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## North Coast Regional Water Quality Control Board

August 28, 2015

Ms. Anna Halligan  
Trout Unlimited  
P.O. Box 1966  
Fort Bragg, CA 95437

Dear Ms. Halligan,

**Subject:** Notice of Applicability (NOA) for Coverage under the State Water Resources Control Board General 401 Water Quality Certification Order for Small Habitat Restoration Projects SB12006GN

**File:** South Fork Usal Creek Instream Coho Habitat Enhancement Project  
WDID No. 1B15100WNME

The North Coast Regional Water Quality Control Board (NCRWQCB) is sending you this NOA letter to certify enrollment of the *South Fork Usal Creek Instream Coho Habitat Enhancement Project* (Project) under the General 401 Water Quality Certification Order for Small Habitat Restoration projects; Order No. SB12006GN (General Order).

**Background:**

On June 30, 2015, the NCRWQCB received your submittal of a Notice of Intent (NOI) and fee to request enrollment of the Project under the terms of the General Order. The proposed project includes the directional falling of streamside riparian trees into the South Fork Usal Creek to improve habitat complexity for anadromous salmonids. The Project is proposed within the property owned by the Usal Redwood Forest Company and managed by the Campbell Global Inc.

The goal of the South Fork Usal Creek Coho Habitat Enhancement Project (Phase I and II) is to increase instream habitat complexity and shelter values. This will be achieved by utilizing an opportunistic approach to large wood loading referred to as accelerated recruitment. Trout Unlimited is proposing to conduct instream coho salmon habitat enhancement through large wood installations in two separate phases (Phase I and II) throughout 4 miles of stream including 3 miles of South Fork Usal Creek and 1 mile of Julias

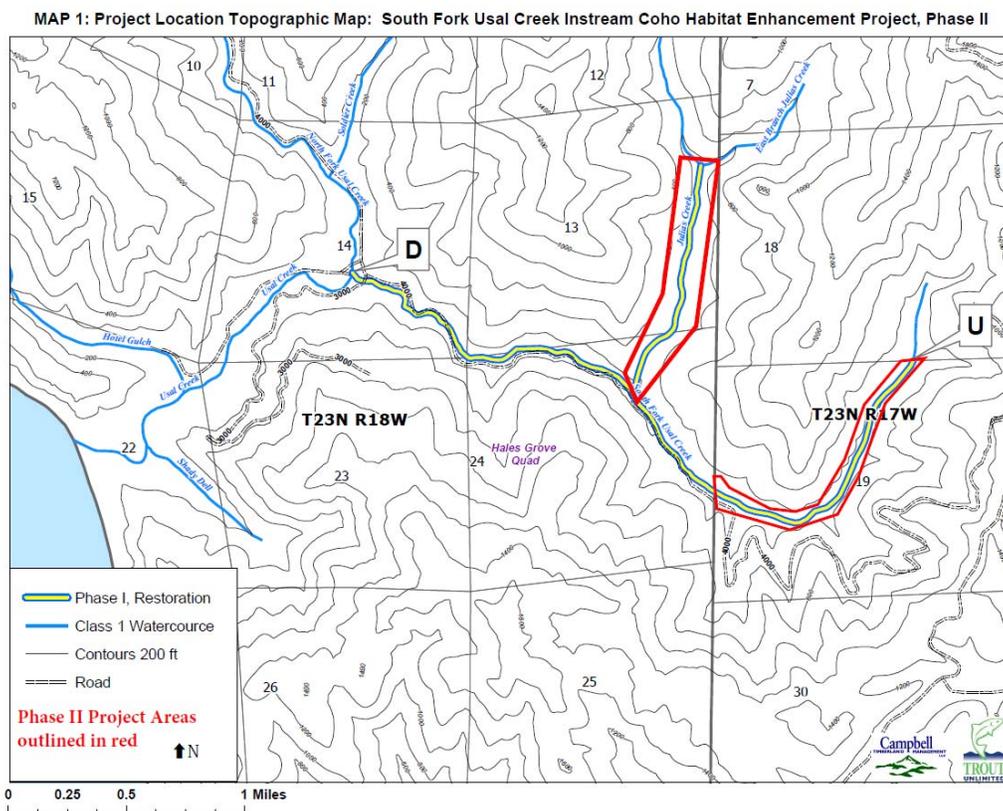
Creek, a tributary to South Fork Usal. Phase I of this project was awarded funding by the FRGP in 2013. The NOI for this Project is to seek enrollment of Phase II of the project.

