

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 4/5 December 2014**

**Response to Written Comments for Order R5-2014-xxxx;
Renewal of Categorical Waiver of Waste Discharge Requirements for
Discharges Related to Timber Harvesting Activities**

At a public hearing scheduled for 4/5 December 2014, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adopting Order No. R5-2014-xxxx to renew the Categorical Waiver of Waste Discharge Requirements for Discharges Related to Timber Harvesting Activities (Waiver). The proposed Order proposes to renew the Waiver for three years and includes non-substantive (clerical) changes.

This document contains responses to written comments received from interested parties regarding the proposed Order circulated on 10 September 2014. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by 10:00 a.m. on 10 October 2014 to receive full consideration. Written comments were received by the deadline from:

1. Roseburg Resources Co. (RRC)
2. Collins Pine Co. (CP Co.)
3. California Forestry Association (Calforests)
4. California Department of Forestry and Fire Protection (CAL FIRE)

The written comments are summarized below, followed by Central Valley Water Board staff responses.

Roseburg Resources Co. (RRC)

RRC – COMMENT 1: RRC supports the renewal of the Resolution with modifications.

RESPONSE: Comment noted.

RRC – COMMENT 2: RRC prefers renewing the Resolution for five years rather than the three years proposed, allowing for unforeseen delays in the Board of Forestry and Office of Administrative Law adoption/approval of Forest Practice Rules covering the Working Forest Management Plan (WFMP). If the WFMP rule package is approved on time, then the new Resolution can proceed in less than five years. If the WFMP rule package approval is delayed, then

unnecessary costs of renewing the 2014 Resolution before five years to accommodate the delays are eliminated.

RESPONSE: Central Valley Water Board staff agrees that there are costs (financial costs and staff time) associated with renewing the Resolution every time renewal is proposed. The timeframe chosen is intended to provide adequate time for staff to address permitting needs for the new Working Forest Management Plan process currently in review at the Board of Forestry and scheduled for implementation in January of 2016, while committing staff to address the new permitting needs in a timely manner.

RRC – COMMENT 3: RRC believes that the Forensic Monitoring should be reduced from two visits (after 5 inches and 15 inches of total precipitation for the season) to one visit (after 10 inches of total precipitation).

RESPONSE: The Central Valley Water Board region covers a vast array of geographical areas and meteorological conditions. The two precipitation values were chosen to ensure adequate triggers for monitoring while considering regional differences in precipitation.

Collins Pine Company (CP Co.)

CP Co. – COMMENT 1: CP Co. supports the renewal of the Resolution as the waiver currently exists.

RESPONSE: Comment noted.

California Forestry Association (Calforests)

Calforests – COMMENT 1: Calforests supports the renewal of the Resolution.

RESPONSE: Comment noted.

Calforests – COMMENT 2: The current waiver system utilizes a series of waiver categories covering a wide range of timber-related activities.

RESPONSE: Comment noted.

Calforests – COMMENT 3: The monitoring and reporting program requirements mandate that monitoring be conducted during the life of the plan and beyond. Monitoring assures that water protection measures have been adequately implemented and that these measures are functioning as intended.

RESPONSE: Central Valley Water Board staff agrees and also conducts both active and completion inspections to follow up on installed protection measures as part of an adaptive management process.

Calforests – COMMENT 4: There is no demonstrated need to change the current waiver process for existing categories covered in the timber waiver process.

RESPONSE: Comment noted.

California Department of Forestry and Fire Protection (CAL FIRE)

CAL FIRE – COMMENT 1: CAL FIRE strongly supports the proposed renewal of the Timber Waiver for an additional three years.

RESPONSE: Comment noted.