



IN REPLY REFER TO:

United States Department of the Interior
California Department of Parks and Recreation

Redwood National and State Parks
1125 16th Street
Arcata, California 95521

T. D. Hofstra 2000



CALIFORNIA STATE PARKS

Y34

UNIT, FG, WQ, ER, RT, **RPF**

THP 1-99-458 HUM
Barnum Timber Company

January 14, 2000

Glenn J. Newman, Chief, Region 1
California Department of Forestry
& Fire Protection
135 Ridgeway Avenue
Santa Rosa, California 95402

RECEIVED

JAN 24 2000

COAST AREA OFFICE
RESOURCE MANAGEMENT

Dear Mr. Newman:

The following comments are provided by Redwood National and State Parks on THP 1-99-458 HUM, currently under review by CDF. These comments and recommendations are based on a pre-harvest inspection attended by Eddie Mendes and Mike Vogel (Barnum Timber Company), Mike Risso (CDF Inspector), Mark Gary (CDF Archeologist), Doug Cushman (Water Quality Engineer, Water Quality Control Board) and Geologists Greg Bundros and Darci Short of my staff on January 6, 2000.

The plan area covers 273 acres located in the Molasses, Moon and Redwood Creek drainages located about 12 miles upstream of the Redwood National and State Parks boundary. It falls within the Southern Oregon/Northern California Evolutionarily Significant Unit for coho salmon where they are listed as a threatened species under the Endangered Species Act. Redwood Creek is listed under Section 303 (d) of the Clean Water Act as an impaired water body due to excessive sediment.

The plan area is underlain by the Incoherent Unit of Coyote Creek, a component of the Franciscan Assemblage comprised of sandstone, conglomerate and mudstone. Bedrock outcrops are uncommon, but they are found along some of the ridgelines and in the lower portions of Rehabilitation Unit III. The landscape has been shaped primarily by earthflow processes as reflected by the subdued and hummocky terrain found in the grassland prairies and in forests adjacent to the prairies (Recommendation #1).

Streamside areas are generally stable, but are still recovering from the significant impacts of earlier practices. Because of the weak bedrock units and naturally occurring hillslope processes, some streams resemble gullies and rely heavily on root strength for streamside stability. In general, little or no harvest is proposed in many of the WLPZs because of earlier entries, and the past use of "hack and squirt" methods to eliminate hardwoods.

Most of the roads are in place and are in relatively good condition. However, roads are surfaced with native material, and will require rock if winter operations occur. While rolling dips have been constructed on many

RECEIVED JAN 27 2000

of the roads, some stream crossings still have diversion potentials because the dips were constructed with inadequate depth and/or "roll."

Preventing stream diversions is perhaps one of the most cost-effective erosion prevention measures, especially where known problems exist along streams, upslope of a road. For example, the Class II watercourse upslope of THP point #32 is currently diverted for about 80 feet due to past skid trail and road construction. The stream is downcutting and widening through road fill, and eventually meanders its way back into the natural channel. If a significant amount of sediment is released suddenly because of this diversion, the culvert below at THP point #32 would plug, and the stream would divert down the road. The stream crossing at THP point #30 also has a high diversion potential (Recommendation #2).

We agree with the recommendations in CDF's PHI report which incorporates the recommendations made by Redwood National and State Parks during the pre-harvest inspection. However, the following recommendations clarify two of CDF's recommendations (#6 and #8) that do not adequately capture our concerns. Please refer to attached map for specific locations.

1) Unstable Area (Point 1): the THP maps should be revised to show a second unstable area inside of Clearcut Unit #1. Prior to harvest operations, the entire feature should be marked on the ground by flags hung at least 10 feet away from the feature and its margins. Within the flagged area, no timber operations should occur and all trees should be retained.

2) Rolling Dips: rolling dips should be constructed at all stream crossings on appurtenant and plan area roads that have diversion potentials. Correcting the existing diversion upslope of THP #32 is not warranted at this time, but the rolling dip at THP point #32 should be reconfigured to prevent a stream diversion if the culvert fails. The *Handbook for Forest and Ranch Roads* (Weaver and Hagans, June 1994) should be consulted for proper design specifications.

We appreciated the opportunity to attend the pre-harvest inspection and offer our sincere thanks to Barnum Timber Company. My staff is available to assist landowners in the Redwood Creek basin when planning or implementing timber harvest, road construction or improvements, and erosion control work. We believe that most timber harvest plans submitted for Redwood Creek should be reviewed by a geologist or hydrologist who is familiar with the erosional processes in the basin. Our involvement during plan development can have a positive effect on protecting the downstream resources in the park, while providing landowners valuable consultation.

If there are any questions or you need additional information, please contact Greg Bundros at our Arcata office (707) 822-7611 extension 5442.

