

To: SantaRosaPublicComment@fire.ca.gov

From:

Friends of Gualala River

Chris Poehlmann

P.O. Box 1543

Gualala, Ca. 95445

7/9/21

Re: 1-18-095 MEN “Little” THP

On behalf of Friends of Gualala River (“FOGR”), please accept and consider the following comments evaluating Gualala Redwood Timber, LLC’s (“GRT”) proposed Timber Harvest Plan 1-18-095 MEN (“Little THP”). These are submitted comments that point to the need for non-approval of this 251 acre THP as submitted. The submitted comments and attached expert comment letter address why this plan should not be approved due to its non-compliance with the Forest Practice Act Rules.

Note: This comment letter includes an updated analysis of potential sediment yields by hydrologist Greg Kamman PG, CHG for the “Little” THP: 1-18-095 MEN. It is attached and is titled: “Estimated Roadway and Skid Trail Sediment Yields, Little THP: 1-18-095 MEN, Mendocino County, California”. The letter and the issue are addressed in topic 1.) below.

The following comments are divided into the following topic groupings:

- 1.) THP Non-Compliance with the Basin Plan and its Non-Point Source NPS Policy
- 2.) Geological evidence pointing to the need to address NPS Policy in the Basin Plan
- 3.) Cable Yarding not chosen as a harvesting technique
- 4.) Inappropriate Requests for Exceptions to the Standard Rules
- 5.) Inadequacy of the Cumulative Effects Analysis

1.) THP Non-Compliance with the Basin Plan and its Non-Point Source NPS Policy

From the FPRs:

898.2 Special Conditions Requiring Disapproval of Plans

The Director shall disapprove a plan as not conforming to the Rules of the Board if any one of the following conditions exist:

(h) Implementation of the plan as proposed would cause a violation of any requirement of an applicable water quality control plan adopted or approved by the State Water Resources Control Board. (emphasis added)

This THP should not be approved because it is not compliant and does not address the Non-Point Source Policy that is part of the Basin Plan. (The director cannot approve a plan that is not consistent with the applicable Water Quality Control Plan). *Section 4-36.00(B)*. This policy is also described in:

California Regional Water Quality Control Board
North Coast Region
RESOLUTION NO. R1-2004-0087
November 29, 2004
Total Maximum Daily Load
Implementation Policy Statement
for
Sediment-Impaired Receiving Waters in the North Coast Region
https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/120204-0087.pdf

The Basin Plan NPS Source Policy includes enforcement language that mandates the Regional Water Quality Control Boards to require harvesting plan proponents to describe actions that show compliance to the following NPS program Key Elements:

- Key Element 1:
A NPS control implementation program's ultimate purpose must be explicitly stated and at a minimum address NPS pollution control in a manner that achieves and maintains water quality objectives. (The Gualala River is identified on the State's List of Water Quality Limited Segments as impaired by the pollutants Sediment and Temperature – which means that Water Quality Objectives are not being met).
- Key Element 2:
The NPS pollution control implementation program shall include a description of the management practices (MPs) and other program elements expected to be implemented, along with an evaluation program that ensures proper implementation and verification.
- Key Element 3:
The implementation program shall include a time schedule and quantifiable milestones, should the RWQCB so require.
- Key Element 4:
The implementation program shall include sufficient feedback mechanisms so that the RWQCB, dischargers, and the public can determine if the implementation program is achieving its stated purpose(s), or whether additional or different MPs or other actions are required. (ie. monitoring)
- Key Element 5:
Each RWQCB shall make clear, in advance, the potential consequences for failure to achieve

an NPS implementation program's objectives, emphasizing that it is the responsibility of individual dischargers to take all necessary implementation actions to meet water quality requirements.

