



October 8, 2015

Mr. John Corbett, Chairman
North Coast Regional Water Quality Control Board
And Board Members
5550 Skylane Blvd Ste A
Santa Rosa, CA 95403-1072

Dear Chairman Corbett and Members of the Board:

It has been some time since our company last presented information to the Board regarding our activities in the Elk River watershed and we want to take a few moments to inform the Board of our activities and accomplishments since that time. We appreciate the time and effort the Board and staff spend on forest management issues and hope this short update will be beneficial.

By far our most significant accomplishment has been the formal submittal of our Report of Waste Discharge (ROWD). This report, several years in the making, was submitted following a period of collaborative draft review with Board staff. The report utilize years of data collection and analysis contained in the previously submitted Elk River Watershed Analysis, a document prepared by Humboldt Redwood Company (HRC) in consultation with a variety of watershed professionals and experts including Dr. Fred Charles (Formation Environmental), Gary Simpson (Certified Engineering Geologist, SHN Engineering), John Oswald (Certified Engineering Geologist, Oswald Geologic) and other notable experts. Our ROWD includes a comprehensive plan for management, monitoring, and reporting.

Some highlights of the ROWD include:

- Forestry prescriptions designed to minimize road and non-road related surface and mass wasting erosion.
- Growth and yield analyses conducted with short and long term planning horizons including effects of changing canopy over time.
- Addresses forestry-related sediment concerns brought forth in the Peer Review Draft TMDL.
- Includes references to key monitoring data used to evaluate management plan effectiveness.
- Includes a monitoring and reporting strategy designed to keep HRC and Board staff up to date on effectiveness and watershed response moving forward.

As a result of our ROWD submittal we are currently engaged with Board staff in the development of the Waste Discharge Requirements (WDR) for our Elk River operations. Key points of the ROWD we want to emphasize and hope will be reflected in the WDR include:

- An accurate depiction of current HRC management practices.
- The ROWD provides measures and requirements demonstrably effective in controlling erosion.
- Our willingness to work with staff to better understand and address, when warranted, requirements staff believe are necessary in addition to the ROWD.
- A permitting and enrollment process that occurs in conjunction and harmony with the multi-agency state-wide timber harvest plan approval process.

In keeping with our long standing record of commitment to restoration projects across our ownership, we have been intimately involved with watershed restoration efforts in the Elk River watershed. Since acquisition we have removed or stabilized over 140,000 cubic yards of sediment as well as upgraded over 75 miles of road including over 450 watercourse crossings. In the last year we have participated in both the Elk River Recover Assessment led by Cal-Trout and Board staff as well as the newly initiated Elk River Stewardship Project. Most recently when grant funding to facilitate the formation and planning effort of the Elk River Stewardship project was delayed our company stepped forward to provide necessary financial support. In addition to participating in these community efforts we continue our own independent restoration work with the recent completion of a two structure wood loading Coho Help Act restoration project in the north fork of Elk river. This project recognizes Elk River as the most productive Coho stream tributary to Humboldt Bay and is designed to improve fish spawning and



rearing habitat as well as quantify effects of engineered wood loading on sediment transport and storage. We are also two years into a collaborative multi-year paired watershed sub-basin study with Humboldt State University and CAL-FIRE; the purpose of which is to further assess the effectiveness of a suite of best management practices, including those detailed in the ROWD, in relation to potential increased sediment discharges associated with harvest activities on the most erodible geologies on HRC's ownership in Elk River. We are committed to long term sustainable forestry and watershed restoration in Elk River as well as the rest of our ownership.

We continue to operate in compliance with the existing Elk River WDR as well as the Corrective Action Orders issued to the now defunct Pacific Lumber Company. In keeping with our company's mission to manage these forests with a high degree of environmental stewardship while at the same time operating a successful business, our company has substantially changed the land management practices under which these regulatory permits and orders were issued, significantly lessening disturbance and impacts. We anticipate, after thorough review of our ROWD and with issuance of a new Elk River WDR the Board will find these orders unnecessary.

We appreciate the opportunity to provide the Board this information and look forward to working with Board staff going forward.

Sincerely:

Dennis Thibeault
Vice President Forestry
707-463-5112

ABOUT HRC

Humboldt Redwood Company (HRC) was created in 2008 from lands purchased in Humboldt County with the publicly declared mission to be good stewards of the forest and at the same time run a successful business. We have made significant progress in that regard:

1. *Adopting policies to make HRCs forestlands FSC certified;*
2. *Adding more than 500 million board feet of redwood and Douglas fir trees by lowering the rate of harvest;*
3. *Defining of old growth down to the level of an individual tree, along with implementation of a policy to protect all individual old growth trees across our property;*
4. *Elimination of traditional clear cutting from our property;*
5. *Long term investments to improve habitat for fish across the property by controlling or holding back over 400,000 cubic yards of sediment from the coastal streams flowing through our forest;*
6. *Upgrading of over 500 miles of roads including over 1400 watercourse crossings;*
7. *Operating as an open and transparent business; including an open invitation to take interested individuals anywhere in the forest;*
8. *Completing a substantial rebuild of our Scotia sawmill, assuring that Humboldt County will have infrastructure in the processing of wood products for many years to come; and*
9. *Employing about 250 skilled employees in Humboldt County earning family-level wages and benefits.*