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SECRETARY FOR  
ENVIRONMENTAL PROTECTION

**North Coast Regional Water Quality Control Board**

Date: February 7, 2013

To: Thomas Williams, Acting Senior, Regional Water Board (RWB) Northern  
Timber Unit  
CalFire (CF) Review Team Chair, Santa Rosa  
Jeremy Drakeford, Green Diamond Resource Company (GDRCo)  
Michael Lommori, Sierra Pacific Industries (SPI)  
Len Nielson, CF  
File

From: Timothy Walcott, Environmental Scientist, Regional Water Board (RWB)

Subject: Water Quality focused Pre-Harvest Inspection Report for THP 1-12-114 HUM,  
Mad River.

On January 29, 2013, I participated in a focused Pre-Harvest Inspection (PHI) for Unit A of Timber Harvest Plan (THP) 1-12-114 HUM. Unit A is 55.7 acres. The silviculture proposed for Unit A is predominantly under the clearcut prescription with selection for the Class I (C I) and Class II (C II) Watercourse Lake and Protection Zones (WLPZs). The harvest area drains into Canon Creek, which drains into the Mad River. The Mad River contains anadromous salmonids listed as threatened and/or endangered. The Mad River watershed is also 303(d) listed for excessive temperature, sedimentation/siltation, and turbidity.

The primary purpose of this PHI was to evaluate protection of the beneficial uses of waters of the State for the Mad River watershed and to evaluate whether the proposed project complies with all substantive and procedural requirements of the Basin Plan and the Porter-Cologne Water Quality Control Act. In addition, this inspection provided an opportunity for RWB staff to verify the proposed THP's compliance with current California FPRs. Comments and recommendations in this memorandum are provided in accordance with California Public Resources Code (PRC) Section 4582.6(a) and (b).

**I. FOCUSED PHI PARTICIPANTS**

Jeremy Drakeford, Registered Professional Forester (RPF), GDRCo  
Michael Lommori, RPF, SPI  
Len Nielson, Forester I, CF  
Timothy Walcott, Environmental Scientist, RWB

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**FEB 07 2013**

COAST AREA OFFICE  
RESOURCE MANAGEMENT

## II. UNIT A SUMMARY

The THP area is located in the Mad River watershed approximately 4 miles southeast of the town of Korbel. The unit proposed for harvesting is within a portion of Section 6 of Township 5 North, Range 3 East of the Humboldt Base Meridian. The erosion hazard rating for the harvest area is calculated as moderate.

The silviculture proposed within Unit A is predominately clearcut with selection for the C I and C II WLPZs. Tractor, skidder, feller, and cable skyline are the proposed yarding methods. Site preparation includes mechanical site preparation, pile burning, and broadcast burning. Winter operations include tree felling and equipment operations, with hauling during non-saturated road conditions. No new road construction is proposed in Unit A.

## III. FOCUSED PHI OBSERVATIONS AND RECOMMENDATIONS

The primary purpose of the focused PHI was to address potential impacts in Unit A from the proposed oversized clearcut, and concentrated on the road system and the proposed watercourse protection measures for Unit A. The main road system in the plan area is in good to fair condition. Point T8 is a new road point that was identified during the focused PHI. There is a C III watercourse that flows across an old skid trail at Point T8 before reentering the original watercourse channel. To ensure that the watercourse does not get diverted down the skid trail, we agreed in the field that Point T8 will be added to the Road Work Order with language that ensures an enhanced berm is constructed **(Rec. 1)**.

There is a C III watercourse segment with a highly eroded channel approximately 25 feet upslope of Point T3. The eroded watercourse channel continues downslope to Point T5. In an effort to minimize the risk of additional channel bank erosion, the inspection team agreed to establish a 15 foot no harvest buffer for this watercourse segment, with the exception of a few trees that were marked for harvest at the time of the inspection **(Rec. 2)**.

The THP proposes the reconstruction of a skid trail in Unit A that crosses an unstable area and would be adjacent to the WLPZ established for Canon Creek. Due to the elevated risk of soil discharge into Canon Creek if the skid trail was reconstructed across this area, the inspection team agreed in the field that the skid trail will not be rebuilt across the unstable area **(Rec. 3)**.

Another concern that was discussed during the focused PHI was the proposed winter operations. In an effort to minimize the risk of soil transport, the inspection team agreed in the field that winter operations be limited to felling only in Unit A **(Rec. 4)**.

It was noted that felling trees near C III watercourses during the winter period may occur. In an effort to minimize the risk of a potential discharge, the inspection team agreed in the

field that language be included in the THP that ensures equipment will be present near a C III watercourse in Unit A if there is the potential for a tree to fall into the watercourse during harvest operations in the winter period (**Rec. 5**).

Unit A contains large redwood C III channel zone trees. None of the trees observed were marked for harvest at the time of the PHI. 14CCR 916.9(e) (2) of the THP specifically states, "In all instances where trees are proposed to be felled within the channel zone, a base mark shall be placed below the cut line of the harvest trees within the zone. Such marking shall be completed by the RPF that prepared the plan, or a supervised designee, prior to the preharvest inspection". To ensure compliance with language in the THP, include language that specifies all channel zone trees in Unit A will be retained (**Rec. 6**).

