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March 12, 2009

Ms. Catherine Kuhlman California Regional Water Quality Control Board North Coast Region 5550 Skylane Blvd, Suite A Santa Rosa, CA 95403

Subject: Enrollment of THP 1-05-123 HUM (Unit 3) in the Freshwater Creek WWDR, "Tier II"

Dear Ms. Kuhlman:

HRC is requesting Tier II enrollment under Watershed-Wide Waste Discharge Requirement (WWDR) Order No. R1-2006-0041 for unit 3 of THP 1-05-123 HUM. This unit is comprised of 28.3 acres of Selection (14.2 clear-cut equivalent acres). Total acres currently enrolled or proposed for enrollment under Order No. R1-2006-0041 Tier II is shown in the Attached Pre-Harvest Planning Report provided by Forester, Mr. Wayne Rice. The Erosion Control Plan (ECP), Form 200 and an annual waste discharge enrollment fee have already been submitted for this THP.

Landslide risks associated with this plan were evaluated in compliance with the Freshwater Creek and Elk River WWDR Permit Acreage Enrollment and Compliance Monitoring Program Quality Assurance Project Plan (Version 2.0, September 1, 2006) approved by the Executive Officer of the North Coast Regional Water Quality Control Board. This approach uses commonly accepted standards for geologic practices in forest management (Sidle et al. 1985, Soeters and Van Western 1996, and Sidle and Ochiai 2006) to assess factors known to contribute to landslides, such as steepness of slope, slope convergence, hydrology, geologic features, and visibly unstable areas. Overlapping and complementary scientific techniques combining state-of-the-art digital elevation model (DEM) slope stability models, field investigation, and terrain analysis were used in this assessment.

In summary the Unit occupies moderate to gently inclined slopes within a mapped unit wide dormant mature earthflow. The earthflow is occurring within mélange rocks of the Franciscan Central Belt Complex. The earthflow has shown no reactivation in response to timber harvest activities that initiated at the turn of the century. The current proposal is to selectively harvest timber from the slope using both cable and ground based technology. The silviculture amended to the plan in response to the new ownership is selection. The selection harvest will target a retention of 100 ft² of basal area per acre. Standard HCP Riparian Management Zones (RMZ) apply to Class II watercourses and the Forester has implemented a Class III RMZ to prevent extensive cutting within and adjacent the watercourses. Although likely within a large dormant mature earthflow, the proposed activities are not anticipated to result in a significant change to the current stable configuration of the slopes underlying the unit. Based on our review, we consider this proposed harvest to meet the requirements for Tier II enrollment.

The THP proposes an uneven-age silviculture retaining 100 sqft of basal area. Sub-merchantable trees and those with specific wildlife value characteristics (e.g., cavities, large limbs, broken tops, snags, etc.) will be retained within the harvest area to the extent feasible. Cable and ground based yarding is approved for the unit. Post-harvest no site preparation will occur.

Greater detail regarding this landslide hazard assessment is provided in the attached *THP Unit Review for Tier 2 Enrollment*. The licensed geologist involved with the Tier 2 landslide risk evaluation has concluded the proposed harvest operation, if implemented as planned and approved, will result in a negligible increase in potential for post-harvest landsliding; and thereby meets the applicable Zero Delivery of landslide related sediment performance standards of NCRWQCB Orders R1-2006-0041 and R1-2008-0071.

Please do not hesitate to contact me should you have any questions or comments regarding this application for enrollment into WWDR (Order No. R1-2006-0041).

Respectfully,

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Wayne D. Rice, RPF Humboldt Redwood Company, LLC

<u>Attachments:</u> Professional Certification of Design THP Unit Review for Tier II enrollment Pre-harvest Planning Report Unit Specific ECP Maps

hereby certify, in accordance with North Coast Regional Water Quality Control Board (NCRWQCB) Order Nos. R1-2006-0039 and R1-2006-0041, that the attached application and the description of THP modifications, and the materials submitted along with:

THP No. <u>1-05-123 HUM (Mid Incline)</u>

Unit #__3___

- a. are in accordance with accepted practices, and recognized professional standards;
- comply with the requirements of the Monitoring and Reporting Program No. R1-2006-0103, approved by the Executive Officer of the North Coast Regional Water Quality Control Board; and
- c. provided that the THP is properly implemented, operated, and maintained, are adequate for the THP to meet the applicable Zero Net Delivery performance standards of NCRWQCB Orders R1-2006-0039, R1-2006-0041, and R1-2006-0103, insofar as such performance can reasonably be predicted by accepted engineering geologic practices.

The opinions presented in the subject THP have been developed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable engineering geologists practicing in this or similar localities. No other warranty, expressed or implied, is made as to the professional advice included in this report.



