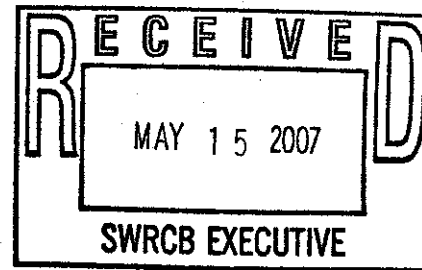




15 May 2007

State Water Resource Control Board  
ATTN: Song Her  
Executive Office  
P.O. Box 100  
Sacramento, CA 95812-0100



TRANSMITTED VIA E-MAIL

**RE: Comments on Proposed Wetland and Riparian Area Protection Plan**

Dear Board Members,

Thank you for the chance to comment on the proposed protection policy regarding wetlands and riparian areas. Campbell Timberland Management (CTM) feels there is not adequate justification provided to support additional regulations of wetlands and riparian areas. The Timber Harvest Plan (THP) review and approval process already make protection of these areas necessary and additional rules would only be duplicative. Watercourse and lake protection measures are stated in section 14CCR (916, 936, 956) et seq., including specific measures for the evaluation of sensitive conditions relative to watercourses and surrounding areas. In addition, Board of Forester Technical Rule Addendum No. 2 provides direction for the assessment of cumulative impacts, including those that may potentially impact watercourses, riparian areas and wetlands. Department of Fish and Game (DFG) 1600 Streambed Alteration Program adds an additional layer of regulation, as does the State Water Resources Control Board's General Waste Discharge Requirements and the U.S. Army Corps of Engineers Section 401 permits. CTM recognizes additional regulations may need to be placed on large landowners in regards to wetland and riparian area protection, where one or more layers of regulation are not in place. However, timberland owners currently have the regulatory oversight regarding these issues. CTM feels that timberland owners should be exempt from the proposed policies.

Sincerely,

Kevin Faucher  
Aquatic Resource Manager  
Campbell Timberland Management