



California Regional Water Quality Control Board

Central Coast Region



Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb3>
81 Higuera Street, Suite 200, San Luis Obispo, California 93401-5411
Phone (805) 549-3147 • FAX (805) 543-0397

Gray Davis
Governor

July 14, 2003

Nancy Drinkard, RPF
Dept. of Forestry & Fire Protection
6059 Highway 9
P.O. Drawer F-2
Felton, CA 95018

Dear Ms. Drinkard:

SUBJECT: RMC TIMBER HARVEST PLAN 1-03-082 SCR

On June 23, 2003, William Arkfeld of my staff attended the pre-harvest inspection (PHI) for the subject timber harvest plan (Plan). The Plan includes two distinct areas totaling 780 acres of land that will be selectively harvested via ground based (tractor and/or rubber tire skidder) and skyline cable yarding logging systems. The first area inspected was a 40-acre parcel in the Reggiarrio Watershed. The second area inspected was a 740-acre area in the San Vicente Watershed. Reggiarrio Creek is part of the Laguna Creek Watershed. Reggiarrio and Vicente Creeks are known to be existing habitat for Steelhead trout and sources of domestic water supply. San Vicente Creek is known to be Coho salmon habitat downstream of the Plan.

NEW ROADS AND LANDING: The Plan proposes construction of approximately 6900 feet of new roads (based on estimates from maps supplied with the Plan) to provide access to 12 of the 19 new landings. The new roads are located near ridge tops with moderate to near level slopes. We recommend that regular inspections of the new roads occur throughout the wet season to ensure drainage features perform as intended. We also recommend that access to the new road be restricted or prohibited during the wet season.

PACIFIC GAS AND ELECTRIC RIGHT-OF-WAY: During the PHI, Regional Board staff observed significant erosion and failed culverts in the east branch of San Vicente Creek. Regional Board staff estimated that at least 10 cubic yards of soil has discharged to San Vicente Creek from a failed PG&E crossing of San Vicente Creek's east branch. The erosion problems and stream crossing failures may have been caused, in part, by off-road vehicle or horse activity. For this reason, access to the right-of-way should be controlled aggressively (gates, slash roads, warn neighbors, etc.). The Regional Board considers the landowner ultimately responsible for water quality problems on their land. However, we understand that PG&E may have assumed responsibility for water quality issues along the right-of-way via legal agreements. During the PHI, Forester Gary Paul indicated that the subject culverts would be removed and that crossing approach owned by RMC Pacific Materials would be restored (i.e., soil on the creek bank removed to recreate the original stream bank topography). Although we encourage and support this restoration work, clarification regarding who is responsible for the PG&E right-of-way is needed. If PG&E is responsible, then please provide documentation this is the case to the Regional board. Resolution of who is responsible for the maintenance and repair of the right -of-way should occur before the THP is approved.

California Environmental Protection Agency



Item No. 13 Attachment No. 5
March 19, 2004 Meeting
RMC 2004-2006 Timber Harvest

WATER DIVERSION: During the preharvest inspection, the review team agreed that the proposed water diversion should be changed from a pump system to a gravity system. This change will lower the maximum rate water will be extracted from the creek to about 2 to 3 gallons per minute. All of the timber harvest water drafting in the San Vicente Watershed is estimated to be 5 gallons/minute or less due to the fact all the diversions are gravity type and that no more than two diversions will be operating at any point in time. This low diversion flow rate will minimize the impact to stream flow to an insignificant level. However, if a drought occurs, diversions within the watershed should be minimized or discontinued to ensure adequate stream flow remains to support the San Vicente Creek fisheries.

CABLE YARDING: The proposed yarding method for most areas along San Vicente and Reggiario Creeks is "cable yarding." All areas disturbed by log dragging adjacent to Class I and II watercourses must be treated to prevent erosion, even if the disturbance is outside of the watershed and lake protection zone (WLPZ). For example, along portions of Reggiario Creek, the WLPZ ends before the first significant change in slope. If erosion control practices are only implemented within the WLPZ, a potential to release sediment from the skid areas exists. Regional Board staff intends to inspect the cable yarding operation during or soon after active operations to further assess the significance of this concern.

