

**Greenwood
Watershed
Association
YEAR 2000**

**The Destruction of
Greenwood Creek and Elk Creek**

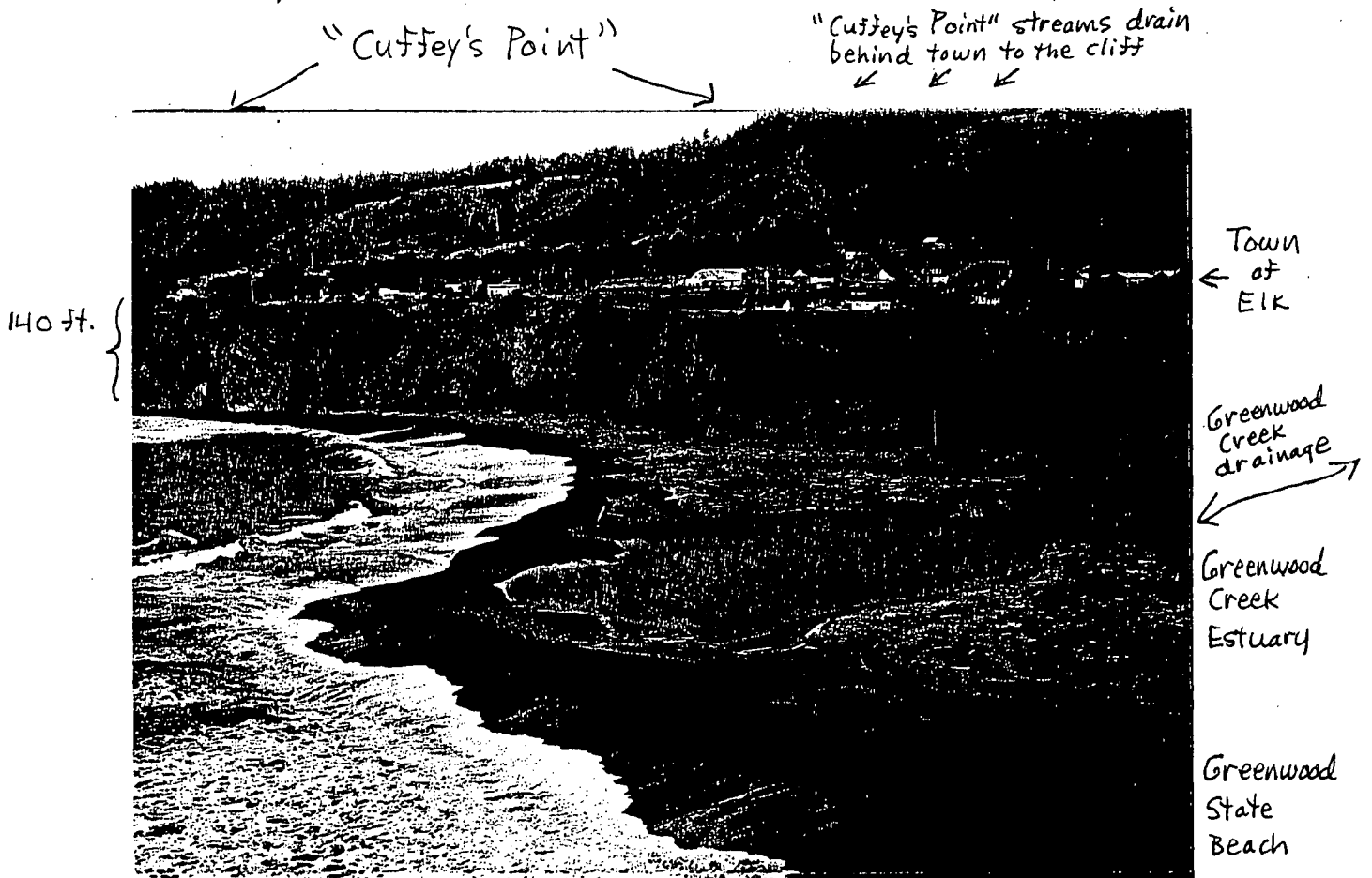
The map above represents the destruction of our local bio-region from excessive logging by the Mendocino Redwood Company (MRC), an investment of the Fishers of Gap, Inc. In 1998, the Fishers bought 231,000 acres of cutover forest land, mills and logging plans from Louisiana Pacific--the most notorious forest liquidator in northern California. Since that time, MRC has increased the total annual acreage of logging plan submissions by one third over L-P. Critical species such as the Coho salmon and the Marbled Murrelet are now facing extinction. The Fishers "green-wash" is

