

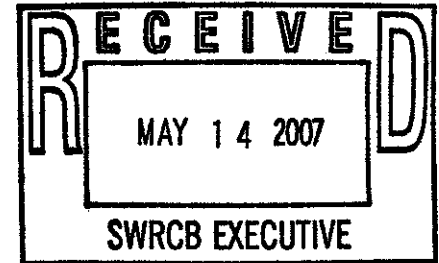


Wetland/Riparian Policy  
Deadline: 5/15/07 12 noon

May 11, 2007

State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Re: Proposed Wetland and Riparian Area Protection Plan



Dear Members of the Board,

Please accept the following comments regarding the Proposed Wetland and Riparian Area Protection Plan.

Big Creek Lumber Company is a small, family owned lumber mill located in the Central Coast of California. Our company was the first redwood production mill to have our forestlands "green" certified under the Principles and Guidelines of the Forest Stewardship Council (FSC). We have received both national and international recognition for our sustainable forestry practices.

If your Board chooses to move forward with changes to your Wetland and Riparian Area policy, we suggest that you pursue Alternatives 1 or 2, and respectfully recommend that you not adopt Alternatives 3 or 4. Alternatives 3 and 4 are far-reaching, overly broad and may exceed the regulatory authority of the Board

Timber harvesting in the Central Coast is a minimal land use, which occurs annually on average, on less than six-tenths of one percent (0.6%) of forested watershed acreage. Nevertheless, our operations are frequently the only effectively regulated and monitored land use in these watersheds.

We are concerned that expanding the definitions of wetlands and riparian areas, as well as increasing the requirements for evaluating these areas, will ultimately result in increased regulatory burden and cost. Our operations are already subject to more than three hundred code sections and subsections of the California Forest Rules that specifically address water quality. Timber harvesting is also subject to a simultaneous water quality monitoring protocol administered by the Regional Water Quality Control Board. Timber harvesting activities adjacent to wetlands and riparian areas are also reviewed by the California Department of Fish and Game. There is clearly no lack of clarity in the existing regulatory framework for protecting these wetland and riparian areas.

For more than sixty years, Big Creek Lumber Company has sought to protect water quality, particularly in wetland areas. We ask that you develop and pursue policies that are protective, while being equitable and considerate of the variation in scope of land use of individual stakeholders. Thank you for considering these comments.

Sincerely,

Janet McCrary Webb  
Chief Forester