

July 1, 2007

To: Board of Directors  
Central Coast Water Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-7906

From: Central Coast Forest Association  
P. O. Box 1670  
Capitola, CA 95010

Re: Timber harvest waivers

Dear members of the board,

The Central Coast Forest Association is an association of forest landowners and forest professionals who are based on the Central Coast of California.

We have some questions about why the general waiver for a timber harvest is taking so long to process. In all other parts of the state, the general waiver takes from ten to fourteen days to process. In the Central Coast region, the processing takes weeks or months and often times out. Since all of the data provided for the waiver outside of the location of the monitoring stations was reviewed in the timber harvest permit before the water control board processes the waiver, we have to wonder why this is taking so long. We also wonder why the waiver cannot process at the same time the THP is being reviewed; as it stands now, the additional time to process the waiver is often long enough to force the harvest into winter operations or the next year. Some of our members have told us of plans being rejected for purely clerical reasons; surely it could be possible to issue a waiver pending corrections of typos and clerical adjustments in documentation. Clerical errors have never affected water quality.

We also have questions about the post-harvest monitoring methodology. Following the harvest, the landowner is responsible for providing monitoring information, including turbidity and water temperature, in locations that have included ephemeral streams (the ones that run dry in the summer). Since there has so far been no legitimate scientific tie between this information and the stream health and since the water control board staff continues to insist on measurements even when there is insufficient water running in some streams to gather legitimate data, we have to wonder about the value of this data. The water temperature data loggers are often required to be deployed in streams where there is water, but not enough water to gather data according to the instructions from the manufacturer. This leads to incorrect data showing a higher water temperature which is due to the data loggers

being deployed in water that is too shallow, and not due to a lack of stream side canopy.

We also question the value of data gathered outside of any complete context; thus far, we have seen no requirements for housing developments, parks and other public open space, or other land designations found intermingled with private forest land to provide similar data for comparisons. It strikes us as a fishing expedition to single out only the timber industry. We would like to remind your board that light selective harvests are the only timber operations conducted in our area, and that this land use receives far more stringent review than any of the other surrounding land uses.

We hope the board will see fit to address these issues as they examine the timber harvest waiver program.

Yours truly,

Cate Moore  
Central Coast Forest Association