

## **Redwood Coast Watersheds Alliance**

tel (707) 877-3405 fax (707) 877-3887

P.O. Box 90, Elk, CA 95432

pirohuck@mcn.org



May 14, 2001

Matt St. John  
NCRWQCB  
5550 Skylane Blvd.  
Santa Rosa, CA 95403

Dear Mr. St. John:

The Redwood Coast Watersheds Alliance and the Greenwood Watershed Association hereby request 303(d) listing for the following south coast Mendocino creeks: Greenwood Creek, Elk Creek, Alder Creek, Mallo Pass Creek, Brush Creek, Schooner Gulch. We further request listing for the following north coast Mendocino creeks: Cottaneva Creek, Hardy Creek, Juan Creek, Howard Creek, DeHaven Creek and Wages Creek.

These relatively small watersheds that drain into the Pacific Ocean independently of major rivers, and which support current or historical coho salmon and steelhead populations and other beneficial uses of water, were mistakenly left off the EPA's 303(d) list of impaired waterbodies. That mistake should now be rectified.

Enclosed you will find our report of information gathered about these watersheds, including many summary tables of information. The information is almost all from public documents, such as Louisiana Pacific's Sustained Yield Plan for Coastal Mendocino (SYP 95-003), Louisiana Pacific Fish Distribution and Temperature studies, and Timber Harvest Plan files of the CA Department of Forestry.

We are also including a study of road impacts in Greenwood Creek, entitled Greenwood Creek Watershed Project Road Survey Summary Report, by Forest, Soil & Water, Inc. (Dr. Fred Euphrate), which includes the data from a Hagans and Weaver road survey of approximately 25% of the Greenwood Creek watershed. The report identifies over 600 sites of erosion on small landowners' roads, a table of "Sites of High Erosion," and identification of 17 priority sites for restoration work. Restoration work on these roads was conducted in 1996-98, but much work remains to be done to control erosion.

The major timber industry landowner, Mendocino Redwood Company, has either not conducted similar studies on MRC timber land in Greenwood Creek and in other coastal watersheds, or has not disclosed the surveys. Similarly, MRC's various management documents contain no watershed assessment or planning information, and are merely documents that state general, overall ownership policies and goals. This leaves a big hole in the information set for these watersheds. However, information from other sources, such as previous owner L-P's Sustained Yield Plan, provides significant information

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indicating serious impairment of the beneficial uses of water in the above mentioned watersheds, including precipitous declines in coho salmon populations and a tremendous loss of the big trees needed to shade watercourses and filter water.

In the case of Greenwood Creek, there is also a town water supply at risk. In a separate submission to the NCRWQCB, the Elk County Water District documents extremely high turbidity in Greenwood Creek and other impacts and costs that indicate serious impairment and require the 303(d) listing process for monitoring and standard setting. The Greenwood Creek Watershed Road Survey indicates that one of the sources of the turbidity is the erosion from rural roads.

Though turbidity data is not available for the other small coastal streams (as far as we know), the similarities between Greenwood Creek and these other creeks, as to logging history, current logging, current roadage and stream crossings, geology and hydrology, historical and current fish species, declines and losses of fish species, and other indicators, point to similar impairment and on-going impacts in these other coastal streams.

Greenwood Creek, upon which an entire town depends for its drinking water, and the other creeks mentioned, which are quickly losing their salmonid populations, all require 303(d) listing, in order to begin the process of monitoring and the setting of standards necessary to preserve the beneficial uses in these watersheds.

Elk Creek is an excellent example of why. L-P Fish Distribution surveys in 1994-96 found "<10" (fewer than 10) coho salmon in Elk Creek. Five years later, the current timber owner, Mendocino Redwood Company, placed evidence of a year 2000 fish survey into Timber Harvest Plan 1-00-363 MEN. The evidence consisted merely of a list of species found last year. The coho salmon was absent from the list. In other words, the coho salmon in Elk Creek have gone from "<10" fish to zero fish over the last five years, according to this survey evidence. MRC has a total of 16 current logging plans in Elk Creek, most of it clearcutting, and including considerable new road construction. A study of the water quality issues in Elk Creek is long overdue, as is a setting of water quality standards.

In another example, Cottaneva Creek, on the north Mendocino coast, is one of only 8 (out of 27 watersheds studied) where L-P found coho salmon in the 1994-96 Fish Distribution surveys.

I will provide you with an inventory of the enclosed documents by fax tomorrow, on May 15.

Sincerely,



Mary Pjerrou  
President, Redwood Coast Watersheds Alliance  
and on behalf of the Greenwood Watershed Association