Timber Harvest Plan approval and successful enrollment of a THP into an approved program for Water Code compliance employs a WDR, Waiver, or a General WDR, additionally the Basin Plan (Non-Point Source Policy) requires **Monitoring** (Element 4) to show trends and effectiveness of current programs to reduce sediment inputs (as required by Non-Point Source Policy). *"Implementation programs also must include a time schedule and describe proposed monitoring activities to assess compliance with water quality objectives."* From POLICY FOR IMPLEMENTATION AND ENFORCEMENT OF THE NON-POINT SOURCE POLLUTION CONTROL PROGRAM, May 20, 2004, page 4.

"Except for waivers for discharges that the SWRCB or a RWQCB determines do not pose a significant threat to water quality, waiver conditions must include, but need not be limited to, individual, group or watershed-based monitoring." Page 7.

"Successful MP implementation typically requires: (1) adaptation to site-specific or regional-specific conditions; (2) monitoring to assure that practices are properly applied and are effective in attaining and maintaining water quality standards; (3) immediate mitigation of a problem where the practices are not effective; and (4) improvement of MP implementation or implementation of additional MPs when needed to resolve a deficiency." Page 11.

The appropriate monitoring missing in this plan that is local and pertinent to this THP can employ, for instance, measurement of:

- pool volumes
- stream embeddedness
- percentage of fines
- changes over time
- habitat health
- benthic macro invertebrates
- stream thalweg depth profiles
- large woody debris volumes
- turbidity

Also required is an **Adaptive Management Program** (Elements 1,2,3) to assess effectiveness of the chosen actions and potential supplementary actions to implement if it is observed that conditions fail to improve. In the POLICY FOR IMPLEMENTATION AND ENFORCEMENT OF THE NON-POINT SOURCE POLLUTION CONTROL PROGRAM, May 20, 2004 it states: *"Successful MP implementation typically requires: (1) adaptation to site-specific or regional-specific conditions; (2) monitoring to assure that practices are properly applied and are effective in attaining and maintaining water quality standards; (3) immediate mitigation of a problem where the practices are not effective; and (4) improvement of MP implementation or implementation of additional MPs when needed to resolve a deficiency."* page 11. And: *"A schedule assuring MP (management practices) implementation and assessment, as well as adaptive manage-*

ment provisions must be provided.” page 15. This adaptive management plan put in place to deal with failures in the initial plan is commonly called a “backup plan”.

Such water quality control programs are described in *Water Code Section 13242 of Cal Water Code* where: 1.) they must provide a description of all actions necessary to attain Water Quality Standards, 2.) they must provide a time table for implementation, 3.) they must have a monitoring program in place to assure the actions are meeting the goal of Water Quality recovery. This THP does not include and describe actions that address monitoring nor an adaptive management plan to make it compliant with this specific Basin Plan policy.

The North Coast Regional Water Quality Control Board has failed to incorporate EPA TMDLs into the Basin Plan and implement those TMDLs on a number of North Coast rivers (including the Gualala River). This failure has resulted in a lack of progress in addressing the serious problems facing North Coast rivers and streams which remain impaired by pollutants such as sediment, nutrients, high temperatures, low dissolved oxygen levels, and turbidity.

Under *Section 208, Federal Clean Water Act of 1973*, each state is required to develop waste treatment management plans or water quality control plans and incorporate them into the basin plan for each of its nine regions. The “Little” Timber Harvest Plan cannot be approved by CalFire as it is not consistent with the Basin Plan for the North Coast. *Forest Practice Rule 898.2(h)* requires CalFire to deny a THP if it fails to comply with the Basin Plan.

This Timber Harvest Plan cannot be enrolled in the applicant’s chosen choice of a General WDR for Timber operations on private lands (or the related Waiver) due to the fact that this Timber Harvest Plan is not compliant with the Basin Plan’s Non-point Source Policy.

The Non-Point Source Policy is in the Basin Plan (along with Sediment Policy) thus, Non-point Source Policy is enforceable and should be manifest in the Implementing Programs/Water Quality Control Plans.