THP: Mid Incline THP 05-123 Unit # 3 3-10-09

Tools Used in This Assessment	Figure Number
Elevation Map with 10 ft Contours (HRC LiDAR)	1
SHALSTAB (Montgomery and Dietrich, 1994 and Palco, 2006) / Slope Class / Hillshade Maps	2
CGS Geology and Geomorphic Features (CGS, 1999)	3
Mass Wasting Potential Map (HRC, 1999)	4
Aerial Photo Map (HRC, 2007)	5
HRC Freshwater Creek WA deep-seated LS inventory (HRC, 2001)	6
Road Condition Map	7

Please see back of enrollment for references

Summary of Changes to THP Prescriptions Based on Tier II Analysis in this Unit:

Geologic Review	Forestry Silviculture/Site Prep Plan	Operational Design Plan
3-1	For reasons other than slope stability hazard, silviculture is now Selection with a target retention of 100 ft ² of basal area per acre. No site preparation will occur due to partial harvesting.	No change to approved yarding methods.



Geological Summary (information presented from existing bodies of work):

The harvest unit occupies north facing, gently inclined slopes underlain by a dormant earthflow. The earthflow is occurring within mélange of the Franciscan Central Belt and is in fault contact with the upper unit of the Wildcat Group to the west (Figure 3). No other geomorphology associated with mass wasting has been mapped by CGS.

Remote Watershed Analysis mapping (Figure 6) presents the same CGS mapped earthflow, however, reduces its size (area), and interprets the feature as having high potential for re-activation. A smaller low to moderate hazard deep-seated landslide is mapped as underlying the northwestern tip of the unit.

Hillslope Shade Relief review (figure 2) shows low gradient slope inclination, along with irregular topography underlying the unit. This morphology is consistent with mélange terrain and/or regional dormant mass wasting. The margins of the mapped earthflows (Figure 3 and 6) are not obvious and may have been interpreted due to the general and regional irregular surface morphology. The prominent watercourses appear moderate to poorly entrenched, linear in alignment, and without significant alteration to the channels from any recent earthflow deformation.

Geologic field review of these two potential earthflows indicates a dormant-mature status. No evidence of active or historic movement in response to the initial harvest was observed. No unstable areas were found with the harvest unit boundaries. The THP was reviewed by various agencies including CGS during PHI and found to be compliant with the Forest Practice Rules with respect to the disclosure of all known unstable areas.

The THP was developed and assessed with respect to clearcut silviculture. Due to new management, the silviculture has been amended to selection with a target retention of 100 square feet of basal area per acre. New road construction has been planned and approved to accommodate harvest.

Due to the uniform attributes associated with the unit and the limited potential mass wasting hazard present, the unit has been treated as a whole, or single polygon, for discussion purposes



THP Unit: #3 Polygon: 3-1

A) General Observations

The harvest unit includes two Class II and numerous Class III watercourses. A Class II watercourse (3a) is located in the western 1/3 of the unit with its upper extent defining the southwestern harvest boundary. The watercourse occupies a marginally well developed channel that is flanked by slopes predominantly less than 40 percent; with a few localized slopes up to 50 percent. SHALSTAB modeling indicates low mass wasting hazard within and adjacent the watercourse (figure 2). Low Mass Wasting Potential (MWP) is modeled for all but the upper extent of the watercourse, where moderate to high hazard is modeled in response to the potential presence of a deep-seated earthflow.

Watercourses 3b, 3c and 3d are seasonally-flowing Class III streamlets located in the northwestern corner of the harvest unit. The channels are moderately developed and flanked by slopes inclined between 20 and 40 percent. Moderate MWP is modeled encompassing watercourse 3b and a small portion of 3c. SHLASTAB modeling throughout the area ranks mass wasting hazard as low.

Watercourse 3e extends upslope and south from the western Class II (3a) and through the unit. The watercourse crosses low gradient (10-30%) slopes and is poorly defined. SHALSTAB models low mass wasting hazard. MWP is modeled as moderate with two locations of high potential; and the entire watercourse is located within a deep-seated landslide as remotely identified by both CGS (Figure 3) and Freshwater Watershed Analysis (Figure 6). Field review found no indication of active or historic instability associated with this watercourse or the deep-seated feature as a whole.

Watercourse 3f originates from within the harvest unit and drains north out of the unit.

