

Letter # 1.502

We received a letter from the California Forestry Association. The issues and comments in this letter have been addressed in previous comments, with the exception of these points;

- None of the information presented by the CFA is new, with the exception of the Monitoring Study Group meeting minutes, which present preliminary data of an active project located in the Central Valley outside of the North Coast Region. This new information with respect to the Southern Exposure research project, contained very little information on the study, for example no QA was submitted, no numerical data was presented, and no metadata for field data was presented. The majority of the information presented is anecdotal.
- The Hillslope Monitoring Report presented as information addresses the effectiveness of the Forest Practice Rules. It does not contain an impact analysis, and contains no specific instream monitoring.
- The Forest Science Project (T.E. Lewis 2000) presented as information already existed in the record as reference #136 of the NCRWQCB Staff Report. The staff have used this data, to support listings of North Coast Rivers for temperature. This report supports variability in North Coast Streams. Temperature varies through a variety of factors; climate, air temperature, drainage area, canopy shade, and others. We agree with the information presented in this report. Furthermore, The temperature modeling work in the Navarro River and Mattole River watersheds for the temperature TMDLs have shown that these factors are both necessary for precise prediction of water temperature and also have an impact on temperature variability.
- The CFA feels that the proposal to set a single stream temperature standard for all streams in Northern California is inappropriate. We agree a single temperature standard for the North Coast Region is inappropriate. We have however, never suggested there should be a single temperature standard for the North Coast. We are not developing or proposing a standard.

The Narrative objective for temperature discusses that the natural receiving water temperatures shall be maintained and the beneficial uses shall be supported. The approach to assessing temperature impairment for the 2002 303(d) list update used threshold values for coho and steelhead as screening values that may be indicative of impairment (Sullivan, et al.), coupled with information about the presence and distribution of salmonids. The 303(d) list update process is not a Basin Plan amendment process and the screening values used are not recommended standards.

Other information:

- Canopy closures of 80% may be supportive of beneficial uses but they are not necessarily protective of beneficial uses. Regardless of the impact of canopy coverage, the amount of shade didn't come into play as far as the listing process is concerned. Canopy coverage will be a factor considered during the development of the TMDL.
- The CFA comments do not specifically dispute the approach used by Regional Water Board staff in assessing temperature impairment for the 2002 303(d) List update. The approach used by Regional Water Board staff in assessing temperature impairment for the 2002 303(d) list update has received support by the 303(d) listing policy steering committee and TMDL management advocates, as well as other agencies, including NOAA Fisheries and U.S. EPA Region 9.

- Sullivan temperatures are similar to Northern California River temperatures as discussed in Response to comment 1.3.1.
- In some instances, recent stream temperatures are lower than levels recorded by USGS between 1950 and 1969. We agree, there are examples of locations where current stream temperatures are lower than levels recorded in the 1950's and 1960's. We note however, that the report cites both "appreciable increases or decreases from historical levels". Catastrophic natural disturbance that occurred in the 1950's and 1960's, coupled with timber harvest practices prior to the passage of the Forest Practice Rules, resulted in widespread disturbance of riparian cover in much of the north coast. Stream temperatures measured during this time period reflect these conditions. Since that time, recovery of riparian vegetation has resulted in decreased stream temperatures in some areas. However, an improving trend does not necessarily mean water quality objectives are being met.