



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southwest Region
777 Sonoma Avenue, Room 325
Santa Rosa, California 95404

April 7, 1998 F/SWR3:PJR

Mr. Tom Osipovich
Department of Forestry
and Fire Protection
135 Ridgeway Avenue
P.O. Box 670
Santa Rosa, CA 95402-0670

Dear Mr. Osipovich

The National Marine Fisheries Service (NMFS) has reviewed THP 1 97-445 MEN, which has received considerable attention from State agencies as well as concerned members of the public. The following comments describe some of the concerns NMFS has with this THP, and with many others that do not fully analyze the impacts of timber harvest on federally listed salmonids and their habitat.

The landowner, Louisiana-Pacific Corporation, proposes to clearcut 418 acres and conduct selection on 188 acres in the Elk Creek Watershed. The proposed THP also proposes to construct approximately two miles of new roads within the watershed.

The plan identifies coho spawning and rearing habitat as on-site and downstream beneficial uses of water that could be affected by the project activities. The plan also states that "In the event that significant adverse impacts occur from this timber harvest, the Lower Elk Creek drainage is likely to be effected."

NMFS is concerned that threatened central California coast coho salmon and the habitat that supports these fish may be impacted, even though the plan evaluation for cumulative impacts is "NO significant effect." The proposed THP acknowledges that coho and their habitat are present and if impacts occur they will occur in Elk Creek. The THP as submitted, confirms sediment delivery from class III streams due to past harvesting activities, yet makes no attempt to assess the current condition of coho habitat or the potential impact of the proposed harvest activities. In Sec. IV of the plan, the RPF's answer was "NO" to the question of impacts due to past projects that may have increased sediment inputs that have embedded gravels, filled pools, or caused channel aggradation within some portion of the stream system. The RPF also answered "NO" to the question regarding past projects that have caused increased channel downcutting or bank erosion as a

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result of increased flows, sediment transport, or other channel modifications. The cumulative effects analysis also has a "NO" answer to the question regarding impacts of future projects (considering mitigation) with respect to increase sediment inputs that will lead to pool filling, embedded gravel etc.

No information is provided in the THP to support the cumulative watershed effects assessment. The RPF did not identify how past impacts were analyzed, provide information on current fish habitat condition or current upslope conditions that may be delivering sediment to channels. This information should be key to the cumulative impacts analysis when a beneficial use such as spawning and rearing habitat for coho salmon has been identified. Without the information on the past impacts, current condition of stream channels and sediment delivery, impacts of the proposed plan (e.g. harvesting, road building, skidding) are almost impossible to predict. Allowing the THP to proceed, even with some additional protection measures, may pose a serious threat to the survival of coho salmon in Elk Creek due to cumulative effects to salmonid habitat.

I believe this proposed harvest (THP 1-97-445 MEN), due to its size and activity level, should require the applicant to provide the documentation and analysis that was used to determine that no significant cumulative biological impacts would occur. The documentation should address past impacts, present conditions and potential impacts of the proposed THP on Federally listed coho salmon and coho habitat.

If you have any questions concerning these comments, please contact me at (707) 575-6059.

Sincerely,



Patrick J. Rutten
Supervisor, Northern CA
Protected Resources Div.

cc: W. Hogarth - SWR
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