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## North Coast Regional Water Quality Control Board

June 15, 2015

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

Dear Mr. Gentry:

**Subject:** Comments on the Board of Forestry and Fire Protection proposed Working Forest Management Plan, dated May 1, 2015, Title 14 of the California Code of Regulations

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

Enclosed is a Memorandum dated, June 15, 2015, which provides Regional Water Board staff comments on the proposed Working Forest Management Plan, as published May 1, 2015. 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.

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. We remain concerned, however, that the proposed rule language is reactive rather than proactive with respect to the requirement addressing erosion sites. Addressing only active and existing erosion sites while ignoring potential erosion sites 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.

We believe that by not addressing potential erosions sites, it is likely that the proposed WFMP regulations will not insure 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 and 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 June 15, 2015

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