



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
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GAVIN NEWSOM, Governor
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May 19, 2026

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**SUBJECT: RON MACMASTER MINOR SUBDIVISION (MS2502) APN 131-020-039
(SCH# [2026041107](#))**

Dear Jessica Pollard,

On April 23, 2026, the California Department of Fish and Wildlife (CDFW) received Del Norte County's (County; Lead Agency) Initial Study and Draft Mitigated Negative Declaration (IS/MND) for the Ron MacMaster Minor Subdivision (MS2502) APN 131-020-039 (Project). CDFW appreciates the opportunity to provide feedback and understands the Lead Agency will accept comments through May 22, 2026.

As the Trustee Agency for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary to sustain their populations (Fish & G. Code, §§ 1801 & 1802). As a Responsible Agency, CDFW administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. CDFW offers the following comments and recommendations in our role as Trustee and Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, §21000 et seq.). These comments are intended to minimize Project impacts on public trust resources.

Project Description

The subject parcel is located on the south side of Highway 199 in Gasquet, an unincorporated community along the Smith River in Del Norte County,

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California. The Project would subdivide an approximately 40-acre parcel (APN 131-020-039) into two parcels consisting of 6.7 acres and approximately 32 acres. The parcel is currently developed with a single-family residence and detached shop in the northeastern corner of the parcel. The remainder of the property is steep and forested. The parcel has a mixed zoning designation of Residential and Agriculture (R1-A) and Light Commercial (C-2). The General Plan Land Use designation includes Rural Residential –1 dwelling unit/acre, Rural Residential – 1 dwelling unit per 5 acres, and Visitor Serving Commercial. Existing residential development would be consolidated on the smaller resultant parcel, with a larger vacant parcel to the west accessed via a 30-foot right of way. The parcel would be served by onsite wastewater treatment and community water.

CDFW Consultation History

CDFW visited the property with Planners from the Del Norte County Community Development Department on April 30, 2026.

Biological Significance

The subject parcel contains streams, wetlands, hillside seeps, and extensive mixed conifer and hardwood forest. Mary's Creek, a tributary to the Smith River, runs along the northern edge of the parcel and provides suitable rearing and potential spawning habitat for resident Rainbow Trout (*Oncorhynchus mykiss*) and anadromous salmonids, including steelhead trout (*O. mykiss irideus*; SSC¹) and Coastal Cutthroat Trout (*O. clarkii*; SSC). An unnamed tributary to Mary's Creek runs along the toe of the slope and represents similar high-quality habitat for fish and amphibians, such as northern red-legged frog (*Rana aurora*; SSC), foothill yellow-legged frog (*R. boylei*; SSC), and Pacific tailed frog (*Ascaphus truei*; SSC). Del Norte salamanders (*Plethodon elongatus*; WL) have also been documented around Gasquet (CDFW 2026(a)) and are closely associated with wetlands, seeps, and shaded talus slopes, all of which occur on the property. Chace juga (*Juga chacei*; S1), a freshwater snail endemic to California, has been observed in Mary's Creek (CDFW 2026(a)). The property's mix of wetlands, streambanks, and rocky, ultramafic soils are also suitable for several special

¹ Abbreviations: SSC – CDFW Species of Special Concern; WL – CDFW Watch List; S1 [State Rank] – at very high risk of extirpation in the state due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors; CRPR [California Rare Plant Rank] 2B.2 – rare or endangered in California; CRPR 1B.2 – rare or endangered in California and elsewhere

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status plant species, including California butterwort (*Pinguicula macroceras*; CRPR 2B.2), seacoast ragwort (*Packera bolanderi* var. *bolanderi*; CRPR 2B.2), and serpentine catchfly (*Silene serpentinicola*; CRPR 1B.2), all of which have been documented on adjacent public land.

Comments and Recommendations

Although the current Project does not entail residential development, subdivision of the existing 40-acre parcel would increase development potential in an environmentally sensitive area. The flat considered most suitable for development is adjacent to fish-bearing streams, whereas the remainder of the parcel is extremely steep and forested. The IS/MND offers a cursory description of stream and wetland habitat but underestimates their ecological significance. It dismisses the potential for anadromy, mentioning only “minnows” in a drainage channel. However, Mary’s Creek has a well-defined stream channel with scour pools, spawning gravel, and cold-water habitat. Although the culvert under Highway 199 is considered a partial barrier to fish passage (CDFW 2026(b)), biologists have observed several juvenile trout (*O. mykiss/clarkii*) and redds upstream (J. Walkley, pers. comm., 2026). Steelhead/Rainbow Trout, and Coastal Cutthroat Trout are most likely given their life history and presence in the Smith River. During the site visit in April, CDFW also observed juvenile trout in the unnamed tributary to Mary’s Creek, along with several foothill yellow-legged frogs. Northern red-legged frogs are also likely to occur on the property in association with streams, wetlands, and seeps. In addition to providing pristine, cold freshwater habitat, the unnamed tributary has an intact riparian corridor with a diverse suite of native plant species.

Residential development has the potential to degrade water quality, alter stream microclimate, and decrease habitat value to fish and wildlife through habitat fragmentation and edge effects, such as the spread of invasive species (CDFW 2014). Stream and wetland buffers are an effective means of tempering these adverse impacts, but their efficacy depends in part on buffer width. The IS/MND concludes that a 50-foot no-development buffer would be sufficient. However, this recommendation is based on an incomplete understanding of the streams’ potential to support anadromy, as well as their overall habitat value for fish, amphibians, and invertebrates. CDFW has consistently recommended buffer widths of at least 100 feet on fish-bearing streams, as the capacity to trap and filter sediments increases with buffer width (Castelle et al. 1992, Castelle et al. 1994, Wenger 1999, CDFW 2014, King et al. 2016, Cole et al. 2020). Larger

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buffers would consolidate development in the ruderal portion of the vacant parcel, protecting the riparian corridor and associated ecological benefits. The 100-foot buffer should be measured from the top of bank or edge of riparian dripline, whichever is greater (**Recommendation 1**). Where wetlands extend beyond the riparian overstory, the buffer should begin at the wetland boundary. To avoid encroaching into the buffer of Mary's Creek, CDFW recommends shifting the right-of-way to the vacant parcel south of the existing pole barn (**Recommendation 2**). Finally, given the potential for several special status species and the limited scope of the Biological Assessment, CDFW recommends conducting additional environmental review and targeted surveys for any development outside the ruderal, flat portion of the parcel (**Recommendation 3**). The steep, forested portion of the parcel has not been adequately characterized and contains at least one spring and associated hillside seep, as well as extensive conifer and hardwood forest.

Summary of Recommendations

- 1) Require a stream and wetland buffer of 100 feet, measured from the top of bank or edge of riparian dripline, whichever is greater. Where wetlands extend beyond the riparian overstory, the buffer should begin at the wetland boundary.
- 2) To avoid encroaching into the buffer of Mary's Creek, shift the right-of-way to the vacant parcel south of the existing pole barn.
- 3) Conduct additional environmental review and targeted surveys for any development outside the ruderal, flat portion of the parcel.

Thank you for the opportunity to comment on this IS/MND. Please contact Kathryn Rian, Environmental Scientist, at Kathryn.Rian@wildlife.ca.gov with any questions or comments.

Sincerely,

DocuSigned by:

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Rebecca Garwood, Adam McKannay, Michael van Hattem, Kathryn Rian
California Department of Fish and Wildlife

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