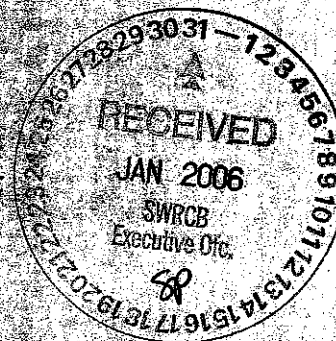




January 17, 2006

Craig J. Wilson
Chief, Water Quality Assessment Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812



303 (d) Deadline:
1/31/06

SUBJECT: CLEAN WATER ACT SECTION 303(d) LIST - REVISION

Dear Mr. Wilson,

On June 10, 2005 Campbell Timberland Management responded to your request for numeric data and information regarding the 303(d) listing process on behalf of the Hawthorne Timber Company (HTC). Please consider the following as you begin revising the list of 303(d) watersheds.

First and foremost, it is not appropriate for staff to use thresholds established by Sullivan (2000) to set regulatory standards for streams in California. The Sullivan paper is a Report issued by the Sustainable Ecosystem Institute in Portland Oregon. It has not been subject to the level of peer-review required for publishing in a typical science journal. The development of guidelines based on this document is inconsistent with the Staff Report that states guidelines were based on scientifically based and peer-reviewed information. Additionally, there is no evidence to suggest coho in Northern California respond to fluctuations in temperature the same way coho respond in other parts of the Pacific Northwest. While the Sullivan approach has obvious merit, more peer review and studies to validate the findings are necessary.

The Staff Report does not consider the inherent potential of a watershed's temperature regime. As evidenced by the data we submitted in 2004, there is tremendous spatial and temporal variability observed throughout coastal watersheds. Why then would the Water Board attempt to apply a single-value, one size fits all threshold for temperature throughout an entire watershed? Clearly there are select stream reaches that may never achieve the 14.8 degree maximum for coho simply due to landscape factors such as orientation, underlying geologic formations and vegetative characteristics. No where in the Staff Report is there an acknowledgement that proposed targets may not be achievable in all places at all times.

The analytical methods used in the Staff Report are flawed. Listing determinations based on the percentage of occurrences (pooled by watershed) that exceed 14.8 creates bias. For example, since 2002 Campbell has removed thermographs from historic locations

deemed "cool" and placed them in "warm" areas to better isolate and characterize areas of concern. This in turn has a substantial effect on the results of the analysis. Without consistent temporal and spatial sampling across a watershed it does not seem appropriate to pool the data for analysis.

Additionally, Campbell requests that Staff consider whether it is appropriate to pool historic data from the mid and late nineties in order to characterize today's instream conditions. Since 1999 there has been a change in ownership/management on the Hawthorne property, there are increase regulations that require a greater level of canopy retention along watercourses and most importantly: trees are growing every day and the watersheds in question are continuing to recover from historic practices.

Pudding Creek Case Study

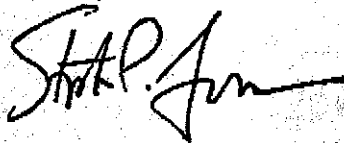
The proposal to list Pudding Creek for temperature is a case in point. After reviewing the historic data from Pudding Creek (Appendix A) it is evident that the analyses were reliant on data from three different locations within the watershed. Furthermore, sampling intensity at each location is not consistent throughout the data record. A closer look at the data shows that a high percentage of exceedance values occurred in 1997 during an unseasonable dry summer. Pooling the entire data set, the Sullivan threshold was exceeded approximately 21.5 percent of the time, however the year-to-year variance ranges from 3.1 to 66.5 percent. It should also be considered that monitoring locations have not recorded a Maximum MWAT of over 16.9 since 1997. Over the last five years, the Maximum MWAT recorded was 15.9.

Based on this information we respectfully request that Pudding Creek is removed from the list of water bodies proposed for 303(d) listing (temperature impairment).

Thank you for evaluating the Ten Mile tributaries separate from the mainstem channel relative to proposed listings. We encourage and are willing to further cooperate with staff in pursuit of a similar investigation in the Big and Noyo Rivers.

Please call if you have any questions. Our staff is also prepared to meet in person and discuss these topics at your convenience.

