
North Coast Regional Water Quality Control Board

DATE: April 8, 2015

TO: General Interested Parties List

FROM: Nonpoint Source Division

SUBJECT: NOTICE OF INTENT TO RELY UPON AN ENVIRONMENTAL ASSESSMENT
FOR THE SECOND-GROWTH FOREST RESTORATION IN REDWOOD
NATIONAL PARKS MIDDLE FORK LOST MAN CREEK

Introduction

The North Coast Regional Water Quality Control Board (Regional Water Board) is proposing to enroll a second-growth forest restoration project in Redwood National Park under Category F of Order No. R1-2014-0011, Categorical Waiver of Waste Discharge Requirements for Discharges Related to Timber Harvest Activities on Non-Federal Lands in the North Coast Region (*Categorical Waiver*).

In considering the proposed project under California Environmental Quality Act (CEQA), the Regional Water Board intends to rely upon the Environmental Assessment (EA) prepared to comply with the National Environmental Policy Act (NEPA). NEPA does not require a discussion of mitigation and growth-inducing effects caused by the Project, and therefore, those subjects are addressed below.

On May 29, 2014, the Regional Water Board received the EA for the Second-Growth Forest Restoration in Redwood National Parks Middle Fork Lost Man Creek (the "Project"). The EA describes the proposed restoration, associated impacts, mitigation measures, and best management practices for erosion control and prevention or minimization of sediment discharge to protect water quality. On October 23, 2014, Regional Water Board staff conducted a site visit of the proposed Project with park forester Jason Teraoka and environmental specialist Aida Parkinson. The purpose of the site visit was to evaluate the proposed Project for compliance with applicable water quality requirements as set forth in the Water Quality Control Plan for the North Coast Region (Basin Plan) as well as the conditions of the Categorical Waiver.

The Categorical Waiver includes conditions that rely heavily on implementation of Forest Practice Rules under the California Department of Forestry and Fire Protection (CAL FIRE)

timber harvest plan (THP) approval process, which includes a CEQA functional equivalent following a multi-agency review. Generally FPRs require the evaluation of logging areas for conditions that could adversely impact the beneficial uses of water and a description of management measures that will be implemented to protect and restore the beneficial uses of water to the extent feasible. Additional conditions of the Categorical Waiver for existing sediment sources include a prioritization and implementation schedule for corrective actions as well as an annual site visit after operations to evaluate the effectiveness of the corrective actions and identify whether additional work is needed. Even though the Project is not subject to CAL FIRE jurisdiction, including the FPRs, Regional Water Board staff finds that it will meet or exceed all the general and specific conditions to protect water quality listed in Categorical Waiver F. In a letter to Regional Water Board staff dated November 20, 2014, Redwood National Park Acting Superintendent, David Roemer, stated that the Project will meet or exceed all of the conditions of the Categorical Waiver. Redwood National Park has completed conservation planning under National Park Service requirements for implementing the National Environmental Policy Act and has documented the decision to implement the thinning in a Finding of No Significant Impact (FONSI) completed in December 2014.

Project Description

The primary focus of the Project is to reduce the time required for the restoration of conditions more typical of old growth redwood forests by thinning second growth forests to reduce overall stem density and increase redwood dominance. The work will include 1,125 acres of dense underdeveloped second growth forest in the Middle Fork Lost Man Creek watershed, located north of Orick, California. The objectives of forest restoration in the Middle Fork Lost Man Creek include: enhanced forest structure and improved forest canopy development; enhanced wildlife habitat; enhanced aquatic systems and fish habitat; minimizing soil erosion and impacts to aquatic systems; and minimizing attraction of avian nest predators such as jays and ravens near old growth forests. Operations to accomplish the work will use a combination of silvicultural methods (low thinning, crown thinning, or variable-density thinning) as well as combinations of thinning intensities (25%, 30%, or 40% reduction in basal area) and operational methods (biomass removal using ground-based operations, biomass removal using skyline operations, or lop-and-scatter operations).

