

6088 Elk River Road
Eureka, CA 95503
18 January, 2016

Northcoast Regional Water Quality Control Board
5550 Skylane Blvd
Santa Rosa, CA 95403
www.waterboards.ca.gov/northcoast

Dear Members of the Board,

Allow me to add to the 18 November comments made on behalf of Friends of Elk River, and to follow up on another reading of the Waste Discharge Requirements and the recent visit to Elk River by two of your staff members.

Let me first say thank you for your time with all these documents, and for your staff's time, and for the exceptional diligence of Matthew St. John and Fred Blatt in coming up here through the rain to talk to those whose lives and property are most directly affected by degraded water quality.

1. The condition of the river is worsening, and the threat to life and property becoming more alarming. Residents and your studies alike say that zero sediment should be added to the river. None of us can understand why you then propose to allow logging to continue. The only possible conclusions are not flattering to you or your staff, and don't require repetition.
2. The prohibition on winter operations, limits on harvest rates, higher retention and enlarged buffer zones, the moratorium on high-risk watersheds, the prospect of restoration—all these are appropriate and timely measures. But they assume that logging must continue.
3. The proposed remedies are arrived at by mathematical estimates, the benefits theoretical and unproven. (Matt St. John said "I believe" at least a dozen times.) Allowing **any** activity known to contribute sediment will have effects that have been measured and experienced for decades. The difference between Water Quality's hopeful projections and the facts we live with are as clear as the difference between pie in the sky and mud.
4. Consistency with the data, the studies, and facts you have before you, require that you include Elk River's North Fork in the list of high-risk watersheds. Its fine particles of already-eroded hillside are just as susceptible to disturbance as the Hookton formation of the South Fork. Again, it's plain as mud.
5. And finally, process. a) The language of the WDR is at times nearly opaque. If you really mean to communicate with the public, your staff should include a professional

editor. b) The “exceptions may be made” clause (58) effectively removes the teeth from the WDR’s strongest measure. Giving this decision-making power to your Executive Officer removes governance even farther from the public’s participation. c) Allowing the public the minimum 60 days, during the holidays, to understand the meaning and implications of the WDR assures minimal input. The WDR should remain open for written comment until after your staff’s February 5 public workshop in Eureka. Two hours of talk on a dark and windy night is a well-intentioned gesture, but is not adequate to the task.

Sincerely,

Jerry Martien