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United States
Department of
Agriculture

Forest
Service

Los Padres
National
Forest

Santa Barbara Ranger District
HC58, Paradise Road
Santa Barbara, CA 93105
805-967-3481
805-967-7337 (TDD)

EXHIBIT CT25

RECEIVED

Reply to: 2640

OCT 02 1997

Date: September 30, 1997

ENTRIX, INC.
(FRONT DESK)

#15

Ramona Swenson
Entrix, Inc.
590 Ygnacio Valley Rd. Suite 200
Walnut Creek, CA: 94596.

Dear Ms. Swenson:

As requested, our staff has reviewed the "Preliminary Draft of the Santa Ynez River Management Alternative Report" for consistency with agency policies. The only alternatives which would require our involvement include those actions which would influence the natural resources or human activities within the National Forest boundaries. These actions may include reintroduction of anadromous steelhead above Cachuma Reservoir by various means, use of broodstocks for downstream augmentation, modification of flow releases from Gibraltar Dam, instream habitat enhancements, and control of exotic predators.

In all cases, these alternatives do not appear to have inherent legal or administrative barriers to implementation. The Forest Service has concerns, however, with the implications of many of these actions. Re-introduction of anadromous steelhead runs is covered as management direction under our Forest's Riparian Conservation Strategy (1994) as soon to be amended in the Forest Land Management Plan: "Where appropriate, consider reintroduction programs for other aquatic/riparian TES species once population and habitat assessments have been conducted and conservation strategies have been developed" (page 15). The status of these reintroduced populations under the Endangered Species Act (ESA) would need to be clarified by the regulatory agencies. If additional protection measures were necessary under the ESA, some human activities on the Forest might need to be curtailed or adjusted. The taking of fish for use as broodstock for augmenting populations is more of a California Department of Fish and Game involvement; however, the Forest Service would need to be involved and NEPA followed if the program would necessitate any ground disturbing activities. Biologically, there may be concerns and complications with such an approach that would need to be addressed. Such programs are usually conducted through interagency Memorandum of Understanding. Modifications of flow releases could get into the legal realm and involve additional negotiations through California Water Resources Control Board. The Forest's interests in Santa Ynez River flows may or may not be benefitted depending on the specifics of the alternative. Instream habitat enhancements would likely require further NEPA analysis but is consistent with Forest direction; "Design, construct, and operate fish and wildlife restoration, enhancement, or interpretive activities in a manner that contributes to attainment of riparian conservation objectives, standards, and



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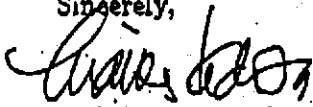
Ramona Swenson, p. 2

guidelines." Exotic predator control programs are already underway. The Forest has currently requested a Biological Opinion from USF&WS and National Marine Fisheries Service on our ongoing aquatic exotic species control program.

Many of our initial concerns may be alleviated with further analysis, definition, and refinement of alternatives. At this time, we can only express our general concerns and interest for further opportunity to provide input on the management implications of various alternatives.

If you should require clarification or additional input, please contact District Resource Officer John Bridgwater at this office, or Forest Fisheries Biologist Sara Chubb in the Supervisor's Office in Goleta (805 681-2703). John is the best contact for matters of policy, and Sara for biological input.

Sincerely,



for GLORIA SILVA
District Ranger

cc. Linda Riddle, Forest Resource Officer
Sara Lee Chubb, Forest Fisheries Biologist