

## North Coast Regional Water Quality Control Board

### *Inspection Memorandum*

**From:** Jim Burke, Senior Engineering Geologist, North Coast Regional Water Quality Control Board (RWB)

**To:** Coast Region California Department of Forestry and Fire Protection (CAL FIRE)  
Pat Hovland, Registered Professional Forester (RPF)

**Date:** May 1, 2026

**Subject:** Preharvest Inspection (PHI) Report and Recommendations for THP 1-26-00021 SON "Card"

**Watershed CalWater (2.2)**  
1113.850201 Big Pepperwood Creek  
1113.850202 Mouth of Gualala River

**Landowner**  
Gualala Redwood Timber Company,  
LLC

**Silviculture**  
Selection (103 acres)  
Group Selection (60 acres)  
Special Treatment (4 acres)  
**Total: 167 acres**

**Erosion Hazard Rating (EHR)**  
Low and Moderate

**Harvesting Practices**  
Ground Based

**Proposed Winter Operations**  
Felling and Yarding

**Roads and Landings**  
Seasonal Road Construction

**Watercourses**  
Class I, II, III, Flood prone area

**In-Lieu**  
WLPZ skid trails and landings

## I. INTRODUCTION

On April 23, 2026, I participated in the Pre-Harvest Inspection (PHI) for Timber Harvest Plan (THP) 1-26-00021 MEN, "Card". The purpose of RWB staff participation in the PHI was to evaluate the potential impacts to water quality from proposed timber harvest activities, evaluate the project for the potential to contribute to existing cumulative impacts, and to evaluate compliance with water quality objectives and prohibitions contained in the Water Quality Control Plan for the North Coast Region (the Basin Plan).

Also present during the inspection were:

- Pat Hovland, Registered Professional Forester (RPF)
- Mark Pugsley, Gualala Redwood Timber, LLC.
- Kim Sone, RPF, California Department of Forestry and Fire Protection (CAL FIRE)
- Kristen Garrison, California Department of Fish and Wildlife (DFW)
- Maxwell Hovland, forestry technician

### **Background**

The proposed THP is located along approximately 4.1 miles the southwestern bank of northwest trending South Fork Gualala River. The plan encompasses 167 acres, much of it on floodplain/flood prone areas<sup>1</sup>. Such areas are considered particularly sensitive due to their important role in maintaining riparian functions and integrating hillslope and fluvial processes. Much of the plan area is located within the footprint of THP 1-11-087 SON, "Kestrel". I participated in pre and post harvest inspections for the Kestrel THP and was able to observe the effects of harvesting on flood prone areas. Operations proposed under the current THP are similar to what was done under Kestrel, essentially representing the 15-year reentry.

Two beneficial uses included in the Basin Plan, Flood Peak Attenuation/Flood Water Storage (FLD) and Wetland Habitat (WET), most pertinent to flood prone areas are defined below:

**Flood Peak Attenuation/Flood Water Storage (FLD)** Uses of riparian wetlands in flood plain areas and other wetlands that receive natural surface drainage and buffer its passage to receiving waters.

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<sup>1</sup> The terms "floodplain" and "flood prone areas" are frequently, but not always, interchangeable. Floodplain is a formally defined geomorphic term, while flood prone area is a more generic term that often refers to the floodplain but can include non-floodplain areas adjacent to the river that are prone to flooding.

**Wetland Habitat (WET)** Uses of water that support natural and man-made wetland ecosystems, including, but not limited to, preservation or enhancement of unique wetland functions, vegetation, fish, shellfish, invertebrates, insects, and wildlife habitat.

Within flood prone areas, Forest Practice Rules Section 916.9 establishes a core zone, and inner zones A and B.

The **core zone** is 30 feet wide measured from the watercourse and lake transition line (WLTL) and no harvesting is permitted.

**Inner zone A** encompasses the flood prone area and extends from the landward edge of the core zone up to 150 from the WTL. Requirements within this inner zone A include the following:

- Focus on thinning from below;
- Minimum 80% post harvest overstory canopy;
- Retain the 13 largest conifers trees per acre.

If the FPA extends beyond 150 from the WTL, **inner zone B** will extend from the landward edge of inner zone A to the landward edge of the FPA. Requirements within inner zone B include the following

- Minimum 50% post harvest overstory canopy;
- Retain the 13 largest conifers trees per acre.

Within both inner zones, the following management practices should be considered:

- Implement actions to improve salmonid habitat conditions;
- Minimize yarding and skidding;
- Minimize soil erosion and site preparation;
- Avoid disturbance to critical flood prone area habitat.

### **Action Plan for the Gualala River Sediment TMDL**

On February 18, 2026, the North Coast Regional Water Quality Control Board adopted Resolution R1-2026-0011 - *Amendment to the Water Quality Control Plan for the North Coast Region to Incorporate the Action Plan for the Gualala River Sediment TMDL*. The Basin Plan amendment is not final until approved by State Water Board and Office of Administrative Law.

The Gualala River watershed has experienced long-term sedimentation and thermal degradation that limit its ability to support cold-water species, particularly salmonids. Elevated sediment levels impair spawning habitat, reduce oxygen exchange, and alter stream structure. The [Technical Support Document](#) (TSD) summarizes watershed conditions, quantifies sediment sources, and documents the load reductions necessary to meet water quality objectives established by [USEPA's 2001 Gualala Sediment Total Daily Maximum Load \(TMDL\)](#). The recently adopted [Gualala Sediment TMDL Action](#)

[Plan](#) outlines implementation measures, clarifies roles and expectations, and establishes a path toward achieving water quality standards.

