



# Central Coast Forest Association

*Caring for forests, protecting our land*

PO Box 66868, Scotts Valley, Ca 95066

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15 November 2011

to: Mr. Charlie Hoppin, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

from: Central Coast Forest Association  
P. O. Box 66868  
Scotts Valley, CA 95066

re: Water Diversion Reporting Requirements by SWRCB in Forestry Operations

DIV OF WATER RIGHTS  
SACRAMENTO  
2011 NOV 21 AM 10:32  
STATE WATER RESOURCES  
CONTROL BOARD

Dear Chairman Hoppin,

The Central Coast Forest Association (CCFA) is an organization comprised of forest landowners, resource professionals and others concerned with forest issues and land use policy in the Central Coast region of California.

CCFA views the new Water Diversion Measurement standards, as they apply to forestry operations, as a solution in search of a problem. What makes sense in other agricultural venues does not translate well to forestry, and since forestry typically uses such small amounts of water in their operations, one would be hard pressed to demonstrate a significant impact on the affected watersheds.

In the Central Coast region, forestry operations typically use water for dust suppression on haul roads and fire prevention around heavy equipment. Timber fallers may carry backpack pumps with them in case their saws spark on dry tinder. Much of the water used for these purposes is bought from municipal water supplies and is already accounted for. In most cases, the usage is .001% or less of the water in a drainage, and that is not even annually. The Southern Subdistrict rules allow entry for timber operations only in cycles of ten years or greater in any one location. Thus, the amount of water used, in terms of overall watershed impact, is negligible, and would be lost in the background variations in any statistical survey of watershed usage. Given this extremely low impact, CCFA wonders why the State Water Resources Control Board (SWRCB) even needs to measure this. Simply because one *can* measure something, it does not mean one must.

If the SWRCB is more concerned about the method by which the water is obtained and the environmental protections that are put in place around the water sources, referencing the Timber Harvest Plan (THP) for the project should provide all the necessary information. The THP is reviewed by CAL FIRE, the California Department of Fish and Game, the appropriate California

Regional Water Quality Control Board, Department of Conservation, Division of Mines and Geology, the California Coastal Commission for plans in the coastal zone, a county representative if the local county so requests, the local water district, the local road association, and the Department of Parks and Recreation if it affects a local park. Furthermore, the director may request other federal, state or county agencies, or Native Americans, when appropriate. Field inspections of the drafting locations are conducted by all interested agencies during the Pre-Harvest Inspection (PHI).

The State of California is in a financial bind largely because it is overdoing and double-doing too many operations. Everything the SWRCB needs to know about forestry related water diversions can be found in the THP process. CCFA urges the SWRCB to consider the best use of their limited resources and apply them to problems of greater impact to our watersheds.

Yours truly,

A handwritten signature in cursive script, appearing to read "Eric Moore".

Eric Moore  
Board Member, Central Coast Forest Association

cc: Richard Satkowski, Division of Water Rights, SWRCB  
Governor Edmund G. Brown  
John Laird, Secretary of Natural Resources  
Assemblyman Bill Monning  
Senator Joe Simitian