

**Draft Waste Discharge Requirements Discharges
Related to Timber Harvesting and Associated
Activities Conducted by Humboldt Redwood
Company, LLC in the Upper Elk River Watershed
(Order No. R1-2016-0004)**

Item No. 2

November 18, 2015

Jim Burke



Presentation Outline

- ❖ Status and Timelines
- ❖ Discuss Draft Waste Discharge Requirements (WDRs)
- ❖ Questions and Public Comments

Anticipated Timeline:

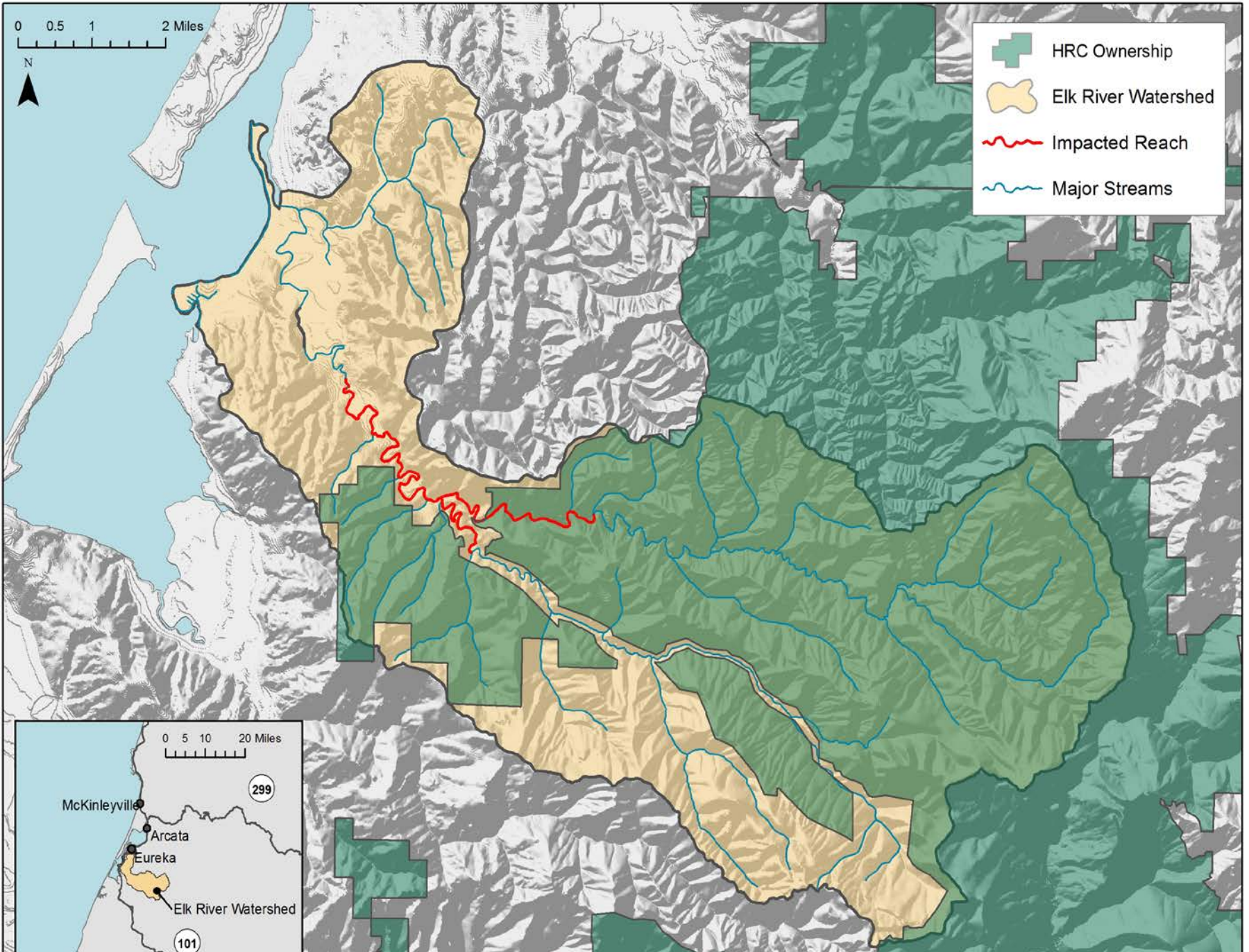
- ❖ November 18, 2015 – Workshop on Draft WDRs
- ❖ By December 4, 2015 - Public comment for Draft WDRs and Mitigated Negative Declaration
- ❖ March 10, 2016 – Adoption Hearing

