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**March 28, 2025**

California Regional Water Quality Control Board  
North Coast Region  
Attn. Valerie Quinto  
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 Ms Quinto,

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, **2024 Completed Annual Summary Report, and 2025 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	2024	
31	HM	180	2024	
32	ML	10	2024	
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	

SITES	AHCP Treatment Priority	Potential Sediment Delivery Volume (cubic yards)	Year of Treatment	Year of Planned Treatment
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	

SITES	AHCP Treatment Priority	Potential Sediment Delivery Volume (cubic yards)	Year of Treatment	Year of Planned Treatment
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	

SITES	AHCP Treatment Priority	Potential Sediment Delivery Volume (cubic yards)	Year of Treatment	Year of Planned Treatment
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	2024	
316	High	54	2024	
317	High	33	2024	
318	Medium	60	2024	
319	Low	0	2024	
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: 2024 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 2024 by treatment class (upgrading or decommissioning). (Map B)

**Table 2: Summary of all Road Work and the Erosion Sites that were completed in 2024**

Treatment Year	Treatment Class	Length of Road to Treat (miles)	# of Sites	Volume Saved (yd <sup>3</sup> )	Treatment Priority <sup>1</sup>
2024*	New Construction	1900			
2024*	Upgrading	1200	7		
2024*	Decommissioning & Abandonment or deactivation	1900			

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

\* Represents Road Points 1-4 from THP 1-22-000173 only.

### GDRCO Overview of the completed projects.

#### **Roads:**

THP 1-22-00173 HUM was activated in 2023. Road points 1, 2,3 and 4 were completed in 2023..Temporary roads for units A and E were constructed and deactivated in 2023. Road work in Unit C will was completed in Unit C in 2024. All remaining roadwork in this THP was completed in 2024.

#### **Harvesting:**

THP 1-22-00173 HUM was activated in 2023. Falling and harvesting of units A, B (shovel portion only) and E were felled and harvested. Units C and D were felled in 2023 and harvesting occurred in 2024. The remaining cable portion of Unit B was harvested in 2024. All units are within the coverage area of this reporting area in 2024. All harvesting for this plan was completed in 2024. Also see Annual Harvest Report for SF Elk River WWDR (January Report)

Observation: During the winter inspection of all previously treated erosion sites, the RPF did not observe any failed sites. Multiple sections of the SA-1000 and 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 in 2024.

### **Detailed information for each Road point completed in 2024**

Site	THP Site	ECP	Company/THP#	Potential Future Yield (yd <sup>3</sup> )	Treatment Priority	Comment on treatment
142101 RP 02	02**	N	142101	0	low	Enhance dip upon seasonal road closure on an unclassified swale.
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.
30	30	N	142101	37	Low	<p>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.</p> <p>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.</p>
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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\*\* Operated again in 2024 to facilitate cable yarding.

## RE: 2025 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 2025 schedule to treat sediment sources on GDRCo's property within South Fork Elk River (MAP A).

### Summary of the proposed 2025 Treatments

Table 3 contains a summary of road points and ECP points that are planned to be treated in 2025 by treatment class. All sites planned for 2024 in the Master Treatment Schedule Report have been completed in previous years or were included in approved and operated under 1-24-000173 HUM THP.

THP 1-24-00168 (142401) was submitted in 2024 but not yet approved. It is expected to be approved in Spring of 2025. Planned operations in 2025 will consist of Road Points from this THP.

**Table 3: Summary of the 2025 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
2025	New Construction (temporary/reconstruction road to be Deactivated)	1.4	9	55	
2025	Upgrading (to be abandoned)	0.25	0	10	
2025	Decommissioning	0	0	0	

Table 4 contains the detailed information for each sediment source site that is planned for treatment in 2025.