Watercourse 3g is a Class II stream with a poorly to moderately defined channel and short, moderately inclined sideslopes (10 - 50%). The watercourse is located within the remotely mapped earthflow/deep-seated landslide (figures 3 & 6). SHALSTAB modeling rates mass wasting hazard for the areas surrounding the stream as low. MWP in the vicinity of the stream is predominantly moderate with a short segment near the top of the watercourse modeled as high potential. Geologic field review found no indications of recent activity or evidence to suggest that the initial harvest, 100 years ago, resulted in re-activation of the earthflow in this area. An old skid trail partially diverts this Class II stream during high winter flows. The diverted flow concentrates along and down a skid trail and has been designated as a Class III watercourse (3h), although it infiltrates back into the ground, dissipating prior to reaching any higher order watercourse.



A) General Observations

Watercourse 3i is a Class II seep/wet area resulting in large part from legacy logging operations (i.e. steam donkey skid trails). The watercourse is in the form of 'T' with a portion of the channel oriented perpendicular to slope. This wet area is located within the large landslide mapped in Figures 3 and 6, with MWP modeled as moderate and low. SHALSTAB models the area as low hazard.

Typical Riparian Management Zones for the Class II watercourses includes a 30-foot no harvest inner band and a selection buffer that extends the RMZ out to between 75 and 100 feet. The outerband may be harvested but must retain a minimum of 60% canopy closure.

The implemented THP mitigation for the Class III watercourses includes the retention of all trees growing within the active channel and all trees 8 inches and less within 15 feet of the channel. The new silviculture has bolstered Class III mitigations to include a 50' RMZ where side slopes greater than 50% exist and maintaining 75 sq. ft evenly distributed in the buffer. Where side slopes are less than 50% employ a 25' RMZ that maintains 75 sq. ft evenly distributed in the buffer and no group opening greater than ¼ acre immediately above the terminus of class III with slopes greater than 40% or immediately above a headwall swale. Additionally sub-merchantable trees and those with specific wildlife value characteristics (e.g., cavities, large limbs, broken tops, snags, etc.) will be retained within the harvest area to the extent feasible.

No unstable areas were observed during THP layout.

B) Harvest Related Impacts and Hillslope Sensitivity

Lack of any observable evidence of historic landsliding within the planned harvest portions of the unit, suggests that legacy ground-based activities did not exceed slope stability thresholds. The slope has experienced clearcut, burning and donkey yarding (a legacy method that dragged the large diameter, felled timber to railroads).

The low landslide hazard modeled by SHALSTAB is indicative of the low gradient topography and lack of overly convergent slopes.

Geologic Review of the various mapped earthflows has been conducted by two licensed geologists, and the California Geologic Survey (CGS). No evidence of historic or recent movement has been observed, despite ground-disturbing legacy operations and subsequent road system construction, and the features have been classified as dormant-mature. Unit 3 of the Mid-Incline THP occupies approximately one-third of the landslide mapped in Figure 3 and one-fourth of the landslide as mapped in Figure 6. This limited footprint is not



B) Harvest Related Impacts and Hillslope Sensitivity

anticipated to re-activate the feature or otherwise increase potential for mass wasting as contemporary logging operations are planned and implemented in a manner causing significantly less ground disturbance than historic practices. In addition, with the transition to selection harvesting, a prominent stand of timber will remain post harvest.

The current approved THP includes a ground-based yarding option for approximately two-thirds of polygon 3-1 with mitigation including:

- no winter operations;
- use of existing skid trails to extent feasible;
- minimal blading and new skid trail construction;
- no new skid trail construction on slopes >50 percent;
- installation of waterbreaks;
- equipment exclusion zones adjacent to watercourses;

These mitigations in combination with the low gradient terrain mean adverse effects to existing slope stability as a result of the planned project are highly unlikely.

The MWP modeled moderate and high hazard designations are based on assumption that this earthflow is active; while in actuality further focused review has determined the feature to be dormant-mature.

The extensive RMZs were designed to provide sediment filtration bands adjacent the watercourses should extensive sediment be generated from the clearcut harvesting. The current level of harvest will retain both canopy closure and slash from the harvested trees potentially increasing the effectiveness of the sediment filtration band.

C) Forestry / Silviculture Plan

The THP has been amended to Selection Silviculture with a target retention of 100 square feet of basal area per acre. The silviculture change in response to a management change and not perceived unstable conditions. No other tier II mitigations were deemed necessary.

Site preparation has been changed to none.



C) Forestry / Silviculture Plan

D) Operational Design Plan

THP approved yarding method for this polygon is ground based yarding in the east and cable yarding (including tractor long lining) in the west.

