

# **FRIENDS OF ELK RIVER**

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15 January, 2014

Adona White  
NCRWQCB  
5550 Skyline Blvd, Suite A  
Santa Rosa, CA 95403-1072

Dear Adona,

Thank you again for your presentation at Elk River Forum last November. And thanks to you and your colleagues, Holly Lundborg and Alydda Mangelsdorf, for the thoroughness of your work and a long day of discussion and questions. When very few entities, public or private, have taken an interest in Elk River's recovery, you water quality staffers remind us that we aren't entirely forgotten.

But the Draft TMDL proposals do not go far enough. After taking a few weeks (and the holidays) to review your presentation and the draft document, we find it does not offer the relief we were hoping for.

The planning and statistical math and peer-reviewed science are a good piece of work. They show us what residents have been saying for some time—that Elk River is a fluvial disaster, a patient on life support, and getting worse instead of better. Yet the cure it proposes--to continue adding sediment for another 20 years while a team of still-hypothetical doctors assess and prescribe and medicate and hope for remission—seems based more on hope than science.

The degrees of harm—the continued allowance of sediment entering the river—are calculated with great rigor and care, but the promise of remediation and restoration remains vague and unconvincing.

The remainder of the forum--the degrees of damage described, the extent of all we don't know, plus the many physical and bureaucratic obstacles to recovery—didn't really support your proposal that we continue to add just a little more "management-based" sediment to a watershed that is so grossly impaired.

Instead of allowing sediment load allocations at 120% of background sediment levels, we strongly feel that the load allocations should be held down to 100% of natural background sediment and 0% management-related sediment. Zero.

Moreover, instead of allowing 0.5% of the area of the TMDL watershed to be logged annually, increasing the area of timber harvest to 1.5% over the 20 years of imagined improvement, we strongly feel that timber harvest should also be 0.0%--zero--until restoration and sediment removal have restored the river's capacity to accept new sediment.

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Until Elk River is a healthy watercourse and there's a place for the silt to go besides back yards and buried spawning grounds--until the promise of restoration is a reality--we do not feel that the state should sanction its ongoing degradation. It is against both law and common sense, and is justified by only one thing, the 900-pound gorilla in the room that was not mentioned during the forum. Money.

Economics might well be the subject of another forum. HRC is a big employer and people's livelihood is at stake—this is as true as it was in the Maxxam days. We support the use of AB 1492 funds for the restoration work that HRC and Green Diamond must undertake, and the conversion of some of their work force to restoration. We encourage a buy-out of the Hole in the Headwaters, now that it has been logged, as a way to compensate the Fishers for an enterprise that has not proved as lucrative as their investment counselors promised.

But you can't ask us to continue paying for it with water quality. Their business plans have no legitimate place in your proposals to restore water quality to Elk River. Some will say we are not being realistic, but our property and safety are real. Salmon are their own return on investment.

Just as Humboldt Redwood and Green Diamond have a bottom line to consider, so do we residents of Elk River. No additional sediment until the river is cleaned up. None. Zilch. Nada. We hope the final draft of your TMDL document will include that small round number. We intend to accept nothing more than zero.

Sincerely,

Jerry Martien

cc: North Coast Regional Water Quality Control Board