this: MRC is logging only 90% of the trees instead of 100% in clearcutting areas (euphemistically termed "variable retention."). They also say they are retaining trees 48+ inch diameter and 250+ years old--of which they have almost none. (Less than 3% of their forests are in 24+ inch diameter, according to L-P statistics). MRC's dramatic increase in total logging acreage will more than make up for these cosmetic measures. We are looking at the end of the once magnificent redwood forest and its magnificent creatures.

Map: The GWA and other groups have filed public interest lawsuits on Logging plans 97-445, 97-352, 95-315 and 98-266. The circles for the bridge and bio-engineering (map right) show the sites of fish restoration work by the Greenwood Creek Watershed Project.

The story of this logging is one of pervasive lies and suppression of evidence, and malfeasance by our state and federal resource agencies. It is a sorry tale. This GWA Newsletter is devoted to telling what we know of the truth in hope that the New Millenium will bring critically needed change in forestry policy.

Pjerrou Exhibit B



CDF says that the coho salmon cited in LP's Sustained Yield Plan as being in Greenwood Creek are not in Greenwood Creek (right photo) but are in "Cuttey's Point" (left photo) which has a 140 foot drop to the ocean (impossible for coho to jump). CDF provided this wrong information in its official Response, two months after the close of public comment - so the public could not correct the error. CDF cited the source of this information as "LP employees who are now with MRC" as reported by MRC RPF John Anderson. (TMP 357 O.R. p. 18)

Pjerrou Exhibit A (1)

