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Rebecca Fitzgerald & other WQ Staff
North Coast Regional Water Quality Control Board
Santa Rosa
California **RE: "... Draft Work Plan to Control Excess Sediment ..."**

Dear Rebecca Fitzgerald and WQ Staff & Board:

I haven't had time to thoroughly review and comment on the Draft Work Plan, but I do have some comments and questions. These are my own, but the Environment Protection Information Center (EPIC) is very interested in the success of this huge program to reduce excess sediment on the North Coast and would like to consult with you and help with the process.

As regards the South Fork Eel River. Pages 61 and 63 need to incorporate other landowners and interested stakeholder parties. These include, but are not limited to the Redwood Forest Foundation, Inc. (RFFI), Coastal Headwaters Association, a number of Indian organizations and tribes (e.g. Cahto, Eel River Wailakis, and the InterTribal Sinkyone Wilderness Council), and other South Fork Eel River restoration entities such as Even Engber's Bioengineering Associates, and restoration configurations that Bill Eastwood and Harry Vaughn are associated with (that includes ERWIG). I would suggest that WQ hold a South Fork Eel River Sediment Control Congress/Workshop that specifically invites a wide range of community groups to initiate and help comprehensive implementation of the Sediment Control Plan.

Stitz Creek should be included on page 81 of the section on the Lower Mainstem Eel River. It was one of the five waterbodies named in 1997 as especially cumulatively impacted by sediment. Bear and Jordan Creek are specifically mentioned, and Stitz needs a focus as well. Maybe we should have an 11th year commemoration of the impacts from the 1996-1997 New Year's storms, perhaps at Stafford. Those three Mainstem Eel tributaries have yet to receive the restoration effort they deserve.

As regards the Mattole section: A similar suggested congress/workshop described above for the South Fork Eel should be held for the Mattole. Also I

think your "Mattole River Task 6" on page 139 may be misconceived and perhaps have a "tendency" to alienate residents from the effort to cooperate in sediment control. You should be aware that Humboldt County has an Alternative Owner Builder Ordinance that allows unpermitted residences if the residences are never to be sold or rented. Outreach and education and incentives will serve better usually than broad threats of government enforcement that could invoke a whole range of citizen fears and resistance. Many of the landowners, residents, and ranchers most supportive of controlling sediment, and conservation in general, fall into the owner-builder category.

Looking forward to seeing how this works out and helping where possible. From time to time the North Coast Board has been a beacon of hope and acted forthrightly despite criticisms and adversity. Your Work Plan needs a Funding Plan that can effectively be supported and successful for the Sediment Control Program.

Sincerely,

Richard Gienger