

State of California

The Resources Agency

Memorandum

To: Mr. Joe Fassler
Review Team Chair

October 5, 1996

From: Department of Fish and Game – Armand Gonzales

Subject: Timber Harvest Plan 1-96-413 HUM

Dear Mr. Fassler,

The Department of Fish and Game (DFG) has recently become aware of the proposed timber harvest plan (THP) 1-96413 HUM. This plan is located in the Sulfur Creek tributary of the North Fork Mattole River watershed. The DFG has greater concern for land use projects within sensitive watersheds such as the Mattole River as signified by our participation in the review of past Mattole River plans. We have provided comments during review of previously submitted THP's in the North Fork Mattole River drainage regarding cumulative impacts, impacts associated with species dependent or associated with late-seral forest habitats, and to the goal of achieving "zero-net discharge" ("ZND").

Our comment pertaining to our review of THP 1-93-537 HUM dated January 24, 1994, November 4, 1994, and our letter of non-concurrence dated November 16, 1994, provide detailed analysis of potential impacts to fish and wildlife resources associated with timber harvest operations in this Sensitive area. When similar physical conditions exist in similar forest habitats, and similar potential impacts are anticipated from similar proposed operations, recommendations made for one plan are generally transferable to all others in the area. For this reason, DFG requests our comments for THP 1-93-537 HUM be incorporated by reference for consideration during review of this plan.

An area of specific concern with this plan pertains to information contained under Item 24, "logging roads or landings are proposed in areas of unstable soils or known slide-prone area". Specifically, on pages 73 - 88, several locations are identified and acknowledged to potentially contribute sediment as a result of operation of this plan as proposed. On pages 12 and 123, the THP identifies measures to "mitigate" the effects of suspended sediment. These measures are considered by DFG to be inadequate to achieve "ZND" and are in most part already [this part illegible in original] by the Board of the rules.

The premise behind "ZND" is based on balancing the actual sediment input with actual sediment reduction. Reducing the "potential" sediment increase that could occur without operation of the plan with measures already required by the rules, does not achieve the intent of

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"ZND". Lawfully following existing rules to reduce potential impacts to the environment is a common practice of responsible land stewardship but is not necessarily adequate for meeting the more rigorous standards imposed by "ZND".

A sediment budget was prepared by Mr. Timothy C. Best, which identifies past erosion from the inventory sites in the harvest area to total 891 yds³, and estimated potential erosion under two different conditions to be: without harvest, 754 yds³, and with harvest, 42yds³.

It is already assumed proposed timber harvest operations will follow current rules and regulations thereby resulting in a net benefit to the environment by correcting careless past logging practices. Our recommendation is, if 42 yds³ of sediment will enter the drainage as a result of operation of this plan, a specific remedial site must be identified that will remove 42 yds³ of sediment from the drainage. This action would result in balancing current sediment production with pre-human disturbance levels.

The additional issue of monitoring the effectiveness of 2ND" mitigation measures was never settled during review of THP 1-93-537 HUM. The rationale for effectiveness and implementation monitoring is still valid. The plan proponent should be instructed to provide a plan which will effectively monitor the adequacy of all mitigation measures adopted as part of this THP DFG would gladly assist in reviewing the components of a monitoring plan as it pertains to fish and wildlife resources.

Please contact me if you have any questions regarding these comments. You may contact me at telephone (707) 441-5669.

Sincerely,



Armand G. Gonzalez
Environmental Specialist III