L-P/MRC ownership

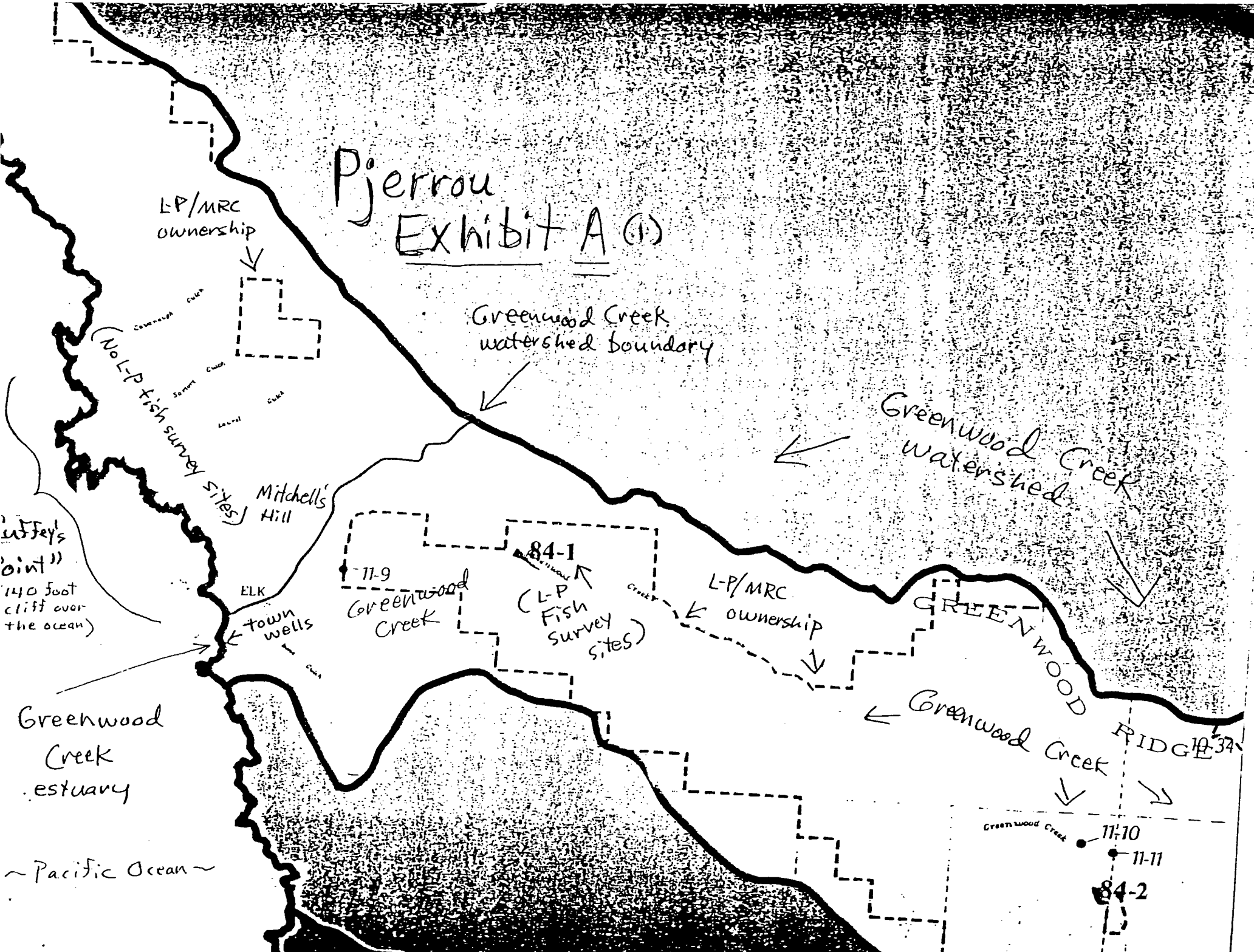
Greenwood Creek watershed boundary

Greenwood Creek watershed

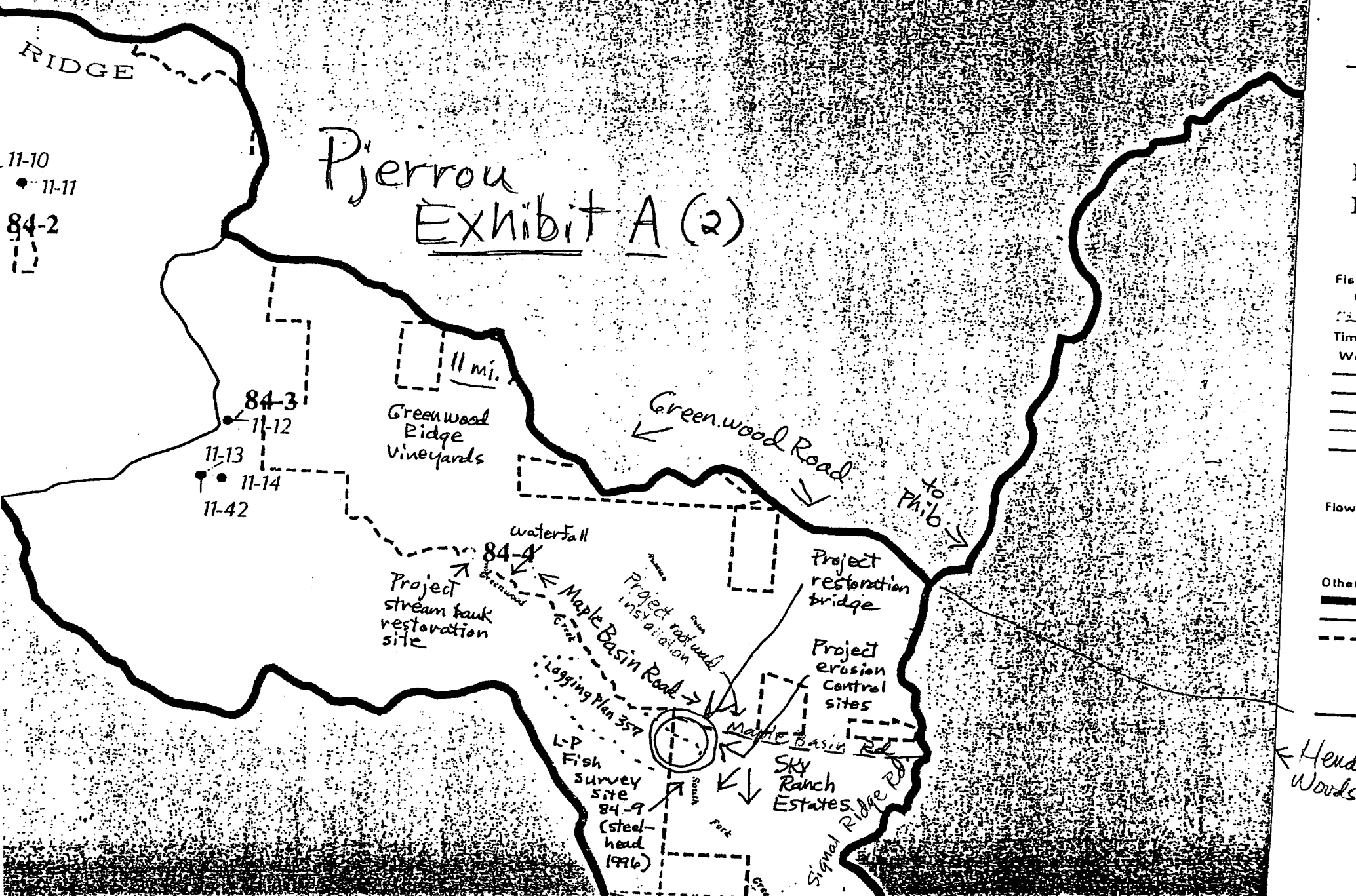
"Jeffrey's Point"
140 foot cliff over the ocean