Sincerely,



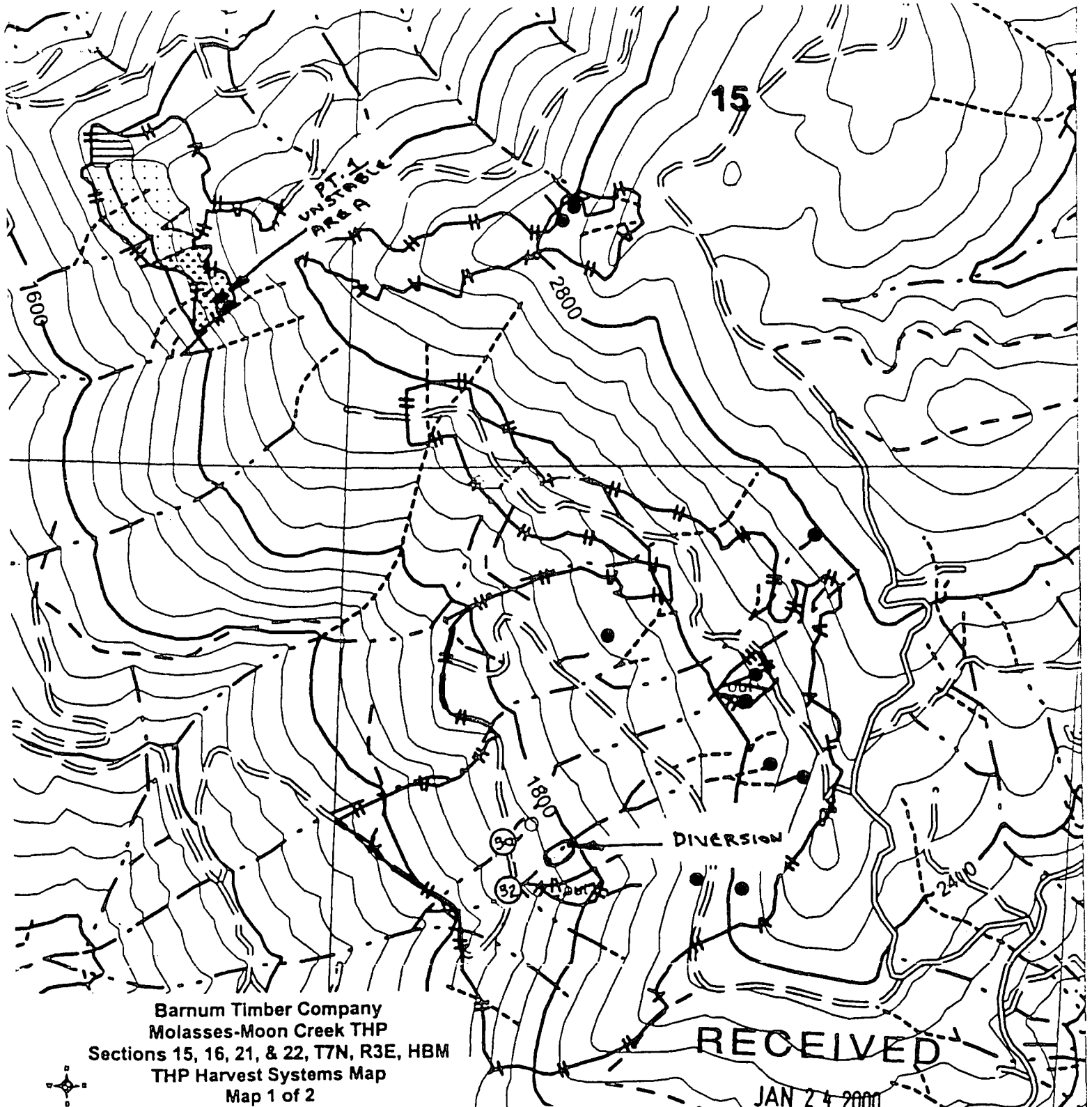
Terrence D. Hofstra
Chief, Resource Management and Science

cc: Review Team Chair, California Department of Forestry, Fortuna
Mike Risso, California Department of Forestry, Salyer
Mike Vogel, Barnum Timber Company, Eureka
Doug Cushman, Water Quality Control Board, Santa Rosa

RECEIVED

JAN 24 2000


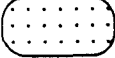
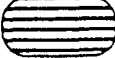


COAST AREA OFFICE
RESOURCE MANAGEMENT




Barnum Timber Company
 Molasses-Moon Creek THP
 Sections 15, 16, 21, & 22, T7N, R3E, HBM
 THP Harvest Systems Map
 Map 1 of 2

1" = 1,000'
 Contour Intervals = 80'
 Date: 7/6/99

Harvest Methods

-  Tractor
-  Cable
-  Tractor/Cable Option
-  Tractor Longline
-  Helicopter

 THP MAP POINTS

 THP Boundary

RECEIVED

JAN 24 2000

COAST AREA OFFICE
 RESOURCE MANAGEMENT