

**RECEIVED 08/13/17 (via email)**  
**Board of Forestry and Fire Protection**

Dear Board of Forestry,

Your cumulative effects assessment is sorely inadequate in relation to the effects of timber harvesting on water and endangered and other species thriving.

I have seen first hand how logging has destroyed water quality in Elk River with the BOF maintaining that all the cumulative impacts of this THP have been mitigated to less than significant. What a loaded and miss-interpret-able phrase that is. We lost the use of Elk River as our water source[and it has always been our only source of domestic and agricultural water] declared by the agencies in 1997 [all due to sediment from logging.] 20 years later we are still getting worse and yet more logging is allowed continuing to degrade our water supply. You may be able to do fancy footloose math determinations with numbers from the industry creating the problem for people and fish but that in no way really encompasses all the cumulative effects.

First your ability to define what is significant needs a better definition and understanding...when logging destroys residents only water source, that is significant. When logging continues to destroy water, fences, downstream residents' farms and homes and threatens their health and safety by cutting off their ability to live in and/or access to and from their homes at a much higher frequency and height that is significant.

When these conditions continue to get worse for 20 years in the face of your so called "adaptive management" a very serious step needs to be taken to acknowledge the situation and deal with the severer consequences that logging has caused. Adaptive management may make logging better one baby step at a time but it does not address the severe consequences wrought onto others. That process could take a very long time as noted by the last 20 years of failure for BOF to deal with the severe consequences to direct downstream residents of logging in Elk River. These severe effects are not limited to the residents however; there is the deposition of huge added sediment in the Humboldt Bay which affects fishermen as well and anyone with a boat docked in the Bay.

Fish survival is severely affected by high sediment loads in winter and now in summer as well as winter[see youtube video 2903:

<https://www.youtube.com/watch?v=ryu5UGBMuzA&feature=youtu.be>] That plume has been going on for weeks now...the whole river is muddy for miles from it.

Define what would be "significant" to BOF to realize severe and destructive cumulative effects of logging.[We residents in Elk River wonder what would be significant and we fully realize our lives,livelihoods and water are definitely not as the rules are interpreted today.]

Define that when effects are severe and affect watershed residents health and safety that logging must be stopped till conditions are made normal again for those in danger.

Mandate that plan proponents interview and follow up on downstream residents explanation of effects onto them from logging As Leslie Reid has said if you want to know what cumulative effects are go ask the people that have lived there a long time. And that means with real intent of action on the industries part to right the harmful

situation they have created not just with more than words on paper that are supposed to improve logging.

Realize that knowledgeable downstream residents information will be in a narrative form and is just as if not more significant than industry created spreadsheets. Spreadsheets created by the company do not show the long term effects from before their data was taken. It can be and often is limited.

When past projects have severely degraded water or air or carbon storage do not just dismiss that as "legacy" effects and set a new normal as you have been doing for years. They are all effects of logging and they all are part of cumulative effects.

Take into account the economic, safety and security effects that all cumulative effects from logging have caused downstream residents and the surrounding community. An engineer has estimated a nearly 40 million dollar affect on the downstream community of Elk River yet every THP declares that all the adverse cumulative effects of this THP have been mitigated to significant...stop looking at a single THP against the backdrop at the time which has always allowed conditions to get worse because no single THP's effects are significant...to the BOF.

More than words on paper declaring things are good to go needs to be done to even begin to address the cumulative effects of logging:

Mandate actual water analysis effects from those directly affected

Mandate actual carbon storage effects not fancy figures on growing trees but carbon storage in trees 60 years and older

Mandate actual effects on people who live in the community

Please interview those of us direct downstream residents on a yearly basis who have a thorough knowledge of the river and the land and the water quality to gain real insight into actual cumulative effects.

Mike Miles may be on the BOF but he came to Maxxam at the end of their reign but has no long understanding of the effects of logging in Elk River. You need people who have an intimate understanding and real eye witness knowledge on the BOF or at least testifying before you; then heed what we say with the seriousness and gravity it deserves.

If I'd had more time I'd been more precise.

Thank you,  
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