

North Coast Regional Water Quality Control Board

Gualala Roads Assessment Order

Frequently Asked Questions - April 2026

This document answers frequently asked questions that staff of the North Coast Regional Water Quality Control Board's (North Coast Water Board's) Watershed Assessment and Recovery Unit has received during outreach with the community on the development of orders to address sediment pollution from private, rural roads in the Gualala River Watershed.

The Gualala Roads Assessment Order (Assessment Order) will require certain landowners in the watershed to inventory, assess, and prioritize rural roads on their property. A later regionwide roads order will require Gualala River Watershed landowners to implement treatments identified through Assessment Order compliance.

Both orders remain under development and descriptions of order requirements are preliminary until adopted by the North Coast Water Board. Each order will go through separate public processes through which interested parties can review and provide comment on draft orders.

1. Why are roads the focus of water quality conditions in the Gualala River Watershed?

The Gualala River Watershed is listed on the US Environmental Protection Agency's (US EPA's) Clean Water Act section 303(d) List of Impaired Water Bodies due to sediment pollution. More than 85% of the human-caused sediment pollution originates from roads. While permits that regulate roads are already in place, for example, those that regulate timber harvests or vineyard operations, a gap in coverage exists wherein private, rural roads not covered by those other permits remain unaddressed by Water Board regulations.

2. How will the orders help improve water quality?

Road treatments will improve drainage to reduce erosion potential, preventing excess sediment runoff to watercourses. Controlling sediment loads will help improve habitat for sensitive aquatic species such as salmonids and protect the quality of water for domestic, municipal, and agricultural uses.

3. What kind of orders are being developed?

Two orders are being developed: a watershed-specific order called the Gualala Roads Assessment Order, or Assessment Order, and a regionwide roads order. The Assessment Order is a Water Code section 13267 investigative order requiring the submission of roads

assessment data in the form of a road management and treatment plan. North Coast Water Board staff are still determining the most appropriate type of order with which to issue regionwide roads requirements.

4. Why not issue all requirements in a single order?

The North Coast Water Board is developing two orders to address sediment pollution from rural roads in the Gualala River Watershed as a way to strike a balance between the need to maintain reasonable enrollment costs and the Water Board's obligation to meet the terms of a stipulated settlement agreement with Friends of Gualala River, which requires expedited development of a watershed-specific order, in this case the Assessment Order.

Road-related sediment pollution is an issue throughout much of the region and the North Coast Water Board has long recognized the need for a single, comprehensive program to address this issue consistently throughout the region. Developing a regionwide roads order allows staff to develop uniform requirements for road management rather than addressing issues watershed-by-watershed. This broader approach expands the number of participating landowners, which in turn lowers permit fees for Gualala landowners compared to the earlier, more limited framework.

5. When will the orders be issued?

North Coast Water Board staff are targeting a December 2026 adoption hearing for the Assessment Order and spring 2029 for adoption of the regionwide roads order. The orders will be issued and legally enforceable after a public review process and adoption by the North Coast Water Board.

6. What does a road assessment entail?

Road assessments will consist of inventories and assessments of all applicable road segments, including evaluations of hydrologic connectivity and episodic sources of sediment such as stream crossings and road fill failures. Assessment findings will be used to develop road management and treatment plans that will include elements such as background information, a field inventory of road-related sediment sources, data tables and analyses, and a prioritization of roads for future treatment.

7. When would landowners have to meet the requirements of the orders?

Compliance schedules will be part of each order and will be shared when the drafts become available for public review. North Coast Water Board staff intend to develop order timelines that maximize landowner flexibility while remaining protective of water quality.

8. What kind of public process will take place in order development?

Both the Assessment Order and regionwide roads order will be available for public review in advance of their respective adoption hearings. Public engagement on the Assessment Order also includes an ongoing series of community meetings held every few months, recurring informal staff office hours, and one-on-one engagement upon request.

Details of the regionwide roads order engagement strategy are still being developed. Staff anticipate initiating this effort in summer 2026.

