

From:
Friends of Gualala River
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8/17/2021

Re: THP 1-18-095 MEN "Little", Faulty Sediment Impacts Analysis

Introduction:

The Regional Water Quality Control Board has failed to demonstrate that the Little THP complies with the requirements of the Timber Harvest WDRs and that the Little THP would not contribute to the existing water quality objective violations and fisheries impairments in the Gualala River watershed. The weight of the evidence submitted demonstrates that 1) it is reasonably likely that existing and future discharges from the Little THP roads are contributing to exceedances of water quality objectives and impairment of beneficial uses; 2) GRT's erosion control plan does not address all of the Little THP's "controllable sediment sources," in particular its roads, despite those sediment sources falling squarely within the Timber Harvest WDRs' definition of "controllable sediment sources"; 3) GRT failed to prepare an inventory and sediment load analysis of the Little THP's road surfaces; 4) that no analysis was done on whether the Little THP's roads are or will contribute to violations of the State's High Quality Waters Policy; and 5) that the omission of road surface erosion from consideration and the likely contribution to violations of water quality objectives results in the Little THP's failure to abide by the Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (May 20, 2004) ("Nonpoint Source Policy"). Any Regional Board enrollment of the Little THP is an abuse of discretion and inconsistent with the terms of the Timber Harvest WDRs.

These are submitted comments that point to avoiding a faulty and illegal enrollment by the Regional Water Quality Control Board Region 1 of this THP into the General WDR program. This THP, with its moderate to high EHRs, will add its cumulative harvest related impacts on listed species and to the river's protected floodplain areas with their crucial role in restoration of listed aquatic and non-aquatic species. These cumulative impacts will be added to all the logging plans from the past, present, or foreseeable future in North Fork and the Doty Creek and Robinson Creek Planning Watersheds. These THPs include the 1-20-00150-MEN "Far North", 1-19-00098 MEN "Elk", and adjacent 1-15-042 SON "Dogwood". The nearby and downstream "Dogwood" THP is the largest ever and most extensive riparian logging proposal on the Gualala River since the Forest Practice Rules were adopted in 1973.

The Little THP does not minimize logging and road related disturbances and sediment delivery to flood prone areas and downstream watercourses. The plan should be denied and resubmitted until it complies with the full intent and provisions of the 2009 Anadromous Salmonid Protection Rules (ASP rules) and with a design incorporating the findings of the white paper titled "Flood Prone Area Considerations in the Coast Redwood Zone, 2005". It should also

be denied acceptance into the WDR program until it complies with all existing applicable water quality regulations and standards as pointed to below in the most recent recent sediment analysis.

Steelhead and coho are struggling and failing to recover in the Gualala River during the current historic drought and the continued water quality impacts from historic and ongoing timber harvesting related activities. Their potential habitat is negatively impacted from impending cumulative impacts of the approved "Dogwood" THP's 5 miles of unprecedented riparian forest logging along with the completed "Plum" and "Kestrel" THPs and now with those from this THP and the proposed "Elk" and "Far North" THPs. These all add to the cumulative impacts along with upslope impacts from plans like the 1-19-00197-MEN "Hoodoo" THP on the North Fork and Robinson Creek watersheds.

Faulty Sediment Impacts Analysis

Relevant is an important statistic from Page 2 of the NCRWCB PHI report in the nearby 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."

A proper and complete analysis of the potential release of sediment from road related and other sources from this Little THP should be submitted and made part of and inform a corrected and updated Erosion Control Plan submission for enrollment in a General WDR. In the absence of any effort by the RFP to properly assess and quantify all of the Little THP's sediment sources, especially the ongoing and future sediment erosion from road surfaces within and appurtenant to the THP, FOGP has retained Hydrologist and Professional Geologist Greg Kamman, PG, CHG, to prepare an estimate of sediment volume from the THP's existing and proposed road surfaces.

