DEPARTMENT OF FORESTRY AND FIRE PROTECTION
NORTHERN REGION HEADQUARTERS - SANTA ROSA
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August 20, 2026

SAVE THE REDWOODS LEAGUE
220 Montgomery Street, Suite 350
San Francisco, CA 94104

Timber Harvesting Plan
No: 1-26-00099-SON
HRRR THP

FIRST REVIEW REPORT

In accordance with 14CCR §1037, the following report provides documentation of the 1st Environmental Review conducted in compliance with the Z'berg Nejedly Forest Practice Act. This report concludes with specific questions which the plan submitter is required to address in order for CAL FIRE to consider the plan to be in conformance with applicable laws and regulations of the State of California.

Review Team Recommendation: File - PHI

Note to RPF: All responses to the first review questions are due at the Coast - Santa Rosa prior to the preharvest inspection, or prior to second review in the event that no preharvest inspection is scheduled. You may e-mail any plan-related correspondence to SantaRosaReviewTeam@fire.ca.gov

Date Received: 8/10/2026 Date of first review: 8/20/2026 Date of Filing: 8/20/2026

PHI must be conducted by: 8/30/2026

RPF: Madeline Pusich

CDFW Region: 3 Water Quality Region: 1

Inspection Unit: Sonoma-Lake-Napa Unit Inspector: Kim Sone

First Review Chair: Cale Lopez Tentative Second Review Chair: Eric Hedge

Note to Inspector: If you cannot schedule the PHI by the deadline indicated above, it is your responsibility to request an extension of the PHI date from the RPF. In the event that an extension is granted, please send a copy of the RPFs response to review team ASAP.

Agencies Requesting Attendance on the Preharvest Inspection

Agency	Name	PHI Attendance	Phone	Available Dates
Santa Rosa Region Office	Amanda Jorgenson	Mutually Agreeable	(707) 696-4659	Please contact
RWQB	Carey Wilder	Mutually Agreeable	707-576-2472	Please contact
CDFW	Kristin Garrison	Mutually Agreeable	707-944-5534	8/26-28, 8/31, 9/1-3
CGS	Hillary Adam	Notify Only	707-738-4118	
CGS	Patrick Brand	Notify Only	707-576-2143	

Agency	Name	PHI Attendance	Phone	Available Dates
CGS	Kevin Doherty	Notify Only	707-576-2904	
Santa Rosa Region Office	Cale Lopez	Notify Only	707-576-2940	

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 Review Team members prior to the PHI. Please also send a copy of your response to these questions to the Review Team in the Coast - Santa Rosa. Failure to send a copy of these responses to the Coast - Santa Rosa may result in delays of approval.

Review Agency	Question
CAL FIRE	1. Section I, Item 5 (page 4): The zip code provided is inconsistent with the zip code provided in Items 3 & 4, as well as the 1600 permit (page 143). Please revise the Plan as necessary for accuracy and compliance with 14 CCR § 1034(e).
CAL FIRE	2. Section I, Item 8.d. (page 7): On page 121, the Plan states that THP area was "transitioned to conservation status under the ownership of Save The Redwoods League". Please revise Item 8.d. as necessary for accuracy.
CAL FIRE	3. Section II, Item 24.f. (page 40); & Section III, Addendum to Item 25 (page 139 & 140): On page 40, the Plan states that "R1 is located 30-100 feet upslope and parallel to the Class I"; however, on pages 139 & 140, the Plan states that "R1 is located 20-100 feet upslope and parallel to the Class I". Please revise the Plan for consistency.
CAL FIRE	4. Section II, page 46: Please revise the footer to reference this THP, instead the Garcia South THP.
CAL FIRE	5. Section II, Item 26.c1. (page 50): It appears that this should be marked "yes" [ref. THP Map Point T4]. Please address and revise the Plan as necessary for accuracy.
CAL FIRE	6. Section IV, Watershed Impacts Assessment Area Description (page 157): Regarding the RPF's response to RTQ #13 from the Letter of Return, the Planning Watershed number is still incorrect. Please revise.
CAL FIRE	7. Section IV, Reasonably Foreseeable Probable Future Projects: Regarding the RPF's revisions in response to RTQ #17 from the Letter of Return, on page 129, the Plan mentions further planned prescribed burns, but the Cumulative Impacts assessment does not explicitly identify any planned prescribed burns. Please clarify if these planned prescribed burns meet the definition of Reasonably Foreseeable Probable Future Projects [ref. 14 CCR § 895.1] and revise the Cumulative Impacts assessment as necessary for compliance with TRA #2.D.1.
CAL FIRE	8. Section IV, Botanical Resources Conclusion (page 239): Regarding the RPF's response to RTQ #25 from the Letter of Return, the botanical resources conclusion still discusses soil productivity and growing space loss, instead of botanical resources. Please revise.
CAL FIRE	9. Section IV, pages 154, 182 & 220: The Cumulative Impacts assessment includes multiple references to the Garcia River. Please revise.
CAL FIRE	10. Section IV, GHG Impacts Assessment (pages 254 & 255): The assessment states "Current project parameters were applied to the CalFire model and summarized on the following pages support our conclusion that the project will result in a net reduction in atmospheric carbon dioxide over time (break projected at 16 years)." However, the conclusion on page 261 states "The stands will take less than 10 years to recoup carbon lost and emitted during harvest" and the project carbon accounting worksheets indicates 6 years for the proposed Selection and 14 years for the proposed Fuelbreak. Please revise the assessment for consistency.

Review Agency	Question
ARCH	11. A confidential ARCH RTQ report has been prepared based on review of THP Section VI: CAA.
CDFW	12. 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.
CDFW	13. 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.
CDFW	14. 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.
CDFW	15. 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.
WQ	16. MP 13: Is there anticipated aggraded material in the current crossing that potentially mobilize after the culvert is removed? Does the typical diagram provided in section II accurately represent the extent of the channel excavation that will occur at this site? What is the expected frequency of use of this crossing after timber operations are complete? How can the RPF ensure that this proposed design does not result in sediment discharge to the Class I watercourse if the channel is wetted year-round?

The following questions were generated by the interagency review team to be answered on the PHI by agency staff.

CAL FIRE Inspector - evaluate the following questions:

No.	Review Agency	Question
1	WQ	When the inspection team encounters a watercourse, please verify the classification and determine if its extent has been accurately mapped.
2	WQ	Page 31 of the THP states there is one skid trail proposed for use within High EHR on slopes over 50% and moderate EHR on slopes over 65% in the northern Selection unit that include map points T1-T3. Please evaluate this skid trail proposed for use and determine if additional protections are necessary to ensure water quality is protected and add them to the THP.
3	WQ	As discussed on page 39 under Item 24 (d) proposes to construct road R1 which has multiple dormant deep-seated landslides (G1, G2 & G3) and has multiple associated shallow-seated landslides throughout the road grade (MP 8, MP 9 & MP 11). Additionally, the proposed R1 is partially located within 30'-100' of a Class I tributary to Haupt Creek. Please evaluate this proposed road construction to determine if additional protection measures are necessary to ensure adjacent watercourses are not impacted.
4	WQ	Page 55, item 27 (a) & (f), proposes to use WLPZ skid trails upslope of L2. Also, a WLPZ landing is proposed for use at L2. Please evaluate this proposal to determine if additional protections are necessary to minimize or eliminate any impact to the watercourse.
5	Kristin Garrison	During the PHI, CDFW would like to discuss/evaluate: • 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

cc: Unit, File
To view harvesting documents, please visit: https://caltreesplans.resources.ca.gov/caltrees/