References:

- CGS, 1999, Geologic and Geomorphic Features Related to Landsliding, Freshwater Creek, Humboldt County, California. DMG Open-File Report 99-10. Available via the web at <u>http://www.conservation.ca.gov/cgs/fwgp/Pages/fresh.aspx</u>
- Montgomery, D.R. and W.E. Dietrich, 1994. A physically based model for the topographic control on shallow landsliding. Wat. Resour. Res. 30: 1153-1171. For specific details regarding the model used in this evaluation, please see Palco, 2006. Additional information from the model authors is available at the following website: http://socrates.berkeley.edu/~geomorph/shalstab
- HRC, 2007, Ortho-photo rectified aerial photographs flown by 3Di West, Eugene Oregon,
- HRC, 2008. Freshwater Creek and Elk River WDR Permit Acreage Enrollment and Compliant Monitoring Program, NCRWQCB R1-2006-0039 and R1-2006-0041, Quality Assurance Project Plan, Version 3.0. Policy document submitted to NCRWQCB dated June 7, 2006.
- HRC, 2001, Freshwater Creek Watershed Analysis, prepared for Pacific Lumber Company (PALCO) dated January 2001, and acquired by Humboldt Redwood Company, LLC in 2008.
- HRC, 2002, (Policy Acquired from The Pacific Lumber Company (PALCO)) Prescriptions Based on Watershed Analysis for Freshwater Creek, California, August 15, 2002.
- HRC, 1999, The Pacific Lumber Company's Habitat Conservation Plan, Vol. 2 Part D, Landscape Assessment of Geomorphic Sensitivity, Public Review Draft.

Brief descriptions of the models used in this evaluation:



SHALSTAB was first described in Dietrich and Montgomery (1994). SHALSTAB is a simple, physically-based model based on the Mohr-Coulomb failure law that can be used to map shallow landslide potential. The model calculates the potential for failure using gridded digital elevation data. The simplicity of the model lies in the formulation of slope stability parameters that allow the model to be run parameter-free using default values suggested by the authors or determined by local measurement. Because the model uses no field measurements of critical characteristics that determine slope stability, the evaluation of potential instability is only an approximation. In applying SHALSTAB for Tier 2 enrollment, HRC has run the model on a 10-m spatial grid using LiDAR elevation data and applied the parameters as suggested by the model authors. HRC's application of the method and parameters is described in HRC (2008).

Mass Wasting Potential (MWP) modeling is a cursory regional assessment that numerically values soil, slope inclination, geology type, and geomorphology with respect to past mass wasting (HRC, 1999). The sums of the values specific to an area are measured against a set ranking system that extends from very low to extreme. The models intent is to highlight areas of high potential for instability at the planning level. The model's use at the site specific level is limited in that pedogenic soil types are used, not textures, the geologic formations utilized provide one value for all of the incorporated facies, and the model is heavily biased if past mass wasting has occurred or has been mapped as occurring in the area.

				Silvic	ulture			Haz	zard
THP Name	THP Number	Unit Number	CC	ROW	CT	SEL	CC Equivalent	Low	High*
Little 34	08-048	1				22.4	11.2	22.4	0.0
Little 34	08-048	2				25.4	12.7	25.4	0.0
Little 34	08-048	3				30.3	15.2	27.4	10.8
McCready Ridge	07-132	1	0	0	0	15.6	7.8	15.6	0.0
McCready Ridge	07-132	2	0	0	0	15	7.5	13.1	7.3
Around gills	05-077	4		3.1		32	19.1	34.9	0.8
Mid Incline	05-123	1		0.4		24.7	12.8	3.3	83.7
Mid Incline	05-123	2				31.5	15.8	31.5	0.0
Mid Incline	05-123	3				28.3	14.2	23.4	18.8
Fresh 1	04-242	2				36.1	18.1	34.3	6.9
Fresh 1	04-242	3				27.4	13.7	27.1	1.2
Little Fresh	05-176	1				36.3	18.2	30.1	23.8
Little Fresh	05-176	2				20	10.0	12.4	29.2
Little Fresh	05-176	3				5.7	2.9	5.7	0
Little Fresh	05-176	5				39.6	19.8	39.6	0.0
Little Main	05-085	2				29.7	14.9	14.3	59.1
Little Main	05-085	3				25.3	12.7	16	35.7
Little Main	05-085	7				33.3	16.7	19.5	53.0
Whiskey	08-041	1				20.9	10.5	20.6	1.2
Whiskey	08-041	2				23.5	11.8	23.2	1.2
Whiskey	08-041	3				35.4	17.7	29.6	22.4
Whiskey	08-041	4				32	16.0	32	0.0
Whiskey	08-041	5				11.3	5.7	9.5	6.9
						Total	304.4		

Table 1. Proposed 2009 Harvest in Freshwater Creek. Revised 3/13/09

*The acres represented here have been converted to High Hazard Acres by multiplying by 3.8404.

