



Central Valley Regional Water Quality Control Board

26 January 2024

United States Forest Service
Regional Forester
1220 SW 3rd Avenue
Portland, OR 97204

PUBLIC SCOPING COMMENTS, NORTHWEST FOREST PLAN AMENDMENT, UNITED STATES FOREST SERVICE, PACIFIC NORTHWEST AND PACIFIC SOUTHWEST REGIONS

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) received the *invitation for comments* letter dated 21 December 2024, for the Northwest Forest Plan Amendment (1994) of the Pacific Northwest and Pacific Southwest Regions of the United States Forest Service.

The Central Valley Water Board has the authority and responsibility to implement both the Federal and State Clean Water Laws within the Central Valley Region of California. Compliance with the Federal and State Clean Water Laws is ensured through the development of and adherence to the Central Valley Water Board's Basin Plans and implementing regulations. Nonpoint sources activities, such as the various activities that this Amendment could affect, have the potential to impact waters of the state. Most commonly, such impacts are in the form of erosion and resultant sediment being discharged to a surface waterbody. However, other activities such as applying pesticides can result in impacts as well.

Nonpoint source activities with the potential to discharge into waters of the state may require permits - ranging from a Federal Clean Water Act section 401 certification of a section 404 through the Army Corps of Engineers and the Central Valley Water Board, to an individual Report of Waste Discharge.

After reviewing the Notice of Intent (NOI) and additional resources provided, Central Valley Water Board staff would like to provide the following comments regarding this proposed project:

- The Bioregional Assessment discusses increasing the pace and scale of landscape restoration and resulting timber harvests which could support local or regional economy. With an increase in ground disturbing activities, an increased focus on Best Management Practices (BMPs) implementation and monitoring should occur to ensure that activities are not impacting water quality.
- NEPA documents and/or other project planning documents to be used to implement project activities should reflect current forest conditions and accurately describe project activities and resource protection measures.
- The NOI addresses that climate change is likely to adversely affect road systems and culverts with impacts to fish and aquatic biodiversity. The Northwest Forest Plan should prioritize ongoing road and watercourse crossing upgrades and maintenance to proactively reduce risks to water quality and aquatic habitat.
- Forest Service Staff are encouraged to collaborate with Central Valley Water Board staff when planning and implementing projects in close proximity to surface waters.
- If standards and guidelines for timber harvest and other land management activities are replaced with desired conditions and goals, project specific resource protection measures should be identified and made available to the public and resource protection agencies. Monitoring should take place throughout project implementation and after project completion to ensure desired conditions have been met.
- The Forest Service should continue watershed monitoring such as the Aquatic and Riparian Effectiveness Monitoring Program to assess watershed conditions, evaluate the Aquatic Conservation Strategy, and to inform land management decisions.
- The *Synthesis of Science to Inform Land Management within the Northwest Forest Plan Area* states that “10 percent of the road crossings that impeded the movements of aquatic and riparian organisms (209 of 2,114) have been made passable on Forest Service Region 6 lands in the NWFP area since NWFP implementation”. The effort of upgrading road crossings has many benefits to water quality and the beneficial uses of water and should be continued in all federal lands covered by the Northwest Forest Plan.

- Implementing the proposed research priority of “evaluating the effectiveness of new analytical approaches and focusing on treating limited lengths of roads” identified on page 508 of the *Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area* could serve to identify and reduce sediment discharge to watercourses and improve water quality.
- As discussed in the *Supplemental Report to the Bioregional Assessment of Northwest Forests, March 2021*, the Forest Service should dedicate the necessary resources to successfully address the road maintenance backlog. Native surface roads without appropriate erosion control measures and inadequately constructed watercourse crossings are a significant source of sediment delivery to surface waters and are a significant water quality concern.

For questions regarding the above information and comments, please contact Melanie Oxley at (530) 224-2426, or by email at Melanie.Oxley@waterboards.ca.gov.

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