

Central Valley Regional Water Quality Control Board

15 June 2015

George Gentry
Executive Officer
State Board of Forestry and Fire Protection
1416 Ninth Street
P.O. Box 944246
Sacramento, CA 94244-2460

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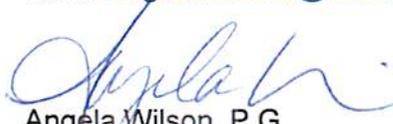
BOARD OF FORESTRY AND FIRE PROTECTION

**COMMENTS ON THE STATE BOARD OF FORESTRY AND FIRE PROTECTION
PROPOSED WORKING FOREST MANAGEMENT PLAN, MAY 1, 2015, TITLE 14 OF THE
CALIFORNIA CODE OF REGULATIONS**

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff has reviewed the second Public Review draft of the Working Forest Management Plan (WFMP), published on 1 May 2015. We have also reviewed a memorandum prepared by the North Coast Regional Water Quality Control Board entitled, "*Review and Comments on the Board of Forestry and Fire Protection proposed Working Forest Management Plan, dated 1 May, 2015, Title 14 of the California Code of Regulations*" (Memorandum). The Memorandum was submitted to the Board of Forestry today, 15 June 2015.

The Central Valley Water Board is in agreement with the Memorandum's findings. The Central Valley Water Board opposes 1094.6(i) Option 1 and conditionally supports 1094.6(i) Option 2 if implemented with the revisions recommended in the Memorandum. We agree that the proposed WFMP rules provide an opportunity for long-term planning and management of timberlands and protection of resources. However, we share the North Coast Regional Water Quality Control Board's concerns that the proposed language addresses only active and existing erosion sites and does not include potential erosion sites. This is inconsistent with the requirements of other sections of the Forest Practice Rules, the Porter-Cologne Water Quality Control Act, and the Water Quality Control Plan, Fourth Edition (Revised October 2011) for the Sacramento River and San Joaquin River basins (Basin Plan).

We appreciate the opportunity to comment on the second Public Review draft of the WFMP rules, published on 1 May, 2015. If you have questions regarding this matter, please contact me at Angela.Wilson@waterboards.ca.gov (530-224-4856).



Angela Wilson, P.G.
Senior Engineering Geologist
Forest Activities Program Manager

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