

Memorandum

To : Mr. David J. Driscoll, Chief
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California Department of Forestry
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Date: June 21, 2001

Attention Mr. Chuck Joiner, Review Team Chairperson
Via fax (707) 576-2608

From : Robert W. Floerke, Regional Manager 
Department of Fish and Game - Central Coast Region, Post Office Box 47, Yountville, California 94599

Subject: Pre-Harvest Inspection Report for the "If I Only Would Have Known"
Timber Harvest Plan 1-00-484 SON, Haupt Creek and Tobacco Creek
Watersheds, Sonoma County

Department of Fish and Game (Department) personnel have reviewed the above-referenced Timber Harvest Plan (THP) document, and has participated in two Pre-harvest Inspections (PHI) of the proposed plan area. This PHI report includes an assessment and recommendations for aquatic, plant and wildlife resources that may be adversely affected by the proposed THP.

I. SCOPE OF REPORT

The Department's assessment and recommendations presented in this report are based on plan-specific information available to the Department to date. As discussed below, information presented in the THP on certain sensitive biological resources is insufficient for the Department to adequately evaluate the potential for significant adverse effects to occur to these resources, and to develop suitable mitigation measures. The plan area is located adjacent to Haupt Creek in northwestern Sonoma County, approximately nine air miles southeast of the village of Annapolis, (Section 10 and Section 15 T9N, R13W MDB&M, Annapolis 7.5' U.S. Geological Survey quadrangle maps).

The plan area supports a late succession forest stand as described under Title 14 California Code of Regulations (14 CCR) 895.1. At risk is the degradation of rare and unique ecological qualities of a contiguous stand of late seral coast forest. Sensitive species potentially affected by the proposed timber management activities include, but are not limited to Federally-listed threatened steelhead trout (*Oncorhynchus mykiss*), and coho salmon (*Oncorhynchus kisutch*), State-listed endangered and Federally-listed threatened marbled murrelet (*Brachyramphus*

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marmoratus), Board of Forestry and U. S. Forest Service listed sensitive northern goshawk (*Accipiter gentilis*), and Federally-listed threatened northern spotted owl (*Strix occidentalis caurina*). Also potentially affected are taxa designated by the State of California as species of special concern, such as foothill yellow-legged frog (*Rana boylei*), sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), Vaux's swift (*Chaetura vauxi*), red tree vole (*Arborimus pomo*), and pallid bat (*Antrozous pallidus*). Other sensitive resources that could be affected by proposed logging operations include swamp harebell (*Campanula californica*), maple-leaved checkerbloom (*Sidalcea malachroides*), and coast lily (*Lilium maritimum*). These plants are considered rare, threatened or endangered in the State of California and elsewhere (List 1B) by the California Native Plant Society (CNPS).

The Department attended the first PHI on May 29, 2001. In attendance were Mr. Charles Richardson, Registered Professional Forester (RPF), Mr. Steve Smith and Mr. Ken Margiott, California Department of Forestry and Fire Protection (CDF), Mr. Dave Hope, Regional Water Quality Control Board (WQ), Mr. John Schlosser, Department of Mines and Geology (DMG), and Ms. Stacy Martinelli, representing the Department. A second PHI was held on June 7 to inspect the plan area as 100 percent marked for trees to cut. In attendance were Mr. Charles Richardson, Mr. Randy Jacobszoon, RPF; Mr. John Ramaley, RPF with Mendocino Redwoods Company; Mr. Ken Margiott; Mr. John Schlosser; Mr. Ronnie Ohlson; Mr. John Brown; Ms. Stacy Martinelli and Mr. Eric Tattersall, Department.

The Department's participation in the PHI was a reconnaissance-level survey without the quantitative sampling of plant, fish, herpetile, avian, or mammalian habitat resources.