Greenwood Creek estuary

~ Pacific Ocean ~



Pierrou Exhibit A (2)



- Field
- Tim
- W
- Flow
- Other

Hend Woods

← CDT
O.R.

In regards to evidence of the presence of coho salmon in Greenwood Creek, the RPF has supplied all the information available at MRC regarding this issue. One member of the general public mentioned a document titled "Historical and Current Presence-Absence of Coho Salmon in the Central California Coast Evolutionarily Significant Unit" by National Marine Fisheries Service, April 1999. The RPF obtained a copy of this report. The first page of the report received from NMFS states "The material is not ready for formal publication since the paper may later be published in a modified form to include more recent information or research results. Abstracting, citing, or reproduction of this information is not allowed.". Therefore, the discussion of this paper should end until it is published. The RPF has contacted the author because the sources used for stating coho salmon in Greenwood Creek are flawed. The data used for this report IS included in THP 1-00-357 on page 100. One can clearly see that no coho salmon were found during this study in Greenwood Creek.

In addition to this information, the RPF joined a team of fisheries biologists from MRC to electroshock Greenwood Creek in the year 2000 after this plan was submitted. Old sites were resampled and new sites were established. They covered the length of Greenwood Creek from MRC's property line near the mouth of Greenwood Creek to the upper portion of the watershed upstream from the falls. This was done over a two day period. No coho salmon were found during this study. A final report with data is due out at the end of February, 2001 and will be included in future plans. (Information provided by RPF, January 31, 2001).

