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## North Coast Regional Water Quality Control Board

July 10, 2014

Scott Kelly  
The Conservation Fund  
14951 "A" Caspar Road, Box 50  
Caspar, CA 95420

Dear Mr. Kelly:

**Subject:** Notice of Applicability (NOA) for Coverage under the State Water Resources Control Board General 401 Water Quality Certification Order for Small Habitat Restoration Projects

**File:** The Conservation Fund – North Fork Gualala Wood in the Stream Project  
WDID No. 1B14058WNME

This letter is to certify coverage of The Conservation Fund's *North Fork Gualala Wood in the Stream Project* (hereinafter referred to as the "Project") under the General 401 Water Quality Certification Order for Small Habitat Restoration Projects; Order No. SB12006GN.

**Background:**

On June 18, 2014, the North Coast Regional Water Quality Control Board (Regional Water Board) received your Notice of Intent (NOI) along with application fees to comply with the terms of, and obtain coverage under, the General 401 Water Quality Certification Order for Small Habitat Restoration Projects (General 401 Order) for the Project.

The Project is being coordinated by The Conservation Fund in partnership with the Gualala River Watershed Council (GRWC), The Nature Conservancy, and Blencowe Watershed Management (BWM). The Project is being funded in part from the Cal Fire and administered by the Mendocino County Resource Conservation District.

**Project Location:**

The Project is located within the Stewart Creek CalWater Planning watershed along a 1 mile reach of the upper North Fork Gualala. The North Fork Gualala River has historically supported populations of both coho salmon and steelhead trout. Data collected within the

last decade show low quantities of functional large woody material (LWM) in the project area. Although woody material densities are very low, juvenile coho salmon and steelhead trout are consistently present during the spring and summer.

The upper North Fork main-stem reach will compliment a recently funded and permitted project that GRWC started implementing in 2012 to increase LWD levels in the North Fork main-stem in the adjacent Robinson and Doty Creek Planning Watersheds. The projects are part of the GRWC Wood In the Stream program, established in 2000. Gualala watershed data demonstrate the need for increased large wood levels in most tributaries.

#### Project Description:

The Project proposes to introduce up to 100 trees into a 1.0 mile segment of the North Fork Gualala River watershed to improve instream habitat complexity and increased shelter for threatened and endangered salmonids. Habitat complexity will be increased by strategically falling riparian trees, as well as recruiting downed trees and rootwads from areas adjacent to the channel. Specific objectives are to increase the length and depth of pools, improve spawning gravel retention and deposition downstream of scour areas, and provide additional pool shelter.

Up to sixty (60) streamside trees will be selected for directional falling along the 1.0 mile segment of the creek. In some limited reaches where there is an inadequate supply of stream side conifers and equipment access is not available, alders will be utilized to create complex structure. Where riparian trees are directly felled their removal will not reduce riparian overstory canopy by more than 0.015 acres per tree, with a total disturbance area of 1.5 acres. Where riparian trees are directly felled their removal will not reduce riparian overstory canopy by more than 20% per lineal 100 feet within 75 feet of a watercourse. Further, native trees with defects, cavities, leaning towards the stream channel, nests, late seral characteristics, or greater than 36 inches DBH and large snags >16 inches DBH and 20 feet high will be retained.

Up to forty (40) trees will be collected or harvested from outside of the riparian zone (>200 feet from the creek) and placed in the channel using a rubber tired skidder. The heavy equipment will need to cross the stream at one location a minimum of 1 round trip, and no more than 3 round trips total. Protection measures are included to ensure that heavy equipment will not crush endangered, rare, or threatened species while crossing the stream.

All logs will be unanchored (no hardware anchoring) and shall be introduced as either "fixed logs" (wedged behind existing hard structures like boulders or trees) or "transport logs". Trees to be utilized are intended to be at least 1.5 times bankfull width to increase retention in the system. Once located into the stream zone, trees will not be bucked to a length of less than 1.5 times the average bankfull width.

Heavy equipment and chainsaw fueling and maintenance will occur away from the waterway and oil absorption sheets will be available in the event of a petroleum spill.

