

The article below **“Will more logging restore the Elk River?”** was published in the Eureka Times Standard by Jerry Martien on February 3, 2016.

Humboldt Redwood Company found a number of comments that would benefit from additional correction, clarification or commentary which are presented on the right side of the page in green italics.

Substantial factual information on Mendocino and Humboldt Redwood forests and its practices are available at [www.mrc.com](http://www.mrc.com). Wherever possible we have provided direct links to specific material on our website to help the readers have easy access.

Text of Article	<i>Facts about Humboldt Redwood Company</i>
<p>Text of article begins below, spaces placed to allow facts to line up with text of article.</p> <p>More than 17 years ago, landslides and flooding and huge demonstrations forced state regulators to shut down Charles Hurwitz’s logging operation in Elk River. After a five year moratorium, his Maxxam Corporation was allowed to resume cutting under the terms of a Habitat Conservation Plan and new regulations from North Coast Regional Water Quality. The public was assured that the new rules would restore the river and allow the severely damaged watershed to recover.</p> <p>During the moratorium water quality did improve, but as logging returned so did sediment. When Hurwitz declared bankruptcy five years later, the river was in worse shape than ever. Even minor rainstorms spilled out of the aggraded channel, leaving silt deposits that regularly collapsed into the river. Orchards and gardens were destroyed, homes were flooded, water and septic systems ruined, and threatened Coho populations continued their decline.</p>	<p>HRC staff was unable to locate records of any 5-year moratorium on harvest, however there was a moratorium placed on new THP approval by Cal Fire in effect from 2000-2002. PALCO harvest records indicate that timber harvest levels were reduced in 1999 and 2001, with no harvest during the year 2000.</p> <p>PALCO’s HCP (adopted by HRC in 2008) was implemented in 1999 with further watershed specific prescriptions implemented in 2005.</p> <p>HRC staff is unaware of any water quality monitoring records being available for the 1998 – 2001 time period supporting the author’s comment that water quality improved during this time period. Salmon Forever (2013) does report a slight decline in suspended sediment concentration in 2005-2007 as recorded on the North Fork. Harvesting during and preceding this time period are consistent with contemporary rates.</p> <p>Like many coastal streams Elk River flows onto its floodplain in response to significant rain. Roads, houses, orchards, and gardens located on the floodplains adjacent the stream channel are susceptible to flooding. The river’s streamflow carrying capacity is affected by surrounding land use including roads and bridges, dikes and levees, channel and flood plain vegetation management, and sediment loading.</p> <p>Elk River provides critical coho, steelhead, and chinook salmon habitat and is likely the most productive coho stream flowing into Humboldt Bay. The California Department of Fish and Wildlife (CDFW) conducts annual spawning ground surveys within 21 stream reaches of the Elk River and its</p>

<p>When Humboldt Redwood Company replaced Maxxam in 2008, Water Quality officials assured us that now their regulations would work. HRC promised no more clearcuts and no cutting old growth. But the quantity of cutting didn't diminish.</p> <p>Elk River is only a tenth of HRC's 220,000 acres in Humboldt County, but it continues to provide 40 percent of its annual cut. Despite the rules — or because of the rules that allowed this cut — Elk River is the poster child of impaired watersheds, the worst of dozens under the jurisdiction of the North Coast Regional Water Quality Board.</p> <p>Now the board has proposed new regulations to deal with Elk River's ongoing deterioration. Once again, they claim they can improve Elk River while intensive logging continues. (They have yet to respond to a May, 2014 petition by residents asking for a moratorium on logging in the watershed till the river has recovered.)</p> <p>The new plans are complicated and contradictory, trying to respond to regulations and science and the residents of Elk River, but giving in to lawyers and politics and money.</p> <p>A long overdue Restoration and Stewardship Program is part of the latest recovery proposal, including the removal of 600,000 cubic yards of silt. But the program is only funded through 2017 and is not expected to be on the ground till 2020. Meanwhile, these future improvements are used to justify ongoing and expanded timber operations.</p> <p>A new Stewardship Group includes two Upper Elk River residents, but will be dominated by big timber,</p>	<p>tributaries, and has documented that adult coho salmon and steelhead trout regularly utilize most major reaches in both the North and South Forks. Annual summer snorkel surveys conducted by HRC indicate that juvenile coho and steelhead utilize all major reaches.</p> <p>HRC's harvest history since implementing new management has included reducing the volume of harvest throughout the ownership and increasing inventory over time. HRC has placed emphasis on new policies to address community concerns including: using uneven-aged management throughout the forestlands (i.e. selection) where possible and prohibiting the use of clearcuts; protecting individual old growth trees and stands; upgrading roads and decommissioning roads to reduce sediment impact; and improving forest and aquatic habitat over time.</p> <p>HRC's harvested volume in Elk River is significantly less than 40 percent of the company's annual cut. Throughout HRC's forestlands and within watershed units, it is HRC's goal to increase forest inventory over time by harvesting less than we grow annually (see our website for details <a href="http://www.hrcllc.com/monitoring/forest-inventory/">http://www.hrcllc.com/monitoring/forest-inventory/</a>).</p> <p>HRC is supportive of the Cal Trout led Elk River Recovery Assessment and the Humboldt County led Stewardship Programs. HRC has provided technical and financial support for these NCRWQCB initiatives. Defining, designing, and implementing actions that address flooding and water supplies and enhance fisheries habitat are the objective of these programs.</p>
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downriver grazing interests (“we love silt”), and the regulatory agencies that have permitted the present damage.

