



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## North Coast Regional Water Quality Control Board

RECEIVED BY

JUL 24 2015

BOARD OF FORESTRY AND FIRE PROTECTION

July 22, 2015

Dr. J. Keith Gilliss, Chair  
State Board of Forestry and Fire Protection  
P. O. Box 944246  
Sacramento, CA 94244-2460

Dear Dr. Gilliss:

**Subject:** Comments on the Emergency Forest Practice Water Drafting Regulations in Response to Continued Drought and Governor Brown's Drought Proclamations and Executive Orders.

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

On July 24, 2015, the State Board of Forestry and Fire Protection will consider adoption of Emergency Water Drafting Regulations in Response to Continued Drought and Governor Brown's Drought Proclamations and Executive Orders (Emergency Regulations).

The Emergency Regulations would extend water drafting regulations that currently apply to watersheds with anadromous salmonids pursuant to 14 CCR § 923.7(l) to apply throughout the state. Substantial areas of private timberlands in the North Coast are located outside of the coastal anadromy zone. Under normal conditions, 14 CCR § 923.7(l) does not apply to these areas.

The North Coast Regional Water Quality Control Board supports the Emergency Regulations. Additional measures to maintain stream flows during water drafting associated with timber operations provided by 14 CCR § 923.7(l) are important to maintain beneficial uses throughout the North Coast Region.

California is in the midst of unprecedented drought conditions that are impacting beneficial uses of water throughout the state, including the North Coast Region. Currently, the entire region meets the definitions of severe or extreme drought conditions, with some areas experiencing exceptional drought conditions (see [www.californiadrought.org](http://www.californiadrought.org) for more information). The drought conditions are taking a tremendous toll on beneficial uses of

JOHN W. CORBETT, CHAIR | MATTHIAS ST. JOHN, EXECUTIVE OFFICER

5550 Skylane Blvd., Suite A, Santa Rosa, CA 95403 | [www.waterboards.ca.gov/northcoast](http://www.waterboards.ca.gov/northcoast)

water throughout the state. California must take prudent measures to balance the human uses of water against the needs to protect vulnerable aquatic organisms in order to protect California's resources for future generations.

Water quantity is a water quality factor. Flow reductions due to human uses of water can result in pollution, a term defined by the Clean Water Act as the "man-induced alteration of the chemical, physical, biological, and radiological integrity of water." Water quality includes water quantity and no artificial distinction can be made between them. It is from this perspective that we urge you to protect the quality of California's waters and the beneficial uses they support by adopting these Emergency Regulations.

Thank you for the opportunity to 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,

 Digitally signed by  
Fred Blatt  
Date: 2015.07.22  
11:31:13 -07'00'

Fred Blatt  
Division Chief  
Nonpoint Source & Surface Water Protection Division

150722\_DLF\_dp\_EmergencyDraftingRegs

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

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