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**March 15, 2023**

California Regional Water Quality Control Board  
 North Coast Region  
 Attn. Matt St. John  
 Executive Officer  
 5550 Skylane Blvd., Suite A  
 Santa Rosa, California 95403

RE: Master Inventory Report specific to GDRCO's ownership within South Fork Elk River as per the **Monitoring and Reporting Program (Order R1-2020-0001 attachment C II (D)) of Green Diamond Resource Co Forest Management Waste Discharge Requirements (FMWDR) Order R1-2020-0001.**

Dear Mr. St. John,

This report contains an updated copy of the **Master Inventory** of all erosion sites located within GDRCo's ownership in the South Fork of Elk River watershed, **2022 Completed Annual Summary Report, and 2023 Planned Annual Work and Treatment Schedule** as defined and set forth under the **Order R1-2020-0001**. The specific provisions are stipulated in Attachment C **Section II (D)** of the Order. **To be submitted by March 31<sup>st</sup>, of each year.**

Table 1 consists of the updated copy of the master inventory maintained as per the Order and includes the status of the treatment for each site (i.e. completed, to be scheduled, year scheduled for treatment).

**Table 1 Master Inventory**

SITES	AHCP Treatment Priority	Potential Sediment Delivery Volume (cubic yards)	Year of Treatment	Year of Planned Treatment
1	M	170	2007	
2	ML	148	2007	
3	ML	140	2007	
4	HM	1187	2007	
5	M	147	2007	
5.1	HM	176	2007	
6	ML	151	2007	
7	ML	224	2007	
8	M	125	2007	
9	M	41	2007	
10	HM	332	2007	
11	ML	101	2007	
12	M	362	2007	

SITES	AHCP Treatment Priority	Potential Sediment Delivery Volume (cubic yards)	Year of Treatment	Year of Planned Treatment
13	H	86	2007	
13.1	H	53	2007	
14	M	280	2008	
15	HM	109	2008	
16	M	351	2008	
17	M	490	2008	
17.1	ML	62	2008	
18	M	345	2008	
19	ML	44	2008	
20	M	43	2007	
21	M	69	2007	
22	HM	64	2008	
22.1	L	13	2008	
23	M	8	2008	
24	M	94	2006	
25	HM	56	2006	
26	H	210	2010	
27	ML	37	2010	
28	H	2139	2010	
29	H	235	2010	
30	Unk	37		2023*
31	HM	180		2023*
32	ML	10		2023*
33	M	5313	2013 Waiver Approved	
34	Unk	0	2013 Waiver Approved	
35	HM	4	2013 Waiver Approved	
36	H	1175	2007 Waiver Approved	
37	HM	56	2011	
38	M	359	2011	
39	HM	485	2011	
40	M	134	2010	
41	H	349	2008	
42	L	0	2008	
43	HM	242	2008	
44	ML	83	2014 Waiver approved	
50	HM	88	2011	
51	HM	18	2011	
52	M	2	2011	
54	ML	0	2014	
55	M	122	2014	
56	ML	0	2014	

<b>SITES</b>	<b>AHCP Treatment Priority</b>	<b>Potential Sediment Delivery Volume (cubic yards)</b>	<b>Year of Treatment</b>	<b>Year of Planned Treatment</b>
57	L	0	2014	
58	M	39	2011	
59	HM	99	2011	
60	ML	66	2007	
61	HM	61	2011	
62	HM	75	2011	
100	L	0	2006	
101	M	327	2006	
102	L	0	2006	
103	ML	5	2006	
104	ML	6	2006	
105	ML	1060	2006	
106	ML	821	2006	
107	L	0	2006	
108	ML	444	2006	
108.1	HM	175	2007	
108.2	L	97	2007	
108.3	ML	89	2007	
109	L	0	2006	
110	H	898	2009	
111	M	0	2007	
112	ML	65	2009	
112.1	HM	71	2008	
113	M	163	2011	
114	L	158	2011	
115	L	92	2011	
115.1	L	0	2012 Waiver Approved	
116	Unk	0	2012 Waiver Approved	
117	Unk	0	2012 Waiver Approved	
118	ML	42	2012 Waiver Approved	
119	HM	319	2012 Waiver Approved	
120	M	252	2012 Waiver Approved	
121	M	80	2012 Waiver Approved	
122	Unk	0	2012 Waiver Approved	
123	ML	17	2012 Waiver Approved	
124	H	393	2007	
125	H	209	2007	
126	HM	443	2007	
127	HM	325	2007	
128	HM	45	2007	
129	ML	9	2007	