This is an interesting statistic from Page 2 of the NCRWCB PHI report on the adjacent “Elk” THP:

"The sediment source analysis concluded that approximately 1/3 of sediment delivery in the Gualala River watershed was due to natural processes and 2/3 of sediment delivery, or 200% of the natural load, due to anthropogenic sources, primarily related to roads and harvest related mass wasting. "

In addition to the THP’s failure to address and implement the Non-Point Source Policy, the THP also is inconsistent with the General Waste Discharge Requirements for Discharges Related to Timber Harvest Activities on Non-Federal Lands in the North Coast Region, Order No. R1-2004-0030 (“General WDRs”). This is dramatically illustrated by the failure of the THP to address the present significant sediment loading and that will continue for road surfaces and skid trails throughout the proposed THP. EPA established a specific allocation for road surfaces and skid trails of 12 tons/mi²/yr.

The EPA's TMDL for the Gualala River provides a clear numeric threshold which the Regional Board and CalFire must apply when considering GRT's compliance with the Timber Harvest WDRs' water quality requirements and whether CalFire has substantial evidence to show that the THP will not cause or contribute to violations of water quality objectives and beneficial uses. EPA has identified a TMDL of 475 tons/mi²/yr, of which 7 tons/mi²/yr is allocated to road surfaces. That is the sediment rate determined by EPA based on the Regional Board's technical support document which must be attained throughout the Gualala River watershed in order to prevent any exceedance of the water quality objectives relating to sedimentation.

Hydrologist Greg Kamman has prepared an expert report (attached) calculating the rate of sediment loading from the Little THP's road surfaces and skid trails employing a methodology developed by Pacific Watershed Associates and assumptions including the assumption of 50% hydrologically connected roads used by GRT this THP, Section 5, page 240.

In response to Mr. Kamman's comments and sediment analysis on a recently submitted similar harvest plan nearby, the "Far North" THP, Danny Hagans of Pacific Watershed Associates submitted a response on behalf of GRT to the CalFire record. Letter from Pacific Watershed Assoc. to GRT dated Jan. 21, 2021 (attached, and submitted as an attachment in the Far North public comments). Mr. Hagans reviewed Mr. Kamman's methodology and determined that, "[i]n terms of the approach and methods utilized by Kamman per Part X, I find no irregularities with utilizing the computational methods as published by PWA." The only concern raised by Mr. Hagans as to the accuracy of Mr. Kamman's calculations was the percentage of the THP's road length which remain hydrologically connected. Mr. Hagans states that, based on PWA's road upgrading work in 2002 and 2003 within GRT's landholdings in the Little North Fork Gualala River watershed ("LNFRG watershed"), there is "little or no future sediment delivery from those treated road reaches" and "very minimal lengths of road have any potential for surface and gully erosion risk and subsequent sediment delivery to nearby streams."

Neither the THP nor Hagans letter cite or present "any field investigations on the current roadway condition, potential roadway degradation over the past 18 years, or percentage of hydrologically connected roadways in the Far North THP, since Hagans 2003 work." Hagans Letter, attached.

In addition, although Mr. Hagans did not submit any information of any recent on-the-ground road erosion or connectivity assessments, he highlights the importance that such efforts would make to evaluating the sediment releases from road surfaces. As Mr. Hagans states:

"..the methods as described in Part X are primarily describing field methods for conducting on-the-ground road erosion and connectivity assessments to develop real-time estimates for quantifying future erosion and sediment delivery risk. This field-based approach to data collection and condition assessment is necessary where the individual hydrologically connected lengths of road within the overall road system assessment area are identified, field mapped and measured." Hagans Letter, pp. 4-5. Mr. Hagans prior comment made no mention of hydrologic connectivity for skid trails. Mr. Hagans comment was made in regard to GRT's Far North THP. In this instance, the Little THP indicates that it is reasonable to estimate that upgraded roads within the THP still have a hydrologic connectivity of 50 per-

cent. Little THP, Section 5, p. 240. That is the estimate used by the RPF to estimate how much sediment reduction will occur from road upgrades. (*Id.*)

Nothing in the CalFire record shows that GRT conducted any such assessments in preparing the Little THP. Responding to Mr. Hagan's assertions about the connectivity of roads in the areas of the Little and Far North THPs and absent a site-specific investigation by GRT documenting the percentage of hydrologically connected roads and skid trails within and appurtenant to the THP, Mr. Kamman has calculated road surface sediment loading for the Little THP using a range of percentages of hydrologic connectivity.

