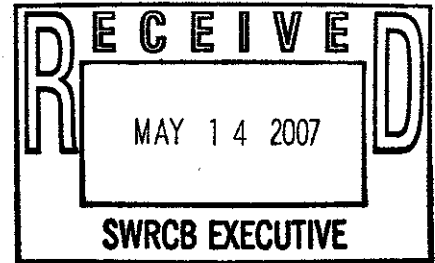




R O S E B U R G

May 10, 2007

State Water Resources Control Board
c/o Song Her
Executive Office
P.O. Box 100
Sacramento, Ca 95812-0100



RE: Proposed Wetland and Riparian Area Protection Plan-Comments

Dear Board:

As you consider the staff proposal to install protections to make up for perceived gaps in the Clean Water Act authority, please consider that no actual impacts to any significant extent have yet occurred, despite the fact that the U.S. Supreme Court SWANCC decision was made several years ago. In addition, numerous regulatory schemes presently operate to provide the protection that staff mistakenly seeks. Examples are Porter-Cologne, Z'berg-Njedley, Fish & Game code, just to cite a few. Any added regulation on your part would be duplicative. The State has a policy of not creating such regulation, as expressed in the Administrative Procedures Act. Further, staff reports produce no details of events that have actually occurred to warrant such policy, which could result in a regulation, thus it also appears unnecessary.

I would ask you to take a jaundiced view of this proposed policy and examine it in the light of necessity and non-duplication. We have adequate existing regulation and this appears to be a "solution in search of problem". If you feel you must entertain this action, then at the very least exclude Alternatives 3 & 4.

Roseburg is a family-owned business that produces a wide variety of wood products throughout the U.S. Our California forests are certified with the Forest Stewardship Council since 2000. We have one of the few ownership wide, programmatic Streambed Alteration Agreements and take pride in our environmental ethic. Thank you for your thoughtful consideration of our comments.

Sincerely,



Arne Hultgren
Land & Timber Manager