

3.0 RESPONSE TO COMMENTS FROM CLARK FENTON

3.1 SEDIMENT MANAGEMENT

This comment states that the “plan” should “quantify and rank the suspended sediment sources into Humboldt Bay,” and should “list and implement sediment monitoring programs” for the bay. The comment also queries the approach that the “plan” would use to protect the bay’s beneficial uses from “elevated sediment deposition.”¹ The comment recognizes the District’s ongoing concern about sedimentation within the bay as a cause of potentially increased maintenance dredging, and that there are other, similar operational concerns for the District. While the comment uses the word “plan,” it appears that the context meaning indicates the Draft EIR, and the District considers the letter as a comment regarding the EIR.

This comment appears to suggest that the District has authority to regulate actions that may affect sediment mobilization from the watersheds that are tributary to the bay, notwithstanding the Draft EIR’s explicit statements to the contrary. The District does not have any legal standing or authority to constrain or force any action by any upland landowner that may either exacerbate or ameliorate sediment mobilization from upland land surfaces, exactly as stated in the Draft EIR, and any other response to this comment would be a misstatement (see subsection 5.1.1 in the Draft EIR).

The District does, nonetheless, have concerns about sediment inflow to the bay, and the Management Plan’s implementation will include the development of a collaborative approach (with the Regional Water Quality Control Board, the Coastal Commission, the two local cities and the County of Humboldt, and other concerned parties) to managing sediment inflow into the bay from the bay’s tributaries and other sources. The District appreciates the commenter’s suggestion that the Plan’s implementation should rank or prioritize the tributaries to the bay with respect to their sediment production, and the District will consider such a ranking as part of the Plan’s implementation.

The comment’s identification of sediment inflow data for the Elk River and Freshwater basins is helpful in clarifying the primary thrust of the Draft EIR’s assessment, which is that the primary source of sediment entering Humboldt Bay is the nearshore Pacific Ocean. As described on page 5-2 in the Draft EIR,² studies of sediment inflow to the bay have estimated a total inflow of approximately 650,000 to 750,000 cubic meters (m³) of sediment annually. The bulk density of the sediment is approximately a ton per m³, and the net inflow to Humboldt Bay is thus approximately 650,000 to 750,000 tons of sediment.³

1 The comment also includes a lengthy attached report regarding Salmon Forever’s documentation and management approaches for the major Humboldt Bay tributaries, Elk River and Freshwater Creek. The attachment does not amplify the comment further and is not included in this FEIR. Interested readers may review the attachment at the District’s office.

2 A result abstracted from the Shapiro Report, but ultimately based on research conducted several decades ago.

3 A typical density for wet sediment is approximately 100 lb/ft³, which is equal to a weight per m³

The comment identified a combined sediment inflow to the bay from the Freshwater Creek and Elk River basins of approximately 23,000 tons. It could be assumed, for purposes of example, that the bay's watershed might deliver as much as about 75,000 tons of sediment per year to Humboldt Bay.⁴ Even with this unlikely assumption regarding total sediment production from the bay's watershed, the watershed still only delivers approximately 10 percent of the total sediment influx to Humboldt Bay, most of which enters the bay through the inlet, as noted in the Draft EIR.

This approximation is not a complete picture, of course, because sediment also leaves the bay on outflowing tides. In a broad sense, the general conformation of the bay bottom will reflect an approximate equilibrium between sediment deposition and sediment erosion and transport out of the bay, regardless of the sediment source. As described in the Draft EIR, however, the equilibrium conformation of the bay bottom would likely preclude many of the activities that citizens would like to carry out in the bay, and some degree of dredging will likely be needed in perpetuity in order to maintain channel and basin configurations that support various public trust-related activities within the bay.

of about 2,061 pounds.

⁴ This appears to be a rather extreme assumption. If the combined sediment delivery from the Freshwater and Elk River watershed is 23,000 tons, it seems somewhat unlikely that the combined sediment delivery from the Salmon Creek and Jacoby Creek basins will be twice as much.

May 26, 2006

Jeff Robinson
Humboldt Bay Harbor, Recreation and Conservation District
601 Startare Drive
Eureka Ca, 95501

RE: Comments on Humboldt Bay Management Plan Draft Environmental Report

Dear Mr. Robinson,

I am writing to submit some comments and data on the upcoming report. My comments primarily have to do with suspended sediment inputs into Humboldt Bay and suggestions what the plan should be doing in regards to suspended sediment into Humboldt Bay. They are primarily addressed in Chapter 5 of the Plan.

Enclosed is the 2005 Operations Report for Salmon Forever for Freshwater Creek and Elk River. Approximately 45 million pounds of suspended sediment were produced from the slopes of these watersheds in 2005. Nine million pounds came from Freshwater Creek and 36 million pounds from Elk River.

- 3.1 | Regardless of your asserted lack of jurisdiction over the watersheds of Humboldt Bay this sediment is ending up in your channels and marinas. Woody Island Marina is directly affected by suspended sediment from Freshwater Creek. The Harbor District has an obligation to protect the public trust resources of Humboldt Bay.

How will the plan protect the beneficial uses of Humboldt Bay from elevated sediment deposition in Humboldt Bay?

The plan should quantify and rank the suspended sediment sources into Humboldt Bay such as Elk River, Freshwater Creek, Salmon Creek and the Eel River. This plan should list and implement sediment monitoring programs for suspended sediment inputs into Humboldt Bay.

Very Truly Yours



Clark Fenton
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