During the first phase of the SF Usal Project large wood will be introduced (approximately 90 individual pieces) at 30 sites along 1.9 miles of instream habitat. Phase I will be constructed beginning mid-August, 2015. Phase II of the SF Usal Project was developed in response to the historic drought conditions that North Coast California streams are currently experiencing. Phase II intends to install 55 pieces of large wood along 1.7 miles of, high priority, core recovery, habitat in South Fork Usal and Julias Creek.

The project is located in the South Fork Usal Creek, at the following coordinates:

NAD83 Long/Lat:

- DD: -123.80761, 39.83545- Downstream end Julias Creek reach
- DD: -123.80228, 39.84909- Upstream Julias Creek reach
- DD: -123.80091, 39.82932 – Downstream end SF Usal reach
- DD: -123.78512, 39.8371- Upstream end of SF Usal reach



### Project Size:

The Project (Phase II) intends to place 55 pieces of wood within one mile of Julias Creek (tributary to SF Usal) and within 0.7 miles of SF Usal (upstream and contiguous with Phase I). Exact locations and designs of the wood features are based on channel characteristics and large wood availability at the time of implementation. Locations of wood placement

will be determined by the TU staff, the contractor (BWM and Pacific Inland) and landowner (CG).

The total size of the project is estimated to be approximately 1.06 acres and 137.5 linear feet. The estimated project size for the project was based on the range of redwood to be installed, typically averaging between 12 and 36 inches diameter breast height and between 55 and 95 feet in length. 55 individual trees are proposed to be installed as part of the project.

Individual site designs and sketches are developed in the field just prior to implementation; therefore, intermediate designs are not necessary, though some typical design sketches are included as attachments to the NOI. Per the California Department of Fish and Wildlife (CDFW) *California Salmonid Stream Habitat Restoration Manual* specifications, 1.5 times bankfull width is the minimum recommended length for unanchored large wood pieces. In some limited reaches where there is an inadequate supply of stream side conifers and equipment access is not available, alders will be utilized to create complex structure. All logs and rootwads will be unanchored (no hardware anchoring).

#### Project Associated Discharge:

The discharge of material into waters of the State resulting from the Project include those associated with the individual conifers and some incidental sediment discharges associated with bank disturbance (estimated to be up to approximately 3 cubic yards of sediment).

#### Project Schedule:

On August 25, 2015, Trout Unlimited submitted a revised project schedule extending the proposed implementation timeframes into 2016. The reason for the request was to allow adequate time for a cultural resource survey to be conducted by Humboldt State University.

The revised implementation schedule is reflected below:

- 2015: Complete Cultural Resources Survey; submit to all relevant permit agencies.
- 2015: Secure all permit applications (USACE 404, NMFS BO, CDFW Coho HELP).
- September 1, 2016 – October 31, 2016: Implement project. Implementation is expected to take 10 days.
- November 2016: Submit Notice of Completion/Annual Report

#### Monitoring & Reporting:

Prior to August 15, 2016: pre-implementation monitoring

- Late Winter 2016/Early Spring 2017: post implementation monitoring
- Prior to October 31, 2017: Submit Monitoring Report

#### Monitoring:

Physical habitat monitoring is planned on all implemented structures, on a 2 tiered basis. Initially, before actual implementation, a modified stream habitat inventory survey will be conducted on the project reach (*measured parameters include but are not limited to: LWD counts, pool depth, shelter rating, canopy, and longitudinal profile*). Physical monitoring will

occur after implementation as well and the pre and post results will be compared. The second monitoring tier consists of photographic monitoring. Benchmark locations will be established and images will be taken from the benchmarks during the same periods as the habitat inventory surveys.