The resulting report (attached) has estimated the rate of sediment discharges from the Little THP's road surfaces employing a methodology developed by Pacific Watershed Associates and THP assumptions of the percentage of hydrologically connected roads used by Gualala Redwoods Timber (GRT) in their other recent THPs in the Gualala River watershed. Absent a site-specific investigation by GRT documenting the percentage of hydrologically connected roads within and appurtenant to the Little THP, Mr. Kamman has estimated road surface sediment loading assuming 1-, 5-, 20- and 50-percent hydrologic connection of the roads. The resulting sediment loading rates for the THP's roads are 30 tons/mi²/yr (assuming 1% hydrologic connection), 151 tons/mi²/yr (5%), 605 tons/mi²/yr (20%) and 1,513 tons/mi²/yr (50%) from those controllable sources. Each of these calculated sediment loadings easily exceeds the load allocation of 7 tons/mi²/year established by EPA in the Gualala River Sediment TMDL. The Gualala River Sediment TMDL and the load allocations of which it is comprised are the maximum rates of sedimentation necessary to meet water quality objectives and protect beneficial uses in the Gualala River. By exceeding the load allocation deemed necessary by the EPA to achieve compliance with the Basin Plan's objectives, it is reasonably likely that the THP's roads are and will contribute to the Gualala River's existing sediment impairment.

In addition to these sediment loads Kamman has indicated that those from appurtenant roads and skid trails that will be employed in the operation of this THP should be added to the totals. The additional calculated sediment

loading rates for these appurtenant roads and skid trails are 7 tons/mi²/yr (assuming 1% hydrologic connection), 34 tons/mi²/yr (5%), 135 tons/mi²/yr (20%) and 338 tons/mi²/yr (50%) from those controllable sources.

Mr. Kamman's analysis indicates that the road surfaces associated with the THP will contribute a significant quantity of sediment to the Little North Fork of the Gualala River. This level of sediment grossly exceeds the allocation for road and skid trail surfaces as set by the U.S Environmental Protection Agency in adopting the Gualala River Total Maximum Daily Load for Sediment ("TMDL"). It also exceeds recommendations set by the Regional Board's Gualala River Watershed Technical Support Document.

According to EPA's adopted TMDL, the sedimentation rate from road surfaces and skid trails must be reduced to 12 tons/mi²/year throughout the Gualala River watershed in order to restore the river's ongoing cumulative degradation from sediment. Because Mr. Kamman's substantial evidence that the Little THP's erosion rate from road surfaces is in excess of EPA's allocation, the Little THP and its roads are clearly contributing significantly to the watershed's ongoing sediment degradation. Mr. Kamman has also estimated the cumulative sediment rates from two other THPs proposed by GRT, 1-19-00098 MEN (Elk) THP and the 1-20-00150 MEN (Far North) THPs. He estimates that the road surfaces and skid trails encompassed by the three proposed THPs are and will cumulatively discharge 1,176 tons/mi²/yr. The Little THP fails to address these conspicuous sediment sources and fails to mitigate to attain sediment load allocations necessary to bring the watershed into compliance with the applicable Basin Plan standards.

Mr. Kamman's review with the incorporated analyses is attached to this email for the 1-18-095 MEN "Little" THP.

TMDL Adoption

In addition to the needed proper and accurate sediment load allocations and a ECP to attain mandated levels, there is another needed action. Vital to the success of the TMDL effort as it specifically pertains to the Gualala River is the need to adopt the TMDL officially into the Basin Plan and to create and adopt the the necessary implementation plan. It has been over two decades since the TMDL for the Gualala river was formulated and it has yet to be adopted. The present recovery successes of the Garcia River just north of the Gualala is widely attributed to its adopted TMDL and implementation plan. It is long past due that this protective legislation be put in place to allow recovery of the Gualala as a EPA 303d listed river.

Summary

The potential impacts of the present plan's flawed sediment delivery analysis (ECP) require that the Regional Board vacate and set aside its approval of any enrollment of the Little THP in the Timber Harvest WDRs. In addition, the Regional Board and State Board should prepare and adopt an amendment to the Basin Plan incorporating the Gualala River Sediment TMDL into the Basin Plan.

Partially to this end, future THP iterations in re-applications to correct these fatal flaws should properly calculate the rate of sediment discharges and employ the maximum use of all mitigations, existing protective regulations, and compliance with the existing TMDL to prevent degradation of the EPA 303d listed Gualala River and its watershed.

Respectfully submitted,

A handwritten signature in cursive script, reading "Chris Poehlmann", followed by a horizontal line.

For Friends of Gualala River
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