

Central Valley Regional Water Quality Control Board

4 April 2025

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PUBLIC COMMENTS, EL PORTAL FIRE RECOVERY AND HABITAT RESILIENCE, STANISLAUS NATIONAL FOREST, GROVELAND RANGER DISTRICT

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received the invitation for comments letter dated 20 March 2025 for the El Portal Fire Recovery and Habitat Resilience project and would like to provide the following comments:

- Page 1 of the Hydrology Report mentions repair of a road culvert, however no further details are provided. Please describe the location and current condition of the culvert as well as the proposed repairs.
- Page 9 of the Environmental Assessment states that a water collection system will be installed for wildlife and water drafting. Please describe the water source and methods for filling the collection system, as well as its location in relation to surface waters and its hydrologic connectivity to surface waters. Best management practices for the installation and use of the water collection system should also be provided.
- Environmental Assessment Appendix B (Modifications Made to the Proposed Action) states, "Improvements to the Little Nellie Creek crossing are now on the list of proposed actions." However, the proposed action only mentions repairs to a crossing approach on Little Crane Creek. Please revise the proposed action to include all crossing improvements as needed to address existing or potential water quality impacts.
- Page 3 of the Hydrology Report states that there are no 303(d) listed waterbodies in the project analysis area. However, based on the *2024 California Integrated Report*, the Upper Merced River is impaired for Alkalinity as CaCO₃. The Upper Merced River is immediately downstream of the project area, and potential impacts to it should be considered.

Water Quality Regulations

Pursuant to the California Water Code, any person that discharges waste or threatens to discharge waste that could affect the quality of the waters of the state must submit a Report of Waste Discharge outlining the proposed discharges.

As of 13 December 2024, no new applications for United States Forest Service project coverage under *Order R5-2017-0061, Waste Discharge Requirements General Order for Discharges related to Timberland Management Activities for Non-federal and Federal Lands* (2017 Timber General Order) are being accepted. To facilitate necessary permitting, your project may be eligible for coverage under *Waste Discharge Requirements Order R5-2024-0059 for Nonpoint Source Discharges Related to Certain Activities Conducted by the United States Forest Service and the Bureau of Land Management* (Federal NPS Order).

Please carefully review the Federal NPS Order to ensure that all requirements are fulfilled. Coverage under the Federal NPS Order may require you to conduct monitoring of the project area and submit a report each year that operations are active and until project operations are complete.

Forms and associated documents for Federal NPS Order coverage are available at the following web address:

https://www.waterboards.ca.gov/centralvalley/water_issues/forest_activities/#usfs_blm

For questions regarding the above information or the Federal NPS Order, please contact Rebecca Hipp at (559) 445-5977 or Rebecca.Hipp@waterboards.ca.gov, or Jonathan Meurer at (916) 464-4626 or Jonathan.Meurer@waterboards.ca.gov.



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