Assuming Mr. Hagan's assertion that the road work conducted 18 years ago is still hydrologically disconnecting a significant percentage of the roads and skid trails within and appurtenant to the Little THP, Mr. Kamman has calculated the erosion rates from those road surfaces with a range of connectivity percentages from 1 to the 50 percent noted above that was identified by GRT in the Little THP (Section 5, page 240). Mr. Kamman calculates the sediment loading estimates for the Little THP incorporating estimates of 50-, 20-, 5- and 1-percent road hydrologic connectivity. Applying a percentage of 50 percent hydrologic connection, Mr. Kamman calculates an expected discharge of 1,513 tons/mi²/yr from the road surfaces and skid trails within the THP area. Applying a percentage of 20 percent hydrologic connection, Mr. Kamman calculates an expected discharge of 605 tons/mi²/yr from the road surfaces and skid trails within the THP area. Mr. Kamman's revised calculations based on 5- and 1-percent hydrologically connected roadways and skid trails results in sediment yield rates to streams of 151- and 30-tons/mi²/yr, respectively within the Little THP area. His calculation of the loading estimate for the Little THP's additional appurtenant roads and skid trails to incorporate 50-, 20-, 5-, and 1-percent hydrologic connections result in additional sediment yield rates of 338-, 135-, 34-, and 7-tons/mi²/yr., respectively.

The TMDL allocates a total 95 tons/mi²/yr to man-made sediment sources. **Of that maximum load, 7 tons/mi²/year is allocated to sediment from road surfaces. An additional 5 tons/mi²/year is allocated to sediment from skid trails.** Kamman's lowest delivery estimate level of just 1% yields 30 tons/mi²/year of sediment from the Little THP's connected roads and skid trails. Even this generous disconnection assumption dwarfs the load allocation for road and skid trail surfaces established for the Gualala River, exceeding the 12 tons/mi²/year by more than **150 percent**. Applying the assumption used by GRT in the Little THP of 50 percent hydrologically disconnected roads as well as skid trails yields a sediment discharge rate of 1,513 tons/mi²/yr, a full 12,500 percent over the TMDL load allocations.

Whether 1-, 5-, 20- or 50-percent of the roads in and appurtenant to the Little THP are hydrologically connected, Mr. Kamman's analysis establishes that the Little THP's roads and skid trails, by themselves, represent a serious threat to contribute to the existing sediment impairment of the Gualala River and the related adverse impacts to salmonids. Absent a comprehensive erosion and sediment loading analysis by the applicant, CalFire cannot support a finding that the applicant has demonstrated that the Little THP will not contribute to violations of water quality requirements applicable to sedimentation.

Because the THP is in violation of the General WDRs and in particular the waste load allocations established in the Gualala River sediment TMDL, the proposed THP cannot comply with Forest Practice Rules, 14 CCR § 916.9. Based on the current record, CalFire cannot point to any substantial evidence that the Little THP, including its many roads and skid trails, will “[c]omply with the terms of a Total Maximum Daily Load (TMDL)” or “[p]revent significant sediment load increase to a watercourse system or lake.” 14 CCR 916.9(a)(1) & (2).

2.) Geological evidence pointing to the need to address NPS Policy in the Basin Plan

There are many notations in the THP application and agency review documentation that point to the need for elevated attention for the identification of sediment sources and the methods to mitigate them using all the in place policy described above.

The location of this THP places it in a very erosion prone geology and virtually on the active San Andreas Fault. Although the majority of the plan is in the sensitive floodplain of the river, some treatment of the steeper areas appears in the report.

Submitted data by CGS Kevin Doherty in his PHI Report dated December 2, 2019:
Geology and Erosion Hazard Rating, Page 7.

