
North Coast Regional Water Quality Control Board

February 7, 2025

Kristen Lark
Mad River District Ranger
Six Rivers National Forest
741 State Highway 36
Bridgeville, CA 95526
kristen.lark@usda.gov

Tara Jones
District Ranger
SFMU
P.O. Box 1190
360 Main Street
Weaverville, CA 96093
Tara.jones@usda.gov

Dear Kristen Lark and Tara Jones:

Subject: Scoping Comments - South Fork Mountain Vegetation Project
Six Rivers National Forest and Shasta-Trinity National Forest

File: USDA - Shasta-Trinity National Forest (CW-754120)
USDA - Six Rivers National Forest (CW-754123)
Shasta Trinity and Six Rivers NF South Fork Mountain Vegetation Project
(CW-899443)

The North Coast Regional Water Quality Control Board (North Coast Water Board) appreciates the opportunity to comment on the proposed South Fork Mountain Vegetation Management Project (Project). The purpose of this letter is to comment on the activities proposed in the Project. Additionally, we are providing you with information regarding compliance with the recently adopted *General Waste Discharge Requirements for Nonpoint Source Discharges Related to Certain Land Management Activities on Federal Lands in the North Coast Region*, Order R1-2024-0012 (Federal Lands Permit). Please see the Waste Discharge Requirements section below for more information about the Federal Lands Permit and project specific comments.

Project Summary

On January 8, 2025, the North Coast Water Board received the public scoping document (Scoping Document) for the Project. The Project is located within portions of both the Shasta-Trinity National Forest (STNF) and the Six Rivers National Forest (SRNF). The project planning area encompasses 7,856 acres and follows the South Fork Mountain ridge along most of the Mad River Ranger District eastern boundary. Mechanical and prescribed fire treatments will include the removal of commercial forest products using conventional ground and cable-based logging systems. Fuels treatments will include thinning-from-below of the overstory canopy to retain the largest, healthiest trees with the best crowns. Potential treatments also include thinning understory vegetation, lop and scatter, tree and large shrub pruning, mastication, chipping, small tree removal, machine/grapple piling, hand piling, pile burning, and understory burning.

General Waste Discharge Requirements- Federal Lands Permit

As background, California state law assigns responsibility for protection of water quality within north coast watersheds to the North Coast Water Board. The North Coast Water Board implements and enforces the Porter-Cologne Water Quality Control Act ("Porter-Cologne Act": Wat. Code, §13000 et seq.) and the *Water Quality Control Plan for the North Coast Region* (Basin Plan). All Federal projects within California must comply with all substantive and procedural requirements of the Porter-Cologne Act (Water Code) and the Basin Plan.

The Basin Plan contains water quality objectives, implementation plans for meeting those objectives, and other policies, including State Water Resources Control Board (State Water Board) and federal policies, which are applicable to operations on NFS lands within California. Water Code section 13260(a) requires that any person discharging waste or proposing to discharge waste within any region that could affect the quality of the waters of the state, other than into a community sewer system, must file with the appropriate North Coast Water Board, a report of waste discharge containing such information and data as may be required. Pursuant to Water Code section 13260, North Coast Water Boards prescribe waste discharge requirements (WDRs) except when it finds, pursuant to Water Code section 13269, that a waiver of WDRs for a specific type of discharge is in the public interest.

The State Water Board *Policy for the Implementation and Enforcement of the Nonpoint Source Pollution Control Program* (Nonpoint Source Policy) requires that all nonpoint source discharges of waste be regulated by WDRs, waivers of WDRs, or prohibitions to ensure compliance with the Basin Plan. Additionally, the Project must be in compliance with any total maximum daily load (TMDL) for the watersheds in which a project will occur.

The North Coast Water Board developed and adopted the Federal Lands Permit as a means for Federal Agencies to comply with the Nonpoint Source Policy, the Water Code, and TMDLs. In order to receive coverage under the Federal Lands Permit, a

project must meet specific eligibility criteria and conditions. The Federal Lands Permit is available for review and can be downloaded at the following web address:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/forest_activities/federal_lands/

Comments

Please accept the following comments based on preliminary information provided in the project Scoping Document:

1. If the mechanical treatments are located in designated riparian zones or include timber harvest, fuels reduction, or vegetation management with a commercial component, the Project must be enrolled as a Category B project under the Federal Lands Permit.
2. Please identify in the Final EA a description of any proposed new or reconstructed watercourse crossings.

Thank you for the opportunity to comment on the Project. We would appreciate receiving copies of the environmental documents and wish to remain on the mailing list for future Shasta-Trinity National Forest and Six Rivers National Forest projects.

If you have any questions, please feel free to contact Benjamin Minx at (707) 576-2690 or Benjamin.Minx@waterboards.ca.gov.

Sincerely,

Forest Fortescue
Senior Engineering Geologist
Northern Nonpoint Source and Forestry Unit

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cc: galen.anderson@usda.gov
adam.dresser@usda.gov