15. Concern: This same MRC forester provided wrong information to the file for THP 99-339 MEN when he stated that the WWA 84-Greenwood Creek, p. 40, statement in SYP 95-003 ("The literature review conducted for the SYP yielded information [that] also indicated that coho populations are present within the Upper and Lower Greenwood Creek planning watersheds.") was referring to "Cuffey's Point" streams rather than Greenwood Creek. THP 357 continues not to disclose this SYP 95-003 statement on Coho, presents far flimsier evidence on its absence (a one day stream survey, 34 years ago, where no Coho were seen and the water was "too muddy to see many fish"), and all recent THPs in Greenwood Creek fail to disclose unpublished L-P data showing Coho salmon in Greenwood Creek in 1995 (see enclosed NMFS Tiburon Admin. Report). Why the discrepancy between the unpublished L-P data in the Tiburon report and the L-P survey data on THP pp. 96-100? What is the point of trying to downgrade Greenwood Creek to a non-Coho creek, using only selected evidence and ignore stronger evidence to the contrary. THP 357 contains wrong and pointedly prejudiced information on Coho salmon in this creek. Do FPR 898.2(c) and (d) mean nothing at all? Why was other information excluded; e.g., the Jesse Russell 1990 lawsuit declaration that he saw Coho there in 1975, the Matson historical account describing Coho "ganging up" in the estuary in the 1920s-30s?

Response: See Response to Concern #14. MRC is treating the stream *as if* it contained coho salmon. The Cuffey's Point streams are streams that are also associated with the watershed assessment area for Greenwood Creek in the SYP. In other words the SYP defined the Greenwood Creek watershed as not only Greenwood Creek but other lesser streams to the north which flow into the ocean. According to LP employees who are now with MRC, when the SYP said coho are present in the Greenwood Creek watershed they were referring to other streams in the assessment area besides Greenwood Creek. (Information provided by RPF, 1/31/01).

16. Concern: Concern writer provides discussion (the L-P SYP, information in an historical book by Walter Matson, a lawsuit declaration from local fisherman Jesse Russell that he saw coho in Greenwood Creek in 1975, unpublished L-P data from 1995 referred to in "the NMFS/Tiburon lab report") supporting presence of coho salmon in Greenwood Creek historically and recently. Concern writer takes issue with discussion in the THP which supports absence of coho salmon in Greenwood Creek, calling it "a pattern

L-P
SYP

1 Introduction

WWAA 84, the Greenwood Creek Watershed and Wildlife Assessment Area, encompasses three planning watersheds in Mendocino County (see Map 1 in the *Map Atlas: Sustained Yield Plan for Coastal Mendocino County, Vols. 1-6*). WWAA 84 is a Tier A assessment area. In general, Tier A WWAAs have greater than 15% L-P ownership and received a full assessment of watershed, fisheries, and wildlife resources as described in L-P's *Watershed Analysis Manual*. Tier B WWAAs generally contain less than 15% L-P ownership and had a reduced level of assessment effort for the SYP. However, all WWAAs in the Coastal Mendocino County Management Unit with 10 to 15% L-P ownership were elevated to Tier A assessment status to better address concerns for sensitive resources in Coastal Mendocino County watersheds. Issues related to Tier A and Tier B WWAAs are covered in more detail in Chapter 1 of the *Sustained Yield Plan for Coastal Mendocino County*.

WWAA 84 is drained by Greenwood Creek and its main tributary, Russian Gulch. Several small creeks drain portions of the WWAA directly to the Pacific Ocean, namely Laurel Gulch, Sartori Gulch, Cavanaugh Gulch, and Bonee Gulch. Greenwood Creek flows to the Pacific Ocean near Elk, California. Selected physical characteristics of each planning watershed in WWAA 84 are summarized in Table 1.

Table 1. Selected physical characteristics by planning watershed for WWAA 84

Characteristics	Planning Watershed Name and ID Number			WWAA Total
	Upper Greenwood Creek 113.61010	Lower Greenwood Creek 113.61011	Culleys Point 113.61012	
Watershed Area (ac)	7,597	8,851	3840	20,288
L-P-owned Area (ac)	3,674	6,008	243	9,924
L-P-owned Area (%)	48.4	67.9	6.4	48.9
Elevation Range of Watershed (ft msl)	530-2,297	0-2,040	0-1,285	0-2,297
Elevation Range of L-P Ownership (ft msl)	530-2,251	39-2,040	652-1,017	39-2,251
L-P Road Density (mi/mi ²)	1.7	3.0	4.6	2.5
Mean Annual Precipitation (in/yr)	55	49	40	50