II. SITE DESCRIPTION AND BIOLOGICAL RESOURCES

The 55-acre plan area is contiguous with approximately 800 acres of late seral coast forest that falls under the same ownership. The area is located on gentle and steep slopes (moderate and extreme erosion hazard rating) that overlook Haupt Creek, a tributary to the Wheatfield Fork Gualala River. The plan area supports a late succession forest comprised of 500-year-old redwood (*Sequoia sempervirens*) and Douglas fir. Other dominant tree species present include tanoak (*Lithocarpus densiflorus*) and California bay (*Umbellularia californica*).

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Haupt Creek, a Class I watercourse, flows through the northeast portion of the plan area. This creek currently supports steelhead trout, however, past records indicate that coho salmon were present during the 1970s. A Class I tributary and a Class II tributary to Haupt Creek also occur on the plan area.

According to the THP, the plan area is potential habitat for northern spotted owl, marbled murrelet, red tree vole, coho salmon, steelhead trout, swamp harebell, and coast lily. Surveys for marbled murrelet have been performed on and adjacent to the plan area in 1995/96 and 1998/99 with no detections (Charlotte Ambrose, pers. comm.). A habitat assessment of existing upland wildlife habitat on the area was conducted by Private Consulting Biologist Ms. Pam Town on December 7, 2000. The assessment includes the results of a field survey; a summary of onsite habitat features; and recommendations to protect and conserve late succession forest, such as not harvesting all the old-growth trees. No other survey information was presented in the THP, however, it is the Department's understanding that surveys for sensitive plants, mammals and birds are forthcoming.

III. PROJECT DESCRIPTION

The THP proposes Clearcut (2 acres), Selection (6 acres), and Seed Tree Seed Step (35 acres). According to the THP, the clear-cut unit will consist of four small clearcut units no more than 0.5 acre in size on southwest facing slopes overlooking Haupt Creek. Artificial regeneration will be used to meet stocking requirements in the clearcut unit. Ground-based equipment to be used include tractor and rubber-tired skidder. Skyline cable will be used on the steeper slopes. A 3,000-foot road segment will be constructed offsite to the north of the plan area on pastureland owned by the Ohlson family. An additional new road segment approximately 1,500 feet in length is proposed on the plan area. Hardwoods may be harvested in the Selection and Seed Tree Seed Step areas, however, hardwoods greater than 24 inches diameter at breast height (DBH) will be retained where they exist.

IV. FIELD REVIEW AND PLAN ASSESSMENT

Information sources used in this report include the California Natural Diversity Data Base (CNDDB) Rarefind 2, Version 2, Integrated Biological Information System (IBIS)

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Version 2, California Native Plant Society Inventory of Rare and Endangered Vascular Plants, Fifth Edition, Sonoma County Breeding Bird Atlas, California Forest Practice Rules 2001, California Fish and Game Code 2001, California Environmental Quality Act-CEQA Guidelines 2001, Department policy and guidelines and Department staff.

Findings:

(1) Wildlife Habitat

According to Noss (2000), late succession redwood forest has been identified by the World Wildlife Fund as a globally significant ecoregion that is unsurpassed in biomass and structural complexity. Throughout its range, old-growth redwood forest has declined in area by more than 95 percent since European settlement. As outlined by Noss, one of the management goals of the redwoods region is to protect the most biologically significant remaining stands of old-growth redwoods that represent the natural range of variation of redwood forest types.

Although the THP area has been classified as Site III, it supports a dominant overstory of mature (500 years and older) conifers represented by approximately 65 percent redwood and 35 percent Douglas fir. As the stand has not been logged in the past, it represents a pristine example of mature forest in Sonoma County. Furthermore, because it is contiguous with approximately 800 acres of late seral forest, it is likely a portion of one of the largest remaining tracts of old-growth forest in Sonoma and Mendocino counties.

