



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

Redwood National and State Parks  
1111 Second Street  
Crescent City, California 95531

*Ringold, 1998*



IN REPLY REFER TO:

A44 (Barnum Timber Company)

December 17, 1998

Stephen R. Horner, Registered Professional Forester  
Barnum Timber Company  
1610 Highland Avenue  
Eureka, California 95502-1365

Dear Mr. Horner:

Thank you for your December 4th letter addressed to Terrence D. Hofstra, requesting clarification of comments provided by Redwood National and State Parks to the U.S. Environmental Protection Agency (EPA). Realizing that we may not agree on issues raised by our comments on the proposed TMDL for Redwood Creek, we hope this response at least clarifies the basis for our comments.

As managers responsible for the protection of public trust resources in Redwood National and State Parks, we remain concerned about the potential impacts to park resources from upstream timber harvest and logging roads. Our concerns are based on past experiences of impacts during large, flood producing storms, our current knowledge of forest practices and rules, and recent storm events in the Redwood Creek basin. As you know, there has been a considerable amount of research performed throughout the Pacific Northwest that attempts to understand the complex interactions of land use and watershed processes, and the research often results in conflicting conclusions that sometimes leaves decision making to professional judgment.

In regard to silvicultural practices along streams and on unstable areas, we encourage you to fly slowly over the Redwood Creek basin and examine the numerous landslides found along Redwood Creek and some of its major tributaries. The causes of landsliding will always be a hotly debated issue, and we are certainly not suggesting that all of the recent landslides are a result of clearcutting methods. However, we feel there are good examples of streamside areas, clearcut within the past 10-12 years, that have failed during recent storms. Recent moderate intensity, long duration rainfalls have favored mass movement processes, and have not necessarily tested road system culverts.

In regard to our statement about past and current forest practice rules and how well they consider water quality and aquatic habitat, you are correct. There is a considerable range of opinions on how well forest practices have addressed these concerns. As we pointed out in our letter to EPA, forest practices have improved, but we feel there is still need for further improvement in regards to water quality and aquatic habitat issues. Other agencies and many timber industry representatives agree with this opinion. In fact, we are encouraged by recent timber harvest plans

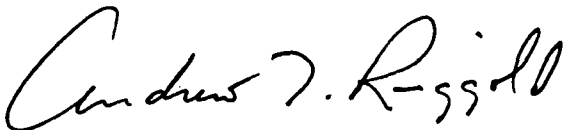
submitted for Redwood Creek that offer improved protection measures that far exceed the basic requirements of the forest practice rules. We encourage you to perform an historical review of forest practice rule development, consider the chronology of timber harvest in the Redwood Creek basin, and review the timber harvest plans submitted within the last 10-12 years to better understand the basis of our concerns.

Our opinion of forest practice rules and their consideration of cumulative impacts from roads should come as no surprise to you. Our opinion is based on the fact that forest practices rules still allow us to walk away from roads and not maintain them. Forest practice rules also place no upper limit on how many roads can be built within a basin. While the actual location of roads might be more important than the number of miles of roads constructed in a basin, the potential hydrologic and erosional impacts from roads are well documented in the literature.

Finally, we are very interested in the results of your study that you presented at the EPA's hearing in Eureka on November 19, 1998. Your results compared erosion from rehabilitated roads inside the park to erosion on Barnum Timber Company roads from the 1997 storm. Please send us whatever information is pertinent to this study (data, maps, citations, criteria, etc.), so that we can better understand the implications of the results and reevaluate our program. Please forward this information to Greg Bundros in our Arcata office.

We hope that you have found our response useful. Enclosed is a list of references that will help explain our opinion of forest practices, and our concern about upstream land use and the protection of downstream park resources. These resources are available from the appropriate agencies, businesses, organizations and libraries.

Sincerely,

A handwritten signature in cursive script that reads "Andrew T. Ringgold". The signature is written in dark ink and is positioned above the typed name and title.

Andrew T. Ringgold  
Superintendent

Enclosure

## REFERENCES

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