<b>SITES</b>	<b>AHCP Treatment Priority</b>	<b>Potential Sediment Delivery Volume (cubic yards)</b>	<b>Year of Treatment</b>	<b>Year of Planned Treatment</b>
130	L	0	2007	
131	H	712	2007	
132	L	0	2007	
133	ML	0	2007	
134	ML	27	2007	
135	M	122	2020	
140	ML	35	2011	
141	M	131	2011	
142	L	227	2011	
143	L	160	2011	
144	M	390	2011	
145	H	411	2011	
146	ML	93	2011	
146.1	H	59	2011	
147	HM	771	2011	
148	H	100	2011	
149	H	227	2011	
150	ML	76	2008	
175	ML	0	2010	
176	HM	303	2010	
177	ML	42	2011	
178	H	337	2010	
179	HM	1902	2010	
180	HM	12	2010	
181	HM	152	2010	
182	M	0	2015	
183	HM	143	2015	
184	HM	777	2015	
185	ML	174	2015	
185.1	M	0	2015	
185.2	HM	60	2015	
186	ML	56	2015	
187	H	510	2007 Waiver Approved	
187.1	L	0	2008 Waiver Approved	
188	M	173	2008	
189	L	0	2008	
190	HM	251	2008	
191	HM	104	2008	
192	M	219	2008	
193	M	43	2008	
194	L	11	2008	

<b>SITES</b>	<b>AHCP Treatment Priority</b>	<b>Potential Sediment Delivery Volume (cubic yards)</b>	<b>Year of Treatment</b>	<b>Year of Planned Treatment</b>
200	HM	502	2011	
200.1	M	120	2011	
201	HM	32	2011	
202	M	278	2011	
203	HM	915	2011	
203.1	M	155	2011	
204	M	13	2011	
205	Unk	0	2011	
206	M	175	2011	
207	HM	81	2011	
210	M	315	2010	
211	L	306	2010	
225	L	0	2013 Waiver Approved	
226	ML	0	2013 Waiver Approved	
227	HM	208	2013 Waiver Approved	
228	L	0	2006	
229	L	5	2006	
230	L	0	2006	
231	L	10	2006	
232	L	0	2006	
233	L	0	2006	
234	L	0	2006	
235	L	0	2006	
236	L	5	2006	
237	L	0	2006	
238	L	0	2006	
239	L	0	2006	
240	L	0	2006	
241	L	0	2007	
242	L	10	2008	
243	L	5	2008	
244	L	0	2008	
246	L	30	2008	
247	L	80	2008	
248	L	0	2008	
249	L	0	2008	
250	L	10	2006	
251	L	0	2008	
252	L	0	2008	
253	L	30	2007	
254	L	0	2007	

<b>SITES</b>	<b>AHCP Treatment Priority</b>	<b>Potential Sediment Delivery Volume (cubic yards)</b>	<b>Year of Treatment</b>	<b>Year of Planned Treatment</b>
255	H	50	2007	
256	Unk	0	2007	
257	L	10	2007	
258	Unk	0	2007	
259	L	20	2007	
260	L	95	2007	
261	L	0	2007	
262	M	60	2007	
263	L	50	2007	
264	M	90	2008	
265	L	40	2007	
266	L	80	2008	
267	L	50	2008	
268	M	80	2008	
269	L	60	2008	
270	M	100	2008	
271	M	60	2008	
272	M	100	2008	
273	L	30	2008	
274	L	80	2010	
275	L	10	2010	
277	L	0	2008	
278	L	0	2008	
279	L	25	2015	
280	L	0	2015	
281	L	25	2008	
282	L	30	2008	
283	L	50	2010	
284	L	50	2010	
285	L	60	2010	
286	L	0	2010	
287	L	40	2010	
288	L	60	2010	
289	M	80	2010	
290	M	80	2010	
291	L	80	2010	
292	M	20	2010	
293	L	20	2010	
294	L	0	2010	
295	M	30	2010	
296	M	30	2010	

SITES	AHCP Treatment Priority	Potential Sediment Delivery Volume (cubic yards)	Year of Treatment	Year of Planned Treatment
297	L	5	2010	
298	L	0	2008	
299	L	10	2008	
300	L	0	2008	
301	L	0	2010	
302	M	0	2010	
303	L	0	2010	
304	L	0	2010	
305	L	0	2010	
306	L	0	2010	
307	L	0	2010	
308	L	0	2010	
309	L	0	2010	
310	Low	0	2014	
311	Low	0	2014	
312	Low	0	2014	
313	Low	325	2014	
314	Low	20	2014	
315	Medium	18		2023*
316	High	54		2023*
317	High	33		2023*
318	Medium	60		2023*
319	Low	0		2023*
320	Low	0	2015	
321	Low	0	2015	
322	Low	0	Not Operated	
323	Low	0	Not Operated	
324	Low	0	2020	
325	Low	0	2020	

\*These sites have been included in 1-22-000173 HUM THP as year of use sites.

