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JACK MONSCHKE
Contractor/Consultant
P.O. Box 500
Miranda, CA 95553
(707) 443-3026 Unit 4156

October 27, 1989

Frank Reichmuth
Charles Green
California Regional Water Quality Control Board
North Coast Region
1440 Guerneville Road
Santa Rosa CA 95403

Re: R&J Monitoring Program

Dear Frank and Charles:

I am writing this letter in response to Mr. Kor's letters of October 10 and 18, 1989, regarding the Monitoring and Reporting Program now in place on R&J's lands along the North fork of the Garcia. While I am confident that the program as proposed will provide important data on the levels of sedimentation occurring in the North fork, it is important that the limitations of the program be well understood. In this way, careful evaluation of the results will lead to wiser management of our coastal forest lands by public agencies, the timber industry and private land owners.

The limitations which concern me most and which I have discussed with you both on several occasions but have never set down in writing until now, fall into three categories:

1. There are no background studies on the Garcia which would provide essential baseline information about what has been going on in the river in the past. For example, we all know that the river is downcutting through a large bedload of sediment which was deposited probably as a result of past logging and the major events of '55 and '64. At any point in the river more or less sediment is being contributed as a result of this downcutting process. If we knew, from background studies, what was being contributed at various points in the river through this process, we would be in a better position to determine what is now being contributed in the form of sediment from R&J's current logging operation

2. The monitoring project should allow us to identify sedimentation changes occurring in the river at the various monitoring stations, however, it will be difficult, if not impossible, to identify the causes of those changes. There are several reasons for this:

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- a. Natural events, such as large flood storms can occur at any time and trigger sedimentation changes.
- b. There are many sites in which past bad logging practices are still contributing sedimentation, both within and outside of the recently logged areas.

3. It has been impossible to find sites above and below the areas currently being logged that will give an accurate assessment of change caused by ongoing logging activities. Each site is unique and the configuration of pools and ripples, the gradient, the trapped bedload within the study area and immediately upstream, and other factors will all effect the collected data.

While I am optimistic about the overall value of the project, I am concerned that its limitations be recognized by all involved. If you have any questions about the matter contained in this letter, please contact me so that we can get together and have discussions.

Very truly yours



Jack Monschke
JM:sa

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