New WDRs

- ❖ TMDL nearing completion
- ❖ Ongoing impairment and lack of assimilative capacity in Elk River
- ❖ Zero load allocation

Draft WDRs- Overview

- ❖ Applies to largest landowner (HRC) in the Elk River watershed
- ❖ HRC owns approximately 22,200 acres in Elk River:
 - ~66% Elk River
 - ~79% of the upper Elk River



Draft WDRs- Overview

- ❖ Relies on Tetra Tech Report (2015)
- ❖ Addresses challenges unique to Elk River:
 - Significant impairments
 - Harm to residents
 - Responsible timber companies

Report of Waste Discharge

- ❖ April 28, 2015 - First Draft
- ❖ September 22, 2015 – Completed Draft
- ❖ October 21, 2015 – Letter acknowledging complete ROWD
- ❖ Some significant issues remain

Draft WDRs- Overview

- ❖ Consolidates HRC's WDRs and Cleanup and Abatement Orders (CAOs)
- ❖ Largely based on:
 - HCP prescriptions
 - HRC's management practices
 - FPRs
- ❖ Similar to Bear and Jordan WDRs



Draft WDRs- Overview

- ❖ Control existing sediment source
- ❖ Prevent creation of new sources
- ❖ Stream restoration
- ❖ Monitoring and reporting

Draft WDRs- Overview

- ❖ Harvest limits
- ❖ Temporary harvest prohibition in high risk subwatersheds
- ❖ Enhanced riparian management zones
- ❖ BMPs to prevent new sediment sources
- ❖ Inventory and treat existing sediment sources
- ❖ Feasibility study to control in-stream sediment sources
- ❖ Monitoring and reporting program
- ❖ 5-year check-in with Board



Harvest Limits

- ❖ Harvest rates associated with sediment production:
 - Increased peak flows
 - Loss of root strength increases landslides
 - Overall increased ground disturbance

