State of California The Resources Agency

**Date** : April 16, 1987

## Memorandum

To: Raymond Jackman, Acting Chief, Region I
Department of Forestry & Fire Protection
P. O. Box 670 Santa Rosa, CA 95402

From : Department of Fish and Game

**Subject**: Timber Harvest Plan 1-87-146 MEN. Jack Smith Creek, Mendocino County.

A preharvest inspection was attended on March 26 and 30, 1987. This did not result in evaluation of the entire plan area. Other areas of the plan were visited during inspection of THP 1-81-234 M, a former harvest plan on this property. Participants during inspections included Ken Wood, RPF; James Purcell, CDF; Tom Spittler, Geologist; Mark Neeley, NCRWQCB; Dick Moore, DFG; and Tom Osipowich, CDF.

Jack Smith Creek is a salmonid spawning and nursery stream for approximately six miles. It is presently recovering from past logging damage as indicated in the attached report for THP 1-81-234 M.

Following the May 7, 1981, inspection of this stream additional downcutting and sidecutting have occurred. The stream has breached the proposed streamside road and would require extensive work to use a streamside road system. A streamside road could not be considered a permanent road system. It would require considerable maintenance resulting in continued stream disturbance.

The upper slopes of the plan area appear more stable than the streamside areas. Roads on these slopes appear stable, with the exception of areas where water concentrates on the road.

Following this inspection it is evident Jack Smith Creek is recovering from significant long-term damage. The operation as proposed can be expected to delay this process. Sampling of the stream spawning gravel may result in information to better evaluate this THP for compliance with CAC 898.1(c) (1).

In addition the THP, as evaluated, contains many areas where the information is incorrect, incomplete or misleading. These may include, but may not be limited to CAC 1034(x) 4, 5, 6, 9 and 10; CAC 1034(z); 1034(bb); 1034(ee); and 1034(gg).

## Cumulative Effects:

During the review of this plan it became evident that use of the old road system as proposed would result in significant long-term adverse effects on the beneficial uses of fish habitat in Jack Smith Creek. This is based on observations on similar streams in the North Coast of California and a reevaluation of this stream following the May 7, 1981 inspection.

## Recommendation:

It is recommended the plan not be approved in the present condition. The plan should be resubmitted, incorporating feasible operating methods and procedures that will substantially lessen significant adverse impacts on the fish habitat. This analysis should evaluate and consider the following:

- 1. A substantial reduction of WLPZ facilities, with effective site specific erosion control on WLPZ facilities that control the transport of disturbed soil to Class I and Class II watercourses.
- 2. No reduction in the WLPZ.
- 3. No winter operations on WLPZ facilities.
- 4. Limit use of temporary stream crossings to one non-winter season, with the exception of Class II watercourses at the main haul road.
- 5. Encourage coordination of the construction of WLPZ facilities with the DFG stream rehabilitation program as a feasible alternative to minimize adverse affects on fish habitat.

Richard L. Moore

Department of Fish & Game

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