The active trace of the San Andreas Fault Zone (SAFZ) appears to bisect the western THP boundary along the southwestern boundary of the valley (Koehler and Baldwin, 2005, Figures 2 and 3). The underlying bedrock is described as Tertiary to Cretaceous Coastal Belt Franciscan Formation and Paleocene to Eocene-age German Rancho Formation (Fuller and others, 2002, Figure 1). Areas of shallow- and deep-seated landsliding are mapped by the RPF and Fuller and others (2002) within and upslope of the proposed harvest units. A complete discussion of the geologic setting is included in the February 1, 2019 PHI memo (CGS, 2019).

From the CGS PHI Report: No references to NPS policy were noted in the CGS comments. The Erosion Hazard Ratings for this THP are rated at Moderate and High.

3.) Cable Yarding Not chosen as an alternate harvesting technique

Cable yarding is feasible in this plan for the steep clearcut and floodplain units proposed. Use of the technique in the THP application was not adequately addressed and subsequently eliminated from being an alternative by the RPF even though it is a superior method to avoid damage to the flood plain areas of the plan. See below. This THP has a more than adequate set of conditions for

consideration and use of highline cable yarding to avoid yarding equipment damage and the dragging of logs over steep erosive hillsides and sensitive floodplain areas of an EPA 303(d) listed river for sediment and temperature. To avoid cable yarding, the applicant has applied for exemptions to the standard FPR's.

The consideration of alternatives to tractor yarding in the floodplain is addressed in the THP with vague and unsubstantiated declarations on pages 119 and 120:

Alternative Approach to Harvesting:

This alternative would not meet most of the landowner's objectives. This alternative may meet the objective of maintaining the flow of high quality timber products to the economy, maintaining a forest products industry, and providing a source of employment in Northern California. However, limitations on appropriate silvicultural methods, and economic limitations of other forms of yarding would most likely make the project a monetary loss overall. Additionally, different silvicultural prescriptions and yarding methods may not achieve the goals of the Forest Practice Rules.

Various yarding methods were analyzed by the RPF during preparation of the THP. The yarding methods chosen is tractor yarding based on the mostly flat topography of the harvest area and the availability of road access.

4.) Exceptions to the Standard Rules are applied for

The wetlands in these floodplain areas designated for harvest operations are some of the most sensitive in the watershed as far as their role in salmonid recovery and their ability to recover from disturbance. The scant attention from the owners and agencies to the cumulative negative impacts to the total floodplain resource of the river and its ability to provide habitat and support to endangered species and watershed health and recovery will not be without consequences.

Exceptions are being asked for on the THP to the ASP Rules and the recommendations of the advisory white paper "Flood Prone Area Considerations in the Coast Redwood Zone, 2005". These floodplain areas of the river, limited in area compared to the whole watershed, are crucial to protect because of their role in the recovery of endangered species and the larger watershed. These floodplain areas are the very features of watersheds that these rules were designed to protect. The granting of exceptions to these rules and recommendations should only be granted in the rarest of circumstances and when the owner has no other alternatives, with the reason rejected that the standard practices are more expensive and therefore unfeasible.

The quotes below point to the delicate nature of the wetlands and floodplain areas and the potential for the caterpillar tractors and rubber tired skidder equipment used in the harvesting in these exemption areas to do damage, the very damage that the ASP rules and the White Paper are aimed at preventing. The only proposal to minimize the damage from the tractors is that they will not be "driven in flood prone areas with their blade lowered except to move debris" and "at watercourse crossings".

From the WQ PHI report:

"8. As in similar recent THPs on flood prone areas on the plan submitter's ownership, the Regional Water Board will be evaluating proposed harvest areas for the presence of wetlands, including seasonal wetlands indicated by areas dominated by wetland plant species, and measures to protect beneficial uses associated with wetlands. Please evaluate plan area for wetland indicators."

