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Sierra Club, Mendocino Group
P.O. Box 522
Mendocino, CA 95460

NOAA and CDF&W,

Please review these comments for the MRC HCP re: salt marsh and pygmy forest.

The Sierra Club Mendocino Group is concerned about the treatment of the Uncommon Habitats, salt marsh and pygmy forest, in the MRC HCP. While we appreciate the efforts to protect these habitats through restricting lumber operations, these sensitive habitats require a bit more protection from unintended consequences.

First, in the salt marsh category, it is not clear whether this category also includes the meadows bordering the actual salt marsh. The meadows are located between the estuary edge (actual salt marsh) and the tree line. These may be salty, brackish, or freshwater marshes or wet meadows, at various times of year. We would hope that they are included within the general "salt marsh" category.

The HCP does not take into account that the salt marsh (inclusive of meadows) is located along a tidal estuary, not a flowing freshwater stream. This makes the AMZ protections listed for a Class 1 watercourse somewhat problematic. While the estuary can be classified Class 1, it has different problems and needs than a flowing stream. For instance, the "recruit LWD" and "stream shade" recommendations are not available where the trees may be 300' away. On the other hand, the largest problem of sedimentation within the tidal areas is not addressed, nor stream bank protections or improvements. The important Section 8, Conservation Measures for Aquatic Habitat does not even mention salt marsh or the underlying seafloor. The mud flats and eelgrass beds in the Lagoon area are very likely to be impacted by the harvesting on the steep hillsides above them. Additionally, boating debris may enter the Lagoon and accumulate and degrade on the salt marsh. We would request that more attention be given to these areas and protections and monitoring be addressed for sedimentation of the estuary and especially the Lagoon.

Most of the salt marsh habitat lies within the Coastal Commission's Special Treatment Area. The impact of this STA is not clearly expressed in the HCP. We would like to see it presented and compared to the standard treatments.

Bird species around the Lagoon should also be acknowledged and monitored. Osprey nests, kingfisher tunnels in the mud banks, otter dens and runs, and heron

nesting trees all exist on the MRC property and could be impacted by nearby logging operations.

The Pygmy Forest habitat is also indicated as protected by restrictions on logging operations within the area. However, some of the main threats to pygmy forest come from roads crossing it. The hydrology of the pygmy forest is crucially important to the continuance of this habitat. Any draining or altering of the hydrology can change the delicate balance necessary. Construction of roads almost always entails drainage ditches, altered flows and disrupted "crust" of the pygmy soils. Without this "crust" intact, erosion from rainwater is greatly increased.

Specific protections for the pygmy forest during roadbuilding, clearing, and improvements need to be added to the Conservation Measures for Terrestrial Habitats. In addition, since the pygmy forest is globally unique, we would like to see a conservation easement be placed on the entire "pygmy forest" area and monitored by an independent organization. Pygmy forest is so sensitive that any intrusion by motor vehicles alters it and cannot be undone.

Submitted by

Rixanne Wehren
Chair, Coastal Committee
Mendocino Group
Sierra Club