

Proposed Waste Discharge Requirements for  
Nonpoint Source Discharges and Other  
Controllable Water Quality Factors 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. 3 May 12, 2016

Jim Burke



# Presentation Outline

- ❖ Status update and overview
- ❖ Public comments and responses
- ❖ Revisions to proposed Waste Discharge Requirements (WDRs)
- ❖ Questions and public comments

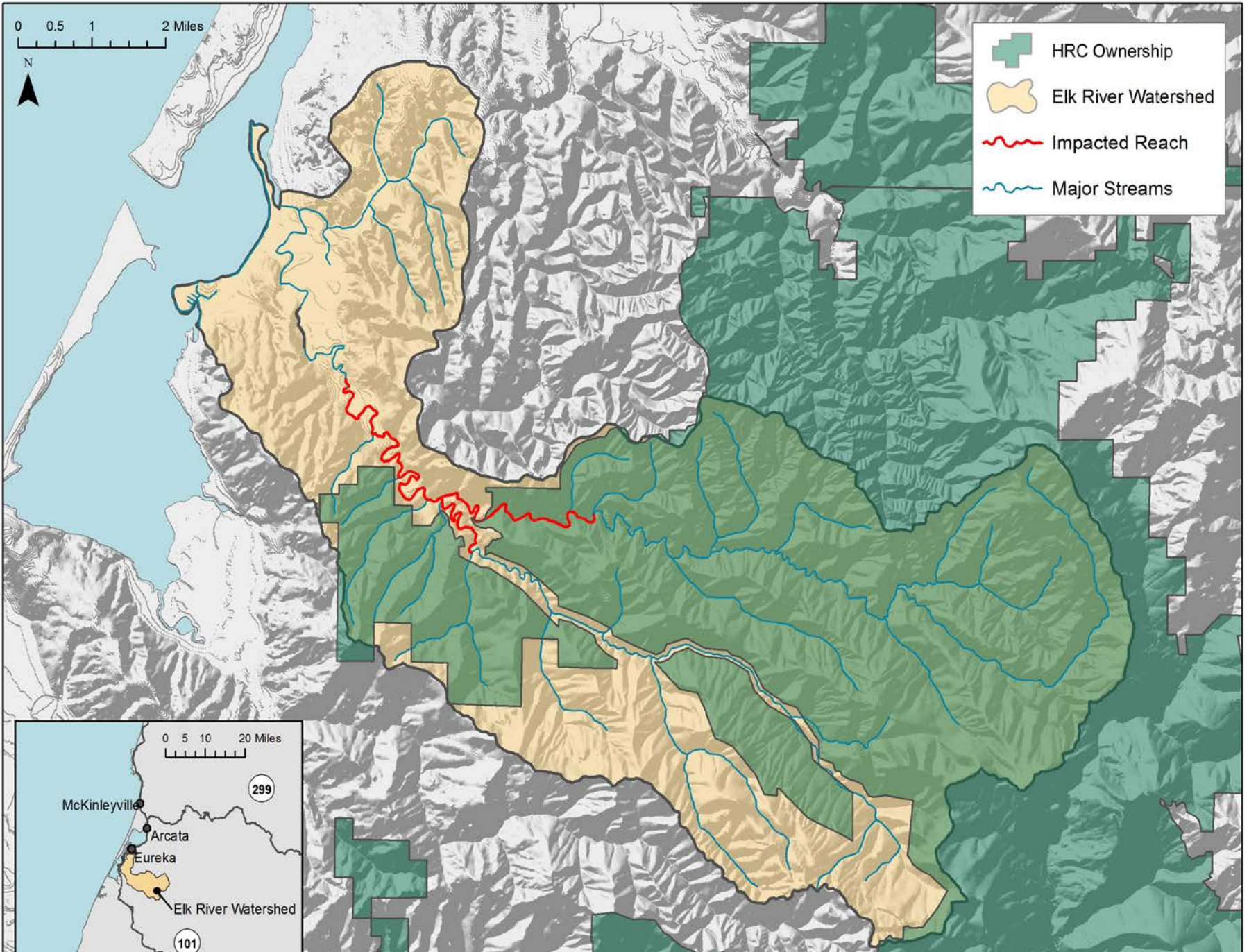
# Timeline

- ❖ November 18, 2015 – Board workshop
- ❖ December 4, 2015 – Begin public comment period for Draft WDRs and Mitigated Negative Declaration
- ❖ January 19, 2016 – Close of public comment period

# Overview

- ❖ Establishes enforceable provision to implement water quality requirements
- ❖ The proposed WDRs replace HRC's existing Elk River WDRs and Cleanup and Abatement Orders
- ❖ Relies largely on HRC's Report of Waste Discharge





# Overview

- ❖ Identify and treat existing sediment sources
- ❖ Prevent creation of new sources
- ❖ Monitoring and reporting

# WDR Requirements

- ❖ Harvest limits
- ❖ Temporary harvest prohibition in high risk subwatersheds
- ❖ Enhanced riparian management zones (RMZ)
- ❖ Feasibility study to control in-stream sediment sources
- ❖ 5-year check-in with Board



