



Community Clean Water Institute

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December 13, 2007

Regional Water Quality Control Board
5550 Skylane Blvd
Santa Rosa, CA 95403

**Subject: Comment - Work Plan To Control Sediment In Sediment-Impaired Watersheds
In Support of Regional Board Resolution No. R1-2007-0095**

In general the Community Clean Water Institute (CCWI) would like to express support for the draft Work Plan to Control Sediment Waste Discharges. The comments below are to address areas where it is believed that the work plan may be improved to better address fine sediment in the in the Russian River Basin.

CCWI is a non-profit group whose primary objective is to promote watershed stewardship and protection through water quality monitoring. CCWI works with volunteer citizen monitors and watershed groups to organize and implement water quality monitoring throughout Sonoma County.

General Comments

The following comments have been prepared under short notice and it is admitted that the entirety of the document has not been absorbed, therefore please excuse and do not take offense to recommendations that are already included in the document.

The tasks listed to address excess sediment in the Russian River are all necessary, but may need some expansion.

Task 1

It would be appreciated if the Community Clean Water Institute along with the Sonoma County Water Coalition were included in the list of interested stakeholders. It is also noticed that Redwood Chapter of the Sierra Club was not included, and perhaps would like to be.

Task 2

Funding of removal of sediment source areas is definitely of high priority. As the Russian River TMDL becomes available it is understood that particular projects will be rated for need. Clear organization of which projects have priority will be important.

Task 3

Municipal Storm Water Programs are extremely important and as yet under solicited. From what I have seen it is apparent that contractors and homeowners are not aware of the importance or requirement to control sediment runoff. It is very important that the storm water program is actively solicited and enforced so that the program is effective.

As for rural residential storm water programs, it would seem that the program is ineffective as is. I am building a second unit with my parents on their property and to my knowledge we have yet to receive any notice of BMPs or the regulation regarding erosion control and the like.

Another recommendation is that literature that details the benefits and the construction of peak runoff reduction systems should be made available. Ideally post-project hydrology should be equal to that of pre-project conditions. In this way concentrated runoff will be less likely to cause erosion and channel incision. Perhaps such a goal should be made, or better yet a rule. Educational materials on infiltration basins and swales should definitely be made available.

Task 4

It is the position of the Community Clean Water Institute that in-stream gravel mining should be phased out completely in the Russian River. As noted in the document, the Russian River channel has incised by as much as 20 ft due to gravel extraction and damming. Extraction of more gravel is in no way a positive to the system. Part of what is trying to be accomplished by this work plan is to decrease the ratio of fine sediment to coarse grained sediment in spawning gravels, to reduce embeddedness. Therefore, the extraction of coarse sediment (gravel) or the input of fine sediment have the same problematic effect. Therefore, an attempt to phase out both is necessary.

Task 5,6

Agreed.

Task 7

Agreed, and make sure to create an easy way for citizens to report egregious sediment sources.

Task 8

Agreed.

Task 9

Agreed.

Task 10

Agreed.

Task 11

Agreed. Ensure that riparian corridors are preserved or enhanced and that these areas may not be permanently or temporarily encroached upon for any reason including for eradication of pests. Promote BMPs including swales and sediment retention systems. Discourage discing as to preserve the soils integrity and infiltration ability.

Task 12

Agreed. Promote riparian corridor protection through BMPs.

Task 13-15

Agreed

Task 16

Agreed and expand to county roads and city roads

Further discussion on Timber Harvest and Vineyard development is included below.

Timber Harvest (WDRs and Conditional Waivers) – Timber Harvest is the predominant land use on most of the sediment impaired listed north coast waterbodies. Inappropriate harvesting and related activity is noted to be a major cause of sediment impairment in these waterbodies (see EPA/NOAA findings - included) and other Scientific Review Panel reports to the Board of Forestry). Thus, Timber Harvest activity should receive significant review and consideration under the Work Plan tasks and activities enumerated.

WDRs and Conditional Waivers for Timber Harvest Operations have been found to have some notable loopholes or inconsistencies that need repair. One example is Non-Industrial Timber Harvest Plans (NTMPs). NTMPs involves permanent approval of Timber Harvest on non-industrial lands less than 2,500 acres. Exemption for NTMPs from many of the Conditions present in regular Timber Harvest Conditional Waivers are erroneously justified on the assumption that NTMPs are less damaging applications of timber harvest activity (i.e. clear-cuts are not allowed). With NTMPs evenaged silviculture (clear-cuts) may not be permitted. However, permitted silvicultural prescriptions (Alternative Prescription, Rehabilitation, and sometimes Variable Retention) can all have (as it is often the case) the same net effects as clear-cutting activity. In addition NTMPs are subject to the same erosion propensity as any Timber Harvest Plan – with similar road construction and harvest activity (including frequency of entry) as any standard Timber Harvest Plan.

In addition, and in regard to timber harvest activity, the Regional Board should continue to comment on rule making by the Board of Forestry and the Department of Fish and Game regarding Impaired Waters Policy and Coho Recovery Guidelines. The Regional Board should strongly support the current Forest Practice Rules for Threatened and Impaired Waterbodies. These Threatened and Impaired Rules provide needed additional protections to aid in limiting sediment inputs from Timber Harvest Activity (See CDF Hillslope monitoring).

Vineyards - Proliferation of this land use has had major impacts on several north coast rivers, such as the Russian, Navarro and Gualala. The *Work Plan* cites the San Francisco Bay Regional Water Quality Control Board (SFBWQCB) conditional waivers for vineyards as a possible model. While the SFBWQCB process is somewhat effective in reducing individual points of discharge within vineyards through implementation of "Best Management Practices (BMPs), there has been overall failure to control cumulative impacts related to the in the watersheds mentioned above. Empirical evidence shows continuing impacts to the Russian River, Navarro River, and Gualala River watersheds from sediment pollution problems due to vineyard development. This issue needs to be looked at more closely by the Regional Board and related suggested tasks in the Work Plan.

Sincerely,

Robert Pennington, Program Coordinator, CCWI

