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Organization: Lahontan Regional Water Quality Control Board
Title: Engineering Geologist
Comments: Mammoth Lakes Ranger District - Inyo National Forest,

Please see the attached comments from the Lahontan Regional Water Quality Control Board regarding the Draft Environmental Assessment for Eastern Sierra Climate and Communities Resilience Project.

Please let me know if you have questions.

Best,

Meghan Walsh
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Lahontan Regional Water Quality Control Board
December 15, 2023

Mammoth Lakes Ranger District, Inyo National Forest
Attn: Eastern Sierra Climate and Communities Resilience Project
PO Box 148, 2510 Main St.
Mammoth Lakes, CA 93546
Comments on Draft Environmental Assessment for Eastern Sierra Climate and Communities Resilience Project, Inyo County

California Regional Water Quality Control Board, Lahontan Region (Water Board) staff, reviewed the Draft Environmental Assessment for the Eastern Sierra Climate and Communities Resilience Project (Project). Inyo National Forest prepared the document in compliance with provisions of the National Environmental Policy Act (NEPA). Water Board staff are providing comments on this Project for activities applicable to Water Board statutory responsibilities and regulatory authority. Our comments in this letter provide information that will support regulatory compliance, permit development, and timely implementation of the Project.

PROJECT DESCRIPTION
The purpose of the Project is to implement ecological thinning to reduce the potential of uncharacteristic wildfire and improve forest health, resistance, and resilience on approximately 58,000 acres surrounding the Town of Mammoth Lakes.

The Project includes hand and mechanical thinning, varying methods of biomass removal, pile burning, construction of temporary roads and bridges over streams and dry drainages, the creation of new skid trails and landings, operations during the winter

period, and work within Waterbody Buffer Zones (WBBZs).

WATER BOARD AUTHORITY
All groundwater and surface waters are considered waters of the state and are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the state are also waters of the U.S. The Federal Clean Water Act (CWA) provides protection for waters of the State that are also waters of the U.S.

The Water Quality Control Plan for the Lahontan Region (Basin Plan) sets forth water quality standards for surface water and groundwater of the Lahontan Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

PERMITS REQUIRED
The following item provides a description of permit coverage that will be required to implement the Project as proposed in the Draft Environmental Assessment.

Lahontan 2014 Timber Waiver (renewed on March 13, 2019)

Project activities in the Lahontan Water Board Region that include timber harvest and
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vegetation management activities will require coverage under the 2014 Timber Waiver. The Lahontan Water Board Forestry Program is currently revising the 2014 Timber Waiver and will propose the Tentative 2024 Timber Waiver to the Lahontan Water Board for consideration in April of 2024. In the meantime, activities requiring coverage will continue to be enrolled under the 2014 Timber Waiver.

The 2014 Timber Waiver and all attachments may be found on our website at:

http://www.waterboards.ca.gov/lahontan/water_issues/programs/waste_discharge_requirements/timber_harvest/timberwaiver.shtml

Please review the 2014 Timber Waiver criteria and conditions while developing specific resource protection measures and design features for the proposed Project. By understanding the 2014 Timber Waiver criteria and conditions, you can tailor your project design features to incorporate those requirements, which will streamline your 2014 Timber Waiver application process. Timber harvest and vegetation management projects ineligible for coverage under the 2014 Timber Waiver must file a Report of Waste Discharge and obtain individual Waste Discharge Requirements.

Please note that the 2014 Timber Waiver uses a watercourse classification system which categorizes watercourses according to their biologic habitat and ability to transport sediment, as defined by the California Code of Regulations, title 14, rather

Timber harvest and vegetation management activities, defined in Attachment A of the 2014 Timber Waiver, and means all activities related to the management of vegetation for the purposes of fuel reduction; forest thinning; and/or environmental improvement (such as forest enhancement, riparian enhancement, and aspen stand enhancement); prescribed burning; cutting or removal of trees and vegetation, together with all the work incidental thereto, including, but not limited to, construction, reconstruction, maintenance, and decommissioning of roads, fuel breaks, stream crossings, landings, skid trails, or beds for the falling of trees; burned area rehabilitation, hazard tree removal; site preparation that involves disturbance of soil, burning of vegetation, or herbicide/pesticide application. Activities do not include aquatic vegetation management, preparatory tree marking, surveying, or road flagging.

than by flow regime. This watercourse classification determines the necessary buffer zone width for that watercourse (see Attachment B of the 2014 Timber Waiver).

To expedite review of your Timber Waiver application, please clearly indicate in your waiver application maps the classification of all watercourses in the Project area, and the location of proposed operations and pile burning within WBBZs.

CONCLUSION

Thank you for providing Water Board staff the opportunity to make comments on this Project. The intent of this letter is to support regulatory compliance, permit development, and timely implementation of the Project. Please contact me at Meghan.Walsh@waterboards.ca.gov or (530) 542-5419 with any questions regarding the content in this letter, or to schedule a meeting to discuss future permit requirements.

Meghan Walsh
Engineering Geologist