



California Regional Water Quality Control Board

Central Coast Region



Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

November 14, 2003

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

Dear Mr. Martinez:

SUBJECT: PRYCE FORK THP, 1-03-173SCR

On October 15 and 28, 2003, Regional Board staff, William Arkfeld attended pre-harvest inspections (PHIs) for the subject timber harvest plan (THP). The THP includes a total 46 acres of land. Selective timber harvesting via ground based (tractor and/or rubber tire skidder), and/or skyline cable yarding logging systems will be utilized. The Plan is located in the headwaters of Brown's Creek and adjacent to Pryce Fork of Ramsey Gulch. Brown's Creek is a tributary of Corralitos Creek, which is a tributary of Salsipuedes Creek, which is a tributary of the Pajaro River. Watercourses within the THP are Class II or Class III.

BENEFICIAL USES: The "Water Quality Control Plan for the Central Coast" (Basin Plan) lists beneficial uses for Ramsey Gulch and Brown's Creek. Throughout the life of this THP, the Board will require protection of water quality and the beneficial uses of water listed below in all waters associated with the Plan. Beneficial uses of Ramsey Gulch and Brown's Creek (downstream) include:

- Water Supply (Municipal, Industrial and Agriculture),
- Groundwater Recharge,
- Contact and Non-contact Water Recreation,
- Wildlife Habitat,
- Cold Fresh Water Habitat,
- Warm Fresh Water Habitat,
- Migration of Aquatic Species,
- Spawning, Reproduction and/or Early Development (of fish),
- Commercial & Sport Fishing.

Pryce Creek is not specifically listed in the Basin Plan. The above-listed beneficial uses of water are applicable to Pryce Creek.

NEW ROADS AND LANDING: The Plan proposes construction of approximately 1500 feet (based on the map included in the THP) of new roads and 5 new landings. The new roads are located near ridge tops with moderate slopes. All existing roads observed during the preharvest inspection appeared to be performing very well with little evidence of erosion. The new roads are designed similar to the existing roads and are expected to perform adequately. Regional Board staff recommends regular inspections of

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Item No. 4, Attachment No. 4
Meeting of May 14, 2004
Pryce Fork Timber Harvest

the new roads and landings throughout the wet season to ensure drainage features perform as intended. We also recommend that access to the new roads be restricted or prohibited during the wet season.

LARGE WOODY DEBRIS: Regional Board staff understands that Jennifer Nelson, of the CA Fish & Game Dept., has indicated that the lack of large woody debris in the Ramsey Gulch Watershed is a limiting factor for steelhead salmon downstream of the THP. For this reason, retention of trees that will eventually become large woody debris (LWD) is a priority of the Board. LWD sources include diseased trees, trees along the banks of creeks and large trees. Although some leave trees have been marked near Pryce Creek in compliance with the Forest Practice Rules (FPR), current conditions warrant going beyond the FPR to ensure adequate LWD in the future. Regional Board staff recommends the following:

1. All leave trees be permanently marked and mapped to ensure that these trees are not cut in future timber harvest unless approved by the review team.
2. All trees adjacent to the creek that could be undermined by the creek should be retained. Pryce Creek appears to be slowly down cutting such that trees along its banks have a good probability of falling over in the future. For example, a large old growth redwood stump on the bank of Pryce Creek (where the tree was harvested after it fell over) is proof that this mechanism of LWD recruitment is normal for this watershed.
3. Not cutting all the largest trees within the WLPZ. As Mr. Twight acknowledged during the PHI, Redwood Empire has a policy of harvesting trees before they reach about 32" in diameter. Allowing some of the trees to grow larger (i.e., late seral stage) would improve the probability of LWD recruitment.

Leaving the trees listed above for LWD recruitment will lower the risk of this THP to water quality. If trees are harvested as they are currently marked, the risk to water quality is moderate.