9. What support does the North Coast Water Board have available for landowners subject to these orders?

The North Coast Water Board has secured \$5 million in contract funding to support Gualala landowners. These funds are being used to (1) develop technical reports that will inform assessment methodologies, (2) conduct community outreach, (3) provide landowner trainings on road improvement techniques, and (4) conduct road assessments.

Road assessments completed with contract funds will be carried out in collaboration with landowners, allowing for consideration of a landowner's operational needs, past property conditions, and planned land management activity.

10. What are the expected costs of compliance with each order?

As noted above, the North Coast Water Board has contract funding available to support Gualala landowners in completing road assessments required of the Assessment Order. Landowners who decline or do not qualify for this support¹ will be required to conduct assessments independently at rates that could range from \$3,500/mile to \$4,000/mile².

The cost of implementing treatments required by the regionwide roads order will vary widely depending on the type of treatment, accessibility of the property, and industry rates at the time of implementation. Drainage improvements such as road shaping and rolling dip installation can be completed with minimal if any material needs, potentially requiring only an excavator and trained operator. Culvert replacement, on the other hand, can be more expensive, often totaling tens of thousands of dollars. Staff anticipate the regionwide

¹ If demand for assessment support exceeds the capacity of the available funds, the North Coast Water Board may need to establish assessment support priorities that determine which properties will qualify for support. These priorities could be based on relative risk to water quality on a subwatershed and/or road network basis. The Assessment Priorities report under development by the Sonoma RCD will be used as a tool to guide this prioritization.

² Estimates of assessment cost varies based on the density of a road network and the road management class, e.g., maintained, seasonal, or abandoned roads. Estimates are based on professional judgement of North Coast Water Board technical staff with prior experience conducting and overseeing this type of work.

roads order to focus on drainage improvements, with culvert replacement required when needed.

There will be no enrollment fees associated with the Assessment Order, only the regionwide roads order. North Coast Water Board staff are contemplating ways to make the orders reasonable and easy to comply with.

11. How would past road assessments be credited toward compliance with the orders?

Past assessment work would be considered for order compliance if it can be demonstrated to be valid by meeting criteria currently under development. Specific details will be available when the draft orders are released for public review.

12. Who will conduct assessments?

Qualifying landowners who accept the North Coast Water Board's contracting support will have their assessments conducted at no cost to them by one of two contractors: the Sonoma Resource Conservation District (Sonoma RCD) or a second contractor soon to be determined.

Landowners who do not qualify for or who decline assessment support will have to conduct assessments independently and will be able to choose their preferred contractor, provided they meet the criteria that will be outlined in the draft Assessment Order. Landowners will have to pay out-of-pocket for assessments conducted independently.

13. What happens if a landowner denies the North Coast Water Board and their contractors access to their property for assessments?

Neither North Coast Water Board staff nor their contractors will access properties without the consent of landowners. If a landowner chooses to accept contract-funded assessment support, the terms of property access will be detailed in a land access agreement between the landowner and North Coast Water Board contractor(s).

14. How would the orders define "roads"?

A decision on which types of roads will be subject to the orders is actively being considered by North Coast Water Board staff. It is common practice for road-related sediment investigations like the assessments required by the Assessment Order to apply to the entire road network, including both active and abandoned roads, roads adjacent to permanent streams and those at a greater distance. While other decisions remain to be made, skid trails are not currently considered for inclusion.

15. Why will requirements be included in orders instead of in a Total Maximum Daily Load (TMDL) Action Plan like other impaired waterbodies, like the Garcia River Watershed?

In the 25 years since the Garcia TMDL Action Plan was adopted, the North Coast Water Board has moved towards permits and other orders as the primary implementing tools of TMDL action plans, as they are easily and efficiently enforceable. This provides a level of adaptive management that is not feasible when included directly in an action plan, in part because altering action plans requires time- and resource-intensive amendments to the Water Quality Control Plan for the North Coast Region, also known as the Basin Plan.