Field Tour Observations

While a significant portion of the project area was evaluated during the inspection, Regional Water Board staff did not evaluate the entire project area. During the inspection much of the road system proposed for use during operations were evaluated for potential impacts to water quality. Additional observations included riparian corridors treated under a previous thinning project similar to this one, and riparian corridor locations proposed for this project. Regional Water Board staff also evaluated areas thinned under a previous project to evaluate post-project conditions. Observations made during the inspection showed a very low potential for impacts to water quality as a result of implementation of the Project. Considering the Projects proposed minimization measures and best management practices addressing water quality protection, Regional Water Board staff find that this project is likely to have a negligible impact to water quality in the adjacent watercourses.

CEQA Findings

In considering the proposed Second-Growth Forest Restoration in the Middle Fork Lost Man Creek for Redwood National Park under CEQA, the Regional Water Board intends to rely upon the finding of no significant impact. Where, as here, a project requires compliance with both CEQA and NEPA, and the EIS or finding of no significant impact is prepared first and meets the requirements of CEQA, CEQA provides that the state agency should use the EIS or finding of no significant impact rather than preparing a separate EIR or negative declaration, pursuant to California Code of Regulations, title 14, section 15221. The EA and Finding of No Significant Impact included the elements necessary to meet the requirements under CEQA for analysis of the Project's potential environmental impacts.

As NEPA does not require a discussion of mitigation and growth-inducing effects caused by the Project, those subjects are addressed here. The EA identifies impacts with mitigation measures to reduce those impacts to less-than-significant levels. Further, as explained in the EA, activities to be conducted pursuant to the Project involve the growing and harvesting of timber, which would not facilitate population growth or remove an obstacle to growth. Thus, there are no potential growth-inducing impacts. The Finding of No Significant Impact was circulated for public review in substantial conformance with the requirements of California Code of Regulations, title 14, section 15087. Therefore, the Regional Water Board is providing this notice of intent to rely on the Finding of No Significant Impact to satisfy environmental review obligations under CEQA in accordance with California Code of Regulations, title 14, section 15225. Written comments are due by May 26, 2015.

Mitigation Measures

Redwood National Park will follow all applicable mitigation measures identified in the Final Environmental Assessment developed for the Project. Adverse effects to water quality will be mitigated using minimization measures and best management practices (BMPs) as described in the EA. Those mitigations include:

- No new roads, skid trails or landings will be constructed;
- Operations will be conducted when soils are dry;
- Heavy equipment will not operate on slopes greater than 35%;
- Cable skyline yarding will be utilized in areas where slopes are greater than 35%;
- Harvesting trees is prohibited in areas with unstable or potentially unstable soils;
- Disturbed soils will be rehabilitated immediately following work;
- Winterization of work sites if rain is predicted;
- Repairing or replacing drainage structures to minimize soil erosion following rain events;
- Operations are prohibited within 500 feet of perennial streams except for hand tools;
- Establishment of streamside buffers for intermittent and ephemeral stream channels;
- Daily equipment checks for possible spills and leaks;
- Thinning prescriptions vary according to stream type, size and slope.

Growth Inducing Impacts

The proposed project does not involve construction of new homes, businesses, or infrastructure. The project would not displace people or existing housing.

Green House Gases

Project activities proposed in the EA will result in sequestration of more greenhouse gas emissions than they will generate, either directly or indirectly. Carbon sequestration will be achieved in the Project area through silviculture including planting and management of forest stands insuring the growing of trees that remove CO₂ from the atmosphere and store carbon. The proposed project is one of many in the Redwood National Park that produce substantial net carbon sequestration benefits over time.

A COPY OF THE FINAL ENVIRONMENTAL ANALYSIS IS AVAILABLE AT THE FOLLOWING LOCATIONS:

California Regional Water Quality Control Board
North Coast Region
5550 Skylane Blvd.
Santa Rosa, CA 95403

On the internet at: http://www.waterboards.ca.gov/northcoast/public_notices/

Please contact Regional Water Board staff listed below to have a copy of this document on CD mailed to you.

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