

September 22, 2014

Central Valley Regional Water Quality Control Board
Timber Harvest Unit
364 Knollcrest Drive, Suite 205
Redding, CA 96002

RE: Calforests Support of Renewal of Central Valley Region's Timber Waivers

Dear Central Valley Regional Board,

Calforests (the California Forestry Association) strongly supports the proposed renewal of Resolution R5-2010-0022, Conditional Waiver of Waste Discharge Requirements for Discharges Related to Timber Harvesting Activities (timber waiver) by the Central Valley Regional Water Quality Control Board (Central Valley Region). Since its inception in 2003, the waiver process for timber harvesting activities has proven to be a highly effective regulatory mechanism to comply with state mandates for waste discharge requirements.

Calforests' membership includes a variety of forest landowners, forest managers, loggers, and registered professional foresters (RPF) within California. Many of these entities—large and small alike—have utilized the Central Valley Region's timber waiver program. The overwhelming response Calforests has received from its members indicates that there is strong support for the renewal of the current timber waiver process.

Calforests believes the current waiver process meets and exceeds legal requirements and mandates for water quality protection in the Central Valley Region in a relatively simple regulatory mechanism. We want to highlight some of the benefits of the waiver process:

- The current waiver system utilizes a series of waiver categories. These categories cover a wide range of timber-related activities, such as Timber Harvesting Plans (THP), Non-industrial Timber Management Plans, Exemptions and Emergencies. Given the breadth of this coverage, virtually all timber harvesting activities on non-federal lands in California can utilize the timber waiver process.
- The criteria for enrolling THPs in the waiver process are tiered directly to the participation by Central Valley Region staff in the Interdisciplinary Review Team Process. This further ensures that the issues and concerns from Central Valley Regional staff during the review process have been adequately addressed in the THP.
- The monitoring and reporting program requirements mandate that monitoring be conducted during the life of the THP and beyond. This monitoring assures that

water protection measures have been adequately implemented and that these measures are indeed functioning as intended.

- The timber waiver process is relatively simple and straightforward. This waiver process is one that is well understood by all those associated with timber harvesting, including state agency review team staff, agency representatives who conduct operational inspections, as well as RPFs, forest landowners, and others involved in the waiver process.

There is no demonstrated need to change the current waiver process for existing categories covered in the timber waiver process.

Calforests also supports the modification efforts of the Central Valley Region staff to include the Working Forest Management Plan (WFMP) in the timber waiver process. Once the WFMP has been formally approved by the Board of Forestry and Fire Protection, we anticipate that the WFMP will prove to be a useful tool for future forest management in California. Future inclusion of the WFMP in the Central Valley Region's timber waiver program will be important to help encourage forest landowners to utilize this new forest management tool.

Again, Calforests supports the Central Valley Region's staff recommendation to renew the timber waiver program for an additional three years. Thank you for the opportunity to comment on this matter.

Sincerely,



David A. Bischel,
President

cc via email: dhallis@waterboards.ca.gov

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SEP 24 2014