

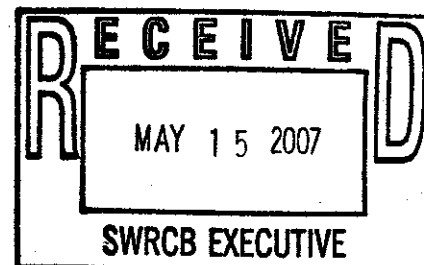


Sierra Pacific Industries

Tahoe District • P.O. Box 1450 • Cedar Ridge, California 95924 • (530) 272-2297

May 11, 2007

State Water Resources Control Board
Attention: Song Her
Executive office
P.O. Box 100
Sacramento, CA 95812 -- 0100



Re: Comments on proposed wetland and riparian area protection policy

Dear Members of the Board:

We understand the board's efforts to address some riparian areas and wetlands not being protected from a recent 2001 court decision. We do not feel there are gaps in protection of the state waters when forest landowners obtain a timber harvest plan (THP) from Cal-Fire or 1600 permits from Fish and Game.

Additionally, these projects are subject to WDR's or waivers in the Regional Water Quality Control Board jurisdictions.

The scoping document fails to recognize the contribution of the California State Forest Practice Act and the Board of Forestry rules in protecting the state's forest waters and riparian areas. As such, there is a total lack of justification for an expanded jurisdictional overlap. We support Alternative 1 as it relates to forest landowners, allowing for currently established rules and regulations to be the regulatory authority.

The Board of Forestry is currently engaged in a scientific literature review process to ascertain information relevant to forest management practices and effects on riparian function. This effort is being recognized as one of the most comprehensive reviews of known information on key riparian elements.

In summary, we find there is no justification for expanded regulatory oversight for permitted forest operations. We do believe continued participation by your representatives at the Board of Forestry and especially in the scientific literature review is the correct venue for protection of the state forest waters.

Sincerely,

Timothy J. Feller
District Manager