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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
EUREKA DIVISION

FRIENDS OF GUALALA RIVER,

Plaintiff,

v.

GUALALA REDWOOD TIMBER, LLC,

Defendant.

Case No.

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

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1 Plaintiff Friends of Gualala River (“FOGR”) hereby brings this action pursuant to § 9 of
2 the Endangered Species Act (“ESA” or “Act”), and 16 U.S.C. §§ 1533(d), 1538(a)(1)(B) & (G)
3 against Defendant Gualala Redwood Timber, LLC (“GRT”), and alleges on information and
4 belief, except as indicated, as follows:

5 INTRODUCTION

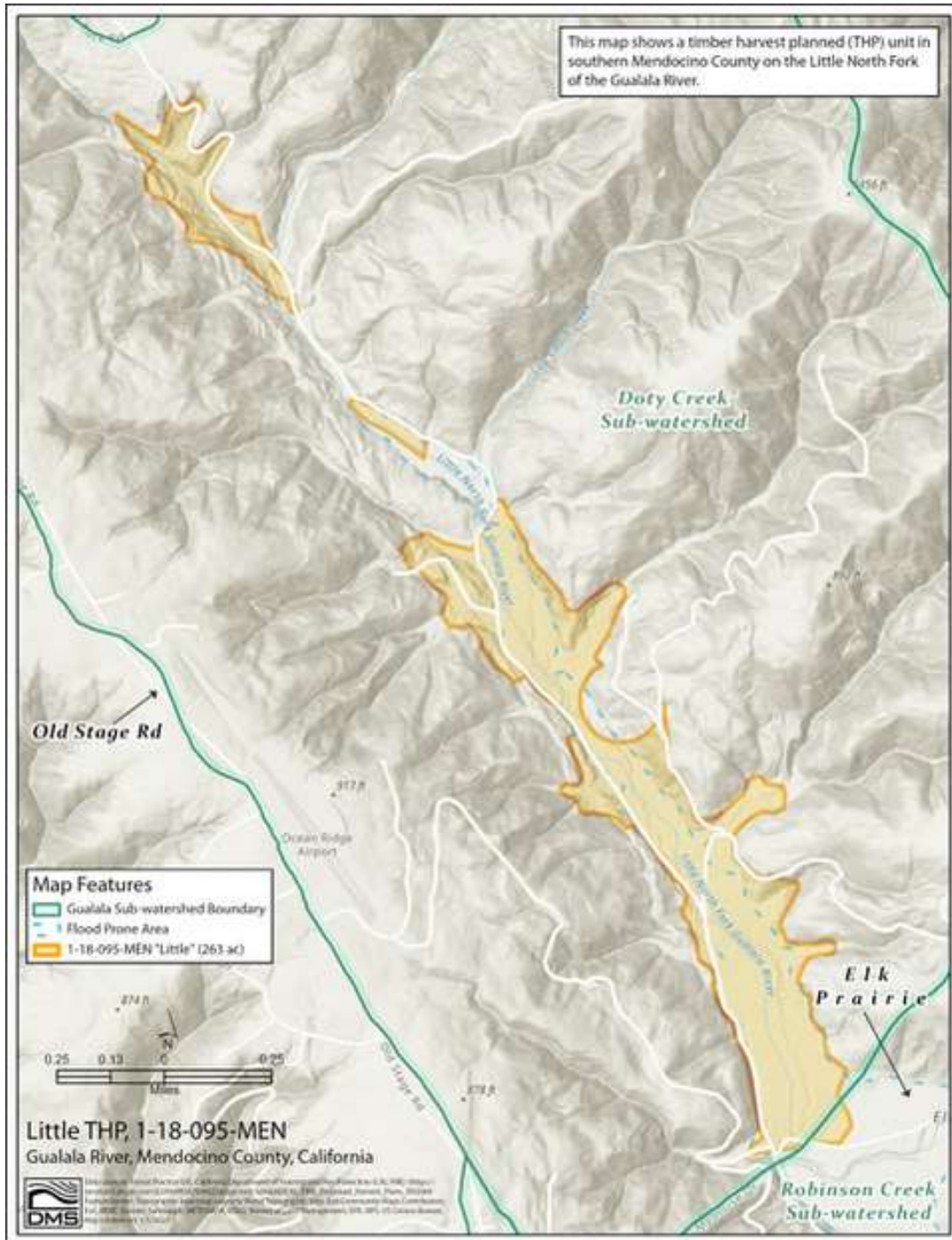
6 1. This action seeks to protect members of three endangered or threatened species
7 who call the Gualala River—including its Little North Fork—and its environs home: California
8 red-legged frogs (occasionally, “CRLF”); Central California Coast coho salmon (occasionally,
9 “CCC Coho” or “coho”); Northern California steelhead (occasionally, “NC Steelhead” or
10 “steelhead”) (collectively, the “Gualala Listed Animals”).

11 2. These animals all depend for their survival on the 251 acres of alluvial floodplains
12 along the Little North Fork of the Gualala River (the “Little North Fork”), where GRT intends to
13 engage in major logging operations. As shown below, the location to be logged consists of non-
14 contiguous logging area on alluvial flats primarily on the Little North Fork of the Gualala River.

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3. Located in Mendocino County, just hours from the Bay Area, the Little North Fork is an oasis for the Gualala Listed Animals and numerous other animals, insects, and plants.

4. The Little North Fork and associated tributaries of the Gualala River contain extensive alluvial floodplains with mature redwood and other riparian ecosystems. This type of

1 forest is exceedingly rare in the area and more generally. It is also essential habitat for the Gualala
2 Listed Animals.



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17 5. Accordingly, GRT's plan to log this ecologically important forest is reasonably
18 certain to kill, harm, and/or harass the Gualala Listed Animals that inhabit the area. GRT intends
19 to cut mature 100-year-old stands of trees in the floodplain, thereby modifying and degrading the
20 habitat for the Gualala Listed Animals, and thus will directly harm and/or harass them. The
21 impacts of the proposed logging operations are, moreover, reasonably certain to continue to kill,
22 harm, and/or harass the Gualala Listed Animals in the future. To prevent these consequences, the
23 proposed logging operations must be enjoined and, in the event that the operations are not
24 enjoined, GRT must be ordered to take affirmative mitigation measures, in order to prevent
25 further impacts from the proposed logging that will otherwise continue after the planned logging
26 operations are completed, and that are reasonably certain to continue to kill, harm, and/or harass
27 the Gualala Listed Animals in the future.

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