**RE: 2022 Completed Annual Summary Report for South Fork Elk River Order No. R1-2020-0001**

**Table 2** contains a summary of road segments that were treated in 2022 by treatment class (upgrading or decommissioning). (Map B)

**Table 2: Summary of all Road Work and the Erosion Sites that were completed in 2022**

Treatment Year	Treatment Class	Length of Road to Treat (miles)	# of Sites	Volume Saved (yd <sup>3</sup> )	Treatment Priority <sup>1</sup>
2022	New Construction				
2022	Upgrading				
2022	Decommissioning & Abandonment				

1: "Blank" represents sites where no treatment is required.

**GDRCO Overview of the completed projects.**

**Roads:**

No operations or road construction, upgrading or abandonment activities occurred within the coverage area of this reporting area in 2022.

**Harvesting:**

No operations (felling or yarding) activities occurred within the coverage area of this reporting area in 2022.

Observation: During the winter inspection of all previously treated erosion sites, the RPF did not observe any failed sites. Multiple sections of the SA-2500 mainline road were identified as needing patch rock surfacing to maintain requirements of the Order. These segments had surface drainage maintenance as well as patch rocking completed in the summer period, 2022.



**RE: 2023 Planned Annual Work and Treatment Schedule for South Fork Elk River Order No. R1-2020-0001**

This annual work plan is correlated with the Master Treatment Schedule Report and provides the anticipated 2023 schedule to treat sediment sources on GDRCo’s property within South Fork Elk River (MAP A).

**Summary of the proposed 2023 Treatments**

Table 3 contains a summary of road points and ECP points that are planned to be treated in 2023 by treatment class. All sites planned for 2023 in the Master Treatment Schedule Report have been completed in previous years or were included in approved 1-22-000173 HUM THP.

1-22-000173 HUM THP includes Master Inventory sites 30-32 & 315-319 and associated timber harvest Unit C. All of these road work sites are year of use treatment sites. At this time, GDRCo plans to operate all of these sites in 2023.

**Table 3: Summary of the 2023 Planned Annual Work and Treatment Schedule.**

Anticipated Treatment Year	Treatment Class	Length of Road to Treat (miles)	# of Sites	Potential Volume Saved (yd <sup>3</sup> )	Treatment Priority
2023	New Construction (temporary/reconstruction road to be abandoned)	0.8	0	0	
2023	Upgrading (to be abandoned)	0.09	1	1200	Medium
2023	Decommissioning	0	0	0	

Table 4 contains the detailed information for each sediment source site that is planned for treatment in 2023.

**Table 4: Detailed information for each sediment source site planned for treatment in 2023.**

Site	THP Site	ECP	Company/THP#	Potential Future Yield (yd <sup>3</sup> )	Treatment Priority	Comment on treatment
142101 RP 01	01	N	142101	0	low	Temporary Tractor Crossing across an unclassified swale.
142101 RP 02	02	N	142101	0	low	Fill crossing on unclassified swale. Enhance dip upon seasonal road closure.
142101 RP 03	03	N	142101	0	Medium	This site does not qualify as an Imminent Risk of Failure site. An unclassified swale above a Class III watercourse has developed voids in the inboard fill as well as above the inboard road edge, inline with the watercourse, indicating subsurface flow. Abandon prior to winter period year of use.
142101 RP 04	04	N	142101	0	Medium	Erosional voids have formed in the road running surface above an unclassified swale.
						An unstable area has caused slumping of the outboard fill for approximately 100 feet, narrowing the road width to less than 14 feet. This site was reviewed in the field by GDRCo Geology staff. As per GDRCo geology staff recommendations, minimize cuts and fills as feasible. Ramp into and out of this area and grade the undulating surface to create a usable road surface. If fill material is needed to establish a usable surface, remove fill after operations have been completed.
30	30	N	142101	37	Low	

