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**To:** [Saucedo, Portia](#)  
**Subject:** Pisarki Merger and CDP 19200  
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Hi Portia,

I received the County's referral for the Pisarki Merger and Coastal Permit (PLN-2025-19200; APNs 111-221-012-000, 111-161-068-000). I have a couple of comments about the Biological Assessment, which mentions a wetland swale in the ravine to the northeast. This makes sense given the topography, which shows a steep gully that ultimately leads to Humboldt Creek. The biologist referred to the County's Streamside Management Area and Wetland Ordinance (which I believe isn't applicable in the Coastal Zone) and drew a 50' setback from the edge of that feature. I would like to see site plans showing both the wetland swale and appropriate buffer relative to the development footprint. There hasn't been a formal wetland delineation, but a visual representation of the site may give some indication of whether the project risks encroaching into sensitive habitat or just the buffer area.

A couple of other recommendations:

- Given the proximity to a drainage and the steepness of the property, CDFW recommends incorporating LID features to capture and treat runoff rather than discharging directly downslope and into the ravine.
- Please consider a condition of approval to prohibit the use of invasive plant species in landscaping. The [Cal-IPC Inventory](#) provides a list of the most problematic species. CDFW always encourages the use of native plants appropriate to coastal northern California, which provide aesthetic and habitat values while requiring minimal watering and maintenance.
- As the biologist mentioned, vegetation removal should ideally occur outside of nesting season (generally March 15 – August 15) to avoid impacts to native resident and migratory birds. If that's not feasible, a qualified biologist shall survey for active bird nests no more than seven days prior to tree removal or significant trimming. If an active nest is found, the permittee should consult with CDFW regarding appropriate site-specific avoidance measures and buffer distances. If there is a lapse in project-related activities of seven days or more, the biologist should re-survey the area before work resumes.

I'd also like to point out that the site visit was conducted at the wrong time of year to be considered a protocol-level survey for special status plants. These surveys are typically done during the late spring and summer when plants are visible and readily identifiable. The biologist's conclusion that special status plants will not be impacted is therefore a little premature. The habitat is probably marginal, but it's hard to rule out the possibility without conducting appropriately timed surveys.

Let me know if you have any questions.

Thanks,  
Katie

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