



California Regional Water Quality Control Board

Central Coast Region



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

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June 3, 2003

Nancy Drinkard, RPF
Dept. of Forestry & Fire Protection
6059 Highway 9
P.O. Drawer F-2
Felton, CA 95018

Dear Ms. Drinkard:

SUBJECT: REDTREE TIMBER HARVEST PLAN 1-03-042 SCR

On May 8, 2003, William Arkfeld of my staff attended the pre-harvest inspection for the subject timber harvest plan (Plan). The Plan includes 278 acres of land that will be selectively harvested via ground based (tractor and/or rubber tire skidder) and skyline cable yarding logging systems. San Vicente Creek, which is adjacent to the Plan, is known to be existing habitat for Coho Salmon & Steelhead Trout. Downstream of the Plan, San Vicente Creek is used as a water supply. Our comments are as follows:

NEW ROAD: The Plan proposes construction of 5,000 feet of new roads to improve access to the northern portion of the Plan. This road crosses a landslide and several class II and III streams. According to the February 21, 2003 Focused Engineering Geologic Review Report (for the subject THP) prepared by Tim Best, CEG, the landslide, which will be crossed by the new road, is "dormant and deep-seated". The design of the road specifies a full cut bench along steep areas be utilized. Spoils materials will be placed at a landing with appropriate erosion control best management practices. We recommend that regular inspections of the new road occur throughout the wet season. We also recommend that access to the new road be restricted or prohibited during the wet season.

PACIFIC GAS AND ELECTRIC RIGHT-OF-WAY: During the PHI, Regional Board staff observed significant erosion and failed culverts in Class I and II streams. Regional Board staff estimated that at least 10 cubic yards of soil has discharged to San Vicente Creek. The erosion problems and stream crossing failures may have been caused, in part, by illegal off road vehicle activity. For this reason, access to the right-of-way should be controlled aggressively (gates, slash roads, warn neighbors, etc.). The Regional Board considers the landowner ultimately responsible for water quality problems on their land. However, we understand that PG&E may have assumed responsibility for water quality issues along the right-of-way via legal agreements. Please identify who is responsible for maintenance and repair of the right-of-way. If PG&E is responsible, then please provide documentation this is the case to the Regional board. We understand that Redtree is willing to do some of the maintenance and repair

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needed along the right-of-way. Resolution of who is responsible for the maintenance and repair of the right-of-way must occur before the THP is approved.

MONITORING: During the May Regional Board Meeting, the Regional Board staff were directed to require water column monitoring for all timber harvest plans receiving a waiver of waste discharge requirements. Monitoring plans shall include the following components:

- Up and downstream monitoring of the timber harvest plan for turbidity and temperature. Turbidity monitoring is required within 24 hours of all large storm events. A turbidity meter is recommended. Temperature monitoring is required during the dry season. Hobo temps are recommended for this purpose. Monitoring data shall be maintained on site or at the office of the forester (RPF).
- Up and downstream turbidity monitoring of each watercourse crossing (existing and abandoned). Turbidity monitoring is required within 24 hours of all large storm events.
- Reporting of all significant water quality problems. Reporting is required when one cubic yard or more of soil is discharged to a creek. This reporting is required for both "natural" and timber caused sediment releases. Reporting is also required when downstream turbidity levels are substantially higher than the up stream samples. When these conditions occur, reporting to the Regional Board is required within 7 days.
- Submittal of an Annual Report. The annual report shall include a summary of timber harvest activities during the previous year and planned for the next year, inspection and monitoring result evaluations, implemented maintenance and repairs, proposed maintenance and repairs for the next wet season.

A monitoring plan, which includes these components, is required before a waiver of waste discharge requirements may be considered by the Regional Board.

WAIVER: At this time, all timber harvest plans must obtain an individual waiver of waste discharge requirements. Once the plan is adopted by CDF, we will require an electronic version of the final timber harvest plan. Please contact Regional Board staff for further information about the waiver process. Currently, we are developing an application form and supporting documentation for timber harvest plan waivers.

RECOMMENDATION: If the above comments are given full consideration, we do not object to the proposed timber harvest plan.

If you have any questions, please contact William Arkfeld at (805) 542-4627 or via e-mail at BARKFELD@RB3.SWRCB.CA.GOV.

Sincerely,

Chris Adam

for
Roger W. Briggs
Executive Officer

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