The mature forest stand on the plan area contains a relatively high density and variation in structural characteristics that are of special significance to wildlife. For example, many of the dominant redwood trees observed on the plan area show evidence of past fire damage. This has resulted in the creation of numerous chimney trees (i.e., cavity at the base of a mature redwood tree with charred, hollow interiors). A bat, likely a pallid bat, was observed in the burned hollow interior of a 100-inch DBH redwood tree located alongside the onsite Class II watercourse. Other wildlife habitat attributes observed were numerous large, broken-topped conifers which could provide nesting habitat for arboreal mammals such as red tree vole and raptors such as northern spotted owl. Also, many of the redwood and Douglas fir trees had large, defective limbs that may

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support nests for marbled murrelet. Conifer snags were observed on the plan area, and the wildlife habitat assessment report states that "many" occur on the area. Standing dead trees create openings in the forest canopy that allow solar radiation to penetrate the forest floor and encourage the growth of herbaceous plants that are used as food and cover by wildlife. Snags also serve as perches and roost sites for birds, wood medium for invertebrates, which are an important food source for forest-dwelling taxa, and breeding sites for cavity excavators and secondary cavity nesting species such as purple martin (*Progne subis*) and small owls. Decaying, large downed wood was also present, creating foraging, cover and resting habitat for forest floor vertebrates. According to Harris (1984), none of the above attributes are unique to old-growth forests, however, the old-growth system is unique in that it possesses all of these attributes simultaneously.

Because of a potential decrease in the structural complexity and thus degradation of the late seral stand on the plan area that would result from the proposed THP, further review and analysis is crucial. The Department, in our First Review questions to CDF, requested an analysis from the RPF of the late succession forest stand on the plan area pursuant to 14 CCR 919.6. The analysis was not provided by the RPF prior to the PHI. As such, it is the Department's assertion that this THP is not in conformance with the Forest Practice Rules. The RPF shall conform to 14 CCR 919.6 and provide the additional information, description and analysis of the late succession forest stand on the plan area. The Department shall be afforded sufficient time (15 business days) to review the analysis and have the opportunity to comment and provide recommendations in a second PHI report to be submitted to CDF prior to Second Review (**Recommendation #1**).

(2) Marbled Murrelet

To the Department's knowledge, the only confirmed stands within Sonoma county are associated with the Gualala River watershed. Potential marbled murrelet breeding habitat is present throughout the plan area. Breeding behavior was observed by Department staff in 1999 approximately four air miles from the plan area. The THP states that surveys for marbled murrelets were conducted in 1995/96 and in 1998/99, on and in the vicinity

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of the plan area with no detections. The Department recommends that the surveys be submitted to the Department for review and acceptance prior to Second Review (**Recommendation #2**).

(3) Raptors

The plan area appears to contain suitable habitat for sensitive raptors including northern goshawk. For example, the plan area supports mature stands of conifers with high canopy closure. In addition, an open forest floor, forest openings and nearby grassland habitat were available for foraging by goshawks and other forest hawks. Although no known breeding records exist for northern goshawk in Sonoma County, the Sonoma County Breeding Bird Atlas suggests that a small breeding population of goshawks may exist in northwestern Sonoma County. Pursuant to 14 CCR 897 (b)(3), 14 CCR 919.4, 939.4, 959.4, 14 CCR 1034 (w), and sections 15064 (b), 15065 and 21160 of the California Environmental Quality Act (CEQA), the THP should determine the presence and status of raptors, including northern goshawk, in the plan area prior to logging operations, and incorporate measures to avoid significant adverse project effects to these species (**Recommendation #3**).

(4) Plants

The THP states that the plan area has been surveyed for swamp harebell, coast lily, maple-leaved checkerbloom and Bolander's reed grass (*Calamagrostis bolanderi*), and none were found on the plan area. The plant survey should be submitted to the Department for review and acceptance prior to Second Review (**Recommendation #4**).

(5) Red Tree Vole

According to the wildlife habitat assessment included in the THP, red tree vole was positively identified on the plan area within the riparian zone of Haupt Creek. The red tree vole is the most highly specialized vole in the world and the most arboreal mammal in North America. Mitigation measures provided in the assessment recommend retaining the nest tree whenever possible. To better conserve this species on the plan area, an individual nest tree or collection of nest trees within a local area (defined as nest trees not separated by more than 100 meters) should be protected by retaining all Douglas fir trees within one site potential tree height surrounding the nest tree.

