

April 15, 2019

North Coast Regional Water Quality Control Board  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403  
James.Burke@waterboards.ca.gov

Re: Waste Discharge Order No. R1-2019-0021  
Subsequent Mitigated Negative Declaration and WDR For Upper Elk River

Dear Members Of The Board:

Thank you for another opportunity to comment on your plans for Elk River's recovery. If you'll forgive a severely impaired metaphor, this latest plan is the best example I have ever seen of rearranging the deck chairs on the Titanic.

I know you've had help. This great wooden boat is originally the work of Cal Fire, built for an extended voyage around the Forest Practices Act. But it's also the creation of your State Board, which instead of rejecting outright your deeply flawed TMDL Action Plan, sent it back for new waveslope indicators. And it's partly the design of your own staff, who after 20 years have learned better than to offer any substantive plan for Elk River's recovery. But I give your board most of the credit.

First, and most notably, you made space for hundreds of first-class staterooms, plus the John Fisher ballroom, when you jettisoned all those years of input from residents and affected parties. Personal testimony, pleas and petitions, photos and documents, peer-reviewed studies, a restoration summit, a public forum, the life boat proposal known as Plan B, with its moratorium on logging in sensitive watersheds, no winter ops, a lot of troublesome mile posts and monitoring—all of that, over the side.

I can't give you full credit for abandoning the rest of the life boats. The Recovery Program was probably doomed when Humboldt County and State Ag jumped overboard before leaving the harbor. But I'm confident you'll steer the great ship TMDL remotely from Santa Rosa. And really, with ponds for fish, ponds for sediment, and a rising tide to float your boat, who needs a river?

I wish you smooth sailing, and will be among the crowd at the launch cheering for those post-harvest percentages and canopy calculations. And hey, over there, where those life vests were, I see room for a few more chairs.

Bon voyage,

Jerry Martien for Friends of Elk River