

Response to Written Comments on Draft Order No. R1-2026-0015

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, Humboldt County

Regional Water Quality Control Board, North Coast Region
May 7, 2026

Introduction

On March 2, 2026, the North Coast Regional Water Quality Control Board (North Coast Water Board) issued a Notice of Public Hearing and Intent to Adopt Draft Order No. R1-2026-0015, 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, Humboldt County (draft Order).

Draft Order No. R1-2026-0015 would revise Order No. R1-2019-0021 to incorporate alternative measures proposed by Humboldt Redwood Company LLC and updates the Order to omit outdated findings and requirements. In addition, the Monitoring and Reporting Program has been moved from Section IV of the Order to Attachment C.

The Public Notice stated that Regional Water Board would conduct a public hearing to consider adoption of the Order and CEQA addendum on May 7 or 8, 2026 Board Meeting, or as announced in the Regional Water Board's agenda and on the [North Coast Regional Water Board's website](http://www.waterboards.ca.gov/northcoast/) (<http://www.waterboards.ca.gov/northcoast/>).

Comments Received

During the March 2 to April 1, 2026, comment period, the Regional Water Board received one comment letter from Vivian Helliwell, of Salmon Returning and Andrew Colonna, Member, California Sportfishing Protection Alliance.

The comment letter included several comments related to the Total Maximum Daily Load (TMDL) and provided an attached letter from California Department of Fish and Wildlife with the subject line, Elk River Total Maximum Daily Load Analysis and Technical Report, dated October 6, 2014. In addition, the letter provided a link to the following document:

Watershed Management for Unstable and Erodible Areas in North Coastal California By: State of California, The Resources Agency, Department of Water Resources, Northern District Prepared for the U.S. Environmental Protection Agency and the State Resources Control Board, October 1982.

Regional Water Board staff were unable to find that document.

This Response to Comments document provides responses to the one comment related to the revisions to Order No. R1-2019-0021 that are contained in Draft Order No. R1-2026-0015. Other comments in the letter relate to aspects of the Draft Order that remain unchanged from Order No. R1-2019-0021.

No changes to the Draft Order were made in response to comments received.

Comments

Comment: In reference to exceptions for operations during “extended dry periods,” what is the definition of an extended dry period?

Response: Section I.F.7 on page 39 of the Proposed Order provides the following definition: *Extended Dry Periods are defined as periods during which saturated soil conditions threatening water quality do not exist. Indicators of saturated soil conditions threatening water quality include (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing material during timber operations, (3) creation of ruts and/or wet slurry, and/or (4) inadequate traction without blading wet soil or surfacing materials, located within 150 feet of a watercourse.*