The dominant land cover type in the L-P ownership area is coniferous forest. Land in WWAA 84 is primarily used for timber production, with L-P owning nearly 50% of the area. Nineteen percent of the land owned by non-industrial timber companies is within the coastal zone, and another 25% of non-industrial timber ownership is beyond the coastal zone. A small percentage of the WWAA is used for private range land and agriculture. A number of rural residences are spread throughout the WWAA. A local watershed group, the Greenwood Creek Watershed Association, is particularly interested in any adverse impacts from timber harvesting activities on Greenwood Creek. According to interviews with L-P foresters, WWAA 84 was first logged in the early 1900s. L-P ownership within WWAA 84 is leased to a private club for recreational hunting.



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2.1.4 Fisheries

Based on flow accumulation models, WWAA 84 contains 37.1 mi of Class I, 41.3 mi of Class II, and 54.2 mi of Class III watercourses (see maps 5–8 for stream channel and fisheries information, including distribution of Class I, II, and III streams or watercourses within the WWAA). The Lower Greenwood Creek planning watershed has the greatest mileage of Class I watercourses in the WWAA (18.9 mi); Cuffeys Point planning watershed has the least (5.0 mi). Class I streams are defined by the state of California as watercourses having fish always or seasonally present on site and includes habitat to sustain fish migration and spawning. Class II streams are defined as watercourses that are always fishless but are tributary to and within 1,000 ft of a Class I stream (excludes Class III streams that are tributary to Class I streams) or that provide aquatic habitat for aquatic species other than fish. Class III streams are defined as watercourses having no aquatic life present and showing evidence of channels that are capable of sediment transport downstream to Class I or Class II streams.

Coho salmon are known to reside in the streams of WWAA 84, where L-P has established 6 fish distribution sampling sites (Map 8). The literature review conducted for the SYP yielded information indicating that coho populations are present within the Upper and Lower Greenwood Creek planning watersheds. Other species of fish known to utilize WWAA 84 are steelhead, resident trout, sculpin, stickleback and California roach.

Available habitat conditions for three critical salmonid life history stages (spawning, summer rearing, overwintering) were evaluated at fish habitat sampling locations in the Coastal Mendocino County Management Unit. Physical parameters used to evaluate spawning habitat include the availability of spawning gravels, degree of substrate embeddedness, and the amount of subsurface fines. Parameters used to evaluate summer-rearing habitat include the availability of pool and deep pool habitat, and the amount of instream cover. Parameters used to evaluate overwintering habitat include the degree of channel confinement, amount of key pieces of LWD, and abundance of coarse substrate. The assessment of habitat conditions was based on general life history requirements. Ideally, these conditions should be evaluated relative to the intrinsic potential of a given stream reach to support salmonids and in the context of a limiting factors analysis. Potential additions and revisions to the fish habitat quality and sensitivity assessments are addressed in the adaptive management and monitoring plan discussed in Chapter 7 of the *Sustained Yield Plan for Coastal Mendocino County*.

1995 Fish habitat surveys revealed generally fair conditions for coho production in WWAA 84 (see Map 8 for location of the survey sites and Table 4 for a summary of habitat conditions at these sites). Based on observations, availability of spawning conditions are the limiting factor in the upper reaches of Greenwood Creek. The lower reaches are limited by summer rearing conditions like deep pools and sufficient cover.

Channel sensitivity was assessed for all Class I streams in the Coastal Mendocino County Management Unit. Individual channel types were defined by unique combinations of slope and confinement (see Map 6A). A matrix of these characteristics was developed to calculate fish habitat and channel sensitivity, resulting in nine channel types (see Appendix C of the *Sustained Yield Plan for Coastal Mendocino County* for the matrix). The sensitivity of channel types was evaluated based on the relative vulnerability of each channel type to increased sediment inputs and the potential value of the fish habitat it provides. Because

effects assessment was found to be sufficiently thorough for the RPF and the Department to determine that as mitigated and if operated in accordance with the plan and the Forest Practice Rules, this plan is not likely to result in significant adverse direct or cumulative impacts to any resources, which were considered.

