

May 2, 2006

TO:

California Department of Forestry and Fire Protection
135 Ridgeway Avenue
Santa Rosa CA 95401
santarosapubliccomments@fire.ca.gov

Via email and US Mail - return receipt requested

FROM:

Lindsey Holm
Timber Harvest Plan Monitor
Environmental Protection Information Center
PO Box 147
Eureka, California 95501



RE: LSFS and THP 1-03-232 (HUM) "Windmill"

Dear CDF,

These comments are submitted on behalf of the staff, board, and members of the Environmental Protection Information Center (EPIC). Based in Humboldt County, California, EPIC has worked for nearly three decades to address the impacts of industrial forestry practices on private lands. EPIC strongly opposes the extensive logging of late Successional Forest Stands (LSFS) under this THP. We feel that the proposed logging of almost all of the remaining LSFS remaining in upper Davis and Hollister Creeks would do irreparable harm these watersheds and the associated old-growth dependent species.

14 CCR 919.16 requires that when "late succession forest stands are proposed for harvesting and such harvest will significantly reduce the amount and distribution of late succession forest stands or their functional wildlife habitat value so that it constitutes a significant adverse impact on the environment as defined in Section 895.1, the RPF shall provide..." information and analysis of impacts. The proposal to harvest LSFS in this THP clearly meets the broad criteria of a significant adverse impact on the environment as defined in § 895.1. SPI has failed to disclose information and conduct analysis required by § 895.1.

Total LSF in the assessment areas and in THP is not disclosed. Furthermore, the area within which the total LSFS was calculated is not defined. Also, information is not given regarding LSFS that are *not* proposed for clear-cut.

In their LSFS analysis, SPI contends that LSFS that are scheduled for uneven-aged management do not need to be analyzed because the stands "shall retain the functional characteristics of LSFS post-harvest." SPI provides no facts to support this contention and we disagree that 'as a rule' selectively harvested LSFS retain their functional characteristics and/or continue to meet the criteria for LSFS (as defined in § 895.1).

SPI fails to identify and describe all of the LSFS within the THP and limits the discussion to LSFS that are proposed for clear-cutting. The information and analysis provided in the THP is deficient because the rules require ;

- a) Information on LSFS habitat structure proposed for harvesting
- b) discussion of how the proposed harvesting will affect the existing functional wildlife habitat for species primarily associated with late succession forest stands in the plan or the planning watershed (including impacts on vegetation structure, connectivity, and fragmentation.)
- c) A description of the structural characteristics for each late succession forest stand within the planning watershed and the methods used to develop the description.
- d) a discussion of anticipated recruitment procedures for important functional wildlife habitat elements
- e) An analysis of the long-term significant adverse effects on fish, wildlife, and listed species known to be primarily associated with late succession forests.
- f) feasible mitigation measures to mitigate or avoid such long-term significant adverse effects shall be described and incorporated in the THP

§ 919.16 requires that maps of late succession forest stands be provided that show;

- A) late succession forest stands within the planning watershed and any other stands that provide functional wildlife habitat for species primarily associated with late succession forest stands that are on the ownership,
- B) those stands which are currently proposed to be harvested, and
- C) known stands on other ownerships.

The maps provided in the THP are insufficient to implement § 919.16 and are inconsistent with the requirement of § 897 (3) which entails that "information in proposed plans shall also be sufficiently clear and detailed to permit adequate and effective review by responsible agencies and input by the public...". The maps provided are vague and laid out in a way that the information they present cannot be meaningfully applied to the THP and an analysis of LSFS. First of all, there are no LASFS maps in the THP, there are maps that depict late seral forest (which are not defined in the FPRs) and are not sufficient for the analysis required pursuant to § 919.16. In addition these maps do not show the THP boundaries or any useful landmarks other than township and range lines and at such a small scale it is impossible to decipher what areas change between the pre-harvest and post-harvest maps. It is our position that these maps, at a minimum should include LSFS, township & Range sections, the plan boundaries, and conventional landmarks such as ridges, main roads and watercourses.

Although it is identified how much LSFS there is [in the planning watershed?, it is not specified], and how much LSFS will be clear-cut in the THP, there needs to be more information to put these numbers in context and evaluate the significance of the loss and degradation of LSFS. Please add the items listed below to the THP and incorporate them into the analysis of LSFS required by 919.16.

- a) A map of LSFS that is of the same scale as standard silviculture maps (1inch=800 ft) and that shows roads, watercourses and contours (or ridgelines).
- b) How many acres of LSFS are in the Planning watershed

- c) How many acres of LSFS are in the BAA
- d) How many acres of LSFS are on the SPI ownership in the Planning watershed/BAA
- e) How many acres of LSFS are within the boundaries of the THP
- f) How many acres of LSFS are proposed for each type of harvest in the THP
- g) How many acres of forested area is in the Planning watershed/BAA
- h) What is the ratio of LSFS to young forest, mid successional forest stands and meadows, respectively, in the BAA/Planning watershed?

Also, please revise the THP with a re-assessment the cumulative impacts analysis to biological resources on a species-by-species basis using assessment area that correspond to each of their characteristics and habitat needs pursuant to **14 CCR § 952.9**.

The adverse environmental impacts from the logging proposed in this THP has not been fully disclosed, adequately analyzed or mitigated to a level of insignificance. This plan is an example of the kind of logging plans that the forest practice rules attempts to prevent and should be denied pursuant to **14 CCR 898.1**.

Sincerely,

Lindsey Holm
Timber Harvest Plan Monitor