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September 22, 2014

to: Water Docket, Environmental Protection Agency  
Mail Code 2822T  
1200 Pennsylvania Ave. NW.  
Washington, DC 20460

**Re: Oppose Docket ID No. EPA-HQ-OW-2011-0880**

Dear Madam or Sir,

The Central Coast Forest Association (CCFA) is an organization comprised of forest landowners, resource professionals and others concerned with forest issues and land use policy in the Central Coast region of California.

We are writing to state our **opposition** to **Docket ID No. EPA-HQ-OW-2011-0880** which proposes to redefine the jurisdiction of the EPA and the Army Corp of Engineers under the Clean Water Act to cover all of the waters of the United States.

We are more than adequately protected by our state and local regulations. The California Forest Practice Rules are contained in a book that is 340 pages long. Within this book, we find regulations governing:

- How to estimate soil erosion hazard, broken out by geographical region
- Harvesting practices near riparian zones
- Harvesting practices on slopes
- Dry season practices
- Wet season practices
- Riparian protection zones and practices
- Pollution controls for servicing of equipment and control of trash and debris from the harvest
- Road, skid trail and landing design, construction, maintenance and decommissioning practices
- Water breaks on haul roads and skid trails
- Watercourse crossing design, installation, maintenance and removal practices
- Watercourse and lake protection practices
- Marsh, meadow and other wetland protection practices
- Erosion control practices
- Special rules for sensitive watersheds
- Special rules for fish-bearing streams, especially salmonids
- Domestic water supply protection practices
- Post harvest monitoring

All of these factors must be addressed before the California Department of Forestry and Fire Protection (Cal Fire) will issue a timber harvest permit.

Cal Fire is aided in their environmental protection mission by the California Department of Fish and Wildlife, who ensures that the wildlife, especially in the riparian zones, receive adequate protection, and the local Water Quality Control Districts, who are in charge of monitoring sediment loads and pollutants such as industrial wastes and agricultural wastes such as pesticide and fertilizer loads. These multi-agency reviews provide the mutual oversights that ensure the environment is fully protected.

There is really nothing left for the EPA to manage. For that reason, we feel the government should save its time and resources and dedicate its efforts to purposes that are not redundant. Furthermore, if **Docket ID No. EPA-HQ-OW-2011-0880** is enacted, the permits and fees required by the EPA will cut into money that landowners could better use to ensure our forests are fire safe. Large stand-destroying wildfires cause far more damage to water supplies and fisheries than forest management practices. If the EPA is truly committed to improved water quality, they will let our local practices take care of things as they have successfully for decades.

**Please drop Docket ID No. EPA-HQ-OW-2011-0880; it's a bad idea.**

Sincerely,

Member, CCFA Board of Directors

Cc: Senator Dianne Feinstein  
Senator Barbara Boxer  
Representative Anna Eshoo  
Representative Sam Farr  
Representative Jackie Speier