



July 6, 2007

Roger Briggs, Executive Officer
Central Coast Regional Water Quality Control Board
895 Aerovista Place
San Luis Obispo, Ca. 93401

RE: Status Report for the Regulation of Timber Harvest Activities in the Central Coast Region.

Dear Mr. Briggs:

Big Creek Lumber Company appreciates the opportunity to provide comment as part of the second annual review of the General Conditional Waiver of Waste Discharge Requirements (Order No. R3-2005-0066) and the associated Monitoring and Reporting Program (MRP No. R3-2005-0066).

We commend staff for their ongoing efforts to attend Preharvest Inspections (PHI's) as well as conduct winter and postharvest inspections. These inspections are critical to the General Waiver process. For these reasons, we support staff's request to acquire an all-terrain vehicle (ATV) to help facilitate site inspections. We hope that staff will continue to move toward 100% attendance for these inspections.

Big Creek Lumber continues to have concerns regarding the functioning and efficacy of the General Waiver process and Monitoring and Reporting Program. Members of our Forestry Department have participated in detailed discussions with Central Coast Regional Water Quality Control Board staff. The following is an overview of some of our concerns.

Local Registered Professional Foresters submitted a joint letter dated May 3, 2007, which outlined a number of concerns specific to turbidity monitoring. Big Creek Lumber continues to have these concerns. We request that your Board and staff review and comment on the recommendations provided in that letter.

The timeframe associated with getting individual harvest plans enrolled in the general waiver continues to be a serious problem. Delays and uncertainty in receiving waivers directly affects our forestry, logging and sawmill operations, as well as the operations and scheduling of our various contractors. We have heard from several sources that applicants in other regions are receiving necessary Regional Water Quality Control Board approval for their timber harvests in about two weeks. We acknowledge that other regions have more staff dedicated to timber harvest review, but these regions are also

handling many more harvest plans per year. We request that your Board and staff review the more timely waiver approval processes used in these other regions to determine if they can be incorporated by Region 3.

We are also experiencing difficulty receiving releases from year-one monitoring. Under the current process, after the first year of monitoring, the applicant submits a written request. This request triggers a field review by your staff and a subsequent release from year-one monitoring requirements. This process is moving very slowly, resulting in increased monitoring costs for landowners.

Your Board instructed staff to review and report on the collective water quality monitoring information that has been submitted to date. Staff was instructed to determine whether this data can be used effectively to understand the relative impacts of selective timber harvesting in the context of overall watershed uses and conditions. We encourage staff to proceed with this analysis and report to your Board and the regulated public as soon as possible.

As currently written, an applicant may be obligated to conduct monitoring on weekends and/or holidays. We request that you Board consider a modification to the General Waiver, allowing monitoring to be conducted on the first business day following a weekend or holiday if the monitoring trigger occurs during a weekend or holiday.

Big Creek Lumber Company remains committed to the protection of water quality and will continue to work with your Board and staff to make the General Conditional Waiver of Waste Discharge effective and fair. Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Berlage". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Bob Berlage
Communications Director



California Regional Water Quality Control Board
Central Coast Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

September 25, 2007

Bob Berlage, Communications Director
Big Creek Lumber Company
3564 Highway 1
Davenport, CA 95017

Dear Mr. Berlage:

**SUBJECT: RESPONSE TO JULY 6, 2007 LETTER RE: STATUS REPORT FOR THE
REGULATION OF TIMBER HARVEST ACTIVITIES IN THE CENTRAL COAST
REGION**

In your July 6, 2007 letter (Attachment 1) to me you outline several concerns and recommendations you have regarding the Central Coast Regional Water Quality Control Board's (Water Board) regulation of timber harvest activities in the Central Coast Region. Your recommendations and staff responses are listed below:

1. Your request for Water Board staff to review and comment on recommendations provided in the May 3, 2007 letter from local foresters regarding the General Waiver Process and the Monitoring and Reporting Program.

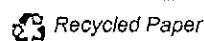
Water Board staff is in the process of reviewing the comments and recommendations provided in the May 3, 2007 letter. Based on their review, Water Board staff will be providing me with recommendations for my consideration and approval.

2. Your request that Water Board staff review the more timely waiver approval process used in other Regional Water Quality Control Boards to determine if their processes can be incorporated in the Central Coast Region's process.

Staff agrees with your suggestion. In July 2005, when the Water Board adopted the General Waiver, other Regional Boards had not yet established their own Timber Harvest waiver programs. Since July 2005, other Regional Boards have established their own waiver programs. Therefore, Water Board staff will incorporate assessment of these other programs in their work plan for 2008. During the review, Water Board staff will look for streamlining possibilities and propose changes as appropriate.

3. Your encouragement of Water Board staff to proceed with analysis of water quality data collected through the regulation of timber harvest activities.

California Environmental Protection Agency

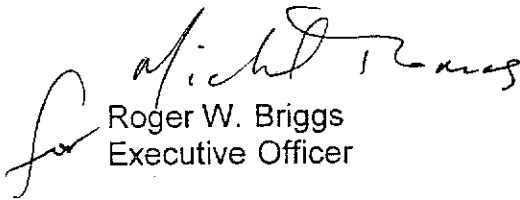


Water Board staff is in the process of analyzing the water quality data associated with the regulation of timber harvest activities and will report their findings to the Water Board in 2008.

4. Your request that the Water Board consider a modification to the General Waiver, allowing monitoring to be conducted on the first business day following a weekend or holiday if a monitoring trigger occurs during a weekend or holiday.

The requirements in Monitoring and Reporting Program are designed to capture data representative of the conditions in the field during or just after larger storm events. Waiting until the next business day to collect a sample, which in some cases could be up to three days, is inappropriate. Therefore, the monitoring trigger requirements in the Monitoring and Reporting Programs will remain the same.

Sincerely,



Roger W. Briggs
Executive Officer

Attachments:

1. Bob Berlage; July 6, 2007 letter RE: Status Report for the Regulation of Timber Harvest Activities in the Central Coast Region

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