Harvest Limits

❖ Silviculture

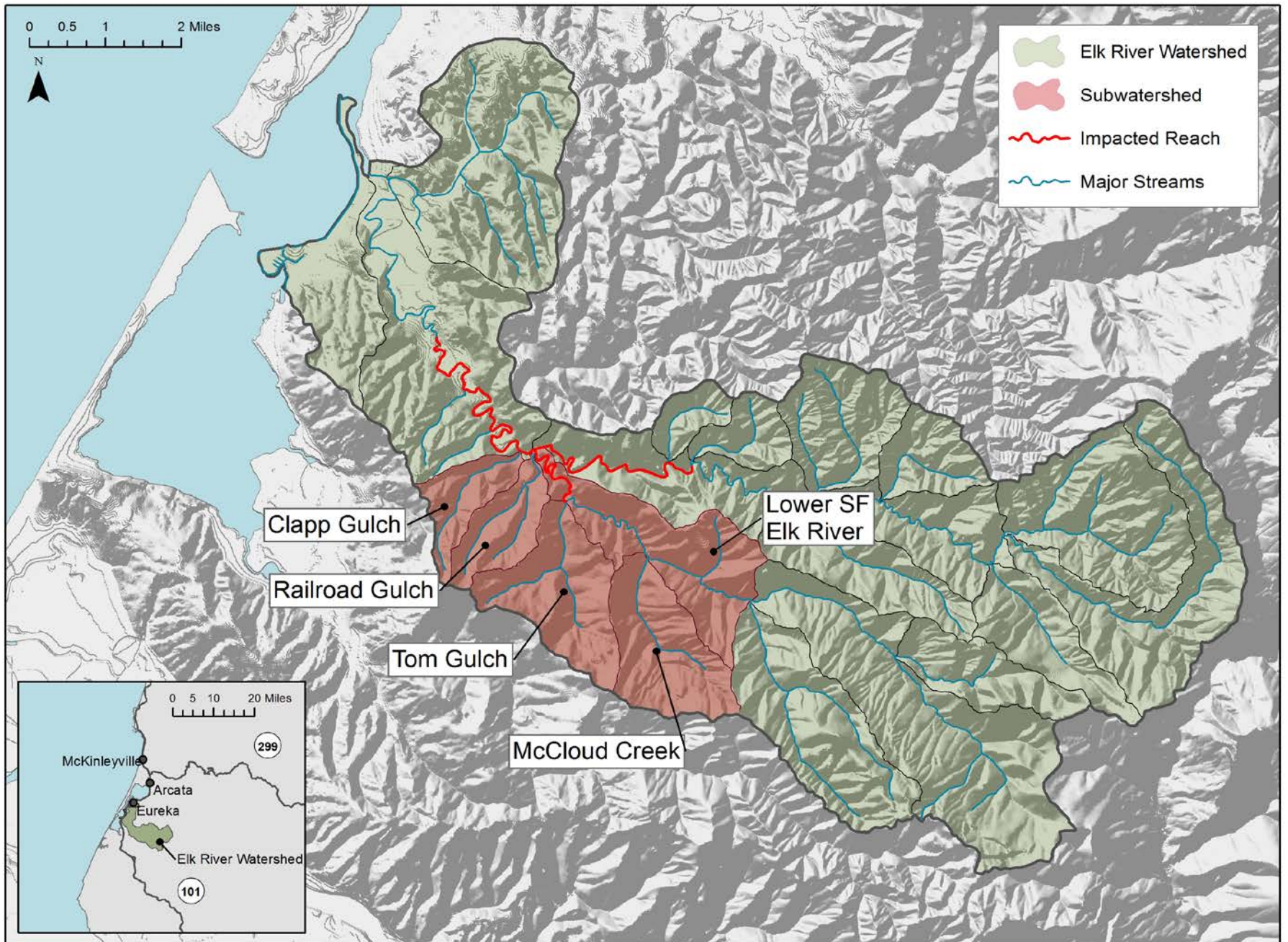
- No clearcutting
- Mostly single tree and group selection
- Limited variable retention and rehabilitation

Harvest Limits

- ❖ HRC's proposed harvest
 - ROWD included 20-year harvest projection
 - Subwatershed harvest acreage in 5-year
 - Modeled overlapping crown canopy
 - Watershed-wide less than 1.5% equivalent clearcut acres/year
- ❖ Order specifies average annual subwatershed harvest not exceed 2% equivalent clearcut acres for any 10-year time period

Temporary Harvest Prohibition

- ❖ Subwatershed risk:
 - Sediment production
 - Bedrock geology
 - Landslide hazard
 - Proximity to impacted reach
- ❖ Five high risk subwatersheds:



Temporary Harvest Prohibition

- ❖ Prohibition will remain until determination by Executive Officer of significant progress toward improved beneficial uses
- ❖ Individual THPs can be approved based on proposed projects that contribute towards correcting beneficial use impairment



Riparian Management Zones

- ❖ RMZs based on Elk River watershed analysis prescriptions
 - 300 feet on Class I
 - 200 feet on Class II
 - 100 feet on Class III
- ❖ Equipment exclusion zones
- ❖ Highest feasible erosion control standards

