

Proposed Permit Framework

for the forthcoming

General Waste Discharge Requirements and General Water Quality Certification for Discharges Related to Sediment Reduction and Road Maintenance and Construction Activities in the Gualala River Watershed

June 2025

I. Document Purpose

The purpose of this document is to outline preliminary details about the forthcoming water quality permit for road-related sediment discharge reduction work, road maintenance, and road construction on private, rural roads in the Gualala River Watershed, referred to as the Gualala Roads Permit. The permit is in the early stages of development, and as such, the content in this document is conceptual and subject to change. A draft permit and supporting environmental analysis document will undergo public review in summer 2026 prior to adoption consideration by the North Coast Regional Water Quality Control Board (North Coast Water Board) in fall 2026. Over the next year, North Coast Water Board staff will prioritize continued and robust engagement with landowners, community members, tribal and agency staff, environmental groups, and other interested parties to ensure that their perspectives and knowledge are considered and leveraged during the permit development process. Please see section V, *Next Steps*, for opportunities to engage with North Coast Water Board staff on the Gualala Roads Permit development.

II. Background

Approximately 61% of the area of the North Coast Region is listed as impaired for sediment on the US Environmental Protection Agency's (EPA) Clean Water Act Section 303(d) list. Inclusion of a waterbody on the 303(d) list for a given pollutant indicates a need to develop a Total Maximum Daily Load (TMDL) that describes allowable pollutant loads and necessary reductions.

The Gualala River was listed as impaired for sediment in 1993 and a TMDL was developed by the US EPA in 2001. The TMDL Technical Support Document reports human-caused sediment loads constituting nearly 69% of the total load, with road-related sources accounting for nearly 85% of the human-caused load. The North Coast Water Board is currently developing a TMDL Action Plan that, when adopted, will

incorporate a summary of the TMDL and details of the program of implementation into the Water Quality Control Plan for the North Coast Region (Basin Plan). The TMDL Action Plan will describe implementation actions designed to recover water quality conditions supportive of beneficial uses of water in the Gualala River Watershed. Chief among these actions will be the development and implementation of the Gualala Roads Permit, designed to address sediment pollution from private, rural roads.

III. What is a Waste Discharge Requirements Permit?

North Coast Water Board staff are proposing to develop a type of water quality permit referred to as *Waste Discharge Requirements*, or WDRs. Waste Discharge Requirements are issued by the California Water Boards, which includes the State Water Resources Control Board and the nine Regional Water Quality Control Boards, such as the North Coast Water Board¹. The primary goal of a Waste Discharge Requirements permit is to protect water quality by minimizing the impact of pollutants on surface water and groundwater. Activities such as timber harvest, construction, road maintenance and improvements, and urban and agricultural runoff are regulated by Waste Discharge Requirements. These permits allow entities to conduct activities that may affect water quality if they adhere to the requirements of the permit. They are also key tools for ensuring Total Maximum Daily Loads² are implemented on-the-ground and appropriate pollutant reduction goals are met.

Like all Waste Discharge Requirements permits, the Gualala Roads Permit will contain the following elements:

- Findings – Statements that provide context and rationale for the permit and why its requirements are necessary to protect water quality. Findings are typically found at the beginning of the permit and/or a permit attachment.
- Conditions – Enforceable permit requirements that the permittee must comply with to ensure water quality is protected. Conditions are important to review and understand because they outline the permittee's required actions under the permit.
- Monitoring and Reporting Requirements – Conditions that ensure that permit requirements are implemented and effective. They require permittees to conduct monitoring activities (e.g., site-specific assessments, inspections, or photo monitoring) and submit reports (e.g., project status updates or annual compliance

¹ Please review the North Coast Water Board's Fact Sheet for more information about our mission and vision here: [WB-RB1 North Coast Regional Factsheet](#).

² See section II, *Background*, for more information on Total Maximum Daily Loads and the Gualala River Watershed Sediment Total Maximum Daily Load.

reports) to the North Coast Water Board by specific timeframes. Monitoring and reporting requirements may mandate permittees to conduct monitoring and/or submit reports on an annual, ongoing, or as-needed basis.

IV. Proposed Gualala Roads Permit Framework

The following permit framework is an initial proposal and may change due to public input, staff recommendations, and/or North Coast Water Board deliberations.

The Gualala Roads Permit will apply to private, rural roads in the Gualala River Watershed. The permit will address sediment discharges that contribute to excess sediment and elevated water temperatures that reduce water quality and harm the river's ecosystem, particularly its native salmon and trout populations. All private landowners in the watershed will be required to maintain their roads to reduce erosion and sediment delivery to watercourses. Additional requirements will apply to "Designated Landowners," i.e., those who own property of 1,000 acres or more and/or those who own less than 1,000 acres but have roads that pose a significant risk to water quality. The 1,000-acre threshold incorporates the significant sediment-generating roads in the watershed (approximately 70%) while also constraining a manageable level of anticipated enrollees. Landowners who do not meet the criteria for "Designated Landowners" will be referred to as "Non-Designated Landowners." High-level, conceptual requirements for Non-Designated and Designated Landowners are described below.