Highlight indicates a THP and Specific Unit to be enrolled prior to establishing an enforceable Zero Discharge Monitoring Plan (Tier I). Weighted Acreage Totals are listed below to demonstrate compliance with the Staff Landslide Model limit of 144 Harvest Acres in Freshwater Creek. Other THP Units will be enrolled after approval of the aforementioned Monitoring Plan

No Highlight Indicates a THP and Specific Unit to be enrolled after establishment of an enforcable Zero Discharge Monitoring Plan (Tier II).

289.1

Indicates tier 1 for ROW and tier 2 for remainder of the unit

Total Clear Cut Equivilant Acres enrolled or submitted for enrollment

		Harvest	Ha	zard
THP Number	Unit Number	Acres	Low	High*
08-048	1	22.4	22.4	0.0
05-077	4	3.1	3.1	0.0
05-176	5	39.6	39.6	0.0
08-041	1	20.9	20.6	1.2
08-041	2	23.5	23.2	1.2
08-041	4	32.0	32	0.0
	141.5	14	3.3	

Table 2. Summary of THPs to enrolled prior to establishment of Zero Discharge Monitoring Plan for Freshwater Creek

		arung System	Voro	ing System	Softwater Of	Site Prov	paration
		Linit Number	Cround Boood	Vorder	Holigoptor	Mochanical	Prophect
			Giounu baseu		neicopter	Mechanical	Divaucast
Little 34	08-048	1	3.9	18.5			
Little 34	08-048	2	8.2	17.2			
Little 34	08-048	3	6.9	23.4			
McCready Ridge	07-132	1	0	15.6			
McCready Ridge	07-132	2	10.1	4.9			
Around gills	05-077	4	19.7	15.4			
Mid Incline	05-123	1	0.4	24.7			
Mid Incline	05-123	2	11.5	23			
Mid Incline	05-123	3	14.1	14.2			
Fresh 1	04-242	2	10.9	25.2			
Fresh 1	04-242	3	0	27.4			
Little Fresh	05-176	1	0	36.3			
Little Fresh	05-176	2	7.3	12.7			
Little Fresh	05-176	3	0	5.7			
Little Fresh	05-176	5	0	39.6			
Little Main	05-085	2	0	29.7			
Little Main	05-085	3	0	25.3			
Little Main	05-085	7	0	33.3			
Whiskey	08-041	1	20.9	0			
Whiskey	08-041	2	11.7	11.8			
Whiskey	08-041	3	9.3	26.1			
Whiskey	08-041	4	19	13			
Whiskey	08-041	5	0	11.3			
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Table 3. Summary of THPs by Yarding System and Site Preparation for Freshwater Creek

Humboldt Redwood Company LLC

Erosion Control Plan (ECP) for the "Mid Incline" THP 1-05-123HUM

Updated ECP – for purpose of identifying **Tier 2** erosion control sites specific to units 1, 2 and 3 (2009 enrollment requests); Unit 2 has site 5969 (Road U91.24), and units 1 and 3 have no erosion control sites located on the spur road system leading specifically to These units.

This plan is being included in the THP to partially meet the requirements of the North Coast Regional Water Quality Control Board Watershed-wide Discharge Requirements. (**WWDRs**)

All operational portions of this ECP that are to be enforced through the Forest Practice Rules have been included in Section II of the THP.

Version 20080819

Humboldt Redwood Company LLC Erosion Control Plan (ECP)

This document addresses the requirements of the California Regional Water Quality Control Board, North Coast Region Order No. R1-2006-0041 (Freshwater Creek) for an Erosion Control Plan (ECP) related to timber harvest activities on Non-Federal lands in the North Coast Region (Sec. III D2 and D3). The responsible party for this ECP is Humboldt Redwood Company LLC, P.O. Box 712 Scotia, CA 95565 (707) 764-2330.

This ECP is submitted for:THP Name:Mid Incline1-05-123HUMContact Person:Jon WoessnerPhone:(707) 764-4376

The landowner is committed to a wide variety of measures to prevent and minimize the discharge or threatened discharge of sediment from controllable sediment discharge sources as part of this project into the waters of the state in violation of applicable water quality requirements. Prevention and Minimization of Controllable Sediment Discharge Sources associated with this project are identified in the *Controllable Sediment Sources* table. The specific conditions of sediment discharge sources and a summary of prevention and minimization measures (Section I) are identified in the table. General prevention and minimization measures for the project (Section II) are incorporated in the ECP by reference.

The RPF and/or the RPF Designee have conducted an inventory of potential "controllable sediment discharge sources" within the project area. As defined in California Regional Water Quality Control Board Order No. R1-2006-0041 (Freshwater Creek).

