From:	Don Allan
To:	Planning Clerk
Subject:	PLN-2019-15661. Marshall Ranch Flow Enhancement Project
Date:	Monday, November 22, 2021 2:56:09 PM
Attachments:	CommentsOnMarshallRanchFlowEnhancementProject_DonAllan_11_22_21.pdf

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Please accept the attached comments on PLN-2019-15661, the Marshall Ranch Streamflow Enhancement Project.

Sincerely,
Don Allan,
821 2nd Ave., Trinidad, CA, 95570

Monday, November 22, 2021

Humboldt County Planning Department,
3015 H Street, Eureka, CA 95501.

Re: Marshall Ranch Streamflow Enhancement Project; PLN-2019-15661

Dear Planning Director, Planning Staff, and Planning Commissioners:

I am writing to you to encourage approval of the Marshall Ranch Streamflow Enhancement Project proposed by the Salmonid Restoration Federation (SRF) and its team of consultants on behalf of the Marshall Ranch. I have been working in the field of watershed restoration for more than 40 years and I have seen an evolution in the understanding of habitat needs and strategies to save our salmon. I have also seen an increase in funding to support the efforts to restore and enhance salmonid habitat yet we are still seeing runs diminish. We are in a race against time and we need to do more. Intense development in our watersheds, both before and after cannabis legalization, has increased the demand for water while climate change has resulted in hotter summers and drier winters. The summer is a critical time for young salmonids like coho salmon and steelhead trout that spend a year in freshwater streams before migrating to the ocean. That year allows them to gain size which greatly increases their chances of survival in the ocean. However, without water in the creeks, juvenile salmonids die in shrinking pools that eventually dry up or are forced to migrate prematurely, with diminished chance of survival.

According to NOAA Fisheries the South Fork Eel River is key to the recovery of coho salmon in the Southern Oregon Northern California Coastal (SONNCC) Evolutionary Significant Unit. The California Water Action Plan ranked the South Fork Eel River as 1 of 5 priority watershed for Flow Enhancement in California. Redwood Creek, a South Fork Eel tributary, suffers from chronic low flows in the dry season where pools become disconnected and water temperatures are lethal for juvenile salmonids. Tributaries like Redwood Creek provide refugia habitat for threatened juvenile coho salmon but they suffer from the cumulative impacts of legacy logging and unregulated water diversions. The Marshall Ranch Project will help alleviate the lack of summer flow in Redwood Creek.

Given the changing climate conditions which scientists believe will lead to hotter temperatures, greater evapotranspiration, and changing rainfall patterns, we need to find creative solutions to enhance summer streamflows to avoid the extirpation of coho salmon and steelhead from our local watersheds. The Marshall Ranch Flow Enhancement Project does just that by creating a storage pond to store water collected during the rainy season and releasing it during the dry season to maintain dry season stream flows. We need more projects like this. Besides benefitting salmon and steelhead in Redwood Creek and the South Fork Eel River, there will be benefits to other aquatic species and to the riparian forest that provides bird and wildlife habitat. The pond will also provide a source of water for emergency fire suppression, and as we have seen in recent years, wildfires are an increasing threat in our rural watersheds.

The Marshall Ranch project has been carefully studied and vetted. In response to concerns of the neighboring property owners, the project team has modified and downsized the original pond design. The project timeline has been delayed one year to conduct additional studies and design a smaller pond to address the concerns of the neighbors. To attain the originally proposed flow augmentation goal, SRF is in discussions with property owners near the headwaters of Redwood Creek to add more pond storage to make up for the reduction of the pond size at the Marshall Ranch. The Marshall Ranch Flow Enhancement Project presents the opportunity to not only enhance summer low flows in Redwood Creek, it will also be a pilot project that will provide valuable information for how to design and implement similar projects in the future. I encourage you to approve the Mitigated Negative Declaration for this project.

Sincerely,
Don Allan,
Westhaven CA.,
Board President,
Salmonid Restoration Federation