

Memorandum

Date: April 28, 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 Pre-Harvest Inspection (PHI) Report for "Card" Timber Harvest Plan (THP) 1-26-00021-SON

PROJECT OVERVIEW

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| Timberland Owner/Plan Submitter | Gualala Redwood Timber, LLC. |
| RPF | Patrick Hovland |
| THP Location | Sonoma County, approximate elevation 40 to 120 feet |
| CalWATER Planning Watershed: Version 2.2.1 | Big Pepperwood Creek (1113.850201), Gualala River (1113.850202) |
| Silviculture (Acres) | Un-evenaged selection (103 acres), un-evenaged group selection (60 acres), special treatment area prescription (4 acres) |
| Yarding method | Ground-based tractor, rubber tire skidder, forwarder, feller buncher, shovel yarding |
| Other THP activities | Road reconstruction (90 feet), watercourse crossings, water drafting, extended wet weather operations |
| PHI Date(s) | April 23, 2026 |
| CalTREES PHI Recommendations Due Date | April 30, 2026 |

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| Biological Resources of Concern | Gray wolf, northern spotted owl, marbled murrelet, northwestern pond turtle, California red-legged frog, foothill yellow-legged frog, California giant salamander, coho salmon, steelhead, chinook salmon |
| PHI Attendees | <ul style="list-style-type: none"> • Kristin Garrison, Environmental Scientist, California Department of Fish and Wildlife (CDFW) • Kim Sone, CAL FIRE • Jim Burke, North Coast Regional Water Quality Control Board (NCRWQCB) • Patrick Hovland, Registered Professional Forester (RPF) • Mark Pugsley, RPF |

As a Trustee Agency for California’s fish, wildlife and native plant resources (Public Resources Code Section 21000, et seq.), a Responsible Agency pursuant to CEQA Section 15381 and Trustee Agency pursuant to Section 15386 and a Review Team Agency under Title 14, California Code of Regulations Section (14 CCR) Section 1037.5(a), CDFW provides the following feasible and project-specific recommendations in order to avoid or reduce potentially significant direct, indirect, and cumulative impacts to biological resources in accordance with the Forest Practice Rules, 14 CCR Section 1037.5(f)(1).

This report presents CDFW’s evaluation of proposed timber operations on fish, plants, and wildlife, and their habitat. CDFW’s evaluation is based on review of the THP document and participation in the PHI. CDFW used the THP, field inspection, and the databases that contain biological resource information, including the California Natural Diversity Database (CNDDDB; <http://www.dfg.ca.gov/biogeodata/cnddb/>) to identify and evaluate potential risks to biological resources.

This report should be applied to the review of all other documents related to this project prepared and reviewed pursuant to the California Environmental Quality Act (CEQA).

PREHARVEST INSPECTION OBSERVATIONS

The purpose of the PHI was to evaluate proposed timber harvesting operations and identify potentially significant adverse impacts to fish and wildlife resources within the THP boundary.

Section II, Map Point Table (MPT)

The Review Team visited Map Point (MP) 9, an existing 30-inch diameter culvert watercourse crossing proposed for cleaning. Upon observation it was determined that the culvert was in deteriorated condition and should be removed and replaced with an appropriate crossing. CDFW recommends the Map Point Table (MPT) be revised to state the culvert at Map Point (MP) 9 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state “yes” for 1600 notification for MP 9. (**Recommendation 1**)

Justification: Fish and Game Code § 1600 et. seq. requires notification to CDFW for work undertaken in or near a river, stream or lake that flows at least intermittently through a bed or

channel, including ephemeral streams and watercourses with subsurface flow where proposed operations may substantially alter the bed, bank or channel of a watercourse. Revising the MPT and Notification provides clear direction that a 1600 Notification is required for MP 9.

Section II, MPT

During the PHI, the Review Team visited MP 14, an existing 24-inch diameter culvert watercourse crossing proposed for cleaning. Upon observation it was determined the culvert was in deteriorated condition and should be replaced with an appropriate crossing. CDFW recommends the Map Point Table (MPT) be revised to state that the culvert at Map Point (MP) 14 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state “yes” for 1600 notification for MP 14. **(Recommendation 2)**

Justification: Fish and Game Code § 1600 et. seq. requires notification to CDFW for work undertaken in or near a river, stream or lake that flows at least intermittently through a bed or channel, including ephemeral streams and watercourses with subsurface flow where proposed operations may substantially alter the bed, bank or channel of a watercourse. Revising the MPT and Notification provides clear direction that a 1600 Notification is required for MP 14.