### **On-site Observations**

Within the harvest area, there are extensive wetlands. In addition, there are wetland type plant species growing throughout much of the harvest area, potentially indicating the presence of seasonal wetlands. Flagged skid trails avoid areas dominated by wetland plants, however, there will be some amount of incidental disturbance to these plants from tractor operations and log skidding. Regional Water Board staff are of the opinion that temporary impacts to seasonal wetlands may occur as a result of proposed timber operations on the flood prone area, but that the impacts are not significant as a result of management measures designed to minimize impacts.

THP item 26 addresses wetlands as follows:

*Springs which are identified and mapped will have a 25-foot Equipment Limitation Zone (ELZ) with a 50 percent overstory canopy retention standard within the 25-foot ELZ. Within the ELZ, equipment is allowed only at designated crossings and existing truck roads unless otherwise noted. Any additional wet areas discovered during timber operations will be protected as described above.*

***Along with protection measures described above, the following applies:***

- 1. Sanitation Salvage logging will not be conducted in WLPZ/ELZ/EEZ areas.*
- 2. All Large Woody Debris (LWD) in watercourses and WLPZ/ELZ/EEZ areas will be retained.*
- 3. An exception to #1 and #2 above is as follows: Only LWD that needs to be moved or skidded for operational reasons, such as opening roads, operational safety, and for riparian or stream restoration work, may be moved. This material shall not be removed from the THP area.*

Wetland areas are shown on THP maps as point symbols, which do not adequately convey the large extent of many of these features. The requirement that only existing, flagged skid trails be used in the flood prone areas is expected to keep equipment away from wetlands. However, in order to ensure compliance with the protection measures described above, all wetlands, including springs and wet areas, shall be flagged on the ground (**Recommendation 1**).

We observed a wetland area adjacent to the seasonal road between map points 18 and 19. The RPF painted "out" on a tree. However, this wetland should be mapped and flagged to ensure compliance with the protection measures above. Segments of the road between this wetland and map point 19 were saturated. If the road is wet during operation, that should be addressed by measures such as rocking, draining, or avoidance if a stable operating surface cannot be achieved (**Recommendation 2**).

During the PHI, the review team found several culverts on watercourse crossings with extensive rust holes that require abandoning or replacement with a constructed drainage structure. The CDFW inspector will provide recommendations for many of these. However, we discovered four additional undisclosed watercourse crossings that require repair or replacement on the appurtenant midslope road above the Mainstem Gualala River leading to the community waste treatment facility. Three were badly

rusted and needed replacement. One was an aluminum culvert with a smashed, shotgunned outlet. Cutting off several feet at the outlet could probably solve the shotgun and constricted outlet. Because these sites lacked map point identifier or locations, the plan submitter will have to identify the sites and propose treatment for each one (**Recommendation 3**).

## II. WASTE DISCHARGE REQUIREMENTS

Discussion and recommendations proposed within this report are intended to provide input to CAL FIRE as part of the multi-agency review team process as well as to inform the RPF and plan submitter as to any issues that may be pertinent to the Regional Water Board permitting.

Following plan approval by CAL FIRE, and prior to beginning timber harvest activities, landowners must apply for coverage under Order No. R1-2004-0030, General Waste Discharge Requirements for Discharges Related to Timber Harvest Activities on Non-Federal Lands in the North Coast Region (Order). If the review team recommendations, including those of the Regional Water Board, are incorporated into the THP, once approved, the THP will be likely to avoid or minimize both short term and long-term adverse impacts to beneficial uses of water. When considered with the proposed silviculture, the requirements for post-harvest retention of overstory canopy, and watercourse and lake protection zone requirements, the plan will likely comply with applicable water quality standards and therefore will be eligible for coverage under the Order. The following web link provides a copy of the Order:

[http://www.waterboards.ca.gov/northcoast/water\\_issues/programs/timber\\_operations/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/timber_operations/)

While a significant portion of the plan area was evaluated during the PHI inspection, Regional Water Board staff did not evaluate the entire THP area. The observations and recommendations are relevant only to the areas observed. The recommendations and comments in this memorandum are provided pursuant to the statutory authority contained in the Porter-Cologne Water Quality Control Act (Water Code, section 13000 et seq.), the Water Quality Control Plan for the North Coast Region (Basin Plan), and the Z'Berg-Nejedly Forest Practice Act (Public Resources Code, section 4511 et. seq.; Cal. Code Regs., tit. 14, section 1037.5)

### Recommendation

1. ELZs for all springs and wet areas shall be flagged.
2. The wetland adjacent to the seasonal road between Map Points 18 and 19 shall be mapped and flagged to ensure compliance with the protection measures from Item 26 of the THP. If the road between the wetland and Map Point 19 is wet during operation, that shall be addressed by measures such as rocking, draining, or avoidance if a stable operating surface cannot be achieved.

3. The RPF shall identify the four undisclosed watercourse crossings that require repair or replacement on the appurtenant midslope road above the Mainstem Gualala River leading to the community waste treatment facility and propose appropriate treatment for each one.