Control of Sediment – Roads

- ❖ All roads “stormproofed” by 2018:
 - Hydrologic disconnection
 - Inventory and treat potential discharge sites
 - Design watercourse crossing for 100-year flow
 - Annual inspection and maintenance

Control of Sediment – Non-Road

- ❖ CAOs require inventory and treatment of Controllable Sediment Discharge Sources (CSDS)
- ❖ Over 80% of high priority sites treated since 2007
- ❖ Remaining sites will be treated based on priority and location
- ❖ Erosion Control Plans for THPs

In-stream Sediment Sources

- ❖ Approximately 74% of sediment in Upper Elk River from in-stream sources
- ❖ HRC must conduct feasibility studies to evaluate methods to control, trap, or meter sediment:
 - 2017 - initial plan
 - 2018 - annual updates
 - 2020 - final feasibility study report
- ❖ If infeasible, resources can be directed to impacted reach



Landslide Prevention

- ❖ HCP hillslope prescriptions
- ❖ Professional Geologist review for all harvest and road construction/reconstruction
- ❖ Maintain landslide inventory
- ❖ Periodic aerial photograph review
- ❖ Harvest limits
- ❖ Riparian protection

Wet Weather Limits

- ❖ No timber operations between October 15th and May 1st
- ❖ Exceptions allowed for emergency corrective action
- ❖ FPR restrictions on operating during saturated soil conditions apply

Enrollment Procedure

- ❖ First 5 years – HRC must apply for THP enrollment
- ❖ After 5 years – THPs automatically enrolled upon approval by CAL FIRE
- ❖ Staff remain involved in all phases of THP review



Monitoring and Reporting

- ❖ Report on covered activities
- ❖ Monitoring compliance with requirements
- ❖ Periodic summaries
- ❖ Evaluate effectiveness of management measures
- ❖ Identify and treat new sediment sources
- ❖ Track HRC's participation in watershed stewardship
- ❖ Track water quality and recovery trends

Monitoring

❖ Inspections

- Roads
- THP areas
- Landslides

❖ Water quality

- Aquatic trends monitoring
- Hydrology and suspended sediment

Reporting

- ❖ Annual Summary Report and Work Plan
 - Timber harvest
 - Road work
 - Sediment control
 - Inspections
 - Landslides
 - Water quality
- ❖ Five Year Summary Report



WDR Summary

- ❖ Acknowledges WQ benefits from HRC's management strategy
- ❖ Relies where possible on:
 - HCP prescriptions
 - FPRs that provide water quality protection
- ❖ Balance between stringent control measures and HRC's management objectives
- ❖ 5-year check-in

Thank You



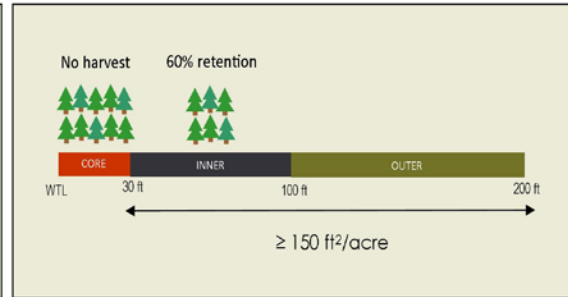
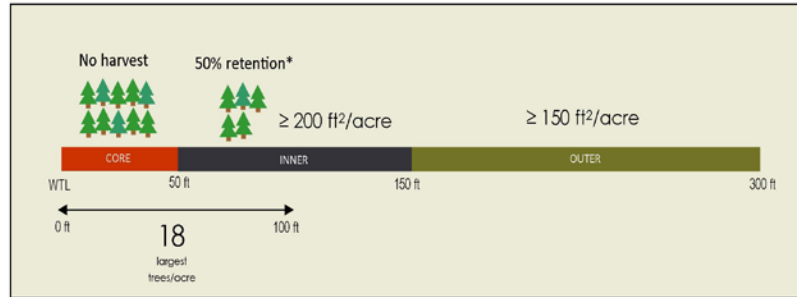
= 10% canopy retention

