

**DEPARTMENT OF FISH AND GAME**<http://www.dfg.ca.gov>601 Locust Street
Redding, CA 96001
(530) 225-2363

November 9, 2004

Ms. Susie Rodriguez
Realty Specialist/Redding Field Office
Bureau of Land Management
355 Hemsted Drive
Redding, California 96002-0910

Dear Ms. Rodriguez:

Salmon Creek Resources, Inc. Notice of Exchange Proposal

The Department of Fish and Game (DFG) reviewed the subject Notice of Exchange Proposal. The Bureau of Land Management (BLM) received a proposal from Mr. Joe Rice, president and owner of Salmon Creek Resources, to exchange approximately 216 acres of Federal lands for approximately 566 acres of non-Federal property. The Federal lands, portions of Section 32, Township 32 North, Range 5 West; and Sections 5 and 6, Township 31 North, Range 5 West, are located in the Salt Creek drainage within the Sacramento River watershed, Shasta County. The non-Federal land, a portion of Section 22, Township 32 North, Range 8 West, is located in the Grass Valley Creek drainage within the Trinity River watershed, Trinity County.

The Federal land being proposed for exchange is located west of Redding in the Salt Creek drainage. Resident rainbow trout, migratory anadromous rainbow trout (steelhead), and fall-run Chinook salmon are all known to use lower Salt Creek for spawning. DFG personnel have also observed resident rainbow trout spawning and juvenile rearing in Salt Creek within the project area as well as upstream of the project area. Our principal concern with this exchange is the likelihood the land will be subdivided and ultimately developed causing substantial sediment deposition and subsequent harm to the aquatic resources of Salt Creek and the Sacramento River.

Since 1997, at the request of both water and fish management agencies, the Bureau of Reclamation has injected 96,050 tons of spawning gravel in the Sacramento River at the mouth of Salt Creek. Additionally, in 2001 CALFED agencies paid approximately \$20 million to improve two fish ladders and a fish screen at the ACID diversion dam located in the Sacramento River downstream of the mouth of Salt Creek. These spawning gravel and fish passage improvements were implemented to encourage spawning by natural runs of Chinook salmon, particularly winter-run Chinook, and steelhead in the Sacramento River between the ACID and Keswick dams.

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The DFG is concerned that future development in this portion of the Salt Creek drainage will mobilize and deposit sediment in the spawning gravel placed at the Salt Creek and Sacramento River confluence. On the other hand, most of the non-Federal land in the Grass Valley Creek drainage offered by Salmon Creek Resources lies above Buckhorn Sediment Dam and the Hamilton Ponds further downstream. DFG believes potential adverse effects to listed fish species are greater at the Salt Creek site.

Furthermore, DFG understands National Oceanic Atmospheric Administration (NOAA) Fisheries is in the process of potentially listing the Central Valley resident trout population of *Oncorhynchus mykiss*. Studies show that Central Valley resident and anadromous *O. mykiss* are genetically very similar where there are no physical barriers to migration or where interbreeding occurs. Since May 18, 1998, naturally spawned populations of anadromous *O. mykiss* (steelhead) residing below impassable barriers have been listed as Federally Threatened. NOAA Fisheries, in the June 14, 2004, Federal Register, Vol. 69, No. 113, page 33113, has adopted the working assumption that resident rainbow trout and steelhead co-occurring in the same area share a common gene pool and therefore belong in the same ESU.

The DFG believes, therefore, that the 216 acres of public land located in the Salt Creek watershed should remain in BLM stewardship. Because all anadromous salmonids in the Central Valley are either listed or candidate species, we ask the BLM to consider not only how important the Salt Creek drainage is to anadromous fish but also what developing that property will mean to listed fish species. The BLM, as trustee agency, must consider all potential environmental impacts and their alternatives in an Environmental Assessment. One viable alternative to this land exchange is for BLM to continue the public's stewardship of these valuable Salt Creek lands.

Please direct any questions or comments to Environmental Scientist Eda Eggeman at the letterhead address or telephone (530) 225-2753.

Sincerely,



DONALD B. KOCH
Regional Manager

cc: See page three

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cc: Ms. Eda C. Eggeman
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ec: Mr. Craig Martz
Ms. Eda C. Eggeman
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