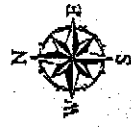
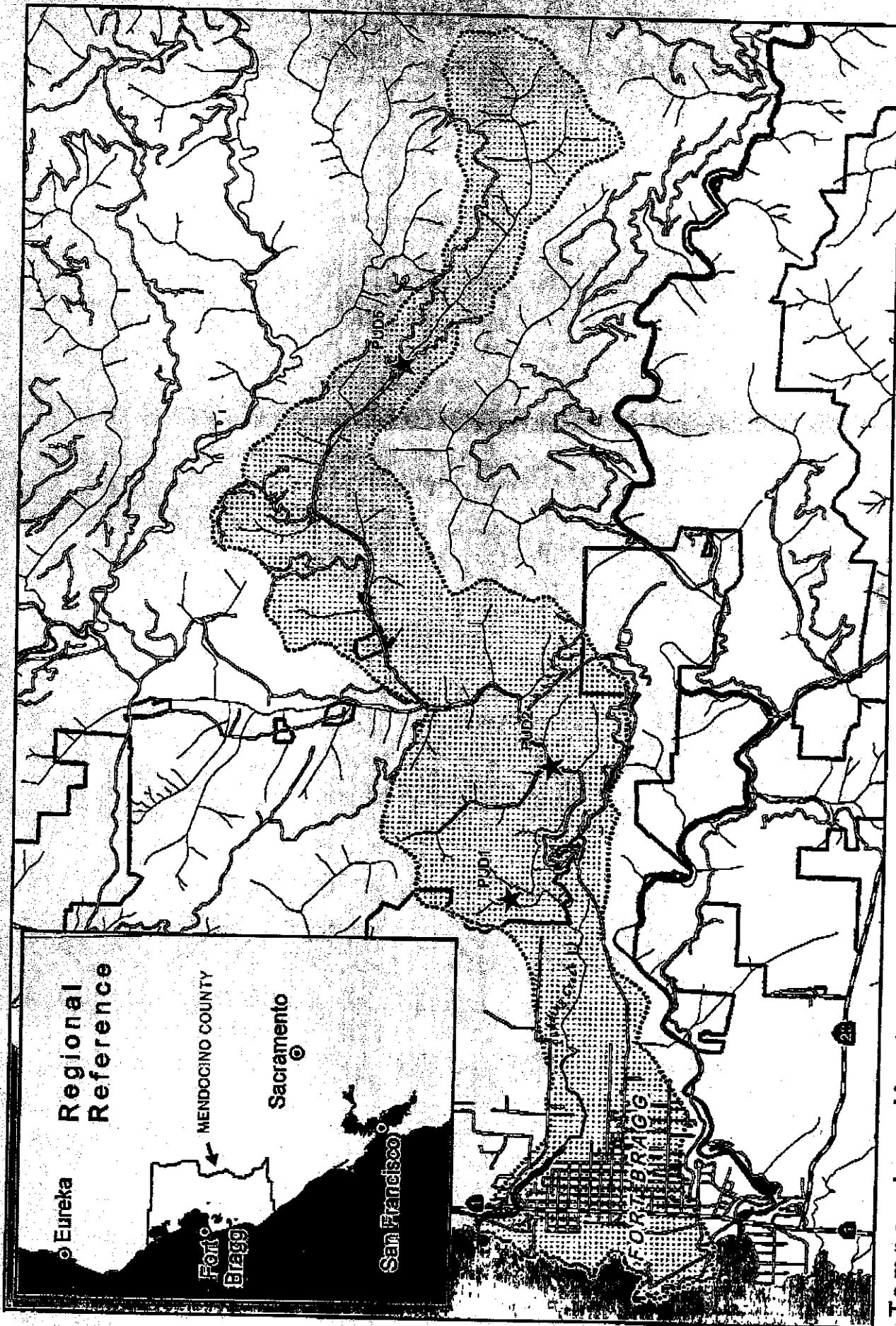
Sincerely,



Stephen P. Levesque
Area Manager

Attachment: Appendix A

Appendix A



Temperature Monitoring Locations: Pudding Creek Watershed

- ★ Monitoring Sites
- ▨ Pudding Creek Watershed Boundary
- ▧ Hawthorne Timberlands
- State Highways
- - - Paved / Rocky Roads
- Major Streams

Water Temperature Data Summary. Pudding Creek Watershed, 1994 - 2003

Year	Parameter	Monitoring Site			Annual Totals
		PUD1	PUD2	Pud5	
1994	MWAT (n)	135.0	132.0		267.0
	Ave. MWAT	13.1	13.6		
	Max MWAT	14.2	14.4		
	Count Exceed				
1995	MWAT (n)		132.0	113.0	245.0
	Ave. MWAT		14.3	13.6	
	Max MWAT		16.4	15.0	
	Count Exceed		47.0	7.0	
1996	MWAT (n)	112.0	105.0	105.0	322.0
	Ave. MWAT	13.4	13.9	13.1	
	Max MWAT	14.4	15.3	14.3	
	Count Exceed		27.0		
1997	MWAT (n)	124.0	106.0		230.0
	Ave. MWAT	14.8	15.4		
	Max MWAT	15.9	16.9		
	Count Exceed	75.0	78.0		
1998	MWAT (n)		114.0		114.0
	Ave. MWAT		14.3		
	Max MWAT		15.5		
	Count Exceed		35.0		
1999	MWAT (n)		135.0		135.0
	Ave. MWAT		13.3		
	Max MWAT		15.4		
	Count Exceed		29.0		
2000	MWAT (n)		151.0		151.0
	Ave. MWAT		13.4		
	Max MWAT		15.1		
	Count Exceed		19.0		
2001	MWAT (n)		127.0		127.0
	Ave. MWAT		13.3		
	Max MWAT		15.1		
	Count Exceed		4.0		
2003	MWAT (n)		105.0		105.0
	Ave. MWAT		14.4		
	Max MWAT		15.9		
	Count Exceed		43.0		
Totals	MWAT (n)	371.0	1107.0	218.0	1696.0
	Ave. MWAT	13.8	13.9	13.3	
	Max MWAT	15.9	16.9	15.0	
	Count Exceed	75.0	282.0	7.0	
					364.0

CAMPBELL TIMBERLAND
MANAGEMENT, LLC
P.O. BOX 1228
FORT BRAGG, CA 95437
PHONE (707) 961-3302
FAX (707) 964-3966



TELECOPY COVER SHEET
CONFIDENTIAL AND PRIVATE

DATE: 1/17/06 FAX NO.: 916-341-5550

TO: Craig Wilson

FROM: Stephen Levesgue

NUMBER OF PAGES (including this page): 7

Should you have any problems receiving this transmission, please call the sender at (707)961-3302.

MESSAGE:

Written Comments

↳ 303 (d) Listings

NOTE: This facsimile is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and destroy this misdirected fax. Thank you.