CLASS I

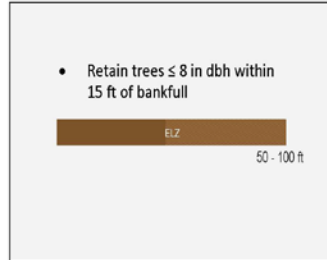
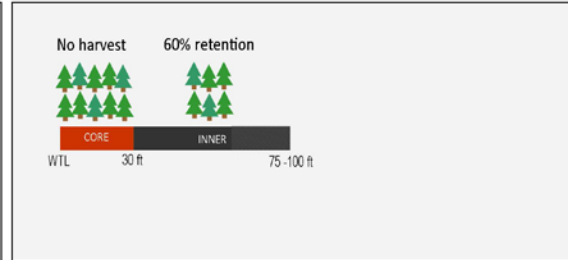
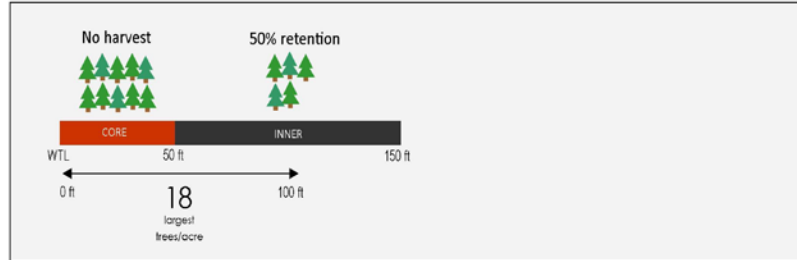
CLASS II

CLASS III

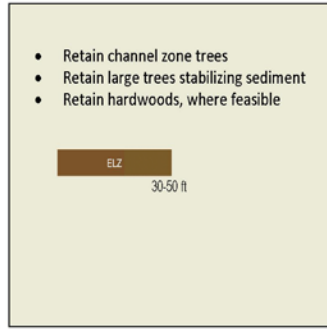
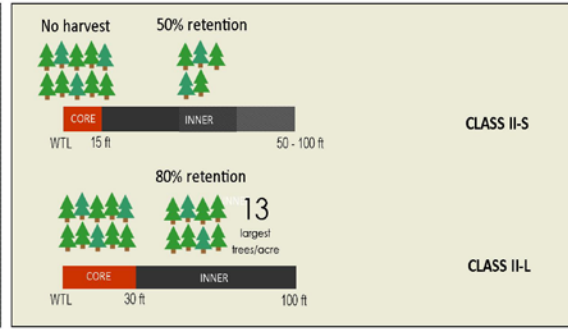
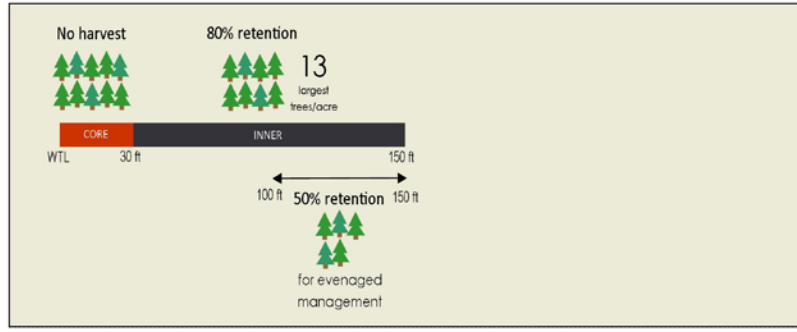
DRAFT WDR
PROPOSED
RIPARIAN
REQUIREMENTS



HUMBOLDT
REDWOOD
COMPANY
ELK RIVER ROWD
SEPTEMBER 2015



FOREST
PRACTICE
RULES 2015
ANADROMOUS
SALMONID
PROTECTION RULES



MENDOCINO
REDWOOD
COMPANY
HCP APPENDIX W