Project Size:

The total area of ground disturbance associated with the project is estimated to be 2.34 acres and 210 linear feet. The applicant has included project size calculations that were used to determine the total size of the Project. The average tree diameter is 2-feet wide at the large end and 75 feet long. The proposed Project size does not exceed what is allowed for coverage under the General 401 Certification for Small Habitat Restoration Projects and associated Categorical Exemption (15333) from the California Environmental Quality Act.

Project Associated Discharge:

The discharge of material into Waters of the State resulting from the Project include those associated with the individual large woody material pieces and some incidental sediment discharges associated with bank disturbance. The average tree diameter is 2 feet at the large end and 75 feet long. Based on other comparable projects of this type, the estimated incidental sediment discharge of 3 cubic yards of native soils could occur.

Project Timeframes:

Proposed project start date: July 15, 2014

Expected date of completion: October 31, 2015

Seasonal Implementation Window: July 15 – October 31

Monitoring Plan:

Monitoring is conducted under an approved (SWCB, NCRWQCB) QUALITY ASSURANCE PROJECT PLAN FOR MONITORING SEDIMENT REDUCTION IN THE GUALALA RIVER WATERSHED (<http://www.grwc.info/Assets/Reports/grwc-qapp-ver-3-1.pdf>) and data is available in an Access Database and GIS format for both monitoring and restoration programs to evaluate program effectiveness and available on the Gualala River Watershed Council website at <http://grwc.info>.

Through the GRWC Cooperative Monitoring program, pre-project and post-project inventories using a number of different metrics that assess and monitor pool quantity, pool depth and formation, sediment aggradation or degradation in the streambed, substrate composition and riparian condition are conducted to assess the impacts from wood placement in stream reaches. In addition, logs will be tagged and documented, and photo points will be established.

Monitoring Data:

- pool quantity and quality
- sediment aggradation or degradation in the streambed
- substrate composition
- riparian condition

- Individual logs are tracked by identifying numbers and by distance placed (or moved to) in each tributary
- Log description type; size and placement; right/left bank/in-channel; angle to bank; keyed/mobile; and stream channel location
- Photo documentation points are established and photographs taken before and after placement
- In-stream measurements are taken to document pool formation and pool depth for each log

The Gualala River Watershed Council will collect pre-project data in the year of implementation and post-project data will be collected the following year. In following years, large wood inventories and stream reach metrics will be collected on a 3 to 5 year rotational basis based on the GRWC Cooperative Monitoring schedule.

The Gualala River Watershed Council will implement the monitoring program documented above and will provide an initial monitoring report one year after implementation of the project.

Notice of Applicability and Project Determination:

Regional Water Board staff has determined that the Project, as described in the NOI is categorically exempt from CEQA review (section 15333 - Small Habitat Restoration Projects) and meets the eligibility requirements for coverage under the General 401 Water Quality Certification Order for Small Habitat Restoration Projects.

Receiving Water: Stewart Creek, tributary to the North Fork Gualala River

Filled or Excavated Area: None

Total Impacts: Acreage Temporarily Impacted: 2.34 acres maximum  
 Length Temporarily Impacted: 210 linear feet  
 Acreage Permanently Impacted: 0.0 acres  
 Length Permanently Impacted: 0 linear feet

Dredge Volume: None

Discharge Volume: 100 trees and ~3 cubic yards of sediment

Project Location : Downstream: 38.82896 N. Lat. and -123.41789 W. Longitude  
 Upstream: 38.84788 N. Lat. and -123.41205 W. Longitude

Regional Water Board staff has determined that the proposed activities may proceed under the General 401 Order.

Reporting:

As required in Section B, Item 4, of the *General 401 Water Quality Certification Order for Small Habitat Restoration Projects*, a Monitoring Plan must also include at least an annual reporting of findings for the period stated. In addition, you must submit a Notice of Completion (NOC) no later than 30 days after project completion. A complete NOC includes photographs with a descriptive title, the date each photograph was taken, the name of the photographic site, the WDID number indicated above, and the photographic orientation. Also, please, include the project name and the WDID number with all future inquiries and document submittals.

Please call Jonathan Warmerdam at (707) 576-2468 if you have any questions.

Sincerely,

*Original signed by David Leland for*

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Matthias St. John  
Executive Officer

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