

Advocates for Wild, Healthy Oceans

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June 23, 2004

Mr. Jeffrey Young, Chairman
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

The Ocean Conservancy

Re: Comments on the Proposed Waivers of Waste Discharge Requirements for the Estrada Non-Industrial Timber Management Plan (Order No. R3-2004-0076); the Big Basin Water Company Non-Industrial Timber Management Plan (Order No. R3-2004-0080); the Castro Valley Ranch Timber Harvest Plan (Order No. R3-2004-0078); the Cowell - South Unit Timber Harvest Plan (Resolution No. R3-2004-0079); the Jennings Timber Harvest Plan (Resolution No. R3-2004-0075); the Little Creek Timber Harvest Plan (Resolution No. R3-2004-0074); and the Viitanen Timber Harvest Plan (Resolution No. R3-2004-0077).

Dear Chairman Young and Members of the Board:

On behalf of our organizations, we submit the following comments on the proposed waivers of waste discharge requirements (proposed waivers) for the Timber Harvest Plans and Non-Industrial Timber Management Plans referenced above. Our comments are policy-based, and consequently bear equally on all six of the proposed waivers. In addition, our concerns regarding these waivers are substantively identical to the concerns we expressed in prior comments, dated January 30, 2004, and April 27, 2004, regarding waivers adopted by the Board at its March 19, 2004, and May 14, 2004 meetings, respectively. Consequently, we hereby incorporate our January 30 and April 27 comments by reference.

The Little Creek Timber Harvest Plan (Resolution No. R3-2004-0074), however, raises a unique issue. According to the Staff Report, and to public assertions made by staff at the May 14, 2004 Board Meeting, the landowner (Cal Poly) is conducting an extensive research study exploring the impact of logging on the watershed. This research is apparently being performed using up-to-the-minute technologies and techniques, making it possible for the landowner to perform much more comprehensive monitoring than the average landowner. Yet despite nagging questions about the impacts of timber harvest activities on watersheds in Region 3, and despite the ready availability of the resources to answer some of these questions, staff does not appear willing to propose more than a run-of-the-mill monitoring and reporting plan. In light of this, we must begin to question the sincerity of staff's interest in getting to the bottom of what the water quality impacts of logging in this Region actually are. We urge the Board to require more.

Thank you for the opportunity to provide these comments. As always, please feel free to call us if you have any questions.

Sincerely,



Sarah G. Newkirk
The Ocean Conservancy



Kevin Collins
Lompico Watershed Conservancy



Jodi Frediani
Citizens for Responsible Forest Management

STAUB FORESTRY

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RPF Response to Monitoring Proposal for Estrada NTMP (II), Order # R3-2004-0076 SCR

The following document is organized such that the Regional Board's original Waiver language is included first (in italics), followed by a response from the Registered Professional Forester preparing the Notice of Operations for the Estrada NTMP (Estrada II).

1. MONITORING POINTS

a) VISUAL MONITORING POINTS: Visual monitoring of all roads, watercourse crossings, landings, skid trails, and if possible, all Class I and Class II watercourse confluences and known landslides on the timber harvest plan.

RPF Response/Agreement: The RPF or his designated representative shall monitor all roads, watercourse crossings, landings, skid trails, the +/-1200' of Wilson Creek that separates the north and south halves of the harvest area, the initial 500' of the watercourse that lies south of Landing a, and the landslide features near Crossings X40 and X41.

b) PHOTO-POINT MONITORING POINTS – Photo point monitoring points shall include the top and bottom of each landslide, up and downstream of each watercourse crossing, and Class I and Class II watercourse confluences. If feral pig activity, trespassing, or other potential sources of erosion are known or discovered, these locations shall be included as photo points. Flagging rebar or another method of establishing the photo point site locations shall be utilized. The document entitled "Standard Operation Procedure 5.2.3 – Photo Documentation Procedure" shall be utilized as the protocol for all photo-point monitoring. All photo-point locations shall be maintained until this Monitoring & Reporting Program is rescinded.

RPF Response/Agreement: Four photo-points have been established at the locations identified on the attached Notice of Operations #4 Photo-point Map. The photo-points include three temporary Humboldt Crossings (X23, X25, and X34), and a moderately active series of landslides near Crossings X40 and X41. The photo-points will be established using 3/4" white PVC pipe, on which will be recorded the photo point number and the direction the photo was taken. No additional photo-points are warranted or proposed. The document entitled "Standard Operation Procedure 5.2.3 – Photo Documentation Procedure" shall be utilized as the protocol for all photo-point monitoring. All photo-point locations shall be maintained until this Monitoring & Reporting Program is rescinded. If feral pig activity, trespassing, or other potential sources of erosion are known or discovered, these locations shall be mapped and recorded in the log book as described in 3(a) below.

2. MONITORING CONSTITUENTS/FREQUENCY

a) VISUAL MONITORING – All visual monitoring points shall be monitored for existing or potential sources of erosion. During active timber harvest activities and for at least one