


DEPARTMENT OF FORESTRY AND FIRE PROTECTION
 COAST-CASCADE REGION
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Received

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 Humboldt-Dei Norte R.U.
 Resource Management

February 11, 1998

Mr. Tom Herman
 The Pacific Lumber Company
 P. O. Box 37
 Scotia, California 95565

Dear Mr. Herman:

I am in receipt of your letter to Deputy Director Craig Anthony and me, dated January 30, 1998 and titled "Watershed Analysis, Mitigation and Monitoring, Erosion control Program to be Instituted by The Pacific Lumber Company, et al." Your letter presents a brief introduction of a methodology which your company contemplates using to evaluate cumulative effects from timber harvesting in five watersheds. This methodology, developed by the State of Washington Department of Natural Resources (DNR), and titled Standard Methodology for Conducting Watershed Analysis, is certainly a process worth pursuing, as it has proven valuable in watershed evaluations done to date in other states.

As to the five watersheds of concern in which The Pacific Lumber Company is a major landowner, namely Bear Creek, Jordan Creek, Stitz Creek, Elk River and Freshwater Creek, all are experiencing varying states of impacts. Bear Creek, Jordan Creek and Stitz Creek have suffered severe aggradation during the 1996-1997 winter which has led to the elimination of, or a significant decline of, habitat recently used by some fish species. Elk River and Freshwater Creek appear to have experienced lesser impacts than the previously mentioned three, but also suffer from stream bed aggradation.

The California Department of Forestry and Fire Protection (CDF), in discussions with the Department of Fish and Game (DFG), North Coast Water Quality Control Board (WQ), and Division of Mines and Geology (DMG), has deemed that these watercourses are significantly cumulatively impacted due to sediment. In consideration of this determination, timber harvest plans (THP) submitted for these drainages should indicate that significant adverse cumulative impacts due to sediment exist [California Code of Regulations (CCR) section 912.9, item number 2]. Along with this disclosure, the agencies deem that additional analysis and mitigation are critical in order to properly evaluate and mitigate THP impacts.

In due respect to your pending proposal, it is imperative that some type of action be taken as soon as possible on those THPs to be submitted and those presently in the system to ensure that a reasoned analysis of impacts with appropriate mitigation has been undertaken. Your statement that THPs should only be approved if said plans incorporate mitigation that avoid significant impacts and would not contribute to the degradation of, or impede the recovery of watershed conditions is certainly a positive approach. To accomplish this goal the letter signed by Mr. Benjamin Kor, Executive Officer, North Coast Water Quality Control Board, addressed to you and dated October 23, 1997, provides the necessary items

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such, I cannot approve any plan in those three drainages until an acceptable watershed analysis, as outlined in the WQ letter, is submitted to the Department.

Once obtained, this information should be factored into the cumulative impacts assessment sections of all future THPs submitted and those presently in the review process by the appropriate Registered Professional Forester (RPF). I ask that the public comment period for those THPs presently undergoing review be extended commensurate with the time necessary to obtain this information and allow for public review.

For Elk River and Freshwater Creek, it is imperative that these watersheds be protected from any further impacts due to sediment intrusion into the fluvial system. Your proposed analysis, once completed, should certainly address sediment, as well as other needs of the watershed. However, to develop such a process and to obtain results is likely to take some time. With this in mind, interim measures need to be incorporated into THPs to assure that significant impacts are avoided and watershed recovery is not compromised.

It is requested that the following items be formulated by the Registered Professional Forester (RPF) into the cumulative impacts assessment (CI) for those THPs being prepared in Elk River and Freshwater Creek:

- a) a complete inventory of sediment source locations so as to develop a reasonable understanding of where impacts are occurring and may occur in the future;
- b) the establishment of instream monitoring stations, including both cross section and longitudinal profiles, for areas which will give a true indication of sediment impacts (found generally at points above and below the confluence of major drainages, as well as in the drainages themselves);
- c) mitigations to deal with the inventoried sediment source areas (on a volume basis) equivalent to the percentage of the watershed to be harvested under THPs that are submitted; and
- d) the development of a comprehensive erosion control plan, similar to one completed for Little Freshwater Creek basin, including a monitoring element to determine how the applied mitigations are working.

Additionally, it should be expected that high risk procedures capable of causing sediment input into these watercourses, including activities such as winter crossing installation, winter road and landing construction, wet weather use of watercourse and lake protection zone (WLPZ) roads, or harvesting on steep inner-gorge slopes be avoided, or conducted only under the supervision of an RPF and reviewed by an engineering geologist as appropriate.

Those THPs in Elk River and Freshwater Creek that are presently undergoing review will be evaluated based upon CCR sections 898 and 912.9. A determination of the appropriate course of action for each will be formulated prior to a decision being made.

The Department will also look for cumulative impacts analyses and mitigation measures in THPs submitted by any landowner owning property within the above mentioned drainages. Such analyses will be reviewed in consideration of the size of ownership and

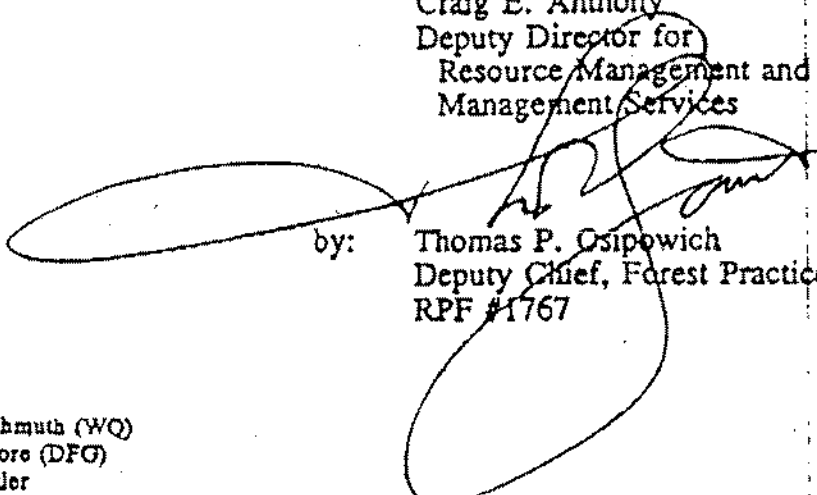
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operational procedures and physical attributes involved with the proposed harvests.

In closing I, as well as the other reviewing agencies, will be available to discuss the contents of this letter with you. Please do not hesitate to contact me at your convenience.

Sincerely,

Craig E. Anthony
Deputy Director for
Resource Management and
Management Services



by: Thomas P. Gaspowich
Deputy Chief, Forest Practice
RPF #1767

Ub
cc:

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