The federal EPA, accusing Water Quality of “analysis paralysis,” funded a 2015 Technical Analysis For Sediment which agreed with previous studies: since the change of ownership to HRC, Elk River has not improved, just gotten worse more slowly. It recommends a “zero load allocation” for silt. A long awaited TMDL (Total Maximum Daily Load allocation for silt) also says: “... the loading capacity for additional sediment is defined as zero ...”

A revised Waste Discharge Requirement, defining how much sediment HRC is allowed to put into the river, also says zero. Yet the WDR assumes that logging will continue. It proposes increased setbacks from water courses and a return to the old custom of no winter logging, but it doesn’t significantly reduce the cut.

The WDR includes a moratorium on logging in five extremely erosive “highrisk” South Fork tributaries. And Water Quality’s Executive Director has delayed a 600acre HRC harvest plan in those high risk watersheds, some of it directly above residential neighborhoods.

But the WDR allows continued cutting on the North Fork, and the South Fork moratorium is subject to “exceptions” if HRC makes a “meaningful contribution” to water quality—like restoring a flood channel or a damaged water system. So more logging will be the price of Elk River’s recovery from logging.

HRC claims economic hardship, denies responsibility for the silt, and is suing the board to approve its 600acre THP. As long as our regulatory agencies give in to these pressures — as the WDR clearly shows — we can expect more mud and bigger floods, and Elk River and its damaged neighbors will not recover. We need a moratorium now.

(On Friday, Feb. 5 at 1 p.m. North Coast Regional Water Quality staff will hold a workshop on the Technical Analysis and TMDL Action Plan at the Humboldt County Agricultural Center, 5630 South Broadway, Eureka. It will come before the NCRWQ Board on April 7 at Eureka’s Wharfinger Building.)

A zero load allocation is a conceptual target proposed by the NCRWQCB staff. The NCRWQCB staff acknowledges that a zero load allocation is not physically feasible considering erosion is a natural process apart from land use influences. Use of the proposed zero sediment load allocation for the Elk River TMDL as an alternate to more standard TMDL allocations that provide for some degree of legacy and contemporary land use influence on erosion rates is currently under consideration by the NCRWQCB.

HRC’s position is that reviews of multiple sources of monitoring have found little in the way of sediment delivery originating from our timber management activities. The THP referenced by Mr. Martien is part of a research project being conducted in collaboration with Humboldt State University and the Department of Forestry and Fire Protection (CalFire) to further quantify and quality the effectiveness of HRC’s forestry best management practices in preventing and minimizing sediment effects in Elk River.

As part of our forestry activities, HRC implements a multi-species state and federal Habitat Conservation Plan (HCP) established by the previous landowner in 1999. Under this HCP every THP is developed using

	<p>established and well vetted forest and watershed conservation and restoration measures. Approximately 45 miles of historic logging roads have been decommissioned and over 350,000 cubic yards of sediment have been removed or otherwise prevented from entering the stream system as part of HCP implementation since 1999. Active operations are routinely inspected by company foresters, Cal Fire and NCRWQCB inspectors, and third-party HCP monitors under the supervision of the HCP signatory agencies. HRC has been certified to the Forest Stewardship Council® US Forest Management Standards for the past 7 years (C031337).</p> <p>HRC takes the underlying concerns voiced by Mr. Martien very seriously, however cannot agree with Mr. Martien’s contention that erosion from contemporary forestry operations are to blame absent any physical lines of evidence of significant sediment discharge sources from HRC’s forestry activities in the watershed. Significant changes in forest practices occurred in 1999 designed to benefit the conservation and restoration of watershed health through effective erosion control and riparian management. There is a growing understanding among those examining the lower Elk River watershed that erosion control alone is insufficient to address health and safety issues related to flooding and water supply. The solution to these concerns lies in strategic management of the stream channel, estuary, and county and private infrastructure in the lower watershed. HRC plans to continue its policy of looking for meaningful ways to partner with the county and downstream stakeholders in addressing these concerns.</p>
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