The RPF also proposed a Special Operation Zone (SOZ) during the PHI. The zone would be the area between the flagged WLPZ that was established for Canon Creek and the seasonal road in Unit A. The SOZ would specify the retention of all hardwoods and any submerchantable conifers. It is anticipated that the RPF will include the establishment of an SOZ in Unit A prior to 2<sup>nd</sup> Review of the THP.

#### Additional Observations:

This proposed THP is very unusual in a couple of ways. Unit A contains numerous large diameter redwood trees (6'-10' range). This is unusual as most old growth redwoods on private timber lands in the Mad River watershed have already been harvested and Unit A contains a significant number of them in a localized area. Secondly, there has been a nesting pair of Spotted Owls in Unit A that have utilized at least seven different nest trees within Unit A during the past decade. Finally, this THP is also unusual in that SPI is the primary landowner and has attempted to harvest this area with previous THPs unsuccessfully, due to the present of the Spotted Owls and the fact that SPI does not have a "Take" permit. With this proposed THP however, GDRCo is also listed as the timberland owner and they possess a "Take" permit. GDRCo intends to utilize their "Take" permit to harvest Unit A.

#### **IV. GENERAL WASTE DISCHARGE REQUIREMENTS**

Timber Harvest Projects on private lands within the North Coast Region must be permitted under either Waste Discharge Requirements or a Waiver of waste discharge requirements. The RWB has adopted General Waste Discharge Requirements (General WDRs) under Order No. R1-2004-0030 to provide coverage for THPs and Program THPs (PTHPs).

The RWB also adopted a Waiver, Order No. R1-2009-0038 (supersedes Order No. R1-2004-0016), which can provide coverage for low impact THPs, NTMPs, Modified THPs (MTHPs), Emergencies, Exemptions, and timber harvest projects in compliance with the Garcia River TMDL.

On October 4, 2012, the North Coast Regional Water Quality Control Board (RWB) adopted Order No. R1-2012-0087, Waste Discharge Requirements for Discharges Related to Green Diamond Resource Company's Forest Management Activities Conducted Within the Area Covered by Its Aquatic Habitat Conservation Plan in the North Coast Region, Humboldt and Del Norte Counties (Forest Management WDRs). Green Diamond THPs in the Aquatic Habitat Conservation Plan area submitted to the Review Team after adoption of this Order do not require enrollment under Order No. R1-2004-0030, General Waste Discharge Requirements for Discharges Related to Timber Harvest Activities on Non-Federal Lands in the North Coast Region (General WDRs). Sediment discharge sources located on Green Diamond's mainline and secondary road system are covered under Order R1-2010-0044, Waste Discharge Requirements for Discharges Related to Road Management and Maintenance Activities Conducted Pursuant to the Green Diamond Resource Company Aquatic Habitat Conservation Plan in the North Coast Region (Roads WDRs).

Copies of the Forest Management WDRs, GWDR and Waiver, as well as other timber related information, can be found at the following web address:

[http://www.waterboards.ca.gov/northcoast/water\\_issues/programs/timber\\_operations/timber\\_waiver/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/timber_operations/timber_waiver/)

It appears this THP will be enrolled under the GWDRs because SPI is the landowner.

## **V. RECOMMENDATIONS**

Recommendations and comments are provided pursuant to the statutory authority contained in the Porter Cologne Water Quality Control Act (California Water Code Section 13000 et seq.), the Basin Plan, and the Z'Berg Nejedly Forest Practice Act (PRC Section 4582.6), and in accordance with the Forest Practice Rules 14 CCR 1037.5(f).

