

April 11, 2019

Matt St. John, Executive Officer
Jim Burke, Senior Engineering Geologist
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403

RE: Comments on Draft WDR for Humboldt Redwood Company, Order No. R1-2019-0021

Dear Matt and Jim,

Please accept the following comments on Draft Order No. R1-2019-0021, 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.

- I. Section F. of the draft Order address Wet Weather Requirements. Subsection 1.b. states:

“Hauling shall cease for a period of 48 hours following a precipitation event that results in 0.25 inches or more of rainfall within any 24-hour period.”

To help provide HRC with regulatory certainty and the Regional Board with the ability to assure permit compliance, a couple requirements should be added:

1. The location of the site measuring the 0.25 inches of rainfall should be specified. In a perfect world, this site should provide real-time data to HRC, the Regional Board, and the public. If real-time data is not possible, 24-hour total rainfall data should be submitted in the Regional Board in the monthly report described in #2 below.
 2. During October 15 to May 1, HRC should provide a monthly report to the Regional Board showing which days hauling took place and the 24-hour rainfall totals if not available in real-time. The hauling information should be readily available from HRC haulers or their hauling contractors.
- II. Given multiple lines of evidence that the Tom Gulch watershed is by far the largest producer of sediment within the Elk River Watershed, timber harvest activities should be prohibited for at least 10 years, while restoration and recovery can proceed.

Thank you for your consideration of my comments.
Sincerely,

Fred Blatt