



Sent via electronic mail on date shown to: [santarosapubliccomment@fire.ca.gov](mailto:santarosapubliccomment@fire.ca.gov)

April 2, 2018

Resource Management  
CAL FIRE Santa Rosa  
135 Rigway Ave  
Santa Rosa, CA 95540

**RE: THP 1-12-026HUM, Am #6, Significant New Information and Recirculation**

Dear CAL FIRE Santa Rosa Resource Management:

The following comments are submitted on behalf of the Environmental Protection Information Center (EPIC) regarding Timber Harvest Plan 1-12-026HUM, “Long Ridge Cable,” Amendment #6, Substantial Deviation. Please consider these comments as significant environmental concerns raised during the review team process, and accordingly, please provide a written response to each point raised prior to issuing a Notice of Conformance for any of the subject-THP/Substantial Deviation.

The CAL FIRE request for additional responsive information from Humboldt Redwood Company dated March 8, 2018, and posted on the CAL FIRE FTP site on March 28, 2018 here: [ftp://thp.fire.ca.gov/THPLibrary/North\\_Coast\\_Region/THPs/THPs2012/1-12-026HUM/Amendments/Major%20Am%20%236/20180328\\_1-12-026HUM\\_AM6S\\_ADD-CDF.pdf](ftp://thp.fire.ca.gov/THPLibrary/North_Coast_Region/THPs/THPs2012/1-12-026HUM/Amendments/Major%20Am%20%236/20180328_1-12-026HUM_AM6S_ADD-CDF.pdf) requests responses that, when provided, will meet the definition of “significant new information,” within the meaning at 14 CCR 895.1 of the Forest Practice Rules “definitions,” and accordingly, the Amendment #6, as a Substantial Deviation, must be recirculated for a period of 30-days for additional public comment prior to any issuance of a Notice of Conformance by the Department.

The recirculation is required on the basis of the definition of “significant new information” at 14 CCR 895.1 under bullet #4, which provides recirculation is required if, “the plan was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

The CAL FIRE request for additional information at bullet #1 states that because the new road and a section of the pre-existing “D” road will be used for timber operations, both roads will need to be amended into the appurtenant road map for the THP. Currently, neither the proposed road or the “D” road are part of the appurtenant road map for the THP, and consequently, the public was deprived from the opportunity to review and provide comment on the use of either of these roads for the purposes of raising significant environmental concerns with their proposed

use in the context of the entire road network appurtenant to the THP. Consequently, the Amendment #6, as a Substantial Deviation must be recirculated for further public inspection and comment.

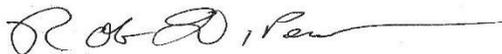
Further, CAL FIRE bullet #2 states that the newly-amended section of the “D” road will need to be evaluated pursuant to 14 CCR 923.1(e)(1) of the Forest Practice Rules “Road Rules” which requires the RPF to evaluate all logging roads and landings in the logging area, including appurtenant roads, for the existence of significant existing and potential erosion sites. Given that this evaluation was not conducted with the submission of Amendment #6, as a Substantial Deviation, the public was deprived the opportunity to review and present comment upon concerns with significant existing and potential erosion sites associated with the “D” road in the context of the entire THP and the entire appurtenant road network. Consequently, the Amendment #6, as a Substantial Deviation must be recirculated for further public inspection and comment.

Finally, CAL FIRE bullet #4 asks the RPF and Humboldt Redwood Company to describe how 14 CCR 923.1(a)(1) is being met; this rule requires consideration on the part of timberland owners to consider reductions of duplicative roads and total road mileage.

HRC provided no rationale or explanation in the originally-submitted Amendment #6 as to why the additional new road segment is necessary, and did not provide any information about why sections of the pre-existing “D” road needed also to be amended into the THP. Further, HRC provided no information or rationale to explain why the pre-existing road network, which the company has used to conduct partial timber operations on the subject-THP area, is now inadequate whereas it was adequate at the time of THP submission and for the conduct of partial timber operations on the subject-THP site. To the extent HRC provides additional information responsive to this CAL FIRE question, the information was not available for consideration during the public comment period for Amendment #6, Substantial Deviation, and accordingly, the public was deprived of the opportunity to inspect and comment upon the information. Consequently, the Amendment #6, as a Substantial Deviation must be recirculated for further public inspection and comment.

EPIC also questions why it took 20 days from the date the request for additional information from HRC was sent by CAL FIRE to get the request letter posted to the CAL FIRE THP FTP site for public inspection. Irrespective, EPIC contends that to the extent HRC provides additional information in response to the CAL FIRE request, that the Amendment #6, Substantial Deviation must be recirculated for 30-days of additional public inspection prior to issuance of a Notice of Conformance in order for the Department to fully comply with the provisions of the Forest Practice Rules governing the submission of significant new information after the close of the public comment period.

Sincerely,



Rob DiPerna

Environmental Protection Information Center (EPIC)