CHANNEL ZONE: On October 28, 2003, the review team held a second preharvest inspection to discuss what constitutes the channel zone along a Class II stream. According to the Forest Practice Rules, the Channel Zone for a confined channel (most creeks in timber lands are confined in this Region) is defined as the 20-year floodplain. This is estimated in the field by determining the "ordinary high-water line" (i.e., the 1.5 to 2 year flood level) and doubling it. Four trees that were adjacent to the Pryce Creek were reviewed. Mr. Twight did not agree that any of the four trees were in the channel zone. However, one of the four trees was unmarked because it was a good candidate for large woody debris recruitment. Regional Board staff recommends that the remaining three trees and all similar trees on the THP not be cut unless Mr. Twight can directly prove that they are out of the Channel Zone. Photopoint monitoring is recommended to clearly define where the ordinary high water line and 20-year flood line exist. If Mr. Twight can prove the tree are out of the Channel Zone, that these trees are not good candidates for future large woody debris recruitment, and that removal of these trees will not adversely impact water quality and associated beneficial uses, then the Regional board staff will not object to harvesting some or all of these trees. By not harvesting trees suspected of being in the Channel Zone, the risk to water quality is low. Harvesting trees adjacent to a creek regardless of whether they are in the channel zone or not creates a moderate risk associated with the butt of the tree sliding into the creek.

UNCLASSIFIED CHANNEL: A channel near mitigation point 9 is not classified as a waterway in the THP. Mr. Twight indicates that the channel was formed by debris slides. However, most of the review team indicated they thought it was a Class III watercourse. Because this channel is located in a skyline cable yarding area (i.e., very steep terrain), re-classifying the watercourse as Class III does not change how trees can be harvested. However, Regional Board staff are concerned this could set an inaccurate precedent. Regional Board staff recommends that the channel be classified as a Class III watercourse. If evidence (i.e., photographs and inspections) can demonstrate the Channel is not a watercourse then the THP can be amended accordingly. Classification of this channel as "Class III" will not influence the risk to water quality significantly. However, a clear understanding of watercourse classification through out



the timber industry is necessary to ensure proper implementation of the Forest Practice Rules and to minimize risk to water quality.

FERAL PIGS: During the preharvest inspection, no evidence of feral pig activity (i.e., disturbed soil/mud) was observed. Feral pig activity near Mount Madonna has been observed. Feral pigs could migrate onto the subject property. These pigs can cause significant releases of sediment and fecal matter to surface waters. We understand that feral pigs are usually managed via hunting. If hunting does not adequately control the feral pig population, then a trapping program similar to the one performed at Wilder Ranch State Park may be necessary to control cumulative impacts to water quality. Risk to water quality from feral pig activity is considered to be low because there was no evidence of recent pig activity observed during the inspection. However, if feral pig activity is found during the life of this THP, then this issue should be addressed in the cumulative watershed effects section of the THP document. Feral Pig activity should be carefully monitored and reported to the Board on at least an annual basis.

THP1-03-192 SCR: Redwood Empire recently proposed this timber harvest plan in nearby Gamecock canyon. However, this plan was not acknowledged in the Cumulative Watershed Effects section of the THP. Regional Board staff recommends that the Cumulative Watershed Effects section of the THP included all significant sources of water quality degradation including proposed THP 1-03-192 SCR.

WATERSHED GROUP & MAPPING: Regional Board staff supports and encourages development of voluntary watershed groups for Ramsey Gulch/Brown's Creek. Staff also recommends development of maps and databases (e.g., geographical information systems (GIS)) to manage the following information:

1. Areas of feral pig activity
2. Water intakes (location and diversion rate)
3. Snag locations
4. Landslide locations and level of activity
5. Stream location and classification
6. Location of each tree along water courses intended for large woody debris recruitment
7. Wildlife trees
8. Trees within the channel zone
9. Delineation of geological formations
10. Water quality monitoring data collected from each monitoring point
11. Other timber harvest data (roads, landings, skid trails, buildings, crossings, etc.)

The above information can be an effective tool for improving watershed and resource management on the subject property.

INSPECTIONS: Regional Board staff intends to inspect this THP on a regular basis. Inspections could include preharvest (before each unit is harvested), wet weather preparedness, wet season monitoring and post harvest inspections. These inspections are intended to ensure the overall risk to water quality stays low throughout the life of this THP.