Section II, MPT

During the PHI, the Review Team visited MP 17. The MPT indicates there is an existing ford at this location, however, it was determined MP 17 was a culvert crossing. Upon observation, it was determined that the culvert was in deteriorated condition and should be removed and replaced with an appropriate crossing. CDFW recommends the Map Point Table (MPT) be revised to state the culvert at Map Point (MP) 17 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state “yes” for 1600 notification for MP 17. **(Recommendation 3)**

Justification: Fish and Game Code § 1600 et. seq. requires notification to CDFW for work undertaken in or near a river, stream or lake that flows at least intermittently through a bed or channel, including ephemeral streams and watercourses with subsurface flow where proposed operations may substantially alter the bed, bank or channel of a watercourse. Revising the MPT and Notification provides clear direction that a 1600 Notification is required for MP 17.

Section II, MPT

During the PHI, the Review Team visited MP 19, an 18-inch diameter iron pipe watercourse crossing. The MPT stated that no action was necessary, however, upon observation, it was determined the crossing was not in good condition and should be removed and replaced with an appropriate crossing. CDFW recommends the Map Point Table (MPT) be revised to state the iron pipe at Map Point (MP) 19 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state “yes” for 1600 notification for MP 19. **(Recommendation 4)**

Justification: Fish and Game Code § 1600 et. seq. requires notification to CDFW for work undertaken in or near a river, stream or lake that flows at least intermittently through a bed or channel, including ephemeral streams and watercourses with subsurface flow where proposed

operations may substantially alter the bed, bank or channel of a watercourse. Revising the MPT and Notification provides clear direction that a 1600 Notification is required for MP 19.

Section II, Biological Resources – Coho Salmon, Chinook Salmon, Steelhead

During the PHI, it was discussed that temporary bridges would be installed at MP 4, 28, 30, and 670, all Class I watercourses. For MP 4, 30, and 670 the MPT states the watercourse gravel bar would be graded to construct the bridge approaches and a tractor would cross the flowing stream for construction access. THP Item 32(a), page 80, does not disclose the potential occurrence of listed fish species (coho salmon, chinook salmon, steelhead) that could be present in the Class I watercourses. THP Item 32(a), page 80, does not include protective measures to avoid impacts to listed fish spawning habitat during temporary bridge construction. For MP 4 and 30, the MPT states fish would be avoided by a person walking and “*splashing and yelling*” in front of the tractor while passing through Class I flowing watercourses. This measure is not protective of spawning habitat and it is unclear how effective this measure would be to avoid juvenile or adult salmonids. Additionally, it was discussed with the RPF that 1-2 heavy equipment passes through the flowing watercourse would be needed during temporary bridge construction and 1-2 passes during temporary bridge deconstruction; however, the MPT (pages 43-49), states that only one pass would occur.

CDFW recommends Item 32(a) be revised to disclose listed fish species (i.e. coho salmon, chinook salmon, steelhead) presence and spawning habitat present within the areas of temporary bridge installation. CDFW recommends revision of Item 32(a) to include spawning habitat and fish presence surveys, and work period restrictions to avoid impacts to listed fish species during temporary bridge construction within the flowing Class I watercourse. CDFW recommends the Map Point Table be revised to include up to 2 heavy equipment passes each during construction and deconstruction. (**Recommendation 5**)

Justification: Section II of the THP is enforceable, so including protective measures for listed fish species in Item 32 ensures these species are protected and the measures are clear and quickly available to the LTO. Revising the MPT work description (i.e. number of heavy equipment passes through the flowing Class I watercourse) ensures the MPT accurately reflects work activities in the field.

Section II, Biological Resources – Northwestern Pond Turtle

During the PHI, it was discussed that THP Section IV, page 231, includes discussion of northwestern pond turtle potential habitat and protective measures, however, this information is not disclosed within Item 32(a). CDFW recommends Item 32(a) be revised to add northwestern pond turtle habitat information and protective measures. (**Recommendation 6**)

Justification: Section II of the THP is enforceable, so including potential habitat and protective measures for northwestern pond turtle in Item 32 ensures species are protected and measures are clear and quickly available to the LTO.

Section II, Biological Resources – Townsend’s Big-eared Bat

During the PHI, it was discussed that Section IV, page 216, includes discussion of Townsend's big-eared bat habitat and protective measures, however, this information is not disclosed within Item 32(a) or Item 14. CDFW recommends Item 32(a) and Item 14(g) be revised to include Townsend's big-eared bat habitat information, protective measures, and felling instructions. (**Recommendation 7**)

Justification: Section II of the THP is enforceable, and including habitat potential, protective measures, and felling instructions for Townsend's big-eared bat in Item 32 and Item 14 ensures species are protected and measures are clear and quickly available to the LTO.

