



Outlook

---

## Coastal permitting clarification re: Berry's Knotfarm NTMP (1-25NTMP-00001-SON)

---

**From** Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

**Date** Tue 2/24/2026 2:40 PM

**To** Cecily Condon <cecily.condon@sonomacounty.gov>; Jacob Sedgley <jacob.sedgley@sonomacounty.gov>; Gary Helfrich <gary.helfrich@sonoma-county.org>

**Cc** Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Tillema, Logan@Coastal <logan.tillema@coastal.ca.gov>

Dear Cecily, Jacob, and Permit Sonoma Staff,

It has recently come to our attention that the proposed Berry's Knotfarm/Sheephouse Creek project (1-25NTMP-00001-SON) near the Russian River currently under review by CAL FIRE is a Non-Industrial Timber Management Plan (NTMP), and not a Timber Harvesting Plan (THP), and therefore should require a coastal development permit (CDP). Specifically, although "timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973" are exempt from CDP requirements under both the Coastal Act and LCP (because they do not constitute development, as development is therein defined), NTMPs are not so exempted, including as an NTMP is not the same as a THP. In fact, when THPs were explicitly identified as exempt in the definition of development when the Coastal Act was first enacted in 1976, NTMPs did not exist. NTMPs were first identified in 1991, and they were not exempted from the CDP requirements. Thus, the NTMP (1-25NTMP-00001-SON) also requires a CDP.

From materials we have seen, it appears that the proposed NTMP project is located fully within the County's coastal permitting jurisdiction, with a substantial portion of the project being in the area where CDP decisions are appealable to the Commission (as well as a portion that appears outside of the coastal zone). We would also note that part of the project appears to be located in a Coastal Commission-identified Special Treatment Area (STA), which may also affect such project when a CDP is considered. We'd note that STAs are defined by the Coastal Act as "an identifiable and geographically bounded forested area within the coastal zone that constitutes a significant habitat area, area of special scenic significance, and any land where logging activities could adversely affect public recreation area or the biological productivity of any wetland, estuary, or stream especially valuable because of its role in a coastal ecosystem" (Section 30118.5). These areas were identified by the Commission in the late 1970s, with maps forwarded to the State Board of Forestry and Fire Protection, along with "specific reasons for those designations and with recommendations designed to assist the State Board of Forestry and Fire Protection in adopting rules and regulations that adequately protect the natural and scenic qualities of such special treatment areas" (Section 30417(b).]

Please ensure that all proper CDP application processes are employed here, including in relation to STA prescriptions for that area, and please feel free to reach out as you consider that application. We are concerned about some of the activities proposed and their potential coastal resource impacts, and would appreciate the opportunity to consult as you consider the CDP application. If you have any questions, or wish to discuss this matter, please let me know. Thank you.

Best regards,

**Luke Henningsen, M.C.P.**

Coastal Planner II

North Central Coast District

California Coastal Commission

Pronouns: he/him



---

**1-25NTMP-00001-SON (Permitting Comments from Coastal Commission Staff)**


---

**From** Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

**Date** Wed 2/25/2026 4:10 PM

**To** Santa Rosa Public Comment@CALFIRE <SantaRosaPublicComment@fire.ca.gov>; Lopez, Cale@CALFIRE <cale.lopez@fire.ca.gov>; Sone, Kim@CALFIRE <Kim.Sone@fire.ca.gov>

**Cc** Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>

 1 attachment (174 KB)

CCC staff letter to Permit Sonoma (Feb 24 2026) (1-25NTMP-00001-SON).pdf;

---

**This Message Is From an External Sender**

This message came from outside your organization.

[Report Suspicious](#)

Dear CAL FIRE Staff,

Coastal Commission staff recently evaluated the Berry's Knotfarm/Sheephouse Creek project (1-25NTMP-00001-SON) and shared our conclusions with Permit Sonoma that this project constitutes a Non-Industrial Timber Management Plan (NTMP), and not a Timber Harvesting Plan (THP), and therefore should require a coastal development permit (CDP) (see attached PDF email). Given that, going forward please work with Permit Sonoma on the coastal permitting process, and please let our staff know if you have any questions or if you would like to consult with us on the coastal permitting process. Thank you.

Best regards,

**Luke Henningsen, M.C.P.**

Coastal Planner II

North Central Coast District

California Coastal Commission

*Pronouns: he/him*