III. DOWNSTREAM.

27. Are site specific practices proposed in-lieu of, or as an alternative to, the following standard WLPZ practices?

- a. ☒ Yes ☐ No Prohibition of the construction or use of tractor roads in Class I, II, III, or IV watercourses, WLPZs, marshes, wet meadows, and other wet areas except as follows (916.3 [936.3, 956.3](c)):
 - (1) At prepared tractor road crossings.
 - (2) Crossings of Class III watercourses which are dry at time of timber operations.
 - (3) At new tractor and road crossings approved by Department of Fish and Wildlife.
- b. ☐ Yes ☒ No Retention of non-commercial vegetation bordering and covering meadows and wet areas?
- c. ☐ Yes ☒ No Directional felling of trees within the WLPZ away from the watercourse or lake?
- d. ☐ Yes ☒ No Decrease of width(s) of the WLPZ(s)?
- e. ☐ Yes ☒ No Protection of watercourses which conduct class IV waters?
- f. ☒ Yes ☐ No Exclusion of heavy equipment from the WLPZ except as follows (916.4 [936.4, 956.4](d) and (f)):
 - (1) At prepared tractor road crossings.
 - (2) Crossings of Class III watercourses which are dry at time of timber operations.
 - (3) At existing road crossings.
 - (4) At new tractor and road crossings approved by Department of Fish and Game.
- g. ☐ Yes ☒ No Establishment of ELZ for Class III watercourses unless sideslopes are <30% and EHR is low?
- h. ☐ Yes ☒ No Retention of at least 50% of the overstory canopy in the WLPZ?
- i. ☐ Yes ☒ No Retention of at least 50% of the understory in the WLPZ?
- j. ☒ Yes ☐ No Are any additional in-lieu or any alternative practices proposed for watercourse or lake protection?

NOTE: A yes answer to any of items "a." through "j." constitutes an in-lieu or alternative practice. Refer to 916.1 [936.1, 956.1] for addressing the in lieu practices. For each item marked "yes", the operational information proposed under #2 below should be provided in Section II, including mapping requirements [1034(x)(15) and (16)]; and the following should normally be provided in Section III:

1. State the standard rule;

Little THP

Section II

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During the PHI, the inspection team members observed that there are several low spots along appurtenant road surface between Map points 1 and 24 that are ponding water. Where water is ponding along the appurtenant road between Map Points 1 and 24 there is the potential for sediment to be delivered into watercourses and wet areas below the appurtenant road. During the PHI, I determined that the best solution is for the LTO to grade and spot rock the low spots along the appurtenant road between Map Points 1 and 24 to ensure standing water does not get transported into watercourses or wet areas below the appurtenant road. The RPF shall revise the THP prior to Second Review to state that the LTO shall address low spots along the appurtenant road between Map points 1 and 24 being either spot rocking or grading to reduce sediment delivery into watercourses or wet areas below the appurtenant road. This is addressed as CAL FIRE PHI Recommendation #5.

47. If operations are proposed on unstable areas, are the proposed operations appropriate and properly mitigated? No

Inspector Observations: During the PHI, CGS Geologist Kevin Doherty made one recommendation to address retaining trees for harvest below the unstable area in the north end of Unit 1 that cannot be harvested without using skid trails that cross this unstable area. See the CGS PHI report for details.

5. Inadequacy of the Cumulative Effects Analysis

The attached study with its imbedded sediment yield analysis from hydrologist Greg Kamman points to major flaws in the analysis of potential cumulative effects from this plan added to those in the Doty Creek planning watershed that contains the Little THP and the adjacent planning watersheds that drain to the North Fork of the Gualala River. THP applicants are unfortunately allowed to ignore these other planning watersheds with their similar additive cumulative effects due to a misinterpretation of the FPRs and the required cumulative effects analysis.

The inadequacy of the analysis of sediment impacts presented in the THP application would, if this plan is approved, lead to inevitable additive cumulative impacts from sediment pollution along with those of harvest plans past, present and future. The underestimates of sediment delivery from this and other THPs nearby are at times levels of magnitude less than to be expected than those calculated using more realistic data capture, estimates and calculations. These impacts from sediment will be assured if the impacts of the Elk and Little THPs are added to those of the Dogwood THP, other approved floodplain THPs in this and other nearby watershed planning areas and the background levels already present in the watershed. These levels are the very ones that have informed the recommended levels of maximum daily loads incorporated into the Gualala River TMDL.