"Controllable sediment discharge source" means sites or locations, both existing and those created by proposed timber harvest activities, within the Project area that meet all the following conditions:

- 1. is discharging or has the potential to discharge sediment to waters of the state in violation of applicable water quality requirements or other provisions of these WWDRs,
- 2. was caused or affected by human activity, and
- 3. may feasibly and reasonably respond to prevention."

Upon guidance of the North Coast Regional Water Quality Control Board (NCRWQCB) staff, discharge from the source must be likely to occur during the life of the Timber Harvesting Plan (THP) and WWDR. (Holly Lundborg, personal communication)

The inventory method consisted of an appurtenant road survey, aerial photos and ground assessments of the harvest units, and a complete ground assessment of all watercourses and associated stream protection zones.

The schedule for implementing the prevention and minimization management measures for the controllable sediment sources will be consistent with the duration of the THP. These measures will be implemented in accordance with the priority level assigned to each site. High priority sites will be addressed first with low priority sites to follow. Work at all sites will be accomplished prior to THP expiration. The general prevention and minimization measures will be implemented concurrent with operations.

I. Inventory and Treatment of Controllable Sediment Sources

All controllable sediment sources are listed in the attached "Erosion Control Plan" table. These sources have been assigned a treatment priority of low, medium or high based on: 1) potential for significant sediment delivery to a Class I, II or III channel; 2) treatment immediacy (a subjective combination of event probability and sediment delivery); and 3) treatment cost-effectiveness.

The Prioritization for implementing prevention and minimization measures for road-related and non road-related controllable sediment sources is based upon guidance provided in Order No. R1-2006-0041 (Freshwater Creek) Highest priority is assigned to the largest sediment discharge sources that discharge to waters that support domestic water supplies or fish. The landowner's prioritization method considers this guidance, and combines it with consideration for accessibility and level of imminent risk of significant sediment discharge. Sources that receive a high priority rating will be treated by a date certain as noted in the Controllable Sediment Sources table. Sources that receive a low or medium rating are determined to have a low to moderate risk of imminent discharge and will be treated prior to completion of the THP, or as otherwise indicated.

Non-road related controllable sediment sources can include skid road crossings, yarding furrow, skid road in watercourse, perched skid road fill, skid road rutting, landslide, layouts, railroad grade, incline, etc.

Information specific to Controllable Sediment Discharge Sources is listed in the Controllable Sediment Sources Table, below. An explanation of information provided in that table is provided below.

II. General Prevention and Minimization Measures for Controllable Sediment Discharge

In addition to the site specific measures detailed above, the general measures proposed in this project, either as required by another State or Federal regulating agency, or as a matter of Humboldt Redwood Company policy, will prevent or minimize future sediment delivery. These measures include, but are not limited to measures incorporated in the THP Section Items as follows:

THP Section II:

- Item 14 Describes silvicultural prescriptions
 - (i) Site Preparation Disclosure of selected site preparation treatments and mitigation measures
- Item 16 <u>Harvesting Practices</u> Describes yarding systems, equipment utilized, equipment limitations, and drainage facility installation timing
 - Inclusive through (m) equipment use limitations and mitigation
- Item 18 <u>Soil Stabilization</u> waterbreak requirements, mitigation to minimize soil disturbance and sediment transport
- Item 20 Ground Based Equipment Use Location
- Item 21 Ground Based Equipment Use in Sensitive Areas locations, descriptions of operations, limitations and mitigation measures
- Item 22 Alternative Practices to Harvesting and Erosion Control
- Item 23 Winter Operations Provides descriptions of limitations and mitigation measures required during winter period operations and Winter Operating Plan
- Item 24 <u>Roads and Landings</u> Describes road and landing construction and re-construction operations, limitations, drainage relief structure installation, mitigation measures, road maintenance, inspections and wet weather road use restrictions
- Item 25 Site Specific Measures to Reduce Adverse Impacts and Special Instructions to the LTO
- Item 26 Watercourse and Lake Protection (WLPZ)
- Item 27 <u>"In Lieu" WLPZ Practice(s)</u>
- Item 28 <u>Downstream Water Users Notification and Domestic Water Supply Protection</u> Description of protection measures
- Item 29 <u>Sensitive Watershed</u> Identifies whether the plan is located in a designated sensitive watershed and mitigation measures
- Item 29 1 <u>Hillslope Management (HCP 6.3.3.7)</u> Describes HCP hillslope management measures required as per watershed analysis

THP Section V:

<u>Sediment Reduction from Roads and THP Sediment Production</u>--Including Table 1 – "Sediment Delivery for Units and Roads for this THP," references, letter regarding Road related sediment assessment for this THP with the calculations of deliverable net cubic yards of sediment, calculations and PWA information related to the THP project area when available

Maps attached:

- Appurtenant Road and Wet Weather Road Use map
- Road Construction Locations/ECP Site Locator Map





III Inspection Plan and Reporting Requirements

A. Inspection Plan

The Inspection Plan is designed to ensure that all required management measures are installed and functioning prior to rainfall events; that the management measures are effective in controlling sediment discharge sources throughout the winter period; and that no new controllable sediment discharge sources developed.

