



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
Southwest Region  
501 West Ocean Boulevard, Suite 4200  
Long Beach, California 90802-4213

FEB 16 2007

In response refer to:  
2007/00652

Mr. Tyrone Kelley  
Forest Supervisor  
Six Rivers National Forest  
1330 Bayshore Way  
Eureka, CA 95501

Dear Mr. Kelley:

On February 8, 2007, NOAA's National Marine Fisheries Service (NMFS) received your February 7, 2007, letter and enclosed Biological Assessment (BA), in which the Six Rivers National Forest (SRNF) requested informal consultation on the Smith River Road Management and Route Designation Project (Project), pursuant to section 7(a)(2) of the Endangered Species Act (ESA), as amended (16 U.S.C. 1531 *et seq.*), and its implementing regulations at 50 CFR § 402. The BA addresses impacts to the Southern Oregon/Northern California Coast (SONCC) coho salmon (*Oncorhynchus kisutch*) Evolutionarily Significant Unit (ESU) and its designated critical habitat (CH). This letter constitutes completion of informal consultation on the Project for the threatened SONCC coho salmon ESU (June 28, 2005, 70 FR 37160) and its designated CH (May 5, 1999, 64 FR 24049).

The Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996 (Public Law 104-267, U.S.C. 1801 *et seq.*) and its implementing regulations [50 CFR § 600.920(a)] require that before a Federal agency may authorize, fund, or carry out any action that may adversely affect Essential Fish Habitat (EFH), that agency must consult with NMFS. The SRNF determined that the Project would not adversely affect EFH, therefore, EFH consultation was not requested.

NMFS worked closely with the SRNF during the preparation of the BA. Accordingly, NMFS' analysis for this consultation relies primarily upon information and analysis contained in the BA. The information and analysis contained in the BA are hereby incorporated by reference.

The action area encompasses the entire Smith River National Recreation Area and Gasquet Ranger District of the SRNF in Del Norte County, California. The SRNF proposes to maintain and manage 469.76 miles of system road, decommission 71.72 miles of system roads and 132.50 miles of non-system roads, and improve and add 46.96 of non-system road as motorized trail or as system roads, over a 15-year period.

All SRNF roads in the action area are categorized into one of five operational maintenance levels (OML). OML 1 roads are retained as intermittent use service roads. These roads are closed to



vehicular traffic when not in use for management activities. OML 2 roads are open for use by high clearance vehicles. OML 3 roads are open and maintained for travel by a prudent driver in a standard passenger car. Roads in this maintenance level are typically low speed, and have a single lane with turnouts. OML 4 and 5 roads are open and maintained as primary access roads. These roads are rated for use by passenger cars, provide a moderate degree of user comfort and have moderate travel speeds. Roads that would be maintained would be: maintained at their current designated OML, upgraded to a higher OML, downgraded to a lower OML, or designated as a motorized trail.

Road maintenance work includes road grading and reshaping, drainage dip and structure maintenance, slide stabilization, spot surfacing, culvert replacement, logging out and brushing of road prism, dust abatement, asphalt pavement patching, new paving, paved surface cleaning, surface treatment, maintenance of unpaved shoulders, asphalt crack cleaning and repairing, ditch maintenance, removal and end haul of materials, drainage structure maintenance, roadway drainage maintenance, vegetation establishment, cutting roadway vegetation, hazard removal and cleanup (including trees), sign maintenance, slide and fill stabilization, stormproofing, bridge repair, and slump and slide removal. Table 1 displays the road maintenance activities and the amount of each activity that could be implemented per year, per 5<sup>th</sup>-field watershed. There are five 5<sup>th</sup>-field watersheds in the action area.

Table 1. Project activities and how much could be implemented per year, per 5<sup>th</sup>-field watershed.

<b>Project Activity</b>	<b>Amount per 5<sup>th</sup>-field Watershed</b>
Grading/Reshaping/Blading	30 miles
Re-paving	20 miles
New paving	10 miles
Surface treatment	< 1 mile
Maintenance of unpaved shoulders	1 mile
Asphalt crack cleaning and repairing	1 mile
Ditch maintenance	10 miles
Culvert placement and replacement	30 culverts (cross drains and stream crossings)
Drainage structure maintenance	40 culverts (cross drains and stream crossings)
Roadway drainage maintenance	30 miles
Storm proofing	20 miles
Bridge repair	3 sites
Upgrading	30 miles

Due to the inherent nature of these activities, many would be done simultaneously. For example, culvert placement and replacement would be conducted as part of stormproofing, and ditch maintenance, drainage structure maintenance, and roadway drainage maintenance typically are done together. New paving would not create new roads and would only be done on existing National Forest System (NFS) roads.

Approximately 204 miles of system and non-system road would be decommissioned over the 15-year period. Decommissioning NFS roads ranges from simple road barricades to removal of culverts and the roadbed. Decommissioning would include re-establishment of the natural

stream channel as well as the removal of any cross drains. All fill material within the stream crossings would be removed and stored in a stable area along the road and shaped to enhance natural drainage patterns. Rolling dips would be installed on the remaining road surface to further re-establish natural drainage patterns. In areas along roads that show signs of road failure due to slope instability, the fill would also be removed and outsloped to reduce the risk of slumps and landslides. Additional erosion control measures, such as hydro-mulching with native grass seed or revegetation with native plants, may also be applied. Road decommissioning activities would not exceed 30 miles per year and 30 culvert removals (cross drains and stream crossings) within each 5<sup>th</sup>-field watershed.

