



**Humboldt
Redwood™**

March 11, 2016

Via Electronic Mail

Mr. Matthias St. John, Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403

Re: Revised Landscape Plan 20 Year Harvest Schedule (Upper Elk River)

Dear Matt St. John

As you are aware, Tom Schultz and I met with Fred Blatt and Jim Burke in January to discuss the proposed Watershed-Wide Waste Discharge Requirements (Draft Order R1-2016-0004). Two of the several concerns we discussed related to the proposed harvest prohibition for five ('high risk') sub-watersheds, and the maximum 2 percent average annual rate of harvest for all sub-watersheds located within HRC's ownership. For the reasons detailed in written comment provided previously to the NCRWQCB by HRC, legal counsel, and Dr. Lee MacDonald, we respectfully continue to strongly disagree with these proposed requirements.

We continue to note the absence of physical evidence (i.e. including landslides, gullies, surface erosion) indicating HRC timber harvest has led to significant sediment discharge or otherwise controls downstream channel behavior. Weather, inherent environmental conditions and processes (i.e. geology, channel gradient, sea level, tidal influence) and land use activities (i.e. lack of channel maintenance, dikes and levees, channel constrictions due to infrastructure, rural subdivisions) off our property and outside of our legal control, continue to determine flooding frequency, intensity, and effect, as well as water quality characteristics.

Nonetheless, in recognition of concerns voiced regarding scheduled future timber harvest in these five sub-watersheds, and our desire to seek further points of agreement in the proposed WDR, HRC has revised its 20 year 'landscape plan' pursuant to the discussion we had with Mr. Blatt and Mr. Burke. This revised plan reduces scheduled harvest in the five sub-watersheds from that originally submitted with the HRC ROWD (Figure 4-3). Timber harvest in these five sub-watersheds is reduced from the previously scheduled **1,440 acres** over the next ten years down to **940 acres**, representing a **35 percent reduction** from the original plan, and a **1.2 percent average annual clear-cut equivalent (CCE) harvest** rate for the next ten years relative to HRC's total ownership in these five sub-watersheds. Watershed-wide the average annual CCE harvest rate remains at approximately 1.2 percent for the first decade, and 1.3 percent in the second decade.

Please consider accepting this revised harvest schedule for the WDR 'high risk' sub-watersheds in place of the harvest prohibition currently proposed. We also ask that the two (2) percent average

annual CCE harvest limitation proposed in the draft Order for the remainder of our Elk River ownership be removed. Analysis presented in both the HRC ROWD, and the findings of the draft WDR Order itself indicate no relationship between this two percent limitation and a supposed 10 percent peak flow effect. The revised plan continues to limit harvest to less than 2 percent CCE acres in most but not all sub-watersheds particularly where HRC's ownership is relatively a small portion of the entire sub-watershed. We could agree to the inclusion of a requirement in the WDR to use the Cafferata and Reid peak flow model for analysis of THPs in sub-watersheds where the average annual 2 percent CCE acres is exceeded for any rolling ten year period as a more site-specific and appropriate way to address potential for peak flow related cumulative effect.

Thank you for your consideration.

Respectfully



Michael W Miles
Director Forest Science



Cc: Fred Blatt, Samantha Olsen, Jim Burke
Dennis Thibeault, Tom Schultz, Mike Jani

HRC ROWD (Revised Figure 4-3)

HRC Alternative 34, Elk River Sustainability Unit

SUBBASINS	Total Acres	HRC Acres	Proportion HRC
Bridge Creek Elk	1,420.9	1,419.8	0.999
Browns	574.0	573.8	1.000
Clapp Gulch	654.1	581.3	0.889
Dunlap	423.8	411.4	0.971
Fields Landing	3,814.4	75.9	0.020
Lake Creek	1,362.4	1,362.4	1.000
Little South Fork	2,327.0	18.0	0.008
Lower NF	1,578.7	1,309.8	0.830
Lower SF	1,840.3	1,138.0	0.618
Mainstem Elk	5,564.0	319.9	0.057
McCloud Creek	1,521.0	209.6	0.138
McWhinney	810.1	810.1	1.000
North Branch NF	2,560.6	2,560.6	1.000
North Fork Elk	2,795.1	2,795.1	1.000
Railroad Gulch	762.0	714.0	0.937
Ryan Creek		21.3	
Salmon Creek	11,838.4	56.5	0.005
South Branch NF	1,224.9	1,224.9	1.000
South Fork Elk	5,140.2	3,626.8	0.706
Tom Gulch	1,605.9	1,188.6	0.740
Upper NF	1,644.2	1,644.2	1.000
		22,062.0	

Modeled Harvest Acres by 5-year period

	Per1	Per2	Per3	Per4
	52.7	45.5	280.9	152.1
**	19.1	178.9	236.0	
			73.5	
			320.7	466.2
		35.7	292.7	217.3
**	131.9	59.6	24.7	
	221.5		56.9	
**	39.3	90.0		
		147.4	59.5	131.1
	1,044.5	87.0	382.3	381.9
	618.4	608.5	239.7	
**	125.2		308.7	
			56.4	
		227.0	337.1	147.1
	571.9	485.9	247.2	538.6
**	10.1	288.7	239.0	
		77.2		514.4
	2,834.4	2,331.5	3,155.1	2,548.7
**	325.5	617.2		

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