MONITORING: Water column monitoring is required for all timber harvest plans. Monitoring plans shall include the following components:

- Up and downstream monitoring of the timber harvest plan for turbidity and temperature. Turbidity monitoring is required within 24 hours of all large storm events. A turbidity meter is recommended. Temperature monitoring is required during the dry season. Hobo temps are recommended for this purpose. Hobo temps should be set to collect a temperature reading every two hours to allow the hobotemp to operate throughout the warm weather months with out interruption. Monitoring data shall be maintained on site or at the office of the forester (RPF).
- Up and downstream turbidity monitoring of each watercourse crossing (existing and abandoned). Turbidity monitoring is required within 24 hours of all large storm events.
- Reporting of all significant water quality problems. Reporting is required when one cubic yard or more of soil is discharged to a creek. This reporting is required for both "natural" and timber caused sediment releases. Reporting is also required when downstream turbidity levels are substantially higher than the up stream samples. When these conditions occur, reporting to the Regional Board is required within 7 days.
- Submittal of an Annual Report. The annual report shall include a summary of timber harvest activities during the previous year and planned for the next year, inspection and monitoring result evaluations, implemented maintenance and repairs, proposed maintenance and repairs for the next wet season.

A monitoring plan, which includes these components, is required before regulatory action will be considered by the Regional Board.

FERAL PIGS: During the preharvest inspection, evidence feral pig activity (i.e., disturbed soil/mud) was observed. These pigs can cause significant releases of sediment to surface waters. We understand that RMC Pacific Materials has previously committed to study the feasibility of trapping feral pigs. We understand a similar trapping project has successfully captured a large number of pigs near Wilder Ranch. We request the status of past and future efforts to trap feral pigs be reported to the Regional Board on an annual basis.

GIS/WATERSHED PLAN: Regional Board staff continues to support and encourage development of a watershed plan for San Vicente Creek. We appreciate RMC Pacific Material's willingness to consider the feasibility of developing a watershed plan. An important component of a watershed plan is data management via geographical information systems (GIS). We understand that RMC Pacific Material has

the equipment necessary to develop GIS databases. Information that RMC should manage via GIS includes:

1. Areas of wild pig activity
2. Water intakes
3. Snag locations
4. Landslide locations and level of activity
5. Stream location and classification
6. Location of each tree along water courses intended for large woody debris recruitment
7. Wildlife trees
8. Trees within the channel zone
9. Delineation of karst formation
10. Water quality monitoring data collected from each monitoring point
11. Other timber harvest data (roads, landings, skid trails, buildings, crossings, etc.)

Development of GIS for RMC Pacific Materials will improve future timber harvest plan development, improve cumulative impact analysis, and improve resource management of RMC's timber resources. Further discussions regarding development of a watershed plan should be done outside the context of the timber harvest plan review process.

REGIONAL BOARD ACTION: At this time, all timber harvest plans must obtain either waste discharge requirements or a waiver of waste discharge requirements. Once the plan is adopted by CDF, an electronic version of the final timber harvest plan will be required. Please contact Regional Board staff for further information about the permitting process. Currently, we are developing an application form and supporting documentation for timber harvest plan waste discharge requirements and waivers.

RECOMMENDATION: If the above comments are given full consideration, we do not object to the proposed timber harvest plan.

If you have any questions, please contact William Arkfeld at (805) 542-4627 or via e-mail at BARKFELD@RB3.SWRCB.CA.GOV.

Sincerely,

(original signed by)

Roger W. Briggs
Executive Officer

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CC:

J.E. Greig, Inc.
100 Ponderosa Court
Santa Cruz, CA 95060

Douglas P. Ley
Redtree Properties
P.O. Box 1041
Santa Cruz, CA 95061

Drew Byrne
Davenport County Sanitation District
701 Ocean St., Room 410
Santa Cruz, CA 95060-4070

Kent Aue
CA Dept. of Fish & Game
P.O. Box 980
Novato, CA 94949-0980

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