31	31	Y	142101	180	Medium	<p>A Class III watercourse crossing that is blown out to grade with vertical sides. The watercourse crossing has two closely adjacent TOPs. Access to this site is blocked by an unstable feature (PWA 30) as well as additional year of use sites, this site has remained unchanged since original assessment in 2012.</p> <p>Excavate between the flagged TOP1 and TOP2 and the BOT removing sediment, debris, and buried logs. Install a temporary watercourse crossing to FPR and GDRCo AHCP guidelines as described in Section II of this THP and remove prior to the Winter Period of the year of use.</p>
32	32	Y	142101	10	High	<p>A failing Class III watercourse crossing with 40% of the fill material remaining. Access to this site is blocked by an unstable feature (PWA 30) as well as additional year of use sites, this site has remained unchanged since original assessment in 2012.</p> <p>Excavate between the flagged TOP and BOT removing sediment, debris, and buried logs. Install a temporary watercourse crossing to FPR and GDRCo AHCP guidelines as described in Section II of this THP and remove prior to the Winter Period of the year of use.</p>
315	315	N	142101	18	Medium	<p>A seep is drained in a functional dip. This site is adjacent to an unstable area (PWA 30) that extends 85 feet along the left approach and narrows the road width to less than 14 feet.</p> <p>Maintain dip upon completion of operations.</p>
316	316	N	142101	54	High	<p>Emergent seep flow from the cutbank drains across the running surface causing erosion of the outboard fill.</p> <p>Use as is and dip out upon completion of operations.</p>
317	317	N	142101	33	High	<p>Emergent seep flow from an old growth stump at the inboard road edge flows across the running surface which has causing the formation of a gully in outboard fill.</p> <p>Use this crossing as it is and dip out upon completion of operations.</p>
318	318	N	142101	60	Medium	<p>This site does not qualify as an Imminent Risk of Failure site. An unclassified swale with voids in the fill.</p> <p>Use this site as is and remove prior to the winter period year of use. If water is flowing at the time of operations install a temporary pipe to FPR and GDRCo AHCP guidelines as described in Section II of this THP and remove prior to the Winter Period of the year of use.</p>

319	319	N	142101	0	Low	<p>An unclassified swale with voids in the fill. Voids have formed in the running surface and there are cracks and settling of the outboard fill for 80 feet on the left approach.</p> <p>Use this site as is and remove prior to the winter period year of use. If water is flowing at the time of operations install a temporary pipe to FPR and GDRCo AHCP guidelines as described in Section II of this THP and remove prior to the Winter Period of the year of use.</p>
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Table 5 contains a summary of areas that were assessed in 2022 to identify non road-related and non ECP (NRR-NECP) -related erosion sources.

The final surveys as per the original Master Treatment Schedule were conducted in 2015. No surveys were conducted in 2022.

As per Attachment C II (D) of WDR R1-2020-0001: *Upon completion of corrective action at all the sites from the master inventory, maintenance and submission of the master inventory will not be required, and inventory and treatment of any new road related sediment sources in the Elk River Watershed shall be conducted pursuant to Green Diamond’s Routine Road Maintenance Program and the Roads WDR (Order R1-2010-0044).*

**Table 5: Summary of areas that were assessed and treated in 2022.**

Year	Areas assessed (acres)	Areas to be treated that may contain potential erosion sites (acres)	Erosion Sites found
2022	NA	NA	

Table 6: All areas identified in the original Master Treatment Schedule for SFER that were to be surveyed for non-road related and non ECP (NRR-NECP) related erosion sources have been surveyed. The final surveys were conducted in 2015.

**Table 6. Summary of the NRR-NECP areas that will be assessed and treated in 2023.**

Year	Areas assessed (acres)	Areas to be treated that may contain potential erosion sites (acres)	Erosion sites found
2023	NA	NA	

**Time Schedule for 2023 Treatment Activities for planned ECP sites (See Map A )**

All non-THP related sites have been upgraded as per the Master Treatment Schedule, completed in 2015. See below for the remaining THP related sites planned or available to be treated in 2023.

Temporary Road construction: Approximately 2900 feet of Temporary Road construction is associated with THP 1-22-000173 HUM. These segments of road construction are associated within Units A & C harvest, planned for 2023. (See Map A 2023).

Road upgrading: No road upgrading is planned for 2023. Crossing upgrades as per Table 4 above are planned concurrently with yarding operations in 2023.

Road decommissioning: No decommissioning is planned for 2023. A segment of historic road to be deactivated is planned in 2023 interior to Unit C.

**Map A:**

Timber harvest, road construction, watercourse treatments planned for 2023 are associated with Units A-E of THP 1-22-000173 HUM. These units are mapped on attachment Map A.

The final areas identified as non-operational areas to be assessed for Non-Road Related and Non-ECP(NRR-NECP) related erosion sites were completed in 2015.

**Map B:**

Harvest units operated in 2022 are shown in orange and white stripes. No operations were conducted by GDRCo in 2022 within this drainage.

**As per South Fork Elk River Management Plan (SFERMP revised 7/26/2012) (D 1 (d))** "Some roads have been abandoned and are in a condition where "no treatment" would be required because they are completely vegetated, no longer pose a threat to aquatic systems, and are in a condition that would render the disturbance inherent in decommissioning counter-productive. The road assessment process will determine whether treating certain roads or road segments would be counter-productive".

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Jim Hawkins



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Forestry Manager  
Green Diamond Resource Co  
California Operations