The extent of the flood prone areas in this plan should be extended out to include the entire valley floor for the maximum protection from fully applied ASP (Anadromous Species Protection) rules without exceptions. This recommendation is strongly pointed to by the letter submitted to the file on this plan by Danielle Castle (CDFW Environmental Scientist) in her 69 page PHI report with its attached supporting document by Mark Smelser (CDFW Senior Engineering Geologist) regarding the extent of the “flood prone area”.

Damage to the delicate floodplains in this plan will add to those cumulative impacts from other plans in this area to this scientifically proven crucial resource that contributes unique environmental services for endangered and all other plant and animal species in the watershed ecosystem.

The additional guidelines found in Technical Rule Addendum No.2 also point to non-approval of the THP. (*Italics added*)

**APPENDIX
TECHNICAL RULE ADDENDUM NO. 2
CUMULATIVE IMPACTS ASSESSMENT GUIDELINES**

This Appendix provides guidelines for evaluating Cumulative Impacts to resource subjects listed in 14 CCR § 912.9(c). The Appendix includes factors, and methods for analysis, that can be considered or used to determine if the Project has a reasonable potential to cause or add to significant adverse Cumulative Impacts.

A. WATERSHED RESOURCES

Cumulative watershed Effects (CWEs) occur within and near bodies of water or Wet Meadows or Other Wet Areas, where individual Impacts are combined to produce an effect that is greater than any of the individual Impacts acting alone. Factors to consider in the evaluation of CWEs include those listed below. The factors described are general and may not be appropriate for all situations. In some cases, measurements may be required for evaluation of the potential for significant adverse Effects. The evaluation of Impacts to watershed resources is based on significant adverse on-site and off-site Cumulative Impacts on Beneficial Uses. *Additionally, the Plan must comply with the quantitative or narrative water quality objectives set forth in an applicable Water Quality Control Plan.* (italics added)

This THP will add its cumulative impacts to ongoing harvesting impacts on listed species, protected floodplain areas with their crucial role in restoration of listed aquatic species, and will be requesting exceptions to the standard FPRs and ASP rules. These cumulative impacts will be added to all the floodplain logging plans that are being applied for and approved. These THPs include the 1-18-095 MEN “Little”, 1-19-00098 MEN “Elk”, 1-15-042 SON “Dogwood”, 1-11-087 SON “Kestrel”, and 1-16-094 MEN “Plum”.

The “Dogwood” THP is the largest and most extensive riparian logging proposal on the Gualala River ever submitted since the Forest Practice Rules took effect. The Dogwood plan and similarly Little THP do not minimize logging disturbances to flood prone areas, and it should comply with the full intent and provisions of the 2009 Anadromous Salmonid Protection Rules and the white paper titled “Flood Prone Area Considerations in the Coast Redwood Zone, 2005”.

Steelhead, Coho, California Red Legged Frog, and Spotted Owls are struggling or failing to recover in the Gualala River during the current historic drought. They cannot tolerate additional cumulative impacts from the Elk and Little THPs along with Dogwood’s 5 miles of unprecedented flood plain logging in the Dogwood THP.

Summary: The omissions of Basin Plan compliance for NPS Policy, inadequate THP content, and agency comments, and supporting science presented above require non-approval of the plan as presented and the need for future iterations to correct these fatal flaws and employ the maximum use of all mitigations and existing protective regulations to prevent degradation of the EPA 303d listed Gualala River and its watershed.

Please incorporate these comments and the attached letters into the **1-18-095 MEN “Little” THP** files.

Respectfully submitted,

A handwritten signature in black ink, reading "Chris Poehlmann" with a long horizontal flourish extending to the right.