**Documents attached to Redwood Coast Watersheds Alliance letter of 5/14/01**

<b>Document</b>	<b>Pages</b>
1. SOUTH MENDOCINO COAST CREEKS - Table 1	1
2. SOUTH MENDOCINO COAST CREEKS - Table 2	1
3. SOUTH MENDOCINO COAST CREEKS - Table 3	1
4. SOUTH MENDOCINO COAST CREEKS - temperature data	1
5. Mendocino Redwood Company THPs: GREENWOOD CREEK as of 5/01	2
6. Greenwood Creek THPs - South Mendocino Coast	1
7. Elk Creek THPs - South Mendocino Coast	1
8. Alder Creek THPs - South Mendocino Coast	1
9. Alder Creek notes	1
10. WWAA-47 COTTANEVA CREEK (et al) - Table 1	1
11. WWAA-47 COTTANEVA CREEK (et al) - Table 2	1
12. WWAA-47 COTTANEVA CREEK (et al) - Table 3	1
13. COTTANEVA CREEK: Temperature data	1
14. Cottaneva Creek THPs (near Rockport - WWAA 47)	1
15. Table 1: TREE FARMING ON THE MENDOCINO COAST	1
16. Table 2: LIQUIDATION LOGGING ON THE MENDOCINO COAST	1
17. Fish Distribution for Watersheds in Louisiana Pacific's Coastal Mendocino/Sonoma Management Unit, 1994-96: (3.7) Greenwood Cr., Elk Cr., & Alder Cr. (WWAA No. 84, 87, & 89) - data	6
18. Fish Distribution for Watersheds in Louisiana Pacific's Coastal Mendocino/Sonoma Management Unit, 1994-96: (3.1) S. Fk. Eel River & Rockport Area (WWAA No. 41, 47, & 55) - title page	1
19. Stream Temperatures for Watersheds in Louisiana Pacific's Coastal Mendocino/Sonoma Management Unit, 1994-96: (3.6) Elk/Point Arena Area (WWAA No. 84, 87, 89, 93, & 94) - title page	1
20. Stream Temperatures for Watersheds in Louisiana Pacific's Coastal Mendocino/Sonoma Management Unit, 1994-96: (3.1) Rockport Area (WWAA No. 41 & 47) - title page	1
21. Stream Temperatures for Watersheds in Louisiana Pacific's Coastal Mendocino/Sonoma Management Unit, 1989-93 - report - title page	1

22. *Redwood Coast Watersheds Alliance, Greenwood Watershed Association and Guardians of Elk Creek Old Growth vs. CA Dept. of Forestry*. Mendocino Superior Court case no. 78423, Intended Ruling (17 pages), Final Ruling (2 pages) and Judgement Granting Petition for Writ of Mandate and Permanent Injunction (4 pages) 23
23. *Redwood Coast Watersheds Alliance et al vs. CA Dept. of Forestry*. Mendocino Superior Court case no. 81923, Judgement Granting Permanent Injunction (4 pages) and Order on Motion in Limine Re Mootness (3 pages) 7
24. Historical and Current Presence/Absence of Coho Salmon (*Oncorhynchus kisutch*) in the Central California Coast Evolutionarily Significant Unit, April 1999, by Peter B. Adams et al. Administrative Report SC-9902, Southwest Fisheries Science Center, Santa Cruz/Tiburon Lab, National Marine Fisheries Service. Title page, Abstract, Table of Contents, Introduction, Literature Citations, and p. 9, 10, 15, and 24. 14
25. Notes from Linda 9/29/00 1
26. Declaration of Jesse Russell (fisherman): Elk County Water District vs. CDF. Mendocino Superior Court case no. CV 60728 4
27. Reminiscences of a Town With Two Names: Greenwood, Known Also as Elk, by Walter Matson, 1980 – title page, p. 31-33 4
28. Final Rule – Coho salmon, NMFS – on-line reference 1
29. Greenwood Creek Watershed Project Newsletter 8
30. Letter of Dr. Edmund Smith to CDF, 1/21/99, re: L-P fish data 4
31. Greenwood Watershed Association newsletter map showing THPs 1
32. Photo of town of Elk showing 140' cliff at "Cuffey's Point" and Greenwood Cr. estuary (CDF & MRC say SYP coho are in "Cuffey's Point" not Greenwood Creek) 1
33. Louisiana Pacific Fish Distribution map– lower Greenwood Cr –with annotations 1
34. Louisiana Pacific Fish Distribution map– upper Greenwood Cr –with annotations 1
35. CDF "Official Response" re: THP 1-00-357 MEN – p. 18 1
36. Louisiana Pacific SYP WWA 84-Greenwood Creek – p. 1, 8 1
37. CDF "Official Response" re: THP 1-00-357 MEN – p. 16 1
38. Louisiana Pacific Fish Distribution survey data – Greenwood Creek 1
39. Mendocino Redwood Company "Management Plan, Policies and Targets August 2000" – title page – full text at ([www.mrc.com](http://www.mrc.com)) 1
40. Public Summary of Certification Report: Mendocino Redwood Company, Certification Registration Number: SCS-FM/COC-00026N, Scientific Certification Systems, October 2000. title & contents page – full text at ([www.mrc.com](http://www.mrc.com)) 2
41. Smartwood Forest Management Public Summary for: Mendocino Redwood Company, Certificate No. SW-FM/COC-128, November 16, 2000. title & contents page – full text at ([www.mrc.com](http://www.mrc.com)) or ([www.smartwood.org](http://www.smartwood.org)) or ([www.isf-sw.org](http://www.isf-sw.org)) 2

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42. MRC "Option A" 12/2/99 – title & contents page	2
43. MRC "Option A" 2/92/00 – title & contents page	2
44. Greenwood Creek Watershed Project 1996 Road Survey Summary Report	96
45. "Roads & Fish" – 22 minute educational video (VHS)	video
TOTAL PAGES	206

**Documents incorporated by reference into RCWA letter of 5/14/01:**

1. All of the above documents referenced by title page, on-line location or other reference, in their entirety.
2. Louisiana Pacific Sustained Yield Plan for Coastal Mendocino (SYP 95-003) and all maps, appendices, plans, reports, and public and agency comment
3. Fish Distribution for Watersheds in Louisiana Pacific's Coastal Mendocino/Sonoma Management Unit 1994-96, Stream Temperatures for Watersheds in Louisiana Pacific's Coastal Mendocino/Sonoma Management Unit 1994-96, and 1989-03, all reports and all data sets for each unit (submitted as public comment to SYP 95-003)
4. All Timber Harvest Plans contained on the above referenced lists, in their entirety including all public and agency comment.
5. Mendocino Superior Court cases CV 78423, 81923, 60728 and 81119, in their entirety including all administrative records, legal briefs, declarations and court documents.
6. All National Marine Fisheries Service Final Rules, Habitat Designations and other listing documents for coho salmon and steelhead trout.

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