- B. Qualified and trained professionals will conduct all specified inspections of the project site to identify areas causing or contributing to a violation of the applicable water quality requirements or other provisions of these WWDRs. The responsible party for inspection and reporting is **Jon Woessner (707) 764-4376**.
- C. No inspections are required in Project Areas where Timber Harvest Activities have not yet commenced.
- D. Project Areas where Timber Harvest Activities have commenced and no winter period Timber Harvest Activities have occurred inspections will be conducted each year and throughout the duration of the Project while Timber Harvest Activities occur.
 - a. The Project is covered under WWDRs and the following inspection requirements will begin at the startup of timber harvest activities within the Project area:
 - i. By November 15 to assure Project Areas are secure for the winter period;
 - ii. Once following ten (10) inches of cumulative rainfall commencing on November 15 and prior to March 1, as worker safety and access allows; and
 - iii. After April 1 and before June 15 to assess the effectiveness of management measures designed to address controllable sediment discharges and to determine if any new controllable sediment discharges sources have developed.
 - b. Project Areas with Winter Period Timber Harvest Activities will conduct inspections of such Project Areas while Timber Harvesting Activities occur and the Project is covered under the WWDRs as follows:
 - i. Immediately following cessation of winter period Timber Harvest Activities to assure areas with winter Timber Harvest Activities are secure for the winter;
 - ii. Once following ten (10) inches of cumulative rainfall commencing on November 15 and prior to March 1, as worker safety and access allows; and
 - iii. After April 1 and before June 15 to assess the effectiveness of management measures designed to address controllable sediment discharges and to determine if any new controllable sediment discharges sources have developed.
 - c. Inspection reports will identify where management measures have been ineffective and when repairs and design changes will be implemented to correct management measure failures.
 - d. After completing the required inspections, and when it has been determined new controllable sediment discharges sources have developed, the ECP, implementation schedule, and inspection plan will be updated, if required, consistent with the WWDRs and submit the updated documents to the Regional Water Board to maintain coverage under the WWDRs. If the approved amendment is found to be out of compliance with the WWDRs, the Project will be amended to be consistent with the provisions of the WWDR within 30 days, or coverage under the WWDRs will be terminated. The Project will then be required to seek Project coverage under an individual WDR.
 - e. Equipment, materials, and workers will be available for rapid response to failures and emergencies, implement, as feasible, emergency management measures depending upon field conditions and worker safety for access.
- D. If during the inspection or during the course of conducting timber harvest activities, a violation of an applicable water quality requirement or conditions of WWDRs is discovered, the following procedures will be followed:
 - a. When it has been determined that discharges are causing or contributing to a violation or an exceedence of an applicable water quality requirement or a violation of a WWDR prohibition:
 - i. Corrective measures will be implemented immediately following the discovery that applicable water quality requirements were exceeded or a prohibition violated, followed by notification to the Regional Board by telephone as soon as possible but no later than 48 hours after the discharge has been discovered. The notification will be followed by a report within 14 days to the Regional Board, unless otherwise directed by the Executive Officer, that includes:
 - 1. the date the violation was discovered;

- 2. the name and title of the person(s) discovering the violation;
- 3. a map showing the location of the violation site;
- 4. a description of recent weather conditions prior to discovering the violation;
- 5. the nature and cause of the water quality requirement violation or exceedence or WWDR prohibition violation;
- 6. photos of the site characterizing the violation;
- 7. the management measure(s) currently being implemented;
- 8. any maintenance or repair of management measures;
- 9. any additional management measures which will be implemented to prevent or reduce discharges that are causing or contributing to the violation or exceedence of applicable water quality requirements or WWDR prohibition violation; and,
- 10. The signature and title of the person preparing the report.
- 11. The report will include an implementation schedule for corrective actions and describe the actions taken to reduce the discharges causing or contributing to violation or exceedence of applicable water quality requirements or WWDR prohibition violation.
- E. For other inspections conducted where violations are not discovered, a summary report will be submitted to Executive Officer by June 30th for each year of coverage under the WWDRs or upon termination of coverage. The summary report, at a minimum will include the date of inspections, the inspector's name, the location of each inspection, and the title and name of the person submitting the summary report.

If helicopter operations are proposed for this project, please find attached a Columbia Helicopters, Inc. (CHI) Fuel Spill Prevention and Cleanup Plan For Columbia Helicopters Field Operations.

