

## **Comments on the Regional Water Quality Control Board Monitoring Plan from Santa Cruz County Staff (John Ricker and Kristen Schroeder)**

These comments are provided in response to the February 1, 2005, letter from Roger Briggs, requesting comments on proposed monitoring and reporting program for regulated timber harvest operations.

Overall – looks like a good approach. It's good to see points and ideas presented from staff and others at the June workshop incorporated into this document. While we support the approach (e.g. determine whether hillslope conditions created by timber harvest operations are resulting in intended instream conditions), we recognize that the broad approach also means that the standards and criteria are still somewhat nonspecific and may need to evolve more as the program is implemented.

Following are specific comments:

Cover letter and questions: Under water quality compliance monitoring, it is asked whether timber harvest activities are impacting water clarity. It seems that the underlying question needs to be broader than just addressing clarity and turbidity: Are timber harvest activities causing introduction of sediment into the stream that is adversely affecting beneficial uses? (See Basin Plan water quality objectives II.A.2.a for suspended material, settleable material and sediment.) Turbidity is a partial and somewhat inadequate measure of potential impact. Are there deposits of sediment in and along drainageways and waterways resulting from timber harvest activities? This is also addressed under forensic monitoring.

Page 1. There is a good link between the monitoring and the requirements for management of timber operations: "Inform development of waiver conditions or WDRs and adaptive management processes in order to maximize implementation success"; and, "Determine whether hillslope conditions created by timber operations are resulting in the intended instream conditions." Again, this is a good approach, but it's still somewhat vague and will be difficult to achieve without good baseline data.

Page 3. Photo monitoring. Photos of forested environments, especially on dark, rainy days may be hard to "read". It needs to be ensured that photo points are close enough to the "subject" (e.g. a stream crossing) to record erosion. Consider including language such as: "photos from the monitoring need to be of sufficient quality to record the effectiveness of the crossing."

Page 4. "if management measures fail..." how do you define fail? Qualify this statement more. Does any minor erosion from a stream crossing count as "failure"?

Page 6. For the temperature monitoring, it would be great to have baseline data. You could include Year 0 (the permitting/planning year). Even if you could not require pre-harvest baseline data, you could encourage it.

Page 6. Although the Basin Plan limits temperature increase to 5° F, this would be a very high impact from a single timber harvest, especially in Santa Cruz where our stream temperatures run high already. Smaller and cumulative increases should also be a concern.

Page 6 D2 - Turbidity. Turbidity monitoring is problematic and of limited value unless it is done during a storm event when surface runoff is occurring or if there is a very severe source of sediment directly in the waterway. Once the rain stops, most sediment movement and turbidity discharge to the waterway will taper off rapidly, usually within an hour. We would suggest monitoring during an active storm, and monitor upstream and downstream of the timber harvest operation where possible.

Page 8, Annual Report. It seems like it would be useful to receive the annual report earlier, perhaps in August or September, so the information could be reviewed and any modifications made to the management practices or monitoring requirements prior to the onset of winter rains.

Thank you for the opportunity to comment. We look forward to continuing to work with you on appropriate oversight of timber harvest operations in Santa Cruz County.