



DEPARTMENT OF PARKS AND RECREATION
Mendocino District
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Major General Anthony L. Jackson, USMC (Ret), *Director*

April 20, 2013

Mr. Eric Shott, Fishery Biologist
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Mr. Chris Browder
Resource Management
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Re: State Clearinghouse Number 2006032049
Comments on the Draft EIS/PTEIR for Authorization of Incidental Take and Implementation of the Mendocino Redwood Company Habitat Conservation Plan/Natural Community Conservation Plan and Timber Management Plan

Dear Mr. Shott and Mr. Browder:

California State Parks (CSP) has limited our review and comments on the proposed Draft Environmental Impact Statement/Program, Timberland Environmental Impact Report (EIS/PTEIR) for Authorization of Incidental Take and Implementation of the Mendocino Redwood Company (MRC) Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) and Timber Management Plan to those sections that most appeared to potentially affect values of the State Park System. Given the massive volume of materials in the Draft EIS/PTEIR and associated HCP/NCCP, the review by CSP is far from comprehensive. As such, CSP comments are limited to those sections, which pertain most significantly to park values, including wildlife habitats and sensitive species populations adjacent to MRC lands, recreational use that may be affected by proposed harvest activities, and visual impacts. The following outlines the CSP comments:

- 1. Reciprocal Road Agreement:** In 2002, CSP acquired 7,332 acres of former Georgia Pacific (GP) timberland in the lower Big River watershed from the Campbell Group, Hawthorne Timber Company. The “Big River Property”, located between Mendocino Woodlands State Park to the east, and the Big River beach to the west, was added to the Mendocino Headlands State Park. MRC had previously acquired adjacent timberland from Louisiana Pacific (LP). As the result of a former deed agreement between GP and LP, MRC retained a reciprocal road agreement that is interpreted as allowing MRC to use all roads on the Big River Property for timber hauling purposes. In 2006, CSP completed the Big River Watershed Restoration Mitigated Negative Declaration for the purpose of correcting erosion and sedimentation problems, improving stream crossings along roads, remove logging roads that contribute sediment to Big River and tributaries, converting roads to trails, restoring predisturbance hydrologic processes, delineating parking areas, constructing a restroom building, and improving public information within the Big River Property. MRC’s

comments on the Draft MND included statements concerning how treatment of the roads may affect their ability to haul timber, specifically: *"In addressing just what is in the proposed project, MRC is concerned with projects that reduce or eliminate our ability to use the roads now or in the future...At this time we can not support the conversion of M14 to a trail. We believe that this road represents our primary access through the Park and it is likely that we will have a need in the future to use this road under the terms of our reciprocal right-of-way."* (2006. Michael E. Jani, Chief Forester, MRC). The M14 road mentioned in the MRC comment letter connects the Mendocino Woodlands State Park to the Big River Property, which in turn connects to the main haul road that parallels Big River for approximately 8 miles, ending at the Big River beach. The haul road functions as the main artery of the Big River Property for recreational, restoration, and interpretive purposes, and is heavily used by park visitors. MRC property does not connect to the M14 road, and is separated from the State Park on the north side of Big River by the Mendocino Woodlands State Park and by former Campbell-Hawthorne timberland currently owned by the Conservation Fund. As a result of concerns raised by MRC, CSP did not implement plans to convert the M14 road to a trail by pulling perched road fill material and reducing its width, which was mainly intended to alleviate road failure and reduce sedimentation in Big River. Since the 2002 park acquisition, MRC has not operated on the M14, and hence not on the adjoining haul road that parallels Big River. However, under the reciprocal road agreement, MRC has operated on and maintains access to other adjacent State Park roads that are also used by the public to the south in the Big River and Little River watersheds.

Upon review of the Draft EIS/PTEIR, CSP finds no reference to the reciprocal road agreement, and no reference to how MRC proposes to utilize the road agreement to implement the HCP/NCCP. CSP requests that MRC disclose the reciprocal road agreement as part of the CEQA and NEPA processes. CSP requests that MRC address how potential use of the State Park roads may affect park values, including: hindering CSP plans to conduct watershed restoration that would benefit habitat and populations of listed species, in addition to how recreational use and public safety may be affected.

2. **Navarro River Redwoods State Park:** Pages 3-489 and 3-490 of the Draft EIS/PTEIR discusses potential viewing areas of the affected environment by stating: *"Views into the primary assessment area are possible from Highway 128 in this area, depending on the local topography. This area includes Dimmick Memorial Grove State Park and the Navarro Strip, which are located along Highway 128 and adjacent to the primary assessment area"*. Paul M. Dimmick campground and "Navarro Strip" are located within Navarro River Redwoods State Park, which is a linear park paralleling Highway 128 from approximately milepost 12 to milepost 0.6. It should be noted that recreational use occurs along the entire length of the park, as many visitors stop at pull outs along the highway to visit various redwood groves designated by Save the Redwoods League, to picnic, or to access the Navarro River for swimming, fishing, and boating. Timber operations upslope can be viewed from the park, and the noise associated with such operations can create disturbance for park visitors as well as wildlife species. CSP requests that the name of the park be corrected in the final EIS/PTEIR, and that potential effects of the proposed HCP/NCCP be addressed within the entire park, not just along the highway, or from the campground.
3. **Sudden Oak Death:** Section 14.9.2.2 of the HCP discusses unforeseen circumstances that may affect implementation of the plan. For causes related to the pathogen that causes Sudden Oak Death, the HCP indicates that 2,000 acres of a plan area watershed must be affected to trigger the unforeseen circumstance. CSP finds no section of the Draft EIS/PTEIR that mentions and addresses Sudden Oak Death (SOD). The spread of SOD in Mendocino County has been substantial in recent years, with outbreaks and/or detections of the pathogen occurring in several of the park units, including Hendy Woods State Park, Maillard Redwoods State Natural Reserve, Montgomery Woods State Natural Reserve,

