Data Submitted (UTC 11): 4/18/2016 7:00:00 AM

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Comments: From: Matthews, Jacqueline@Waterboards [mailto:Jacqueline.Matthews@waterboards.ca.gov]

Sent: Monday, April 18, 2016 4:11 PM

To: McRae, Heather -FS <hmcrae@fs.fed.us> Subject: Lower McCloud Fuels Projects

Hi Heather - Attached are my comments. They are pretty general in nature since there wasn't much info available yet, but these are my areas of interest/concern. Thanks!

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ATTACHMENT:

PRELIMINARY COMMENTS ON THE LOWER MCCLOUD FUELS MANAGEMENT PROJECT, US FOREST SERVICE, SHASTA-TRINITY ANTIONAL FOREST, MCCLOUD RANGER DISTRICT

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) appreciates the opportunity to provide comments on the Lower McCloud Fuels Management Project (Project) during the scoping period; comments are as follows:

Conditional Timber Waiver, Order No. R5-2014-0144

Based on the scoping documents, it appears that the Project will require coverage under the Central Valley Water Board's Conditional Waiver of Waste Discharge Requirements for Discharges Related to Timber Harvesting Activities, Order No. R5-2014-0144 (Waiver). Timber harvesting activities that pose a threat to water quality must be enrolled under the Waiver at least 30 days prior to the start of timber operations, or file for individual Waste Discharge Requirements 120 days prior to operations. A copy of the Waiver and enrollment documents can be found at:

 $http://www.waterboards.ca.gov/centralvalley/water_issues/timber_harvest/index.shtml\\$

Water Quality Specific Concerns

The Central Valley Water Board has the following generalized concerns based on the limited information in the scooping document:

Dozer Line and Fire Lines - Based on the scoping map, a large dozer fire containment line is proposed across several intermittent streams; the Central Valley Water Board requests that the environmental document include information regarding the dozer encroachment/crossing of streams and specific mitigation measures to be

implemented (e.g. installation of line when streams are dry, installation and spacing of waterbars and/or spreading of slash/chipped material on disturbed soil post burning) to stabilize the line prior to wet weather.

Beartrap Creek Fire Management Zone - The scoping map shows a fire management zone along the western boundary of the project within/along Beartrap Creek. Additional information is requested to assess possible impacts to water quality that could result from operations in the riparian area (e.g. equipment crossing locations and the extent of equipment operations in the riparian areas to remove vegetation and access the western side of the creek, firelines in the riparian areas, etc.). Please be sure that the document details operations within the riparian areas and management measures that will be employed along Beartrap Creek.

Mechanical Thinning/Burning in Streamside Management Zones - Since mechanical thinning and burning will occur within streamside management zones, the Central Valley Water Board is interested in specific management measures that will be employed to minimize adverse effects to water quality (e.g. no high-intensity fire in the zone, limitations on frequency/size/intensity of pile burning in the zone).

The Central Valley Water Board looks forward to helping develop management measures for the Project for the protection of water quality. If you have any questions regarding the above comments, please contact me at (530) 224-3249 or at jmatthews@waterboards.ca.gov.

Jacqueline Matthews Environmental Scientist