

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
PRE-HARVEST INSPECTION RECOMMENDATIONS**

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To: Forest Practice Manager, North Coast Region Office
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Timber Harvest Plan: 1-20-00084 SON, Silver Estates
Pre-Harvest Inspection Date: July 24, 2020

The following are California Department of Fish and Wildlife's (CDFW) recommendations based on the review of the 1-20-00084 SON, Silver Estates Timber Harvest Plan (THP) and participation in the pre-harvest inspection (PHI). These recommendations are focused on avoiding or minimizing the proposed project's effects on fish, wildlife, and botanical resources. CDFW requests that these recommendations be included as enforceable conditions in the approved THP.

RECOMMENDATION 1.

During the first review process, CDFW brought to attention discrepancies in Section II, Item 32(a) of the THP regarding northern spotted owl protections. The habitat definitions and retention standards described appeared to be from Attachment B instead of Attachment A, which contains the take avoidance measures for northern spotted owls in the coast forest district. In the RPF response to first review, the definitions and retention standards were not corrected, and Attachment B was referenced near the beginning of Item 32 within the northern spotted owl protections.

CDFW recommends in Section II, Item 32(a), the protection measures for NSO be revised to reflect the definitions and retention standards for Attachment A, the November 1, 2019 revision. Justification: The take avoidance measures should reference the appropriate ecotype, allowing the review team to evaluate the proposed measures for NSO take avoidance.

RECOMMENDATION 2.

During the PHI, the review team inspected the culvert located at map point 22. In the THP Significant Erosion Sites Map Point Table, map point 22 is described as a functioning 12-inch by 20-foot ditch relief culvert with a partially plugged inlet. This culvert is proposed to have the inlet cleaned out and two rolling dips installed on the upslope portion of the roadway to reduce runoff from the road. When observed in the field, the culvert was found to be crushed on the inside. The review team agreed that the culvert needs to be replaced to ensure proper drainage of the road and to prevent crossing failure.

CDFW recommends in Section II, Significant Erosion Sites Map Point Table, the description for map point 22 be revised to state the culvert will be replaced in kind. Justification: Replacing the culvert will restore it to working condition and allow water to be hydrologically disconnected in the landscape which will reduce sedimentation of watercourses.

RECOMMENDATION 3.

During the PHI, the review team inspected map point 7, the head of an unnamed Class III watercourse, and the area upslope from the crossing. Just uphill of map point 7 the review team located a new, unmapped wet area within the THP. The wet area is within a homeless encampment and appears to have been dug out to access subsurface water. The review team found three small step pools that have been dug out and that contain standing water. The water appears to go subsurface up and downslope

of the wet area. There is a variety of trash and debris around this wet area. The extent of the wet area was flagged by the RPF during the PHI.

CDFW recommends the THP operations map be revised to include this additional wet area.

Justification: By adding this wet area to the THP operations map, it can be avoided during harvest operations.

RECOMMENDATION 4.

During the PHI, the review team inspected map point 8, a rocked ford on a permanent road over a Class III watercourse. This culvert is proposed to be replaced with an 18-inch diameter culvert according to the THP. The upslope side of the rocked ford is very steep with minimal vegetation and drains directly onto the road before flowing through the rocked ford. The review team assessed the inlet and agreed that when the culvert is installed the inlet should be armored with rock to prevent further erosion before the water enters the culvert.

CDFW recommends the Section II, Significant Erosion Sites Map Point Table and 1611 Addendum be revised to state rock will be installed around the inlet of map point 8. Consult the CGS PHI report for information about the size of rock to be used. Justification: Installing rock at the inlet will help to reduce erosion and dissipate the force of water as it flows off the hillside and into the culvert.

RECOMMENDATION 5.

During the PHI, the review team inspected the culvert located at map point 1. In the THP Significant Erosion Sites Map Point Table, map point 1 is described as an existing, failing 24-inch diameter by 100-foot long corrugated metal pipe on a Class II watercourse that drains into the Russian River, a Class I watercourse, approximately 60 feet below the outlet. Half of the culvert is on Redwood Empire property; the other half is on Sonoma County property. The THP describes and the review team observed multiple issues with the culvert; it is rusted with holes in the bottom resulting in soil piping, the outlet is perched with no downspout or energy dissipaters, it is undersized, the inlet is fully plugged with debris, and there is record of the culvert plugging during high flows and diverting water approximately 50 feet down the access road before discharging into the inside ditch of Neeley Road. The THP states, "*The existing culvert will ultimately need to be replaced with a larger diameter pipe. However, because about half of the pipe crosses a public road with underground utilities on County lands, any repair of this site will need to be done in cooperation and support from Sonoma County public works. The RPF contacted the County about this culvert and they replied that they do not have immediate plans to replace this culvert.*"

The review team agreed that the culvert is failing and should be replaced. Currently the THP proposes to limit repairs to improving the culvert inlet because there is little benefit to replacement of only the upstream half of the culvert on Redwood Empire property. The short-term improvements will improve crossing conditions but will not prevent failure. CDFW along with the other review team agencies agreed to contact Sonoma County Public Works to inform them of our evaluation of the culvert conditions and recommendation for replacement.

CDFW recommends that any correspondence between the agencies and the Sonoma County Public Works regarding map point 1 be amended into the plan. Justification: Including documentation of review team agency requests for map point 1 replacement supports the RPFs proposal to only apply short term improvements and it provides background information to assist with future inquiries into proposed work at the map point.

RECOMMENDATION 6.

During the first review process and through a Northern Spotted Owl (NSO) consultation, CDFW brought to attention concerns with the timing and stations of the NSO surveys that may affect the quality of the survey data, resulting in a possible false negative finding. The RPF agreed to supplement the survey

effort with three additional surveys in 2020 conducted as close as possible to the crepuscular hours and one additional thorough Stand Search of the THP area. Efforts to obtain NSO survey information from past THPs on the property were ongoing at the time of the PHI, and the RPF was able to provide eight years of NSO survey data from a neighboring NTMP during first review. The additional survey efforts and any past survey data will allow CDFW to make a higher confidence determination regarding take avoidance.

CDFW recommends, prior to second review, the RPF amend into the THP the NSO consultation email correspondence from CDFW dated July 9, 2020, the survey data from three surveys in 2020, the stand search maps & data sheets, and any past property survey data if available. Justification: To make a determination on NSO take avoidance, all available survey data should be provided to CDFW for review and evaluation.