13. Concern: Failure to provide fish survey information, in view of the evidence of extreme impacts on the Coho salmon, constitutes jeopardy as does failure to comply with National Marine Fisheries Service guidelines for Coho salmon and steelhead. Degradation of spawning habitat by increasing sediment in watercourses constitutes a taking.

THP 1-00-357 fails to include adequate information (for instance, current fish surveys) for the federally-listed as threatened coho salmon and steelhead trout. It does not disclose the presence of rainbow trout above the Maple Basin waterfall (which may be impacted by the Maple Basin Road haul road).

Response: Rainbow trout is not a listed species and disclosure is not required by the Forest Practice Rules. THP page 58 indicates that rainbow trout were present in a 1966 DFG survey of Greenwood Creek and page 59 cites an historic reference that rainbow trout were present there according to a personal account from the early to mid 1900s. Class I watercourse designation applies to all fish species. Coho salmon and steelhead protection measures are applicable to rainbow trout. Coho and steelhead are anadromous fisheries which receive more protection under the current rules. These new rules do not apply (according to a communication between the RPF and CDF staff forester Wendy Wickizer), because a waterfall $\frac{1}{4}$ to $\frac{1}{2}$ mile downstream of the restoration bridge creates a barrier to anadromous fisheries. The RPF has seen the waterfall and attests to the fact that no fisheries can go past this barrier, except for resident trout upstream (written communication from RPF, 1/31/01).

The listing of Coho Salmon and steelhead was accomplished in relationship to an Evolutionary Significant Unit. This listing affects all Class I watercourses that have coastal access regardless of past, present or future fish use. The RPF has provided protection measures for Coho Salmon and Steelhead habitat within the THP, which meet or exceed acceptable standards for protection as specified in the Forest Practice Rules and in literature referenced for Coho Salmon protection. In relationship to 898.2(c), to require fish survey information prior to the approval of a THP is not reasonable or necessary since potential habitat within the ESU must be protected.

Information from the L-P Fish Distribution and Temperature studies 1989-1996 is present in the plan. Page 52 of the plan summarizes the results of a salmonid habitat evaluation, which was conducted in the Greenwood Creek watershed in 1995. Assessed were conditions relating to spawning, summer rearing, and overwintering habitat conditions. Overall, the Greenwood Creek drainage was considered to be in moderately good condition. Stream temperature data from 1999 is provided and discussed on THP page 53 with additional information in Section V of the plan. Comparison is made with data collected in 1994 and 1995. The information provided shows that summer water temperature is decreasing on the MRC ownership over time. However, stream temperatures are above the preferred range for coho and steelhead, and this is why the WLPZs and ELZs on this plan are no-cut.

The plan also reports the result of a stream channel evaluation conducted in the area of this plan. Page 55 gives ratings for gravel embeddedness, pool filling, aggradation, bank cutting, bank mass wasting, downcutting, scouring, among of organic debris, stream-side vegetation, and recent flooding. The RPF concluded that the results of the stream channel study showed that the stream channel conditions have been adversely impacted from past activities in the watershed. Skid trails were constructed in watercourse channels and sedimentation of the watercourses occurred.

TABLE 44. Summary of results for fish (and miscellaneous vertebrate species) distribution surveys within the Greenwood Creek watershed (WWAA #84; Louisiana-Pacific Corporation), Mendocino Co., California, 1994-'96. [-] Indicate no fish were observed. Refer to Map 25 & 26 and Appendix 44 for survey site locations and miscellaneous pertinent information, respectively.

