

February 15, 2010

To The Central Valley Water Quality Board;

I am writing on behalf of Sierra People's Forest Service (SPFS). SPFS is based out of the North San Juan area in Nevada County and represents individuals that live in the surrounding counties of Nevada, Sierra and Yuba.

This letter is in regards to “Notice of Intent to Renew Resolution R5-2005-0052, Conditional Waiver of Waste Discharge Requirements for Discharges Related to Timber Harvest Activities (Waiver)”.

We are concerned citizens that live amongst the many thousands of acres that Sierra Pacific Industries is logging in these counties in an unsustainable manner.

Timber Harvest Plans which include; hundreds of acres of 20 acre unit rehabilitation/clearcuts adjacent to prior

clearcuts, repeated herbicide spraying of all vegetation not including planted trees, and a complete disregard for neighbors, wildlife habitat and forest continuity are some of our major concerns.

Sierra People's Forest Service is very concerned that the Water Quality Control Board does not know: how extensive the clearcutting is that has taken place; what a short period of time it has occurred in; or the extent of the impacts it is having on water quality and quantity. These are serious issues that must be addressed before renewing, extending or granting waivers to the waste discharge requirements.

We have not been able to ascertain how many thousands of miles of logging roads there are throughout the state's watersheds. This is of concern because roads are intricately linked with the health and functional abilities of watersheds. A significant amount of erosion from roads is ultimately delivered

to streams, because much of the road network is hydrologically connected to streams (Kattlemann, 1996; Wemple et al., 1996). Roads are also directly connected to streams by gullies and ditches. Logging inevitably increases soil erosion and stream sedimentation, regardless of how carefully it is designed and implemented, as the USFS has concluded (USFS and USBLM, 1997a; c). Stream sedimentation degrades water quality and has many adverse impacts on water quality, aquatic habitats, and aquatic biota (Beschta et al., 2004; Karr et al., 2004).

SPFS has no idea as to why a waiver was given for unsustainable timber harvesting in the past and why it might be renewed now when the negative impacts of unsustainable timber harvesting have been researched and documented? If waivers are given, do they not completely circumvent the point of such rules and regulations as the Clean Water Act? Was not the point of such rules and regulations to protect the waters that belong

to everyone and to stop the same consistent and damaging impacts that we are writing about here?

We urge the Water Quality Board to NOT renew Resolution R5-2005-0052, Conditional Waiver of Waste Discharge Requirements for Discharges Related to Timber Harvest Activities (Waiver).

Thank you for your considerations,

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