

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

P.O. Box 279
SANTA ROSA, CALIFORNIA 95408
(707) 576-2284



January 21, 1999

Mr. John Campbell
President
Pacific Lumber Company
P.O. Box 37
Scotts, California 95565

Dear Mr. Campbell:

In December 1997, The California Department of Forestry and Fire Protection, along with the North Coast Regional Water Quality Control Board, the California Department of Fish and Game, and the California Division of Mines and Geology, determined that the Freshwater Creek and Elk River watersheds, as well as the watersheds of Bear, Jordan, and Stitz Creeks, were experiencing significant adverse cumulative watershed effects. This information was relayed to you in a letter dated February 11, 1998. As a result, PALCO agreed to provide a Washington Department of Natural Resources type analysis for the Freshwater Creek watershed and verbally stated this would be done by the spring of 1998. This report has yet to be received by CDF. We understand that the Pre-permit Application Agreement in Principle (PPAAP) for the Pacific Lumber Company HCP/SYP will partially address aquatic habitat concerns in these watersheds, but it does not adequately address flooding and safety issues in the Freshwater Creek and Elk River watersheds.

CDF and the agencies named above remain concerned that residents in the Freshwater Creek and Elk River watersheds are experiencing an increased rate of flooding and sedimentation that corresponds with the current cycle of logging in these watersheds. The increase in peak flows following a rainfall event appears to be a cumulative effect of timber harvesting. To address these concerns, CDF and the other agencies have determined that Timber Harvesting Plans for these watersheds must address the cumulative effects of timber harvesting on flooding and public safety. Where the cumulative impacts of timber harvesting adversely affect local communities, these impacts will be regarded as a significant effect on the environment under CEQA.

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Because flooding and sedimentation for these two watersheds occurs at the watershed scale, completed watershed analyses must be supplied for review. One possible approach you may choose for developing this information is that of Washington's Department of Natural Resources, with modifications to accommodate specific conditions in California. We acknowledge that the Pre-Permit Application Agreement in Principle (PPAAP) for the Pacific Lumber Company HCP/SYP already in place will partially address aquatic habitat concerns, but it does not adequately address the flooding and public safety issues.

We will require that a Level II watershed analysis be conducted for both of these watersheds. If you use the Washington Department of Natural Resources methodology, the analysis should include the mass wasting, surface erosion, hydrology, riparian function, fish habitat, and stream channel condition modules. If you choose to use a different approach, the methodology must be pre-approved by all of the agencies and include at least as much information as the Washington method. A sediment budget must be included in the analyses to identify both chronic and potential sediment source areas. The analyses must clearly show how the company will address and mitigate these source areas, including the time frame for treatments. Additionally, the company will need to indicate how it will monitor sediment source areas over time.

The hydrology module must address potential changes in peak flows in both basins that may occur due to timber harvesting. A thorough literature review on this subject, including papers published outside of California, will be needed. Channel geometry must be studied so that channel capacity can be documented. Results of the sediment budget analyses must be integrated with the hydrology module information to allow reasoned conclusions to be reached regarding the magnitude of channel aggradation that has occurred and how significant this process is in changing flooding in the watersheds. Current 2-, 10-, 25-, 50-, and 100-year flood stages for both basins must be determined to assess how they have changed over the past several decades, how they are currently impacting public safety, and what the potential effects of continued harvesting will be on peak flows. A monitoring plan will be required as part of the watershed analyses. Additionally, it must be stated how this information will be used to modify, if necessary, future harvesting activities in these watersheds.

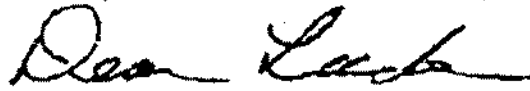
The Level II watershed analyses for the Freshwater and Elk River basins must be conducted in an open environment that can involve agency personnel as well as the UC Freshwater Team of scientists (Drs. Dietrich, Dunne, Gray, Resh, and Agee) and others. The products of the watershed analysis must be peer reviewed by qualified resource professionals prior to delivery to the resource agencies. It is strongly suggested that the UC Freshwater Team be part of the peer review process.

The following THPs that have been submitted to CDF for approval will be affected by this need for further environmental analysis: 1-97-046 HUM, 1-98-301 HUM, 1-98-109 HUM, 1-98-001 HUM, 1-98-279 HUM, 1-97-489 HUM, 1-97-518 HUM, 1-98-411 HUM, 1-98-414 HUM, 1-98-409 HUM.

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We have worked closely with the North Coast Regional Water Quality Board staff and this information will also fulfill the requirements requested in their January 7, 1999, letter to Tom Herman on Freshwater Creek. If you have any questions regarding these requirements, please do not hesitate to call me.

Sincerely,



Dean Lucke
Assistant Deputy Director
for Forest Practice

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