16. How would the orders apply to ownerships covered by other water quality permits, such as timberlands?

Both the Assessment Order and regionwide roads order are being designed to fill the gaps in regulatory coverage of rural roads. Some existing permits, such as waste discharge requirements for timber harvests, include robust road requirements. Existing regulatory coverage would not be duplicated and could instead be used to demonstrate a degree of compliance with the Assessment Order and regionwide roads order.

17. What is the Sonoma RCD's role in order development?

The Sonoma RCD is not involved in regulatory decision-making and does not have a role in developing the content of the Assessment Order or regionwide roads order.

The Sonoma RCD is tasked with developing technical reports that will inform assessment methodologies, conducting community outreach, providing landowner trainings, and conducting road assessments.

18. What is the TAC's role in order development?

The TAC is not involved in regulatory decision-making and does not have a role in developing the content of the Assessment Order or regionwide roads order.

In developing technical reports, the Sonoma RCD has established and actively manages a Technical Advisory Committee (TAC) that provides feedback on and ensures the scientific rigor of their reports.

19. What qualifications do TAC members hold?

TAC members were selected for their expertise in rural road design and engineering, watercourse crossing design and engineering, erosion and sediment control, hydrology, fisheries biology, geology, and/or regional knowledge.

The TAC includes several contracted seats selected through a request for qualifications process that was managed by the Sonoma RCD. It also includes several seats filled by

staff of state agencies, Tribes, and local advocacy groups who were invited directly, without the need to compete through the request for qualifications process. The organizations invited directly to participate in the TAC were chosen for their technical expertise, knowledge of the watershed, and to ensure the representation of a diversity of perspectives.

20. What documents are the Sonoma RCD preparing in consultation with the TAC?

The Sonoma RCD is developing the following documents: (1) a watershed overview report that summarizes the contemporary watershed conditions, (2) a prioritization framework that establishes assessment priorities, (3) a prioritization assessment report that identifies high priority sub-watersheds and road networks, (4) an evaluation methodology that will guide on-the-ground assessments carried out by the Sonoma RCD and another contractor soon to be determined, and (5) a road inventory report that summarizes on-the-ground assessments.

21. How will the documents the Sonoma RCD is developing be used in order development?

The watershed overview report, prioritization framework, and prioritization assessment report will primarily guide the North Coast Water Board's decision-making in distributing assessment support. Funding distribution decisions will only be necessary if more assessments are requested than can be provided with the available funds.

The evaluation methodology will be used to establish recommended assessment protocols for Assessment Order compliance. The Executive Officer of the North Coast Water Board will consider requests to use equivalent methodologies from those who conduct independent assessments.

The road inventory report will be used to develop road management and treatment plans for landowners to submit to the North Coast Water Board for Assessment Order compliance.

22. Why would the Assessment Order apply only to landowners with property of 1,000 acres or more?

The Assessment Order will apply primarily to ownerships of 1,000 acres or more, but properties whose roads are determined by the North Coast Water Board's Executive Officer to pose a significant risk to water quality will also be subject to its requirements.

Using ownership size as a threshold for order applicability allows the North Coast Water Board to maximize the total length of roads addressed by the order while maintaining a manageable number of ownerships for whom staff can provide meaningful support in navigating order compliance.

23. How would the North Coast Water Board determine if a property under 1,000 acres poses a significant risk to water quality?

Determinations of risk to water quality will be made on a case-by-case basis. Community members can bring concerns to the North Coast Water Board's attention by reaching out directly to staff of the Watershed Assessment and Recovery Unit or by reporting an environmental concern through the California Environmental Protection Agency's complaint system, found at <https://calepa.my.salesforce-sites.com/complaints/Complaint>.

24. Would the orders apply to county roads?

No, county roads would continue to be regulated through a separate program that uses the 5C Road Management Waiver. Community members with concerns about sediment pollution from county roads are encouraged to contact the program liaison, Maggie Robinson, at maggie.robinson@waterboards.ca.gov.