

April 18, 1991

Mr. Stan Dixon, Supervisor  
Humboldt County Board of Supervisors  
825 Fifth Street, Room 111  
Eureka, California 95501

Dear Mr. Dixon:

Subsequent to my June 13, 1990, letter to the California Department of Forestry and Fire Protection regarding sediment issues in the Mattole River watershed, my staff has been asked by several members of the public as well as various agency representatives to clarify what we mean by "zero net discharge" of sediment. This letter is intended to help provide that clarification, I thought it appropriate to address this clarification to you as the supervisor representing the citizens living in the Mattole River watershed. I also think this clarification is timely in light of the good progress I understand the citizen groups in the area are making in trying to resolve problems and reach a common ground on restoring the watershed.

I don't think that many people living or working within the Mattole watershed would disagree that the system is in bad shape due to the presence of excessive amounts of sediment. I also realize there is considerable disagreement as to where the sediment is coming from and how much impact various sources of sediment is having on the river. From the perspective of the significant fishery resources dependent upon the Mattole, our Department believes that it doesn't necessarily matter where the sediment is coming from because there is already too much sediment in the system. If we are going to restore the Mattole River salmon and steelhead fishery, we must deal with the adequacy of the habitat. Thus, minimizing all sources of sediment will help us achieve this objective.

The phrase "zero net discharge" of sediment implies the objective of trying to ensure that with any given land management activity at a specific location, the net result of completing that activity means that no additional sediment is added to the system. We recognize that many land disturbing activities will expose soil and result in the generation of sediment regardless of how carefully the activity is conducted. What we're suggesting with the phrase "zero net discharge" is to realize that some sediment will enter the system with any given land disturbing activity. To compensate for this sediment input we recommend that an existing source of sediment input be stopped or at least diminished to a degree that completely offsets the sediment generated by the activity. This offsetting process should occur

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Humboldt Co. 4/18/91 *J. J. J. J.*

Stan Dixon  
April 18, 1991  
Page Two

as close as possible to the site of the land disturbing activity. The net result of this offsetting process would be no additional sediment being added to the system. From a practical standpoint, we would support offsetting reductions of existing sources of sediment that exceed the amount of sediment generated by the activity. This is the only way to help restore the Mattole in terms of its sediment load rather than just maintaining the status quo.

A common question we have received regarding implementing a "zero net discharge" policy is how do you measure actual amounts of sediment expected from the activity as well as actual amounts of sediment reduced by the offsetting activities. We are currently working with the us Soil Conservation service and the North Coast Regional Water Quality Control Board to develop a methodology for estimating volumes of sediment in this process. This is occurring within the Grass Valley Creek watershed in Trinity County which has highly erosive decomposed granite soils. We are hopeful the methodology developed in this area will be applicable to other watersheds like the Mattole. We should have a final draft of the methodology in the next few months.

Another question we've been asked is how widespread should the "zero net discharge" policy be applied. In our view, watershed restoration must be approached on a watershed-wide basis. Although this approach was directed initially at timber harvesting activities, we believe any activity that has the potential to generate sediment should be included. This would involve such activities as road construction and maintenance, residential development, mining, timber harvesting and in some instances farming and ranching. Of course, there are numerous natural sources of sediment such as landslides, slumps and the presence of highly erosive soils that should be dealt with where feasible.

It is very important to note that dealing with various land disturbing activities can only be done through the existing regulatory framework. Our Department has no authority whatsoever to dictate to individual landowners what they should or shouldn't do on their land. We must rely on existing local, State and Federal regulatory agencies and processes as well as the cooperation of local landowners to accomplish our common goal of restoring the Mattole.

For example, Humboldt County is the lead agency for most land disturbing activities occurring within the Mattole watershed. You can utilize your existing permit review processes and ordinances to help begin to deal with some sediment problems. Similar efforts can be made and are being made by the California Department of Forestry and Fire Protection and North Coast Regional Water Quality Control Board.

Mr. Stan Dixon  
April 18, 1991  
Page Three

It is our hope to gain a cooperative approach between landowners, agencies, various interest groups and the public in dealing with problems on the Mattole. With a mutual commitment to protecting the Mattole's unique resources and a lot of hard work, we are confident we can achieve our objective.

I understand there is going to be another community meeting about the Mattole on Sunday, April 21, 1991. A representative from the Department will be there to answer any questions or provide assistance to the local community regarding fish and wildlife issues within the Mattole watershed.

Our Department looks forward to working closely with you and your constituents regarding issues involving the Mattole. If you have any questions regarding this letter, please contact Environmental Services Supervisor Gary Stacey at (916) 225-2371.

Sincerely,

Banky E. Curtis  
Regional Manager  
Region 1

cc: Mr. Bill Imboden  
California Department of Forestry and Fire Protection  
Santa Rosa, California

Mr. Ben Kor  
North Coast Regional Water Quality Control Board  
Santa Rosa, California

Mr. Al Wright  
Bureau of Land Management  
Ukiah, California

Mr. Carl Chavez  
California Department of Parks and Recreation  
Santa Rosa, California

Members of the Mattole Agenda Committee

GBS/mrw:ESD15.2

bc: Mr. Ken Moore - Eureka, California  
Mr. Larry Preston - Eureka, California  
Mr. John Hayes - Redding, California  
Mr. John Turner - IFD, Sacramento, California  
Mr. Scott Downey, IFD, Sacramento, California