MONITORING: Regional Board staff will develop a monitoring plan for this THP as a condition of approval of a waiver of waste discharge requirements. The overall risk to water quality posed by this THP is considered to be moderate due to the steep slopes, erosion risk, harvesting near creeks and earthmoving activities (building of roads, landings and skid trails). Comments about this monitoring plan are welcome and encouraged. The following is a preliminary draft of the monitoring plan:

1. Water Column:



- a. Water column monitoring for turbidity up stream of the THP and near Mr. Twight's house (i.e., down stream of several THPs owned by Redwood Empire), as Mr. Twight proposed in the THP document. During the PHI Mr. Twight showed the review team two upstream monitoring points; one within the THP and one just outside the THP (upstream along Pryce Creek). Both of the monitoring points are acceptable as upstream monitoring points. The monitoring point off site should not be used if the landowner objects. If possible (safe), monitoring immediately downstream of the THP where Pryce Creek joins Ramsey Gulch is also recommended. This monitoring shall occur within 24 hours of storm events of two inches or more.
 - b. Temperature monitoring currently required for the Ramsey II THP should continue at least until this THP is closed.
2. Photo Point: Photo point monitoring of:
- a. All stream crossings by roads,
 - b. stream confluences,
 - c. stream areas impacted by feral pigs or cattle,
 - d. top and bottom of all landslides capable of delivering sediment to a watercourse,
 - e. all other sites known to have significant potential to deliver sediment to a water course (e.g., a problematic skid trail water course crossings, etc), and
 - f. the unclassified channel located near mitigation point 9 (to resolve whether this is a Class II stream or a debris flow channel).

Photo point monitoring shall be performed consistent with the attached "Standard Operating Procedure 5.2.3, Photo Documentation Procedure."

4. Hillslope: Following all storm events of two inches or more within 24 hours, visual observations of all roads, drainage features, stream crossings, landslides, and other potential sources of sediment delivery to a waterway shall be inspected. All observed natural and human caused erosion problem sites (i.e., involving one or more cubic yards of soil to be discharged to a water course or when upstream turbidity levels is 50% lower than downstream turbidity levels) shall be photographed and reported to the Board within 7 days. If possible, sources of erosion shall be controlled promptly. All observations shall be documented in a logbook.
5. 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.

REGIONAL BOARD ACTION: At this time, all timber harvest plans must obtain either waste discharge requirements or a waiver of waste discharge requirements. Once the plan is adopted by CDF, an electronic version of the final timber harvest plan will be required. The Board has received a "Timber Harvest Information Package" for this THP and expects Regional Board consideration during the March 2004 Board Meeting

RECOMMENDATION: If the above comments are given full consideration, we do not object to the proposed timber harvest plan. Regional Board staff intends to propose a waiver of waste discharge requirements for this THP.



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

Sincerely,

Roger W. Briggs
Executive Officer

ATTACHMENT – Photo Documentation Procedure Document

S:\WB\Northern Watershed\Timber Harvest\Inspections\Pryce PHI Letter.doc
CC:

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California Regional Water Quality Control Board



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Arnold Schwarzenegger
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December 4, 2003

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Dear Mr. Martinez:

SUBJECT: PRYCE FORK THP, 1-03-173SCR

On November 17, 2003, the "Second Review Team Meeting" for the subject timber harvest plan occurred. We understand that the Second Review has been extended. We have also reviewed the November 17, 2003 Pre-Harvest Inspection Report for the subject THP prepared by Fish and Game. After further review, the Regional Board staff concurs with Fish & Game's position that the THP should be denied.

The Regional Board received a "Timber Harvest Information Package" for the subject THP on November 7, 2003. However, since the current recommendation of both Fish & Game and the Regional Board is denial of this THP, the Timber Harvest Information Package is now considered incomplete. Regional Board staff will process the Timber Harvest Information Package once all water quality related issues are resolved

In summary, the following issues need to be resolved before the Regional Board staff can proceed with processing the THP Information Package:

1. **Large Woody Debris:** The THP shall demonstrate how adequate amounts of large woody debris will be recruited to Pryce Fork in the future.
2. **Steep Slopes:** The THP must demonstrate how trees will be felled on very steep slopes. If trees are expected to slide down slope upon being felled, the potential water quality impact shall be thoroughly addressed in the THP.
3. **Cumulative Impacts:** The THP shall thoroughly address cumulative impacts from all timber harvesting in the watershed and from other sources (housing development, road construction, wildlife, off road vehicles, etc.).
4. **Winter Cutoff Date:** The Winter cutoff Date shall be established to ensure that no wet season impacts to water quality will result.

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5. Watercourse Classification: All watercourses shall be mapped and properly classified.
6. Channel Zone: All trees in the channel zone shall be clearly marked for retention.

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

Sincerely,

Roger W. Briggs
Executive Officer

ATTACHMENT – F&G and RWQCB PHI Reports

S:\WB\Northern Watershed\Timber Harvest\Inspections\Pryce PHI Letter2.doc
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