



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

December 2, 1999

F/SWO31:EJS

Mr. Rodger Thompson
Deputy Chief, Forest Practices
California Department of Forestry and Fire Protection
135 Ridgway Avenue
Santa Rosa, California 95401

Dear Mr. Thompson:

The National Marine Fisheries Service (NMFS) has initiated discretionary review of California State timber harvest plans (THP) with an emphasis on Endangered Species Act (ESA) listed coho salmon populations. The THP 1-99-361 MEN occurs within an important Mendocino county watershed, Salmon Creek, used by the Central California Coast coho salmon (*Oncorhynchus kisutch*) Evolutionarily Significant Unit (ESU) listed under the federal ESA on October 31, 1996. Coho salmon are known to occur in both Salmon Creek and the tributary associated with this THP, Hazel Creek. The coho salmon population is small in this watershed and it is one of the few remaining in this ESU. Northern California ESU Steelhead (*Oncorhynchus mykiss*) are also known to be present and is a Federal ESA candidate species.

On November 19, 1999 the NMFS conducted a field review to better evaluate potential adverse effects of operations proposed under THP 1-99-361 MEN on coho salmon and their habitat. Representatives from The Timber Company, California Department of Forestry (CDF) and NMFS were present. Due to rain, vehicle travel on the unrocked roads was not advisable and we were unable to visit the bulk of the THP area along and near Hazel Creek. Hence, we observed the north northwest areas within, and adjacent to, THP boundaries including the confluence of Hazel Creek and Salmon Creek. Of most concern during the field visit was a high road density infrastructure that appears to be, especially along the unrocked portions, in relatively poor condition. NMFS is further concerned with the apparent lack of instream complexity, including wood structure, and high fine sediment load. Sediment is a significant concern relative to operations within this watershed.

Based on our field observations, data provided in the THP and information provided by CDF, the following concerns are applicable to the entire THP area. The NMFS has concluded that the THP, if implemented as proposed, would likely result in significant impairment of essential behavioral patterns (e.g., breed, feed, or shelter) of salmon as defined by the "Harm" rule [Federal Register Vol. 64 No. 215 November 8, 1999, p.6072] due to habitat modification and continued degradation of the instream and riparian environment. The following baseline

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conditions in the THP area combined with the proposed THP activities will create circumstances which are likely to contribute to harm as described above:

Baseline Conditions

High density of roads and skid trails
Extensive unrocked road system
Inadequate waterbar spacing on roads
Improper summer dust abatement leading to loose road soil
High erosion hazard rating for many areas
High levels of instream fine sediment
Lack of instream woody debris
Lack of recruitable large woody debris trees along the riparian zone in some areas
Significant coho salmon population

Proposed Activities

Increases in road and skid trail density
Lack of adequate road rocking in and/or near the watercourses
Winter operations to include cable yarding, timber falling and mechanical site preparation
Inadequate soil stabilization of bare soil in water and lake protection zones
Anticipated post harvest basal area of 75 square feet
Large tree removal in the water and lake protection zones
Tractor operations and/or disturbances within all water and lake protection zones

The mitigations in the THP are insufficient to avoid harm as described above. Therefore, until the issues discussed above are adequately addressed, NMFS recommends that CDF not approve this THP. If you have any questions please feel free to call me at 707-575-6059.

Sincerely,



Patrick J. Rutten
Northern California Supervisor
Protected Resources Division

cc: Rod McLanis, NMFS
Jim Lecky, NMFS
Joe Blum, NMFS
Ron Monk, The Timber Company
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