Blencowe Watershed Management (BWM) staff plan to conduct the monitoring in late August prior to implementation and again following at least one winter after implementation. All monitoring results will be provided following completion.

#### Measurable Performance Standards

The primary performance measures that will evaluate the project's goal of increasing LWM in the SF Usal Creek will include shelter values and LWM wood counts. Prior to implementation, project partners (BWM, CG) will complete a modified Level II habitat inventory following the CDFW Habitat Inventory Methods described in the California Salmonid Stream Habitat Restoration Manual (CDFW, July 2010). Each LWM log will be tagged with an aluminum tag to track and monitor transport and function within the project area.

This pre-project survey will provide baseline data to determine the change in shelter values and shelter types. Pre-treatment data collection will also include completion of photo-documentation (using permanent photo points, and opportunistic photo points as needed) of pre-project conditions.

One winter following implementation, project partners will conduct a habitat inventory again following the CDFW Habitat Inventory Method. Additionally, a post implementation longitudinal profile will be conducted as well. This post-implementation data will be compared to the pre-project data to determine changes in shelter values and shelter types.

The following monitoring parameters and protocols will be used to determine whether performance standards have been met:

- Shelter Value: CDFW Habitat Inventory Method, California Salmonid Stream Habitat Restoration Manual (CDFW, 2010)
- LWM Wood Count: No known protocol.
- Longitudinal Profile: CDFW Habitat Inventory Method, California Salmonid Stream Habitat Restoration Manual (CDFW, 2010)

#### Notice of Applicability & Project Determination

Regional Water Board staff has determined that the proposed activities as described in the NOI are categorically exempt from CEQA review and may proceed under the General 401 Water Quality Certification Order for Small Habitat Restoration Projects.

Receiving Water: South Fork Usal Creek  
Mendocino Coast Hydrologic Unit 113.11

Filled / Excavated Area: ≤3 cubic yards of incidental sediment discharge

Total Impacts:                   Acreage Temporarily Impacted: 1.06 acres  
  Length Temporarily Impacted: 137.5 feet

Dredge Volume:                   None

Discharge Volume:               55 logs

Latitude/Longitude:              Project Center : 39.49029° N, 123.80091° W

### Reporting

As required in Section B, Item 4, of the *General 401 Water Quality Certification Order for Small Habitat Restoration Projects*, Monitoring Reports be submitted at least annually documenting the achievement of performance standards and project goals. In addition, a Notice of Completion (NOC) shall be submitted by the applicant no later than 30 days after the project has been completed. A complete NOC includes at a minimum: photographs with a descriptive title, the date each photograph was taken, the name of the photographic site, the WDID number indicated above, and success criteria for the project. The NOC shall demonstrate that the Project has been carried out in accordance with the Project description as provided in the applicant's NOI. Please include the project name and WDID number with all future inquiries and document submittals. Document submittals shall be made electronically to: [NorthCoast@waterboards.ca.gov](mailto:NorthCoast@waterboards.ca.gov)

The State Water Resources Control Board General 401 Water Quality Certification Order for Small Habitat Restoration Projects SB09016GN can be found here:  
[http://www.waterboards.ca.gov/water\\_issues/programs/cwa401/docs/generalorders/shrpcert032713.pdf](http://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/generalorders/shrpcert032713.pdf)

Please call Jonathan Warmerdam at (707) 576-2468 or Jake Shannon at (707) 576-2673 if you have any questions.

Sincerely,

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Matthias St. John  
Executive Officer