State of California
Department of Fish and Wildlife

Memorandum

Date: August 19, 2026
To: Forest Practice Manager
North Coast Region Office
California Department of Forestry and Fire Protection (CAL FIRE)

From: Kristin Garrison
Environmental Scientist
Bay Delta Region 3

Subject: California Department of Fish and Wildlife 1st Review Comments for-26-00099-SON HRRR Timber Harvest Plan (THP)

Basic Information

Contact Info: CDFW, Region 3, Kristin.Garrison@wildlife.ca.gov, (707) 944-5534

Review Team Email: SantaRosaReviewTeam@fire.ca.gov

Plan Submitter: Save the Redwoods League

RPF: Madeline V. Pusich

1st Review Date: August 2, 2026

PHI Notifications

_X_ Contact CDFW (Kristin.Garrison@wildlife.ca.gov) to schedule a mutually agreeable PHI.

Comments to be addressed prior to PHI

Comments for the RPF:

1. Section II, Item 32(a), page 72, Coho Salmon, Steelhead, Chinook Salmon – During 1st Review conducted on July 29, 2026, CDFW stated, "*Section III, Notification Information List Pursuant to Fish and Wildlife Code Section 1611 (1611 Addendum), page 142, states that work will be conducted "April 1 through November 15*" and "*Please evaluate the impacts to listed fish species at Map Point 13 and revise Item 32(a) and the 1611 Addendum to include protection measures including a modified work period to avoid listed fish species that may be present at Map Point 13*." Item 32(a) and the 1611 Addendum do not include information regarding listed fish species that may be present at Map Point 13 during work activities, nor do they include a protective measure establishing a modified work period to avoid listed fish species. The Map Point Table,

Section II, page 84, and the 1611 Addendum, Section III, page 147 state methods to divert the watercourse around the work area and to maintain unimpeded flow for fish passage, however, impacts to listed fish could occur due to excavation of temporary watercourse channels, diversion of water from the watercourse to the temporary channel, and incidental release of sediment, debris, or hazardous materials (e.g., heavy equipment leaks) from work areas adjacent to the watercourse. Please consider revising Item 32(a) and the 1611 Addendum to include information regarding presence of listed fish during crossing work and a modified work period to avoid listed fish species that may be present.

2. Section II, Item 32(a), page 71, Biological Resources, Gray Wolf – The THP states, "*If a gray wolf is discovered within the THP area, halt operations and notify the RPF or Plan submitter, and CDFW will be consulted for further recommendations*." Please consider revision of Item 32(a) to also include establishment of a 500-foot buffer if a gray wolf den or rendezvous site is detected.
3. Section II, Map Point Table, page 84, and Section III, Notification Information List Pursuant to Fish and Wildlife Code Section 1611 (1611 Addendum), page 147 – For Map Point 13 the THP states, "*Coffer dams may consist of clean sandbags, native material, or aquadams*." Use of aquadams requires filling of the dam liner with water. Please consider revising the Map Point Table and 1611 Addendum to include information regarding the source of the water to be used to fill the dam liner and whether filling will occur by gravity or by pump. If the origin of the water for filling the aquadam is from the Class I watercourse at Map Point 13, please consider revising the Map Point Table and 1611 Addendum to include protective measures to avoid the entrainment and impingement of listed fish species.
4. Section III, Notification Information List Pursuant to Fish and Wildlife Code Section 1611 (1611 Addendum), page 147 – The 1611 Addendum for Map Point 13, a Class I watercourse, states, "…*water diverted around the project site using a pump*…" and "…*with water diverted either by gravity or a pump...*" However, the 1611 Addendum states, "*Water will be flowing unimpeded*…" and "…*maintain proper unimpeded flows for any wildlife resources including fish*." Pumps are typically used when a coffer dam completely blocks flow, thus, use of a pump may conflict with the intent of providing unimpeded flow for fish passage. Additionally, the use of a pump is not included in the description of Map Point 13 within the Map Point Table, page 84. Please address these discrepancies.

Questions for the CAL FIRE Inspector

None

Topics to discuss during PHI

- Sample harvest mark
- Wildlife trees and marking, if applicable
- Watercourse classifications and transitions
- Map Points 1, 2, 3, 6, 7, 11, 12, 13, 13.1, 15, T1, T2, T3, T4
- Drafting Map Points WH-1 and WH-2