO-2 Date: September 26, 2008

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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.

1. Prior to Second Review, the RPF shall revise the plan to specify all oaks will be retained within the proposed units, with the exception of specific units, identified by the RPF, where oaks must be reduced to provide for the establishment and growth of conifer regeneration. If units are identified where oaks must be reduced, the RPF shall specify the amount of oak to be retained within these units.
2. Prior to Second Review, the RPF shall revise the justification for oversized unit 4956 to include off-site mitigation work.
3. Prior to Second Review, the RPF shall revise the plan to specify at Map Point 8.5, run-off shall be directed across the skid trail at the large cedar stump, and approximately 50 feet below the large cedar stump.
4. Prior to Second Review, the RPF shall revise the plan to specify erosion controls shall be constructed on the skid trail below Map Point 19.13, to correct the diversion of the Class III watercourse.
5. Prior to Second Review, the RPF shall revise the plan to delete the WLPZ road at Map Point 19.26, the WLPZ landing at Map Point 19.8, and the temporary crossing at Map Point 19.7. The RPF shall revise the plan to address the proposed road and landing below the midslope road in the northwest portion of Unit 5222 that was reviewed during the PHI.
6. Prior to Second Review, the RPF shall revise the plan to include the new crossing upstream from Map Point 19.20, and the new road construction. The new crossing shall be a permanent rocked ford, using the specifications provided on page 62 of the plan. The entire road width shall be rocked for 25 feet on either side of the crossing prior to log haul. The existing road and crossings shall be abandoned by constructing a barrier at the intersection on the northwest side of the watercourse. The landing on the east side of the watercourse shall be cross drained, directing runoff to the north, and away from the abandoned crossings prior to October 15, the year the road is used.
7. Prior to Second Review, the RPF shall revise the plan to specify the WLPZ road segment at Map Point 19.10 shall be abandoned from Map Point 19.15, approximately 350 feet toward Map Point 19.1. A bypass road shall be constructed outside of the WLPZ. The culvert at Map Point

19.16 shall be removed, and a 36-inch diameter culvert shall be installed at the new crossing upstream. The outlet of the Class III crossing at Map Point 19.15 shall be re-aligned approximately 60-feet to the south to direct the Class III across the road at a right angle. Road abandonment shall consist of blocking both ends of the abandoned road, constructing waterbreaks, and placing logging slash or straw mulch on the abandoned road surface.

8. Prior to Second Review, the RPF shall revise the plan to specify the road shall be outsloped at Map Point 13.2.
9. Prior to Second Review, the RPF shall revise the plan to specify the down drain at Map Point 13.16 shall be armored with rip-rap from the road surface to the channel.
10. Prior to Second Review, the RPF shall revise the plan to specify the fill slope shall be armored with large, native rock at Map Point 8.3.
11. Prior to Second Review, the RPF shall revise the plan to specify a critical dip shall be constructed on the road downgrade from the culvert at Map Point 19.14.
12. Prior to Second Review, the RPF shall revise the plan to specify large rock, 24-inches in diameter and greater, shall be placed in the pool below the outlet of the culvert at Map Point 8.9, in the area between the existing boulders.
13. Prior to Second Review, the RPF shall revise the plan to specify the inlet of the culvert at Map Point 13.14 shall be sealed to prevent further piping, and the pool at the outlet of the culvert shall be armored with large rock, greater than 24-inches in diameter.
14. Prior to Second Review, the RPF shall revise the plan to specify the southern approach to the crossing at Map Point 18.14 shall be rocked for approximately 40 feet after log haul, but prior to the winter period.
15. Prior to Second Review, the RPF shall revise the plan to disclose the landing at Map Point 13.23 extends approximately 30-feet into the WLPZ. The RPF shall revise the plan to specify a berm, at least 24-inches in height, shall be constructed approximately 20-feet from the Class II, to define the outside edge of the landing, and prevent run off from being directed toward the watercourse. The berm and a drainage ditch shall extend approximately 30-feet to the south of the landing to direct run off away from the Class II watercourse.
16. Prior to Second Review, the RPF shall revise the plan to specify the skid trail within the ELZ at Map Point 8.4 shall be re-routed to avoid the ELZ. Prior to commencement of timber operations, the RPF shall flag the location of the new trail outside of the ELZ.
17. Prior to Second Review, the RPF shall revise the plan to specify brow logs shall be placed on the edge of the landing a minimum of 50-feet from the edge of the watercourse at Map Point 18.9. The plan shall specify a berm shall be constructed on the outside edge of the in-lieu trail segment for approximately 150-feet to tie in with the existing berm. The plan shall be revised to prohibit use of the in-lieu skid trail to the west of the landing at Map Point 18.9.

18. Prior to Second Review, the RPF shall revise the plan to specify the approach to Waterhole Number 3 shall be rocked with clean, 2 to 3 inch drain rock approximately 50 feet in length, to the first dip.
19. Prior to Second Review, the RPF shall revise the plan to specify the debris shall be removed from the channel above the culvert at Map Point 7.5, and the channel shall be defined. The overflow channel between the waterhole and the inlet of the culvert shall be armored with rip-rap, and the existing dip in the road shall be improved to serve as a critical dip for the new culvert.
20. Prior to Second Review, the RPF shall revise the plan to specify the excavated bed load material at Map Point 19.17 shall be used to armor the vertical banks of the watercourse. The RPF shall revise the plan to include direction on timing of use of this waterhole to avoid potential impacts to Mountain yellow-legged frogs. The RPF shall revise the plan to state the Department of Fish and Game shall be notified prior to construction of this waterhole.
21. Prior to Second Review, the RPF shall revise the THP maps to show the location of the two Class III watercourses in Unit 5222.
22. Prior to Second Review, the RPF shall revise the Confidential Archaeological Addendum to include a primary record for the site discovered near Unit 5031 during the PHI.

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**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