

Greenwood Watershed Association

tel (707) 877-3551 fax (707) 877:1861 ndevall@mcn.org P.O. Box 106, Elk, CA 95432

December 11, 1997

Ross Liscum, Chair, and Members
California Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, suite A
Santa Rosa, CA 95403

Dear Chairman Liscum and Members of the Regional Water Quality Control Board:

The Elk County Water District letter to you of December 8, 1997, does an excellent job of presenting the case for the 303(d) listing of Greenwood Creek. I would like to summarize that letter for you, provide you with further documentation, and briefly discuss this matter.

The Elk County Water District letter makes three main points, as follows:

- There are two resources at risk in Greenwood Creek: the water supply to the town of Elk, and the coho salmon and steelhead fisheries.
- Both resources have been seriously impacted by upstream management activities. These impacts include sedimentation, with profound results both on domestic water use and on the salmonid fishery. Other impacts on the fishery include unstable and unvegetated stream banks, lack of fish pools and lack of large woody debris.
- Water quality monitoring and enforceable water quality standards are essential to the protection of these resources.
- Louisiana Pacific Corporation, which owns more than half of Greenwood Creek watershed, has failed to include water quality monitoring and water quality standards in its "Sustained Yield" Plan, has failed to reply to any of our letters over the last year asking for a discussion of this matter, and is currently proposing to clearcut 32% of its Greenwood Creek holdings over a ten year period, after having already thoroughly hammered this watershed during the 1980-1990 decade.

The documented evidence that Greenwood Creek is sediment-impaired is overwhelming. This evidence includes:

- 1) the Elk County Water District Turbidity graphs covering a period of 1992 through 1997 (attached to the ECWD letter);
- 2) the 1995 Greenwood Creek Stream Survey Report, by Dr. Fred Euphrat (May 1996); and
- 3) the 1996 Greenwood Creek Road Survey Summary Report, by Dr. Fred Euphrat (September 1997).

The Turbidity Readings indicate extremely high turbidity in Greenwood Creek during peak flows. The Elk County Water District cannot treat this pollutant during peak flows and must switch to a backup well which has other problems (such as natural iron pollution).

The Stream Survey Report documents numerous "sediment transport corridors"--landslides, stream bank erosion sites--along the first ten miles of the main stem of Greenwood Creek. The Stream Survey Report is supported by a 300-page data printout (not included here) with computerized maps of the numerous stream bank erosion sites impacting the Creek. (The Stream Survey Report contains sample maps.)

The Road Survey Summary Report documents upslope erosion sites on 25 miles of the watershed road system, on non-L-P lands, and is supported by a 23 page spreadsheet printout (included). The condition of roads on L-P lands is not documented because they haven't yet done a road survey. They promised to do one by 1996, in the first draft of their "Sustained Yield" Plan, but have apparently deleted that promise from the final draft. They have not allowed the Greenwood Creek Watershed Project to survey anything other than a miniscule piece of one of their roads.

The Greenwood Creek watershed community has been making a strenuous effort, over a three year period, to work cooperatively with L-P and other landowners, to address the impacts we have been discussing here. The Greenwood Creek Watershed Project has received the cooperation of almost all of the smaller landowners--about 35 altogether.

L-P cooperated on one project that did not involve their lands--although it did involve an L-P haul road. The project was very successful--and included a bridge installation and bioengineering of an eroding stream bank. The success of this restoration work indicates what could have been

done. Unfortunately, L-P's cooperation has been too little and too late, and it does not include any substantive effort to address the sediment sources on L-P lands, nor to monitor those impacts.

Documentation of the presence of coho salmon and steelhead in Greenwood Creek is included in L-P's "Sustained Yield" Plan (Coastal Mendocino County, Vol. 2, Greenwood Creek, page 21). Steelhead are further documented in the 1995 Stream Survey Report by Dr. Euphrat. Both species are mentioned in Greenwood Civic Club historical publications. Serious depletion in fish populations has been documented by local fishermen.

To sum up our request for the 303(d) listing of Greenwood Creek:

- Greenwood Creek has a serious sediment problem and other impacts
- Greenwood Creek has two resources at risk: domestic water use, and fish, including the recently federally listed coho salmon species
- We expect additional future impacts
- Additional water quality monitoring is needed
- A water quality standard is needed
- We do not expect the major landowner to implement such a program on its own--indeed, we expect them to be gone quite soon, as we all know.

Greenwood Creek was included on the original 303(d) list, and was removed from the list apparently because of its size (15,600 acres). This is insufficient reason for exclusion from the list, given the resources at risk, and given the serious nature of the water quality impairments.

We request that Greenwood Creek be re-instated on the 303(d) list of north coast impaired waterbodies, and that the 303(d) process be implemented immediately.



Norman de Vall, Co-Chair
Greenwood Watershed Association

enc.

cc: Pacific Coast Federation of Fishermen's Associations, National Marine Fisheries Service