

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

P.O. Box 944246
SACRAMENTO, CA 94244-2460
(916) 653-7772
Website: www.fire.ca.gov



October 16, 2013

Matthias St. John, Executive Officer
North Coast Regional Water Quality Control Board
Attn: Jonathan Warmerdam
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403

Subject: Comments on Order No. R1-2013-0059—General 401 Water Quality Certification, Waiver of Waste Discharge Requirements, and Monitoring and Reporting Program for the Mendocino County Permit Coordination Program

Dear Mr. St. John:

Thank you for opportunity to comment on Order No. R1-2013-0059—General 401 Water Quality Certification, Waiver of Waste Discharge Requirements, and Monitoring and Reporting Program for the Mendocino County Permit Coordination Program. The California Department of Forestry and Fire Protection (CAL FIRE) strongly supports adoption of the proposed Order No. R1-2013-0059, and its associated Monitoring and Reporting Program, to promote improved habitat conditions for listed salmonids in Mendocino County watersheds.

CAL FIRE staff has heard updates on the Mendocino County Permit Coordination Program at numerous Wood for Salmon Workgroup (WFSW) meetings from Ms. Patty Madigan, Conservation Programs Manager for the Mendocino County Resource Conservation District, beginning in 2011.¹ We, along with several other participants from the WFSW, have offered suggestions for improvements to the Program. CAL FIRE has always been supportive of the Mendocino County Permit Coordination Program. In many ways, this Program mimics what the WFSW has been trying to accomplish on a larger scale (i.e., all of the North Coast or at least the Central California Coast coho salmon ESU area vs. only Mendocino County) since December 2010, when the workgroup was formed by CAL FIRE. The WFSW has worked for the past three years to develop a simplified, coordinated permitting process, outside of the California Department of Fish and Wildlife's Fisheries Restoration Grant Program (FRGP), that can facilitate large wood projects to

¹ Information regarding the Wood for Salmon Workgroup is posted at:
http://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/california/salmon/Pages/wfs_resources.aspx

rapidly improve habitat for listed anadromous salmonids in California. While the Mendocino County Permit Coordination Program covers a broader array of activities than only large wood enhancement projects, it includes this type of restoration work and will reduce the permitting burdens normally faced by landowners. The fact that the General 401 Certification has been drafted as a Waiver with a monitoring and reporting order, and relies heavily on the other components of the Mendocino County Resource Conservation District permit coordination program already in place, will greatly assist applicants by reducing the paperwork needed for filing.

Several of the types of projects covered under Order No. R1-2013-0059 are consistent with the concept of active management within riparian zones. CAL FIRE supports the use of site-specific riparian management where it can more rapidly improve conditions for State and federally listed anadromous salmonids, as is specified in the Anadromous Salmonid Protection Rules adopted by the Board of Forestry and Fire Protection in 2009.² This includes removal of riparian vegetation for projects such as placement of large wood in fish-bearing watercourses using conifers from the watercourse and lake protection zone (WLPZ), as will be occurring as part of the Mill-Smith THP in western Mendocino County. Order No. R1-2013-0059 will be highly beneficial in allowing riparian restoration projects to be accomplished in a timely manner.

CAL FIRE finds the Monitoring and Reporting Program specified for Order No. R1-2013-0059 to be reasonable for landowners to implement without undue economic burden. Requiring implementation and simple effectiveness monitoring for all projects, and reserving project monitoring and photo point monitoring for larger, more complex projects makes sense from our perspective.

Again, CAL FIRE strongly supports adoption of Order No. R1-2013-0059. We believe that this smaller scale coordinated permitting program is a good model for what a larger scale program might look like, and that it will be highly beneficial for Mendocino County watersheds—leading to protection and recovery of State and federally listed anadromous salmonids.

² Detailed information on where and how to implement site-specific riparian management has been provided in a guidance document titled: Site-Specific Riparian Zone Management: Section V guidance. This document is available online at: http://www.bof.fire.ca.gov/board_committees/vtac/vtac_guidance_document/vtac_guidance_document_dec21-2012_final.pdf

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Thank you for the opportunity to comment on the draft Waiver of Waste Discharge Requirements and General Water Quality Certification for the Mendocino County Permit Coordination Program, and the associated Monitoring and Reporting Program. If you have any questions or comments regarding this letter, please contact Pete Cafferata of my staff at (916) 653-9455 or pete.cafferata@fire.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "William E. Snyder". The signature is fluid and cursive, with the first name "William" being the most prominent.

William E. Snyder
Deputy Director
Resource Management

cc: Duane Shintaku
Dennis Hall
Kelly Dreesmann
Pete Cafferata
Clay Brandow