

May 12, 2001

Matt St. John
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403

Dear Mr. St. John;

Upon direction from the E.P.A. to the State Water Board the Mattole River has been designated as impaired both for sediment and temperature considerations. It is suggested that this impairment has had a negative impact on the beneficial uses of the stream and its tributaries, namely the habitat for our anadromous salmonoid fisheries. The implication being that land management practices have exacerbated this impairment.

It is our belief that evidence gathered to support this impaired designation is in part anecdotal, incomplete, outdated, and inaccurate.

During December of 1955 and again in December of 1964, our watershed experienced inordinate amounts of rainfall. The resulting slide activities and flooding scoured streambanks and deposited great quantities of debris and sediment in our streambeds. (see exhibit A).

These years, 1950 through the 1960's were also years when extensive logging and road-building took place in the Mattole. How much of the slide activity, debris and sediment deposits are to be attributed to ill-placed or ill cared for roads used for the timber harvesting of that time is hard if not impossible to quantify. Current stringent forest practice rules insure that timber harvesting activities will not play a major role in such events again.

It is our contention that catastrophic events resulting in great sediment deposits are not a new phenomenon for the Mattole (Exhibit B) In the context of time perhaps this watershed was not as affected or impaired during the last half century as has been suggested; imagine such rainfall events and saturation of the soil coupled with a major earthquake!

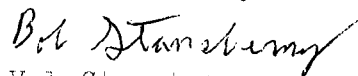
What is amazing is the short period of time that it is taking the watershed to heal or return to the normalcy that we perceive it should be in. Sediment deposits are migrating downstream, hillslope vegetation is increasing, old slides are healing and riparian vegetation/canopy is regrowing (see exhibits C,D,E). Some of our streams are now fairly teeming with anadromous fish. In some areas, since fire now doesn't play its historic role in the ecological balance of our landscape, we are actually experiencing a net loss of our native grasslands, (see exhibits E&F). The full impact of this role (or lack of of it) on our environment we have not yet fully come to understand or appreciate.

Mankind seems to have an impulsive need to "fix" mother nature without truly understanding the impacts of their meddling. Remember the misguided "clearing the streams of obstacles" period in the 60's encouraged by Fish & Game? Thousands of dollars are spent every year on restoration work that washes downstream in the first high water of the year. In the meantime, nature is doing it's own restoration work on it's own schedule.

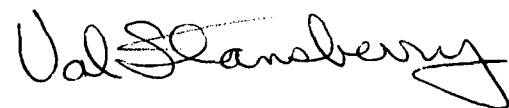
Setting up an artificial TMDL schedule will have little effect on nature's time-table. The salmon are returning to the Mattole, the watershed is recovering, and these things are happening in spite of man's misguided help, not because of it. Throwing more rules and regulations at landowners won't help the recovery process. It may force a number of landowners to increase utilization of the resources on their land in order to meet TMDL requirements.

We believe the Mattole needs to be taken off the 303-(d) impaired listing.

Bob Stansberry



Val Stansberry



For more information please contact

Bob & Val Stansberry

Box 56

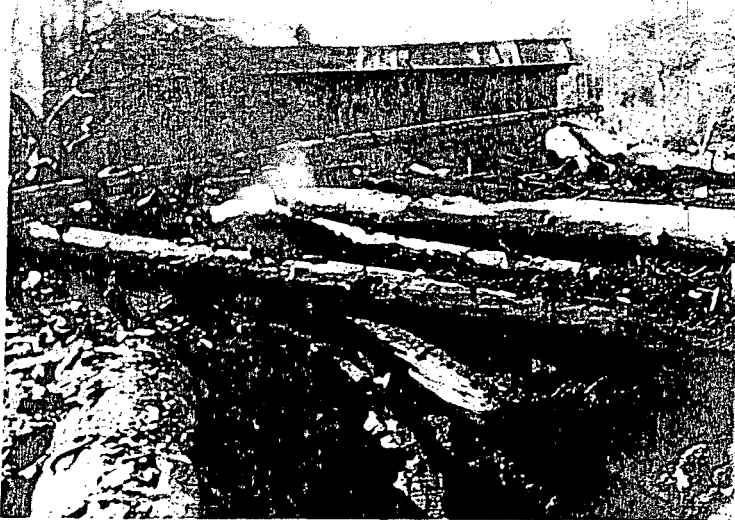
Honeydew, Ca. 95545

Tele 707-499-8819

Exhibit A

Upper North Fork of the Mattole River

Photograph taken following L.C. 1953 flood



No extensive logging
or road building had
occurred in this
tributary previously.
Note in photo on left
old growth trees
that floated down
from its upper reaches.