Non-Designated Landowner Requirements

Non-Designated Landowners would be required to comply with "general requirements" of the permit, such as routinely inspecting and maintaining their roads to prevent and minimize sediment discharges to watercourses and adhering to water quality laws and regulations. Non-Designated Landowners will **not** be required to comply with the long-term treatment requirements described in the *Designated Landowner Requirements* section below. However, Non-Designated Landowners can apply for permit coverage when conducting eligible road work activities that have the potential to discharge sediment to watercourses.

Designated Landowner Requirements

Designated Landowners will be required to reduce road-related sediment sources by (a) hydrologically disconnecting road drainage from waterways and (b) upgrading or replacing non-functioning stream crossings, as needed, over a period of time. The Gualala Roads Permit will outline a process for meeting these long-term treatment requirements that will include the following steps:

- create an inventory of roads and stream crossings on the property,

- assess the level of treatment required for roads and stream crossings to be compliant with the permit,
- establish a prioritization scheme to determine which areas to treat first,
- repair road-related sediment sources,
- conduct monitoring and submit required reporting,
- conduct necessary maintenance on roads and stream crossings to prevent future erosion, and
- follow an implementation schedule for conducting road repairs.

North Coast Water Board staff acknowledge that implementation measures to both (a) hydrologically disconnect roads and (b) upgrade stream crossings can take significant time and resources to complete and require site-specific considerations. The Gualala Roads Permit will therefore be developed with separate compliance pathways and implementation schedule requirements for elements (a) and (b), with an initial focus on (a) hydrologically disconnecting roads. Site-specific conditions and relative risk to water quality on individual ownerships will inform a tiered enrollment approach.

Designated Landowners will incur costs for permit fees (initial and/or annual) and road assessments, repairs, and maintenance necessary to address sediment sources. These costs will vary based on specific property conditions.

The North Coast Water Board has secured funding to support Designated Landowners in conducting assessments of high-priority roads. Available funds are limited and Designated Landowners are encouraged to reach out to North Coast Water Board staff as soon as possible to learn more and express their interest in working cooperatively on road assessments.

Road Improvement Trainings and Funding Opportunities for All Landowners

The North Coast Water Board will work with contractors to provide a series of road improvement trainings. All landowners will have the opportunity to receive on-the-ground instruction of the evaluation and implementation of erosion control and sediment-reducing best management practices (BMPs). The anticipated goal of these trainings is to help landowners establish an understanding of the design elements and BMPs that are critical to hydrologically disconnected road networks and properly functioning stream crossings so that they can implement some of the work required by the permit. These road improvement trainings will be available to all landowners in the watershed, including Non-Designated and Designated Landowners.

Funding support for road improvement projects may be available through state and federal grant programs. North Coast Water Board staff can answer questions about these additional funding opportunities (see contact information in the *Next Steps* section below).

V. Next Steps

North Coast Water Board staff will develop a draft Gualala Roads Permit to be released for public review in the summer of 2026. In the meantime, staff will hold in-person and virtual public scoping workshops in late-July 2025 to solicit input on the scope of an environmental analysis of the proposed permit, which will soon be made available for public review. Landowners and other interested parties are encouraged to review the environmental analysis and participate in the scoping process.

In order to incorporate community input into the draft permit as it's developed, North Coast Water Board staff will soon begin holding a series of informal "office hours." These recurring meetings will provide a platform for members of the community to pose questions, provide comment, and share concerns about the project. Staff will prioritize meeting formats that increase community accessibility, alternating between virtual and in-person meetings. Further details will be provided when available.

In partnership with a contracting team, the North Coast Water Board will host community meetings to share information about the Water Board, the developing Gualala Roads Permit, related amendments to the Basin Plan, and other relevant items of interest to the community. These meetings will be held at regular intervals, with the first three anticipated to occur by June 30, 2026.

Landowners are invited to contact North Coast Water Board staff at RB1-Gualala@waterboards.ca.gov to learn more about the Gualala Roads Permit and to discuss relevant land management challenges that should be considered by the permit development team.

For more information about the upcoming environmental analysis scoping meetings, "office hours," and further engagement opportunities and information, please visit the Gualala Roads Permit's webpage:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/waru/index.html.

Community members can receive project updates by subscribing to the "Total Maximum Daily Load – Gualala" email list found at:

https://public.govdelivery.com/accounts/CAWRCB/subscriber/new?qsp=north_coast.