



CALIFORNIA  
LICENSED  
FORESTERS  
ASSOCIATION

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November 11, 2011

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

**RE: Water Diversion Reporting requirements by SWRCB**

Dear Mr. Chairman,

The California Licensed Foresters Association (CLFA) appreciates the opportunity to comment on the new Water Diversion Measurement standards required by the State Water Resources Control Board (SWRCB). CLFA, with a membership responsible for the sustained management of millions of acres of California forestland, represents the common interests of California Registered Professional Foresters.

CLFA has the following concerns regarding the new proposed reporting structure as well as some suggestions for making this process simpler for landowners as well as the SWRCB.

**Water diversions associated with timber operations are typically minor in amounts and difficult to measure with the water most often being used in the same watershed from which it was diverted.**

**Timber operations often cover large areas and may have several water-sources for a given project.**

**Diversion points are diverse and determining amounts of water taken from each location would be difficult.**

**The forms currently used for reporting are inadequate for timber operations.**

**Emergency water use for operations is nearly impossible to report because the diversions are often completed by a number of contractors and state agencies with no oversight from the landowner.**

**Due to variations in water needs based on weather and ground conditions estimates of monthly usage will be difficult to determine**

The “Best Available Technologies” and “Best Professional Practices” standards do not apply well to timber operations as most diversions in the forest setting take place in the form of water being pumped into water trucks not through diversion canals or weirs where current measuring technologies allow for better estimates of water usage.

The SWRCB proposal to report water use is attempting to oversee and regulate an environmental concern that is already being addressed during the Timber Harvesting Plan (THP) review process. CAL FIRE, the Department of Fish and Game, and Regional Water Quality Control Boards are all active participants in THP review and take water drafting locations, construction, maintenance, and potential amounts of diverted water into consideration.

CLFA proposes the Water Diversion and Use Form be modified or a new form be developed to better represent timber operations. Additionally, CLFA requests that the SWRCB allow for a one-time general report for timber harvest operations that focuses on water-diversion quantities per watershed.

We hope that SWRCB will consider this proposal and along with the potential economic impacts the new Water Diversion Measurement Requirements will have on landowners. Please let us know how we can support SWRCB in achieving this proposal.

Sincerely yours,



**Frank Mulhair RPF#2625**

**President CLFA**

Cc: CLFA Board of Directors.

*The California Licensed Foresters Association, with a membership responsible for the sustained management of millions of acres of California forestland, represents the common interests of California Registered Professional Foresters. The Association provides opportunities for continuing education and public outreach to its membership, which includes professionals affiliated with government agencies, private timber companies, consultants, the public, and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 after the passage of the landmark California Professional Foresters Law.*