



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Division of Ecological Services
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FISH & GAME

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July 24, 1986

J. E. Thorne, Chief
Environmental Planning Branch
California Department of Transportation
P.O. Box 3700
Eureka, California 95502-3700

Subject : Proposed Widening of Highway 101 near Forsythe Creek in Mendocino County

Mr. Thorne:

We understand that the California Department of Transportation is proposing to widen Highway 101 in Mendocino County to a four-lane freeway in the vicinity of Forsythe Creek, and that there has been a change in the proposed alignment of the freeway since the Environmental Impact Statement (EIS) was prepared several years ago. The new alignment has been proposed to avoid unstable hillsides in the project reach. You have requested that we review the proposed changes in the project from the standpoint of impacts on fish and wildlife.

The alignment described in the EIS was designed to avoid Forsythe Creek by cutting into a hillside on the east side of the existing highway. The proposed realignment would be located to the south and west of the alignment described in the EIS. The realignment would require that Forsythe Creek be rerouted and channelized for a length of approximately 300 feet. The proposed frontage road on the south side of the proposed freeway would be lengthened compared to the design presented in the EIS. The lengthening would require placement of rock slope protection along Forsythe Creek. The revised project would also include relocation of the Uva Drive/Forsythe Creek Bridge. Mike Long of my staff inspected the project site with representatives from Caltrans on June 24, 1986.

Forsythe Creek supports runs of steelhead trout. The creek also is populated with smallmouth bass and other resident fishes. According to the California Department of Fish and Game, the portion of Forsythe Creek

within the project area may be used by steelhead for spawning as well as a migration corridor.

There is a very narrow band of riparian vegetation along the left bank (looking downstream) of the creek consisting of willows, alders, and oaks. Vegetation on the hillside between the creek and the existing highway is a woodland composed of deciduous and live oaks, alders, and mountain mahogany. The riparian and oak woodlands are used by a wide variety of migratory and resident wildlife, including songbirds, raptors, small mammals, deer, and reptiles and amphibians.

The U.S. Fish and Wildlife Service Mitigation Policy (Federal Register 46 (15): 7644 - 7663, January 23, 1981) provides internal guidance for establishing appropriate compensation goals for proposed projects impacting waters of the United States. Under the Mitigation Policy, resources are divided into four categories to assure that recommended compensation is consistent with the fish and wildlife values involved. These Resource Categories cover a range of habitat values from those considered to be unique and irreplaceable to those believed to be of low value to fish and wildlife resources. The Mitigation Policy does not apply to threatened or endangered species.

The evaluation species selected to determine the Resource Category for the aquatic habitat of Forsythe Creek was steelhead trout. The evaluation species selected for the riparian area were migratory songbirds. Blacktailed deer was the evaluation species selected to determine the Resource Category for the upland woodland. These species were selected for the high level of interest shown in them by the public and their substantial contribution to recreation in Northern California (i.e., fishing, birdwatching, hunting). The Service has placed a high priority on enhancing runs of anadromous fish in North Coast streams in California. Therefore, we have placed Forsythe Creek into Resource Category 2. The mitigation goal for Resource Category 2 is no net loss of in-kind habitat value. Riparian habitat in California has been reduced by over 90 percent through land use conversion to agricultural and other uses. This makes those habitats remaining an extremely valuable and increasingly scarce resource. Based on these considerations the Service has determined that the riparian stand in the proposed project site also belongs in Resource Category 2. The upland woodland habitat belongs in Resource Category 4. The mitigation goal for Resource Category 4 is to minimize loss of habitat value.

The proposed realignment would result in the replacement of 300 feet of natural creek with a man-made channel. The new channel may not be suitable for steelhead spawning even with careful design. Riprap placed along at

least one bank of the new channel would likely preclude dense riparian growth along the channel. The lack of overhead cover would reduce the value of the new channel to steelhead and other fish. Loss of the riparian and oak woodland area from the slope fill for the new alignment would eliminate wildlife use of those areas.

It is Service policy to recommend against the authorization of proposals which would result in the destruction of valuable aquatic or wetland habitat for non-water dependent purposes unless public interest requires further consideration. It is also our policy to recommend that adverse biological impacts to all habitats be minimized to the greatest extent possible. Unavoidable impacts to fish and wildlife habitats are to be compensated for in accordance with the mitigation goals set forth in the Service's Mitigation Policy.

The most significant impacts from the proposed project changes could be eliminated by avoiding placement of fill in Forsythe Creek and its associated riparian zone for the slope fill. We understand that the main area Caltrans wishes to avoid cutting into is the hill along the southern curve of the alignment. It appears from the maps you provided us that impacts to Forsythe Creek could be avoided by retaining the original alignment for the northern curve, and using the "intermediate alignment" (as shown on the map you provided) for the southern curve. This approach would not require cutting into the unstable hill at the southern end of the alignment. Another possibility would be to reduce the design speed of the curves from 65 miles per hour as now proposed. This would allow for curves with shorter radii and would reduce the amount of cutting and filling needed.

Due to time constraints it was not possible to look at the areas for the proposed rock slope protection along the proposed frontage road and the proposed site of the new Uva Drive Bridge. However, the impacts from these parts of the project would probably be minor as long as adequate mitigation is provided for fish and wildlife habitat which would be disturbed.

In summary, we believe that the alignment preferred by Caltrans would have a greater adverse impact on fish and wildlife than the original alignment for the freeway. We recommend that an alignment be selected that does not involve filling of Forsythe Creek or its associated riparian belt. If you can demonstrate that there are no less environmentally damaging, practicable alternatives to the currently proposed alignment, we would recommend that all unavoidable impacts to fish and wildlife habitats be fully mitigated.

Thank you for the opportunity to review the proposed changes to the Highway 101 Widening project. If you have any questions regarding these comments please contact Mike Long at (916) 978-4613.

Sincerely,

James D. Carson
James D. Carson

Acting Field Supervisor

cc: Reg. Dir. (AMR), FWS, Portland, OR
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