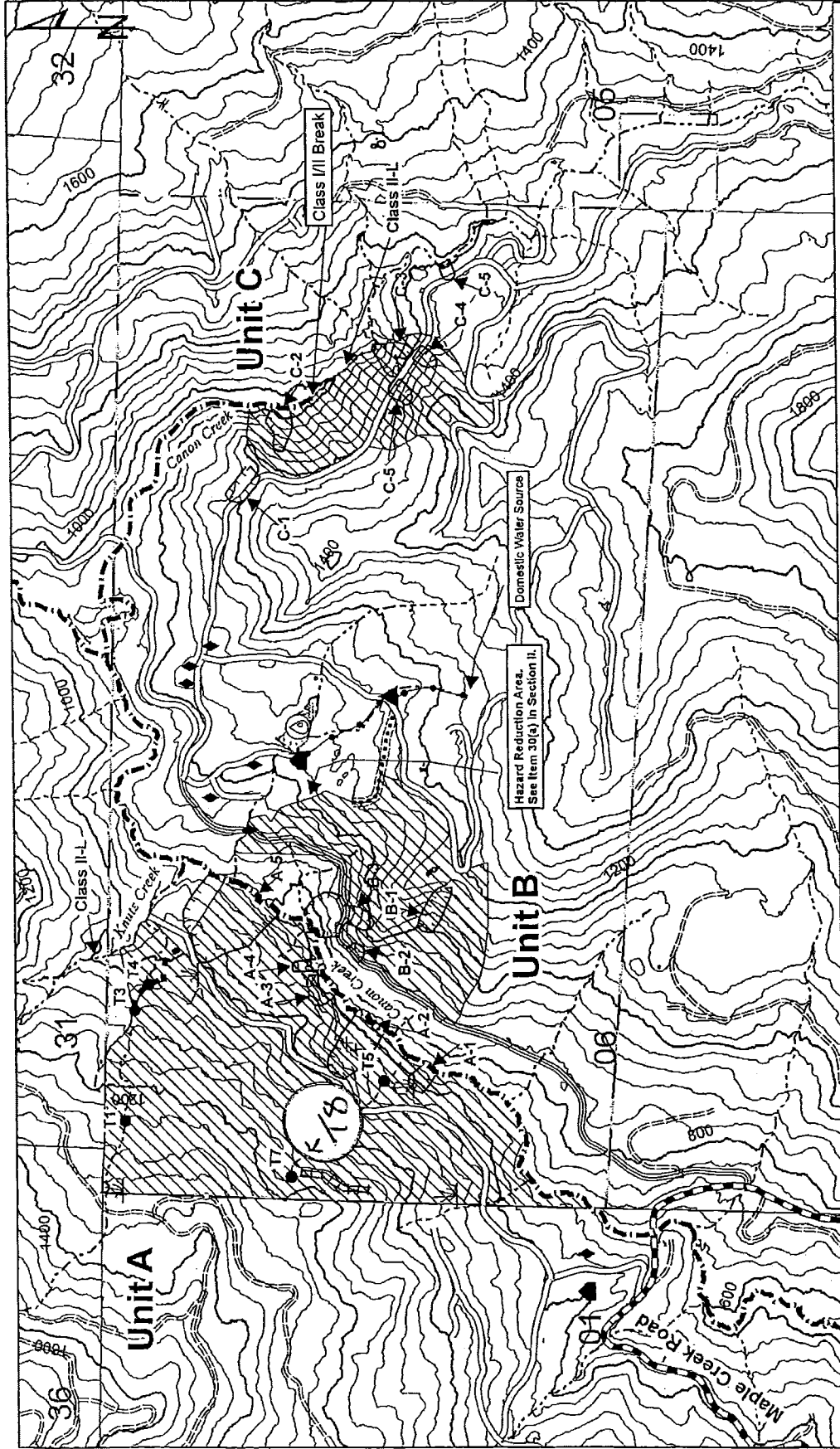
Recommendations 1-5 were agreed to by the RPF at the time of the PHI. Recommendation 6 is supported by the documentation in this report.

1. Add Point T8 to the Road Work Order. Include language that ensures an enhanced berm is constructed so that the watercourse will not get diverted down the skid trail.
2. Establish a 15 foot no harvest buffer for the C III watercourse segment from approximately 25 feet upslope of Point 3 to Point T5, with the exception of a few trees that were marked for harvest at the time of the inspection.
3. Include language in the THP that ensures a skid trail will not be reconstructed across the unstable area in Unit A.
4. Include language in the THP that ensures winter operations will be limited to felling only for Unit A.

5. Include language in the THP that ensures equipment will be present in Unit A if there is the potential for a tree to fall into a C III watercourse during harvest operations.
6. Include language in the THP that specifies all channel zone trees in Unit A will be retained.

**VI. Recommendations for Compliance with the General Waste Discharge Requirements**

It appears this THP will be enrolled under the GWDRs because SPI is the landowner.



**Nacho Libre THP** Section 6, T5N, R3E, HBM **THP Map** USGS 7.5' Quadrangle: Korbel (1979) Scale: 1 inch = 750 feet  
 Contour interval = 40 ft.

Roads	Watercourse	Occupied Residence
<ul style="list-style-type: none"> <li>Existing permanent road</li> <li>Seasonal road</li> <li>Public road</li> <li>Proposed seasonal road</li> </ul>	<ul style="list-style-type: none"> <li>Class 1</li> <li>Class 2 (I-L, II-S)</li> <li>Class 3</li> <li>Class II Pond</li> <li>Class III Wet Area</li> </ul>	<ul style="list-style-type: none"> <li>Occupied Residence</li> <li>Outbuilding</li> <li>Water Tanks</li> <li>Domestic Water Line</li> <li>Tractor XING</li> <li>Drafting Location</li> </ul>
<ul style="list-style-type: none"> <li>SPI Ownership</li> <li>THP Boundary</li> </ul>	<ul style="list-style-type: none"> <li>Unstable Area</li> <li>WLPZ Skid Trail</li> <li>Skid Trail in Unstable Area</li> <li>Skid Trail on slopes of 65%</li> </ul>	