Russian Gulch State Park, Van Damme State Park, and MacKerricher State Park. CSP has initiated control programs involving large scale infected tree removal operations in the campgrounds at Henty Woods and MacKerricher. CSP considers an outbreak of several acres of Sudden Oak Death to be an unforeseen circumstance that would trigger a change in management actions. For timberland management, CSP would certainly expect well under 2,000 acres of infestation of the *Pytophthora ramorum* pathogen that causes SOD to result in significant landscape scale changes that would affect listed species covered under an HCP. CSP requests that the Draft EIS/PTEIR address Sudden Oak Death, including an analysis of appropriate acreage that may trigger consideration of changes to the HCP. The analysis should also consider the cumulative effects of tanoak die-off as a result of SOD in relation to the killing of tanoaks for timber management. In addition, the potential effects of timber management in spreading SOD to adjacent parklands, despite preventative sanitation measures, should be addressed.

- 4. Effects of Barred Owl on the Northern Spotted Owl:** On page 3-323, the Draft EIS/PTEIR states: *“There are no documented declines in northern spotted owl density or reproductive success associated with the increase in barred owls...If the barred owl invasion continues unabated, it is possible that northern spotted owl could be completely extirpated from the assessment area”*. On page 3-342, Draft EIS/PTEIR states: *“Under the No Action alternative, MRC would not be obligated to participate in barred owl management. It is difficult to predict the eventual result of no barred owl management on northern spotted owl populations in the primary assessment area. The barred owl invasion would be expected to increase until the number of barred owls is greater than the present number of spotted owls. Based on current trends of barred owl population growth and corresponding decreasing occupancy of northern spotted owls both on MRC lands and elsewhere, the numbers of northern spotted owls would certainly decrease over time. [underline emphasis added] The entire northern spotted owl population could possibly be extirpated from the primary assessment area”*. The sentences appear to be contradictory. In the first sentence, it would appear that the MRC data does not support the claim that extirpation of northern spotted owl due to barred owl invasion is inevitable, however the following sentences appears to assume extirpation if barred owls are not controlled. It is also unclear as to why MRC would not be obligated to participate in barred owl management under the no action alternative. CSP recognizes that the increase in barred owl populations should be a management concern for all land managers that are responsible for forest habitats that support northern spotted owl, and that there may be regulatory requirements in the future to address this concern. Under the proposed project alternative, barred owl management is described, but with the possibility that a control program could completely fail (pages 3-358 and 3-359 of the Draft EIS/PTEIR). CSP requests that the cumulative effects of proposed timber management activities be considered in relation to the potential extirpation of northern spotted owl populations due to barred owls. CSP also suggests that incidental take for northern spotted owls not be authorized in areas where barred owls are becoming established, unless the incidental take is only associated with continued research activities (e.g. banding).
- 5. Difficulty in Assessing Information from the Environmental Documents:** CSP found it difficult to ascertain and compare the effects of the various project alternatives on the northern spotted owl and other listed species that also inhabit adjacent parkland, especially within the lower Navarro watershed, based on the maps in Appendix F. Substantial occupied habitat for the northern spotted owl currently exists along the Navarro corridor, both within the State Park and on adjacent MRC land. From the maps, it appears that this owl habitat will decline under the preferred project alternative. The Navarro watershed is also split between two maps, and the projected habitats for years 0, 40, and 80 are presented on separate maps that are impossible to overlay. The only numeric comparison of proposed changes in the distribution of northern spotted owl was found on Table 10-7 of

the HCP. Based on the figures in the table, it would appear that the number of northern spotted owls in Navarro West, which is primarily adjacent to the State Park, would decrease substantially under the proposed alternative. The number of owls would increase in Navarro East. Based on this table, it would appear that the MRC proposed alternative would result in a net loss to a listed species that also inhabits the park. CSP requests that the relative effects of the various alternatives on all of the listed species be clearly presented and analyzed on both the maps and in text, so that we can better determine how the proposed actions may affect wildlife values of the State Park System.

Thank you for the opportunity to provide comments on the Draft EIS/PTEIR for Authorization of Incidental Take and Implementation of the Mendocino Redwood Company Habitat Conservation Plan/Natural Community Conservation Plan and Timber Management Plan. The HCP/NCCP is a highly complex undertaking and we appreciate the tremendous efforts involved in producing the environmental documents. Still, we believe additional information and time are needed to present and assess the potential effects on various parklands. If you have questions regarding the CSP comments, or would like more information on any of the Mendocino District State Parks, please contact me at 707-937-5721 or at Renee.Pasquinelli@parks.ca.gov.

Sincerely,



Renee Pasquinelli
Senior Environmental Scientist
California State Parks

cc:

Brad Valentine, Staff Environmental Scientist, California Department of Fish and Wildlife
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