Survey Site Location	Survey Site No.	Survey Date (mm/dd/yy)	Salmonid Species & Age-Class (AC) Present, & Relative Abundance Category (RAC) ^{1,2,3}								Misc. Vertebrate Species Present (& Relative Abundance Category) ^{2,3}
			STH		COH		CIH		CTT		
			AC	RAC	AC	RAC	AC	RAC	AC	RAC	
Greenwood Creek	84-1	8/04/94	0, 1, 2	1	-	-	-	-	-	-	SCP (2), STB (1)
Greenwood Creek	84-1	8/04/95	0, 1, 2	3	-	-	-	-	-	-	STB (1), SCP (1)
Greenwood Creek	84-1	7/27/98	0, 1, 2	3	-	-	-	-	-	-	RCII (1), STB (1), YLF (1)
Unnamed Trib. to Greenwood Creek	84-2	8/12/98	0, 1, 2	2	-	-	-	-	-	-	PGS (1)
Greenwood Creek	84-3	8/04/94	0, 1, 2	2	-	-	-	-	-	-	RCII (1), PGS (1), FRO (1)
Greenwood Creek	84-3	6/22/95	0, 1, 2	3	-	-	-	-	-	-	RCII(2)
Greenwood Creek	84-3	6/13/98	0, 1, 2	3	-	-	-	-	-	-	RCII (1), NEW (1), YLF (1)
Heather Gulch	84-4	8/04/94	0, 1	2	-	-	-	-	-	-	PGS (1)
Heather Gulch	84-4	8/22/95	0, 1	3	-	-	-	-	-	-	CAN (1), CAN/RSN (1)
Heather Gulch	84-4	6/13/98	0	2	-	-	-	-	-	-	
Heather Gulch	84-5	8/12/98	0, 1, 2	1	-	-	-	-	-	-	PGS (1), YLF (1)
Unnamed Trib. to Greenwood Creek	84-6	8/04/94	0, 1, 2	2	-	-	-	-	-	-	PGS (1)
Unnamed Trib. to Greenwood Creek	84-8	8/04/95	0, 1	3	-	-	-	-	-	-	PGS (1)
Unnamed Trib. to Greenwood Creek	84-8	8/13/98	0	2	-	-	-	-	-	-	
Unnamed Trib. to Greenwood Creek	84-7	8/04/94	0, 1	2	-	-	-	-	-	-	
Unnamed Trib. to Greenwood Creek	84-7	8/04/95	0, 1	2	-	-	-	-	-	-	PGS (1)
Unnamed Trib. to Greenwood Creek	84-7	8/13/98	0, 1	1	-	-	-	-	-	-	
Greenwood Creek	84-8	8/04/94	0, 1, 2	2	-	-	-	-	-	-	RCII (1)
Greenwood Creek	84-8	8/18/95	0, 1	3	-	-	-	-	-	-	PGS (1), CAN/RSN (1)
Greenwood Creek	84-8	8/13/98	0, 1, 2	3	-	-	-	-	-	-	
South Fork Greenwood Creek	84-8	8/12/98	0, 1, 2	2	-	-	-	-	-	-	PGS (2)

1- Age Classes (AC): 0+ = < 70 mm (Young-Of-The-Year); 1+ = 70 to 130 mm (Yearling); 2+ = > 130 mm.
 2- Relative Abundance Categories (RAC): 1- < 10 Individuals; 2- 10 to 40 Individuals; 3- > 40 Individuals; 4- > 400 Individuals.
 3- Species Abbreviations: STH-Steelhead; COH-Coho Salmon; CIH-Chinook Salmon; CTT-Cutthroat Trout; BRT-Brown Trout; BKT-Brook Trout; RBT-Rainbow Trout; RCII-Roach; STB-Stickleback; SKR-Sucker; SCP-Sculpin; WWF-Warmwater Fish (Misc.); PCL-Pacific Lamprey; PBL-Pacific Brook Lamprey; LAM-Lamprey, Unidentified Species; CRF-Crayfish; PGS-Pacific Giant Salamander; NWS-Northwestern Salamander; SSS-Southern Torrent Salamander; TLF-Toad Frog; YLF-Yellow-Legged Frog; RLF-Red Legged Frog; FRO-Frog, Unidentified Species; RBN-Red-Bellied Newt; RSN-Rough-Skinned Newt; CAN-California Newt; NEW-Newt, Unidentified Species.