



# Friends of the Gualala River

PO Box 1543 Gualala, CA 95445

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Forest Practices  
California Department of Forestry  
135 Ridgeway  
Santa Rosa, CA 95401

Comments: THP 1-04-260 MEN - Robinson Creek, Gualala River

On behalf of Friends of the Gualala (FoGR) I am submitting the following comments and concerns for inclusion to the administrative file for THP 1-04-260 and SYP/Option A.

Cumulative effects, unstable soils analysis, sediment capture, and other site-specific operational analyses are inadequate.

This THP/SYP is based on inaccurate assumptions and data input.

This THP/SYP is not consistent with the Forest Practice Act, State Water Code, and CEQA. Readily available scientific information is often only selectively referenced in the THP/SYP, and where it is used, its conclusions are often misrepresented or completely ignored. The result is a plan that often pays only nominal lip service to good science in seeking regulatory clearance for the short-term economic goals of Coastal Ridges, Ltd.(formerly Coastal Forestlands, Ltd)

Growth rate projections in excess of 10% appear exaggerated. The information provided in the Strata Mapping and related Option A material suggests a far lower growth rate than projected in the THP

Inventory, growth, yield and harvest rate information and conclusions are inaccurate and inconsistent. The numbers do not add up.

Coastal Forestlands, Ltd had a documented history of being associated with inaccurate inventory and growth rate projections. In 1999 sustainable forestry expert Hans Burkhardt, author of the book, *Maximizing Forest Productivity* is quoted as saying, "Coastal Forestland's gross data was not credible," He also said. "The plan's claims of average growth are more than five times higher than CDF projections of the average growth for Mendocino County's industrial lands." (See Attachment A)

Also from 1999 was the following quote regarding Coastal Forestland, Ltd:

"The numbers say what we've all suspected," said Steve Smith, forestry advisor to the Mendocino County Forest Council. "The stocking is not there; the growth isn't there; and they just don't have the trees out there anymore. They've cut into their growing stock." The new report shows a current inventory averaging 4,000 board feet per acre of conifers, substantially less than what should be there, and only 1,092.7 board feet per acre of



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redwoods, by far the most valuable timber. The Option A plan, the so-called long-term timber management plan for the property conditionally approved by CDF last year, showed there should be an average inventory of 6,840 board feet per acre by now. The inventory actually discovered on the ground, the report said, is "substantially lower than industry norms for the region and well below the productive capacity of the land." (See Attachment B)

Extra scrutiny and verification by CDF of information and projections provided by Coastal Ridges, LLC is warranted. CDF should make sure it is performing due diligence to verify the information being provided is accurate. Groundtruthing of inventory is essential and independent scientific peer review of inventory, growth rate and harvest projections are needed.

Analysis of sensitive wildlife and plant species in the THP/SYP is inadequate.

The THP/SYP does not evaluate the cumulative impact of the plan, in combination with foreseeable future actions, on the likelihood of survival of Coho salmon. Because Coho salmon and steelhead in the Gualala River watershed must migrate through downstream channel reaches and estuaries which will continue to be adversely modified by these cumulative impacts, this THP/SYP will lead to decreased likelihood of survival for Coho salmon and steelhead throughout the watersheds. Continued impairment of water quality due to high suspended sediment loads will directly impact salmon and domestic water use.

FoGR supports all DFG's recommendations including "that management result in a higher density of trees greater than 24 inches dbh." Old-growth trees should be retained.

This THP/SYP will contribute to continued increases in the severity of cumulative impacts arising from hydrologic changes. Continued high rates of logging, will maintain uncharacteristically low rates of foliage interception loss of rainfall by increasing the proportion of the area that is at the earliest stages of hydrologic recovery at any given time. This change will also increase land sliding rates because of the resulting increases in effective storm rainfall and seasonal rainfall at potential landslide sites and because of increased undercutting of banks and inner-gorge slopes downstream of the logged areas. The area of the THP is currently subject to peak flow effects from previous harvest, interception of hydrology, and loss of vegetation. Additional disturbance will increase the peak flow effects. Mitigation of these impacts will not be possible because their mitigation requires that the hydrological roles of the mature forest cover be fulfilled through other means, and no such means exist.

The THP is very steep and subject to high erosion yields. The watercourses downstream from the project are highly impacted from excessive road building, a very high level of recent disturbance and the cumulative adverse effects of historic timber practices. Site-specific analysis of erosion potential for this THP is missing. Sediment loads will continue to increase as the current high rates of logging continue. Professional analysis by a registered geologist or a THP Engineering Geologic Review by the California Geological Survey is necessary.

According to Dr. Leslie M. Reid (USDA Forest Service Pacific Southwest Research Station),



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“The impacts from altered woody debris, water, and sediment regimes contribute to increased cumulative adverse impacts to habitat critical to the survival of Coho salmon and other components of aquatic ecosystems.”

Many of the concerns held by Friends of the Gualala River are clearly expressed in Dr. Reid’s review of the Pacific Lumber Company SYP/HCP, which is attached. (See Attachment C)

I incorporate by reference Dr. Leslie Reid's assessment of the following impacts as relevant to this SYP/THP:

- inadequate woody debris regime
- increased destabilization and aggradation of downstream habitats important to Coho salmon and other Pacific salmonids
- increases in the severity of cumulative impacts arising from hydrologic changes,
- decrease in foliage interception loss of rainfall
- changes in peak flows
- changes in rainfall infiltration
- increases in the proportion of the area that is at the earliest stages of hydrologic recovery at any given time
- increased landslide rates
- increased scour of downstream spawning sites
- increased fining of channel beds and increased sediment load
- increased flood discharges
- increase in length of active road network
- winter road use
- chronic turbidity
- invalid calculations of projected timber yields
- inadequate no-cut buffer widths on Class I, Class II and Class III streams
- questionable methods of cumulative impact analysis

This THP/SYP must be brought into compliance with Regional Board Waste Discharge Requirements for Timber Operations, Water Quality Mandates, Basin Plan objectives, the Forest Practice Act, Water Quality Control Plan, and all relevant assessments and findings of the EPA approved Sediment TMDL for the Gualala River. It currently is deficient and should be denied.

Respectfully submitted,

John Holland  
President  
Friends of the Gualala River



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Attachment A - The Anderson Valley Advertiser April 7, 1999

Attachment B - The Anderson Valley Advertiser May 26, 1999

Attachment C – "Reid, Leslie M." 1998. "Review of the Sustained Yield Plan / Habitat Conservation Plan for the properties of The Pacific Lumber Company, Scotia Pacific Holding Company, and Salmon Creek Corporation" "Unpublished report prepared at the request of Congressman George Miller and EPA, 15 November 1998. 68 p.".