# Summary of Comments

- ❖ Written comments by twenty individuals
- ❖ Commenters opinion generally split:
  - Permit is too lenient
  - Permit is too stringent



# Adequacy of the ROWD

- ❖ Net reduction in sediment over existing conditions
- ❖ Need water quality protection above that provided by ROWD
- ❖ Alternative methods of compliance

# Other Comments

- ❖ Harm to residents and beneficial uses
- ❖ Prohibition applies only to South Fork Elk subwatersheds



# Revisions

- ❖ Riparian protection
- ❖ Removed expanded Class I RMZ
- ❖ Revised RMZ tree retention requirements to percent canopy:
  - 60% for Class II
  - 70% for Class III

# Other Revisions

- ❖ Temporary prohibition
  - Removed limited lifting
  - Clarified lifting of prohibition subject to public comment and Regional Board decision
  - Allowing exception for Railroad Gulch study
- ❖ Wet weather requirement changed to precipitation threshold




# Summary

- ❖ 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

# **Staff recommendation:**

Adopt proposed Order No. R1-2016-0004



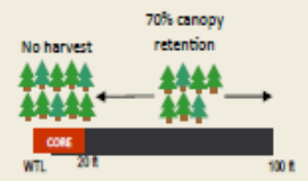
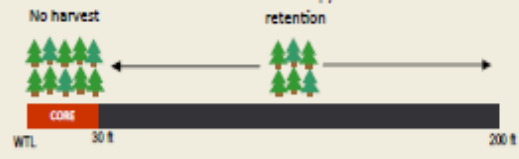
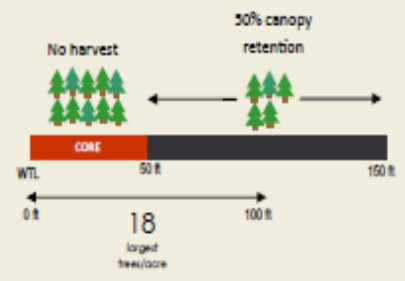
 = 10% canopy retention

# CLASS I

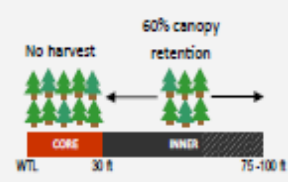
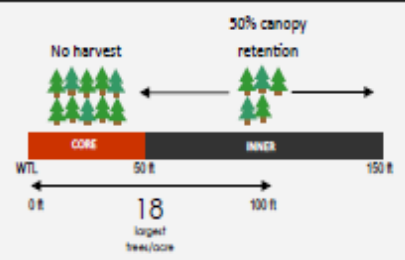
# CLASS II

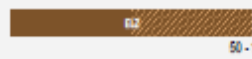
# CLASS III

PROPOSED WDR RIPARIAN REQUIREMENTS

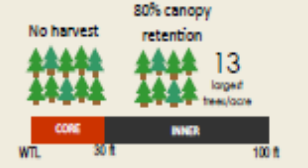
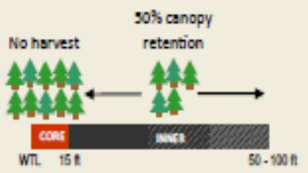
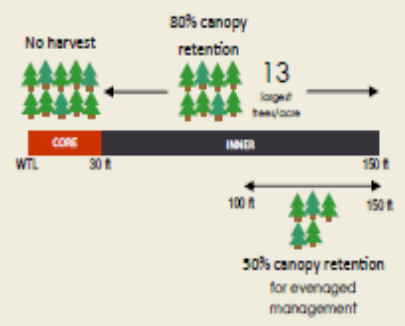



HUMBOLDT REDWOOD COMPANY ELK RIVER ROWD SEPTEMBER 2015



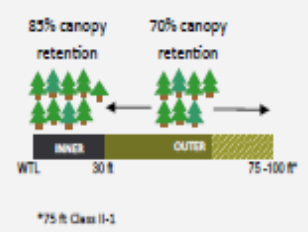
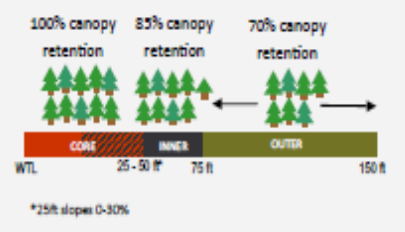
- Retain trees  $\leq 8$  in dbh within 15 ft of bankfull
- 

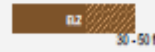
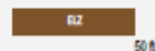
FOREST PRACTICE RULES 2015 ANADROMOUS SALMONID PROTECTION RULES



- Retain channel zone trees
  - Retain large trees stabilizing sediment
  - Retain hardwoods, where feasible
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GREEN DIAMOND RESOURCE COMPANY Elk River/ Salmon Creek Management Plan



- Tier A (slopes <math>\leq 30\%</math>)
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- Retain channel zone trees
  - Retain 15 sq ft of basal area hardwoods per acre
- \*30ft slopes <math>< 30\%</math>
- Tier B (slopes <math>> 30\%</math>)
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- Retain channel zone trees
  - Retain one conifer  $\geq 15$  in dbh per 30 ft of stream length