Friends of Gualala River / Chris Poehlmann
P.O. Box 1543
Gualala, Ca. 95445

Attachments:

(see copies sent as separate attachments in this public comment submission.

"Estimated Roadway and Skid Trail Sediment Yields, Little THP: 1-18-095 MEN, Mendocino County, California" Greg Kamman, hydrologist.

MEMORANDUM

Gregory Kamman, PG, CHG

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May 21, 2021

Mr. Michael Lozeau, Lozeau/Drury LLP
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Subject: Estimated Roadway and Skid Trail Sediment Yields,
Little THP: 1-18-095 MEN, Mendocino County, California

Dear Mr. Lozeau:

I have been retained to estimate the sediment yield from surface erosion of roadways and skid trails within and appurtenant to the Little THP and lying within the Little North Fork Gualala River watershed. This letter presents the approach, methods and results of the road and skid trail surface erosion analysis.

It is important to note that other sources of erosion and sediment yield from road related gullying, road related landslides and road-stream crossing failures were not estimated in this analysis due to the lack of available information. Including these processes and sediment yields would significantly increase the sediment yield values presented herein.

1.0 Approach and Methods

Estimating road surface erosion volumes followed the "Measuring and Estimating Future Erosion Volumes" (page X-34) approach and methods presented in Part X (Upslope Erosion Inventory and Sediment Control Guidance) of the California Salmonid Stream Habitat Restoration Manual (March 2006). Specific variables and assumptions used in this analysis include the following.

- Road and skid trail types and lengths were determined and measured from the Little THP Road Points Maps (see Figure 1a and 1b), Little THP WLPZ Facilities Maps (see Figure 2a and 2b), and Little THP Appurtenant Roads Map (Figure 3).
- This analysis included only roads draining to the Little North Fork Gualala River. The cumulative drainage area within the THP boundaries that contributes runoff to the Little North Fork Gualala River is 0.405 square miles.
- The road and cut bank width are assumed to be 25 feet, a common assumption presented in California North Coast THP Erosion Control Plans such as the Elk THP (1-19-098-MEN) and Little THP (1-18-095-MEN). The width of the skid trails is assumed to be 12-feet.



UNIT, Ca IT, ARV

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RECEIVED

FEB 18 2021

**COAST AREA OFFICE
RESOURCE MANAGEMENT**

Subject: Comments on the Proposed Far North THP 1-20-00150 MEN, Little THP 1-18-095 MEN and the Elk THP 1-19-098 MEN, as well as on the analysis provided by Kamman Hydrology & Engineering, Inc. on behalf of the Friends of Gualala River.

Introduction

My name is Danny Hagans, and I am a Principal Earth Scientist at Pacific Watershed Associates (PWA), a geological and environmental engineering consulting firm with offices in McKinleyville and Petaluma, California. Our 35-person environmental firm specializes in science-based watershed and fisheries restoration and protection work throughout northern and central California, and elsewhere. Our staff includes licensed and certified geologists, engineering geologists, water resource engineers, erosion and sediment control specialists, certified stormwater specialists and trainers, as well as hydrologists, fisheries biologists and botanists. I am coauthor of the *Handbook for Forest, Ranch and Rural Roads* (PWA, 2015) and Part X of the California Salmonid Stream Habitat Restoration Manual, titled *Upslope Erosion Inventory and Sediment Control Guidance* (CDFW, 2006). These manuals and guidance documents have been funded and adopted by various state and federal agencies as the standard of practice. PWA has also played a substantial role in developing TMDL sediment source investigations and recovery targets related to sediment for the US EPA and NCRWQCB in the Gualala River watershed, as well as many other North Coast watersheds.

Because of our past extensive work on properties owned by Gualala Redwood Timber (GRT), and at the request of John Bennett, GRT Forest Manager, I have prepared a brief summary concerning our two decades of on-the-groundwork conducting road erosion assessments, restoration planning activities, and road "storm-proofing" on the former Gualala Redwood, Inc. (GRI) timberland properties, now owned and managed by GRT.

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