Exhibit B

Left - from above



Right - Mattole

On left is photo of the top of a large old fir tree that has recently been unveiled due to stream bank erosion on the Mattole River. It has lain buried here in sediment deposits for perhaps hundreds of years.

Below is another example of trees buried during an ancient event, their tops recently revealed and protruding from streambank

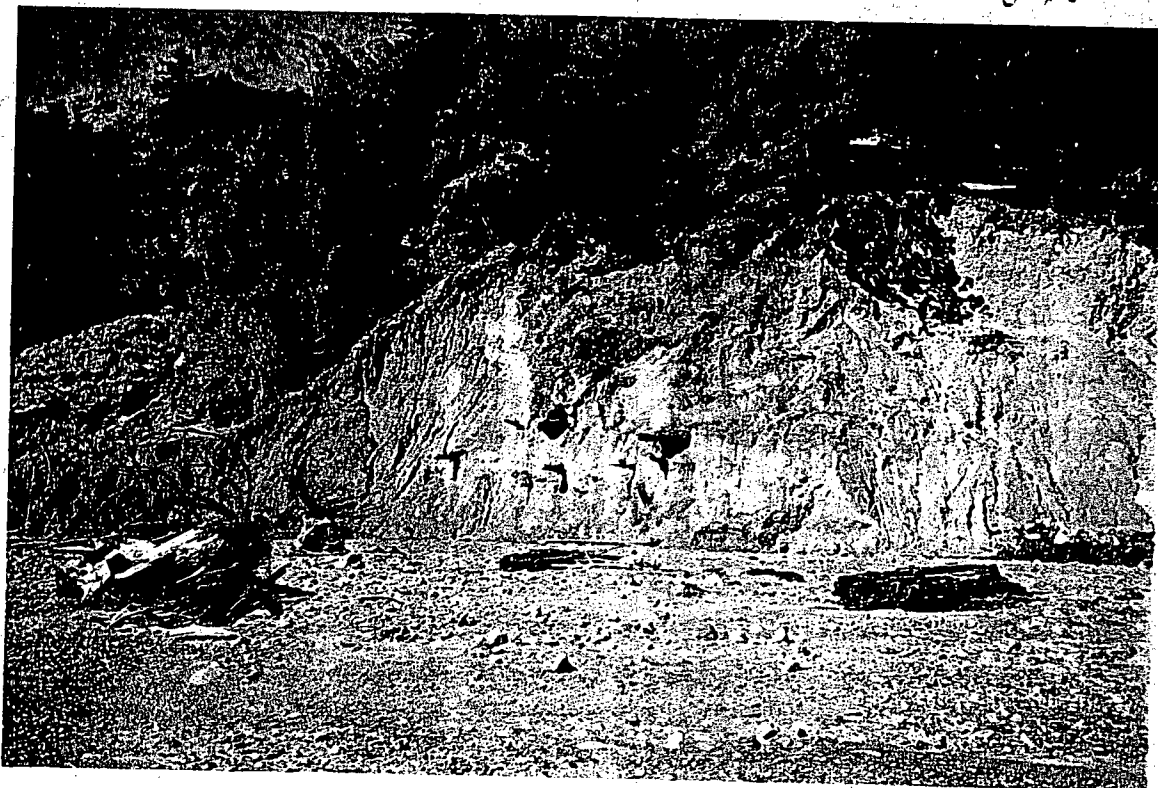
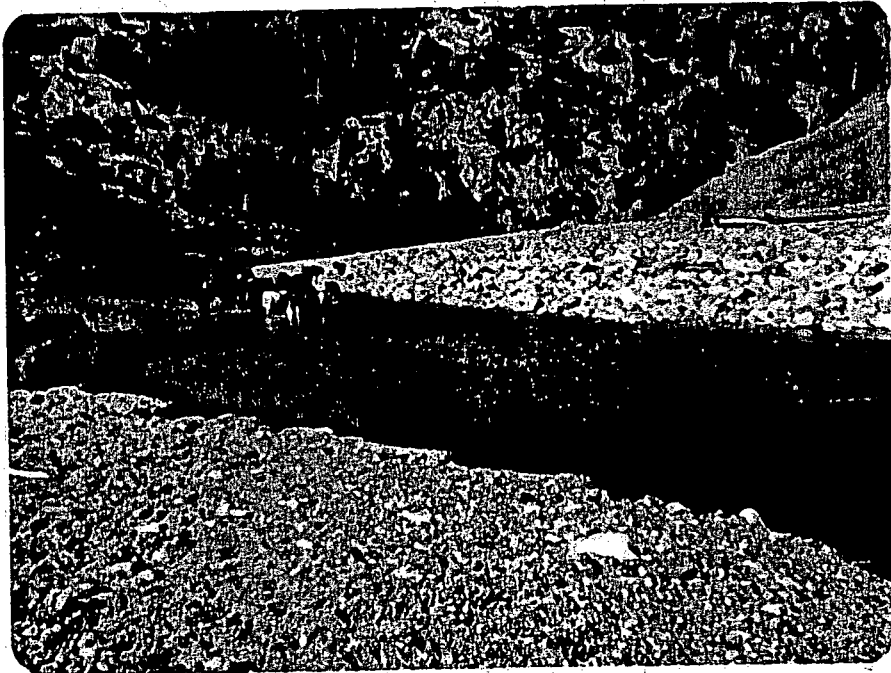


