

THE HEARST CORPORATION

Hearst Forests, LLC.

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April 5, 2017

Re: Waste Discharge Requirements General Order for discharges related to timberland management activities in the Central Valley Region.

Ms. Jacqueline Matthews
Central Valley Regional Water Quality Control Board
364 Knollcrest Dr. Ste. 205
Redding, California 96002

Dear Jacqueline:

Thank you for providing the opportunity to comment on the above mentioned General Order. We conduct timberland management activities throughout our ownership in accordance with a Program Timberland Environmental Impact Report (PTEIR #: 970-72103). This landscape level California Environmental Quality Act (CEQA) compliant document has been actively used since 1998 to inventory, mitigate, monitor, and report potential environmental impacts associated with our field operations.

The proposed General Order does not appear to recognize the existence of this type of CEQA compliant document. At a minimum we feel language addressing PTEIRs should be included at the following General Order locations:

1. Item II: Provisions (recognize that operations conducted under a PTEIR are already CEQA compliant).
2. Item "D" Category 3B.
3. Item "E" Category 4.
4. Attachment "A" Definitions item 7 "project."
5. Attachment "B" Monitoring and Reporting Program.

Specifically, please consider adding the following language:

1. Item II: Provisions (or elsewhere at the beginning of the General Order) --
"Activities conducted in accordance with a certified CEQA project permit that provides inventory, mitigation, monitoring, and reporting will be deemed compliant with and satisfy the conditions of this General Order."
2. Attachment "A" Definitions number 7 Project – Include a PTEIR as a recognized project.

We will continue to work with the Board and staff to insure that no significant unmitigated impacts from our operations occur and that the Basin Plan is followed.

Regards,


Lloyd T. Bradshaw
Director Hearst Forests

Cc: Ms. Angela Wilson