Section II, Biological Resources, California Red-legged Frog (CRLF)

During the PHI, CDFW indicated the THP does not include a protective measure if CRLF are found during operations. CDFW discussed adding a protective measure stating that if CRLF is detected, it would be allowed to leave the work area of its own volition and the RPF agreed. CDFW recommends Item 32(a) be revised to state "*If California red-legged frog (CRLF) is found during operations, halt all operations within 200 feet and allow the CRLF to leave the work area of its own volition. If CRLF cannot be avoided during operations, contact CDFW for consultation regarding additional protection measures.*" (**Recommendation 8**)

Justification: Revising the THP to allow CRLF to leave the work area of its own volition will avoid take of CRLF and provide a consultation request option for circumstances when CRLF cannot be avoided.

Section II, Biological Resources – Foothill Yellow-legged Frog (FYLF)

During the PHI, CDFW indicated the THP does not include a protective measure if FYLF is found during operations. CDFW discussed adding a protective measure stating that if FYLF is detected, it would be allowed to leave the work area of its own volition and the RPF agreed. CDFW recommends Item 32(a) be revised to state "*If a foothill yellow-legged frog (FYLF) is found during operations, halt all operations within 200 feet and allow the FYLF to leave the work area of its own volition. If FYLF cannot be avoided during operations, contact CDFW for consultation regarding additional protection measures.*" (**Recommendation 9**)

Justification: Revising the THP to allow FYLF to leave the work area of its own volition will avoid take and provide a consultation request option for circumstances when FYLF cannot be avoided.

Section II, Biological Resources, California Giant Salamander

During the PHI, CDFW indicated the THP does not include a protective measure if California giant salamanders are found during operations. CDFW discussed adding a protective measure stating that if a California giant salamander is detected, it would be allowed to leave the work area of its own volition and the RPF agreed. CDFW recommends Item 32(a) be revised to state "*If a California giant salamander is found during operations, halt all operations within 200 feet and allow the salamander to leave the work area of its own volition. If California giant salamanders cannot be avoided during operations, contact CDFW for a consultation regarding additional protection measures.*" (**Recommendation 10**)

Justification: Revising the THP to allow California giant salamander to leave the work area of its own volition will avoid take of California giant salamanders and provide a consultation request option for circumstances when California giant salamanders cannot be avoided.

RECOMMENDATIONS

- 1) Prior to 2nd review, CDFW recommends the Map Point Table (MPT) be revised to state the culvert at Map Point (MP) 9 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state “yes” for 1600 notification for MP 9.
- 2) Prior to 2nd review, CDFW recommends the Map Point Table (MPT) be revised to state that the culvert at Map Point (MP) 14 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state “yes” for 1600 notification for MP 14.
- 3) Prior to 2nd review, CDFW recommends the Map Point Table (MPT) be revised to state the culvert at Map Point (MP) 17 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state “yes” for 1600 notification for MP 17.
- 4) Prior to 2nd review, CDFW recommends the Map Point Table (MPT) be revised to state the iron pipe at Map Point (MP) 19 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state “yes” for 1600 notification for MP 19.
- 5) Prior to 2nd review, CDFW recommends Item 32(a) be revised to disclose listed fish species (i.e. coho salmon, chinook salmon, steelhead) presence and spawning habitat present within the areas of temporary bridge installation. CDFW recommends revision of Item 32(a) to include spawning habitat and fish presence surveys, and work period restrictions to avoid impacts to listed fish species during temporary bridge construction within the flowing Class I watercourse. CDFW recommends the Map Point Table be revised to include up to 2 heavy equipment passes each during construction and deconstruction.
- 6) Prior to 2nd review, CDFW recommends Item 32(a) be revised to add northwestern pond turtle habitat information and protective measures.
- 7) Prior to 2nd review, CDFW recommends Item 32(a) and Item 14(g) be revised to include Townsend’s big-eared bat habitat information, protective measures, and felling instructions.
- 8) Prior to 2nd review, CDFW recommends Item 32(a) be revised to state *“If California red-legged frog (CRLF) is found during operations, halt all operations within 200 feet and allow the CRLF to leave the work area of its own volition. If CRLF cannot be avoided during operations, contact CDFW for consultation regarding additional protection measures.”*

- 9) Prior to 2nd review, CDFW recommends Item 32(a) be revised to state *“If a foothill yellow-legged frog (FYLF) is found during operations, halt all operations within 200 feet and allow the FYLF to leave the work area of its own volition. If FYLF cannot be avoided during operations, contact CDFW for consultation regarding additional protection measures.”*

- 10) Prior to 2nd review, CDFW recommends Item 32(a) be revised to state *“If a California giant salamander is found during operations, halt all operations within 200 feet and allow the salamander to leave the work area of its own volition. If California giant salamanders cannot be avoided during operations, contact CDFW for a consultation regarding additional protection measures.”*