Exhibit C

Healing of the Mattole River
Changes in a quarter of a century



Note hillslope
vegetation increasing
and smaller gravels
migrating downriver,
as larger vegetation
encroaches on
both banks and
gravel bar.

Above 1975 below 2001

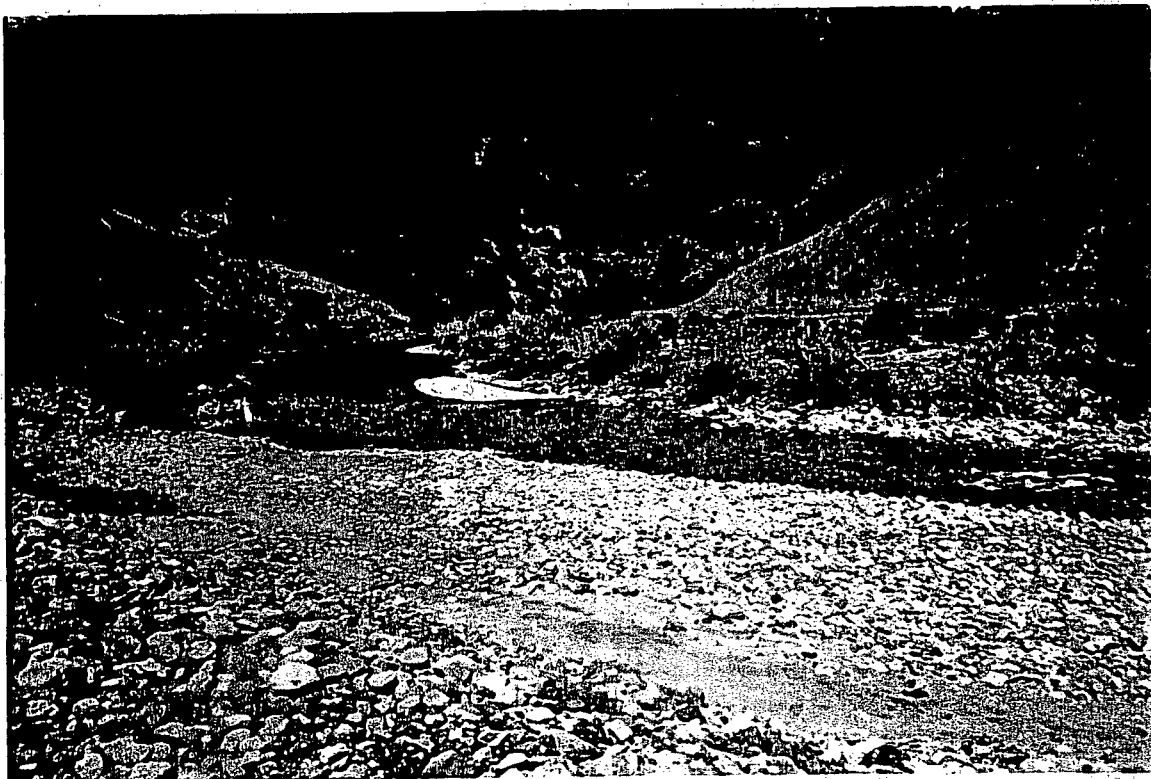
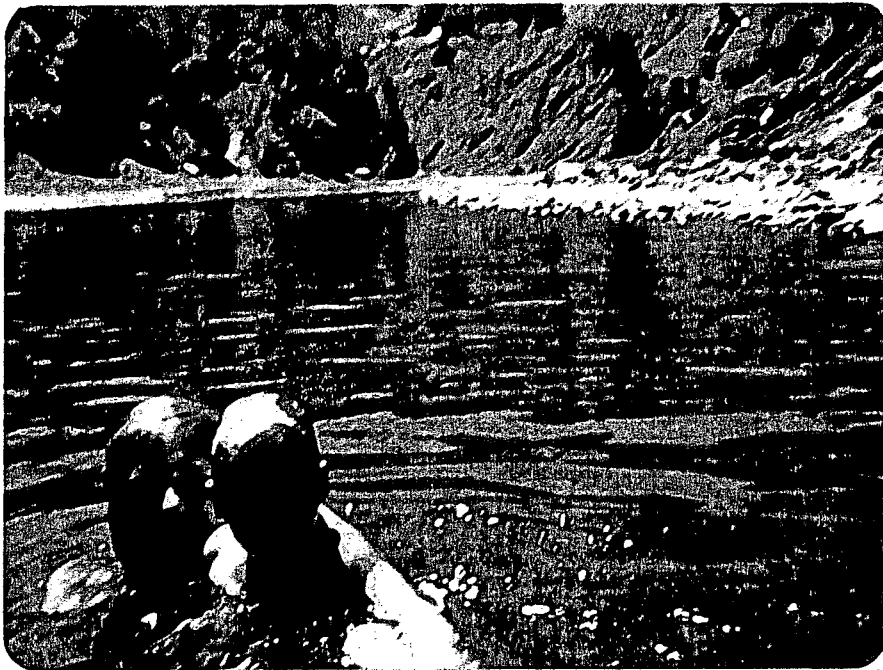
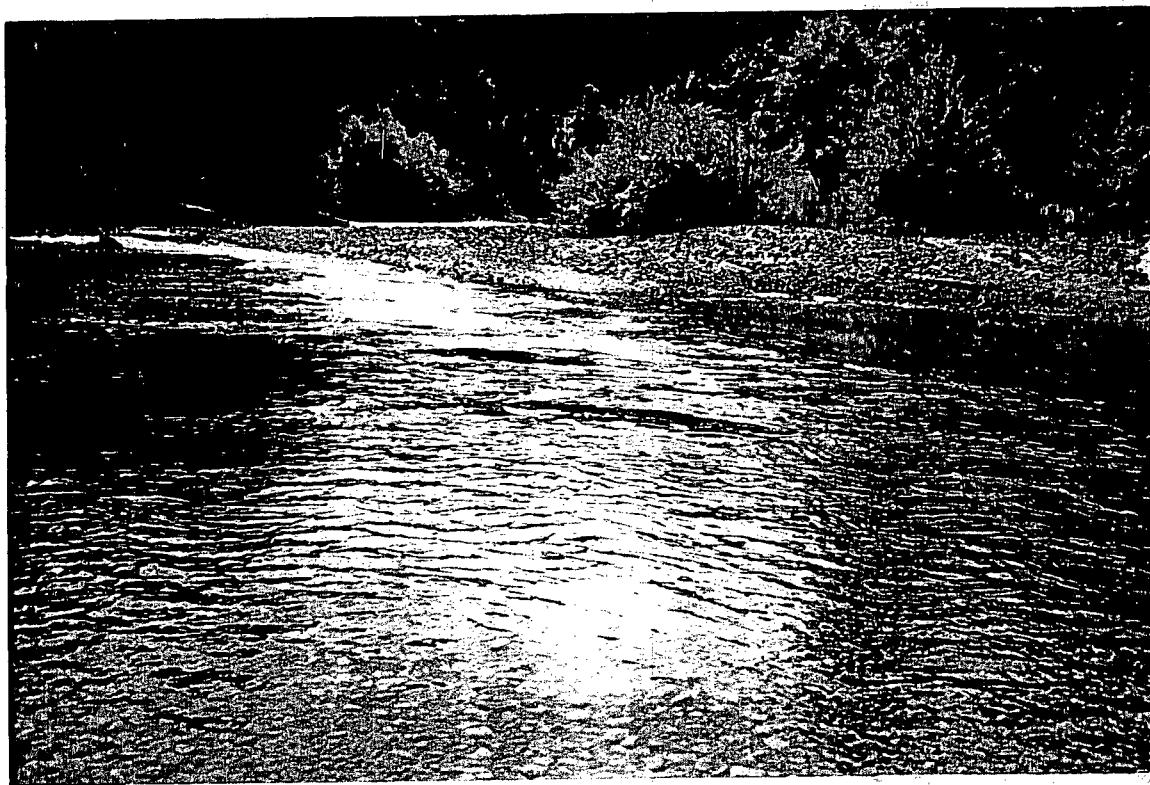


Exhibit D

Mass heading of the Pitt River 25 June 1975



Above 1975 - below same place 2001



Note river has established channel again
left bank is evidence of wood debris and
with abundant riparian growth.

Exhibit E

30 plus years of change on native rangelands



Above photo: taken 1959 below taken 2001



Note that native grasslands in background have been replaced by a dense forest of trees. This is a result of the timber management program.

Exhibit F



80 years of
Dust-bowl
encroachment
on prairie in
Mottale watershed

Top to bottom
photos were taken
around the years

1915, 1935
and 1995

Note gradual
loss of
grass and on
hilltop and
hillside in
background

