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## North Coast Regional Water Quality Control Board

August 1, 2016

Mr. Matt Dias  
Acting Executive Officer  
Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, CA 94244-2460  
[Matt.Dias@bof.ca.gov](mailto:Matt.Dias@bof.ca.gov)

Dear Mr. Dias:

**Subject:** Comments on the Board of Forestry and Fire Protection proposed Working Forest Management Plan, dated June 10, 2016, Title 14 of the California Code of Regulations

**File:** Timber, Board of Forestry, General

Enclosed is a Memorandum dated August 1, 2016, which provides Regional Water Board staff comments on the proposed Working Forest Management Plan, as published June 10, 2016. These comments were prepared by David Fowler, Regional Water Board staff.

We appreciate having had the opportunity to participate and to provide substantial input during the development process of this rule package to ensure actions authorized under this regulation comply with Regional Water Quality Control Board water quality requirements. We also appreciate that the Board of Forestry and Fire Protection has addressed many of our concerns.

Overall, we believe the proposed Working Forest Management Plan rules provide an opportunity for long-term planning and management of timberlands, and protection of resources. However, there remains one issue of concern. Addressing only erosion sites that are directly attributable to timber operations ignores existing erosion sites which may be exacerbated by operations under the WFMP. This is inconsistent with other existing sections of the Forest Practice Rules, the requirements of the Water Quality Control Plan (Basin Plan) for the North Coast, and the Porter-Cologne Water Quality Control Act.

By not addressing all anthropogenic erosions sites within the WFMP area that are discharging or threatening to discharge in violation of water quality requirements and can reasonably and feasibly be treated, it is likely that the proposed WFMP regulations will not ensure compliance with the North Coast water quality requirements nor the Water Quality Control Plan for the North Coast Region. We recommend that rules be developed that are consistent with applicable water quality requirements and protection of the applicable beneficial uses of water. This approach would be consistent with the intent section of AB 904 (Public Resources Code § 4597(b)) and help our agencies provide the people of the state with efficient government.

Again, thank you for the opportunity to review and comment. If you or your staff have any questions or concerns regarding our comments, or would like additional information, please contact David Fowler (707-576-2756) or Jim Burke (707-576-2289) of our staff.

Sincerely,

Fred Blatt  
Division Chief  
Nonpoint Source & Surface Water Protection Division

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Enclosed: Regional Water Board staff comments August 1, 2016

cc: Board of Forestry and Fire Protection - [publiccomments@BOF.ca.gov](mailto:publiccomments@BOF.ca.gov)