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or collection of nest trees (habitat retention areas). All nest trees and habitat retention areas should be mapped and included in the THP, and flagged in the field prior to operations **(Recommendation #5)**.

V. RECOMMENDATIONS

In accordance with Section 1802 of the Fish and Game Code and 14 CCR 897 (b)(1)(B), the Department recommends that the following be included as enforceable conditions of THP 1-00-484 SON for the protection of plants, anadromous fish and wildlife and their habitats, which may be affected by this THP:

- (1) Pursuant to 14 CCR 919.6, the RPF shall submit the information, descriptions, and analysis of the late succession stand on the plan area as detailed in provisions (a) and (b), to the Department and CDF at minimum 15 business days prior to Second Review. CDF shall accept for consideration, additional recommendations in a second PHI report submitted by the Department to CDF, prior to Second Review.
- (2) No harvest operations shall occur on the plan area until all survey data collected on marbled murrelets (1995-96 and 1998-99) performed on and near the plan area is submitted to the Department for review and acceptance. The data shall be submitted to the Department at least 15 business days prior to Second Review. CDF shall accept for consideration, additional recommendations in a second PHI report submitted by the Department to CDF, prior to Second Review.
- (3) A raptor survey shall be conducted on the plan area during the breeding season prior to logging operations. The survey shall consist of multiple visits in the early morning and late evening. Systematic searches through stands and along roads, trails, and watercourses shall be conducted looking and listening for sign of raptors (nest structures, plucking posts, feather piles, white-wash, mobbing etc.). Voice or broadcast calls (species specific and northern spotted owl) shall be made periodically to evoke a raptor response. Voice or broadcast taped calls should not be used within a known northern spotted owl activity center. Species observations, species behavior, and the times and dates of the surveys shall be recorded. Raptor observation **RECEIVED**

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locations, survey routes and all nest sites shall be mapped. Additional intensive stand searches shall be conducted in areas where raptors are seen or suspected. Survey efforts shall focus on providing adequate coverage of the plan area. The Department is available to assist in the development of a suitable site-specific survey methodology. In addition, a protocol-level survey for northern goshawk shall be conducted if it is determined by the Private Consulting Biologist that disturbance to northern spotted owl will not occur. If no spotted owls are detected during surveys in and adjacent to the plan area prior to mid-June, then a protocol-level survey for northern goshawk shall be conducted. A raptor survey report, that includes the data sheets from the northern spotted owl protocol survey, shall be submitted to the Department and CDF for review and acceptance at minimum 15 business days prior to Second Review. The survey report shall include a detailed discussion of survey methodology, results, and appropriate protection measures. The protection measures, including Department comments and recommendations, shall be submitted by the RPF as an amendment to the THP Amendment.

- (4) The RPF shall submit to the Department and CDF, the results of the botanical survey at minimum 15 business days prior to Second Review. The RPF shall submit a detailed description of the survey methodology used, a detailed map of the survey routes, dates of field surveys, results of the survey, names and qualifications of the surveyors, description of reference site(s) visited, references cited, persons contacted, and herbaria visited. The Department's guidelines for botanical surveys and reports can be reviewed at www.dfg.ca.gov/whdab/guideplt.pdf.
- (5) The RPF shall submit to the Department and CDF, at minimum 15 business days prior to Second Review, a map indicating active and inactive red tree vole nests observed on the plan area, and habitat retention areas surrounding each nest or collection of nests. The retention area surrounding the nest tree shall be a circle with a radius equal to the height of the nest tree. All Douglas fir trees within the retention area shall be retained. Nest trees and habitat retention areas shall be flagged in the field prior to operations.

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This concludes the Department's recommendations for 1-00-484 SON. If you have questions or comments, please contact Ms. Stacy Martinelli, Environmental Specialist, at (707) 996-2348; or Mr. Stephen Rae, Timber Harvest Program Supervisor at (707) 944-5575.

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