**Table 4: Detailed information for each sediment source site planned for treatment in 2025.**

Site	THP Site	ECP	Company/THP#	Potential Future Yield (yd <sup>3</sup> )	Treatment Priority	Comment on treatment
1	1	Y	142401	10	High	<p>A class II watercourse with a 72 inch CMP has started to develop rust holes in the bottom but is otherwise in good shape.</p> <p>Repair culvert by lining the bottom with concrete. The lining will be completed during low-flows and all stream flow will be diverted from the site. The culvert after lining will remain within the minimum diameter size of 68.33 inches required for 100 year flow. Specific requirements regarding concrete lining are included under item 38.</p>
2	2	Y	142401	15	High	<p>A class III watercourse crossing with a 24 inch CPP that is cracked through more than 25% of the length.</p> <p>Excavate between the flagged TOP and BOT removing sediment, debris, and buried logs. Install 24 inch CMP to FPR and GDRCO AHCP guidelines as described in Section II of this THP.</p>
3	3	Y	142401	15	High	<p>A class III watercourse crossing with a 24 inch CPP that is cracked through more than 25% of the length.</p> <p>Excavate between the flagged TOP and BOT removing sediment, debris, and buried logs. Install 24 inch CMP to FPR and GDRCO AHCP guidelines as described in Section II of this THP. Install a catchment area with suitable armor at inlet as needed.</p>
4	4	Y	142401	17	Medium	<p>A class III watercourse with a 18 inch CMP that has flow beneath the culvert.</p> <p>Excavate between the flagged TOP and BOT removing sediment, debris, and buried logs. Install 24 inch CMP to FPR and GDRCO AHCP guidelines as described in Section II of this THP. Install a catchment area with suitable armor at inlet as needed.</p>
5	5	Y	142401	25	High	<p>A class III watercourse with a 24 inch CMP that is separated at the coupler.</p> <p>Excavate between the flagged TOP and BOT removing sediment, debris, and buried logs. Install 30 inch CMP to FPR and GDRCO AHCP guidelines as described in Section II of this THP. Install a catchment area with suitable armor at inlet as needed.</p>

7	7	Y	142401	20	High	<p>.A Class III watercourse with a 24-inch CMP. Flow goes subsurface above the inlet and has eroded a large sediment pipe through the road fill. This site requires AHCP and Consistency Determination mitigations for known tracts exhibiting highly erodible soils.</p> <p>Excavate between the flagged TOP and BOT removing sediment, debris, and buried logs. Install a 24-inch CMP to FPR and GDRCo AHCP guidelines as described in Section II of this THP. The road approach surface shall be treated with either: rock, slash, seed and straw mulch, seed and stabilized straw, or seed and slash from the watercourse channel to the nearest drainage facility, but not less than 50 feet, or to the hydrologic divide, whichever is less</p>
14	14	Y	142401	22	High	<p>A Class III watercourse crossing with a 24-inch CMP that is separated at a coupler.</p> <p>Excavate between the flagged TOP and BOT removing sediment, debris, and buried logs. Install a 24-inch CMP to FPR and GDRCo AHCP guidelines as described in Section II of this THP.</p>
15	15	Y	142401	10	High	<p>A Class II watercourse crossing with a 18-inch CMP that is rusted through greater than 25% of the length.</p> <p>Excavate between the flagged TOP and BOT removing sediment, debris, and buried logs. Install a 24-inch CMP to FPR and GDRCo AHCP guidelines as described in Section II of this THP</p>
16	16	Y	142401	12	High	<p>This site qualifies as an Imminent Risk of Failure site. A Class III watercourse with a 24-inch CMP that is plugged at the outlet. The road surface was also not adequately disconnected from this site.</p> <p>Clear outlet and channel below culvert to ensure proper flow can occur and sediment will not backup in the culvert. The road surface shall be hydraulically disconnected and no grading spoils will be deposited at this point.</p>


Table 5 contains a summary of areas that were assessed in 2024 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 2024.

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 2024.**

Year	Areas assessed (acres)	Areas to be treated that may contain potential erosion sites (acres)	Erosion Sites found
2024	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 2025.**

Year	Areas assessed (acres)	Areas to be treated that may contain potential erosion sites (acres)	Erosion sites found
2025	NA	NA	

#### **Time Schedule for 2025 Treatment Activities for planned ECP sites (See Map B )**

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 2025.

Temporary Road construction: Approximately 6272 feet of Temporary Road construction is associated with THP 1-24-00168 HUM. Temporary road construction (2000 feet total) are planned for construction in 2025. (See Map B 2024).

Road upgrading: No road upgrading is planned for 2025. Crossing upgrades as per Table 4 above are planned on the appurtenant road system in 2025

Road decommissioning: No decommissioning is planned for 2025. 2000 feet of temporary road may be deactivated in 2025

#### **Map A:**

Timber harvest, road construction, watercourse treatments operated in 2024 are associated with Units B, C and,D 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:**

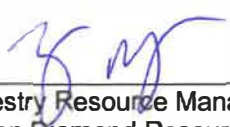
Harvest units to be operated in 2025 are shown in purple stripes. These units are mapped on attachment B. Operations will include harvesting, road construction and crossing upgrades as per Table four as well as Road Point 5 associated with THP 1-24-00168 HUM.

**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.

Zach Mohrmann



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Forestry Resource Manager  
Green Diamond Resource Co  
California Operations





