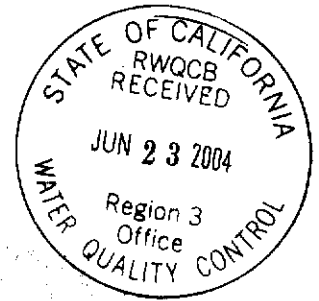


Advocates for Wild, Healthy Oceans

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June 23, 2004

Mr. Jeffrey Young, Chairman
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

The Ocean
Conservancy

Re: Comments on the Proposed Waivers of Waste Discharge Requirements for the Estrada Non-Industrial Timber Management Plan (Order No. R3-2004-0076); the Big Basin Water Company Non-Industrial Timber Management Plan (Order No. R3-2004-0080); the Castro Valley Ranch Timber Harvest Plan (Order No. R3-2004-0078); the Cowell - South Unit Timber Harvest Plan (Resolution No. R3-2004-0079); the Jennings Timber Harvest Plan (Resolution No. R3-2004-0075); the Little Creek Timber Harvest Plan (Resolution No. R3-2004-0074); and the Viitanen Timber Harvest Plan (Resolution No. R3-2004-0077).

Dear Chairman Young and Members of the Board:

On behalf of our organizations, we submit the following comments on the proposed waivers of waste discharge requirements (proposed waivers) for the Timber Harvest Plans and Non-Industrial Timber Management Plans referenced above. Our comments are policy-based, and consequently bear equally on all six of the proposed waivers. In addition, our concerns regarding these waivers are substantively identical to the concerns we expressed in prior comments, dated January 30, 2004, and April 27, 2004, regarding waivers adopted by the Board at its March 19, 2004, and May 14, 2004 meetings, respectively. Consequently, we hereby incorporate our January 30 and April 27 comments by reference.

The Little Creek Timber Harvest Plan (Resolution No. R3-2004-0074), however, raises a unique issue. According to the Staff Report, and to public assertions made by staff at the May 14, 2004 Board Meeting, the landowner (Cal Poly) is conducting an extensive research study exploring the impact of logging on the watershed. This research is apparently being performed using up-to-the-minute technologies and techniques, making it possible for the landowner to perform much more comprehensive monitoring than the average landowner. Yet despite nagging questions about the impacts of timber harvest activities on watersheds in Region 3, and despite the ready availability of the resources to answer some of these questions, staff does not appear willing to propose more than a run-of-the-mill monitoring and reporting plan. In light of this, we must begin to question the sincerity of staff's interest in getting to the bottom of what the water quality impacts of logging in this Region actually are. We urge the Board to require more.

Thank you for the opportunity to provide these comments. As always, please feel free to call us if you have any questions.

Sincerely,



Sarah G. Newkirk
The Ocean Conservancy



Kevin Collins
Lompico Watershed Conservancy



Jodi Frediani
Citizens for Responsible Forest Management