Explanation	of Information Included in the Controllable Sediment Sources Table
Column Heading	Explanation
Site No.	Site identification unique to project area
Site Type	A description of the existing site. Example: Humboldt Crossing; Culvert Crossing; Unstable Fill; Unstable Cut Slope; Diversion Potential.
Estimate of Potential Erosion	A quantitative estimate of the volume, in cubic yards, of the total amount of potential erosion/displacement of soil that will occur should the site entirely fail. The landowner often uses a methodology developed by Pacific Watershed Associates to estimate erosion, which assumes 100% delivery of calculated volume—use of this method for individual sites is noted in Site Description.
Potential Sediment Delivery Percent	An estimate of the relative potential for sediment delivery expressed as a percent of the total amount of Potential Erosion that will be discharged to waters of the State should the site fail.
Sediment Prevention Volume	The volume, in cubic yards, of sediment discharge estimated to be prevented by implementation of the prescribed treatment. Volume represents the Estimate of Potential Erosion multiplied by the Potential Sediment Delivery Percent.
Treatment	Treatment priority reflects the immediacy of sediment discharge and the relative risk to the receptor, should the site fail. Low priority sites are ones that will not likely deliver significant amounts of sediment during the life of the WWDR permit, and will be treated prior to filing of THP work completion report, which does not exceed 5-years following THP approval date. Medium or high priority sites indicate potentially imminent discharge, and the timing of treatment is indicted in Implementation Schedule column.
Implementation Schedule	Indicates the timing of implementing the prevention and minimization measures listed in the Treatment column.
Site Description	Provides sufficient information that describes the existing condition of the site and factors that inform the chosen treatment methods and implementation schedule. This information will include a description of how the existing condition of the site (ie. stable or unstable) will be affected by different storm events, and whether sediment discharge is imminent. For example, an unstable site could easily discharge significant amounts of sediment in a small storm, thus the treatment priority should be higher. Conversely, a stable site that may take one or more very large storms to trigger discharge could be lower treatment priority. If PWA method is used to calculate erosion/delivery volumes, it will noted here.
Treatment	Sediment discharge prevention and minimization measures that will be implemented at the site, including treatment specifications if necessary.

Attachments:

ECP Table

Erosion Control Plan								
Site	Site Type	Est. Potential Erosion (Cu.Yards)	Est. P Del (Cu.Ya	otential ivery rds & %)	Priority fo Treatmen	r Implementatio t Schedule	on Site Description	Treatment
Project Mid Incl	ine							
RD: U91.24 STATION: 5969 SITE: WQ 1 WOID: -617032201 SEDID: 4N1E13C601 REPAIRED: NO	Surface Erosio	n 3	3	100%	Low	Prior to THP Final Completion.	crossing needs more rock or straw waddles placed to minimize erosion	Add rock over crossing and/or install straw waddles to minimize surface erosion related to sediment discharges.
RD: X65.50 STATION: 4566 SITE: UF79.2 WOID: 50003624 SEDID: 4N2E07B301 REPAIRED: YES	Critical Dip	60	60	100%	Med	Prior to Oct 15; FIRST year of operations. 10/15/08	Culvert outlet crushed. No critical dip present.	Install a critical dip on the left hinge line. Install 2 rolling dips to the right of crossing to break up ditch flow. Outlet of pipe is partially crushed replace with 24" CMP . Prior to October 15 of the first year of operations. Remove existing culvert and install a new culvert 10 feet upslope of the current location. Rock armor the inboard ditch over a distance of 15 feeet upslope of the new culvert inlet.
RD: X65.50 STATION: 6382 SITE: UF80 WOID: 1760146313 SEDID: 4N2E07D401 REPAIRED: YES	Rolling Dip	120	120	100%	Low	Prior to THP Final Completion.	1180' of undrained road needs 4 rolling dips	1180' of undrained road needs 4 rolling dips, with one 50' to right of crossing.
RD: X65.50 STATION: 12745 SITE: UF1010 WOID: 5111425 SEDID: 4N2E08C602 REPAIRED: NO	Critical Dip	81	81	100%	Low	Prior to THP Final Completion.	Install critical dip	Install critical dip on right hingeline.
RD: X65.5051 STATION: 120 SITE: UF47.1 WOID: -1737556690 SEDID: 4N2E08C601 REPAIRED: YES	Perched Fill	89	89	100%	Med	Prior to THP Final Completion.	perched fill on outboard edge of pulled crossing	Excavate the remainder of the crossing restoring natural channel gradient from TOP to BOT. Lay back sideslopes 2:1. Store spoils on either side of the road.
Total Estim	ated Yards	353	3	53				