Annual seasonal road closures from mid October to June 15 (or later until road surfaces dry out in late spring or early summer) on selected roads would be utilized to reduce the risk of spread of Port-Orford cedar root disease.

All Project activities will follow Best Management Practices (BMPs) and Project Design Standards (PDSs) developed to avoid or minimize effects to Pacific salmonids and their habitats. In addition many of the Project activities would be implemented miles away from SONCC coho salmon and their CH. Some of the Project activities (such as road maintenance, culvert replacement, *etc.*) are expected to improve trends at the site and watershed scales. Although the Project would implement a large amount of ground disturbing activities over a 15-year period, there is very little overlap (crossing of CH) of NFS roads and coho salmon habitat.

The SRNF analysis revealed that roads within 500 feet of SONCC coho salmon CH proposed for decommissioning are roads 18N03 and 18N09.102. Road 18N03 is approximately 400 feet from the upper Middle Fork Smith River and has six culverts that would be removed. Road 18N03 has a stable road bed and is currently outsloped with no inboard ditches. The decommissioning would be done during the summer when there is no flow in any of the six intermittent streams. Erosion control measures (BMPs and PDSs) would limit the amount of material that could be potentially delivered into the intermittent streams, and in turn, be transported downstream towards coho salmon CH. While the sediment is being transported downstream, some of the larger-sized particles will settle out in slower reaches of these streams. The much larger Middle Fork Smith River would dilute the small amount of sediment to insignificant amounts.

Road 18N09.102 is approximately 300 feet from Diamond Creek, only crosses intermittent streams with low water crossings, and would require approximately 1 mile of outsloping and waterbarring. Since this road has low water crossings, little work or soil disturbance would take place in channel crossing areas. Outsloping of the road would create natural hydrological drainage so water would not concentrate. Therefore, very little material is expected to be transported out of this area. All other roads proposed for decommissioning are more than 0.25 miles from CH and would have insignificant levels of turbidity and sediment reaching coho salmon and their CH due to dilution of small amounts of sediment being transported.

Roads within 500 feet of CH that would receive maintenance activities are road 18N07 along the upper Middle Fork and Knopki Creek, road 18N09 along Diamond Creek, and road 17N01 along Siskiyou Fork. These roads would receive maintenance activities, however, for this analysis, SRNF focused on maintenance activities that could transport sediment to SONCC coho salmon or their CH.

Road 18N07 has 5 culverts on intermittent streams. The proposed blading, shaping, grading, and drainage structure maintenance would result in negligible amounts of sediment delivery due to the nature of the disturbance (small disturbance within the road prism) and the implementation of BMPs and PDSs that minimize sediment transport.

Ten cross drains would be maintained on road 18N09. This work consists of cleaning and reconditioning culverts and other drainage structures, such as catch basins, inlet and outlet channels, and ditchline transition areas. This work is usually accomplished by hand. Because of the implementation of PDSs and BMPs, and this road not being hydrologically connected, the potential for sediment transport to Diamond Creek is discountable.

Maintenance activities on road 17N01 include the repair of 2 bridges, and drainage structure maintenance and replacement of 8 cross drains and 2 culverts on intermittent streams. Bridge repair involves structural and surface repair. Both bridges are anchored on footings outside of the stream channel within existing roadbeds. Support structure or abutment repairs would occur within the existing road prism. The channels at the 2 culvert stream crossings drain subsurface into a flat below the Project area and are not hydrologically connected to Siskiyou Fork. Therefore, no sediment transport to Siskiyou Fork is likely to result from these sites.

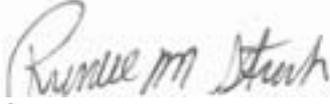
NMFS agrees with the SRNF's analysis of effects contained in the BA. NMFS believes the Project will have insignificant or discountable effects on SONCC coho salmon and their CH because: (1) most Project activities are 300 feet or a greater distance from SONCC coho salmon and their CH; (2) road segments that are within 500 feet of CH have low water crossings, or intermittent streams, with little or no expected channel adjustments, are unlikely to transport detectable amounts of sediment, and the Project activities would be implemented during the dry season; and (3) the implementation of PDSs and BMPs would result in minimal Project-generated sediment that will substantially dilute by the time it reaches SONCC coho salmon or their CH.

Based on this analysis, in conjunction with the supporting analysis contained in the BA, NMFS concurs with the SRNF's determination that the Project may affect, but is not likely to adversely affect, SONCC coho salmon and their CH.

This concludes informal consultation for the Project. Reinitiation of consultation is required where discretionary Federal agency involvement or control over the action has been retained (or is authorized by law) and if: (1) new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered, (2) the action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered, or (3) a new species is listed or critical habitat designated that may be affected by the action.

Please contact Steve Liebhardt at (530) 825-5186, or via e-mail at [steve.liebhardt@noaa.gov](mailto:steve.liebhardt@noaa.gov) if you have any questions concerning this consultation.

Sincerely,



*Rodney R. McInnis*  
Rodney R. McInnis  
Regional Administrator

cc: Copy to file 151422SWR2007AR00027:SL