



United States  
Department of  
Agriculture

Forest  
Service  
Lassen  
National  
Forest

2550 Riverside Drive  
Susanville, CA 96130  
(530) 257-2151 Voice  
(530) 252-6624 TTY  
(530) 252-6428 Fax

File Code: 2530-3

Date: March 9, 2009

Danny McClure  
Water Resource Control Engineer  
Regional Water Quality Control Board, Central Valley  
Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

Dear Mr. McClure:

I am writing in response to the recent proposal by the Central Valley Regional Water Quality Control Board (Regional Board) to list the following water bodies on the Lassen National Forest as impaired water bodies on the State's 303(d) list:

Water Body	Pollutant	Potential Sources
Butte Creek	Mercury	Unknown
Almanor Lake	Mercury	Resource extraction
Britton Lake	Mercury	Resource extraction
Butte Creek	pH	Resource extraction
Fall River (Pit)	Sedimentation/Siltation	Historic land management activities including logging, grazing, channelization, roads, and railroads.
Feather River (below Lake Almanor)	PCBs	Unknown
Feather River, North Fork (below Lake Almanor)	Temperature, water	Flow Regulation/
Feather River, North Fork (below Lake Almanor)	Unknown toxicity	NPS-animals
Feather River, North Fork (below Lake Almanor)	Mercury	Resource extraction
Pit River (from confluence of N and S forks to Lake Shasta)	Nutrients	Agriculture  Agriculture-grazing
Pit River (from confluence of N and S forks to Lake Shasta)	Organic Enrichment/Low Dissolved Oxygen	Agriculture  Agriculture-grazing
Pit River (from confluence of N and S forks to Lake Shasta)	Temperature, water	Agriculture  Agriculture-grazing

Source: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/tmdl/impaired\\_waters\\_list/app\\_a\\_303d\\_changes\\_30jan09.pdf](http://www.waterboards.ca.gov/centralvalley/water_issues/tmdl/impaired_waters_list/app_a_303d_changes_30jan09.pdf)



The Forest Service manages 750,708 acres (27 percent) within these watersheds as part of the Lassen National Forest. A primary objective of the Forest Service in managing these lands is to improve and protect watershed conditions (USDA Forest Service Strategic Plan, 2007). Forest Service recognizes its responsibilities to protect water quality and supports the efforts of the Regional Board to enforce the Clean Water Act and the California Water Code through revision of its 303(d) list of impaired water bodies.

Water quality on the national forests in California has been protected since 1981 through a Management Agency Agreement (MAA) between the State Water Resources Control Board (State Board) and the USFS. This MAA provides for a USFS Water Quality Management Program (WQMP) that is based on Best Management Practices (BMPs) developed for a wide variety of USFS resource-management activities. These BMPs were certified by the State Board and approved by the U.S. Environmental Protection Agency (USEPA).

The State's Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (2004) supports the use of BMPs and MAAs as the primary mechanisms for meeting water quality standards on public lands. As described in this policy, successful MAAs are more efficient than direct regulation by the Regional Boards, limit unnecessary duplication of effort, and leverage limited staffing and financial resources. BMP implementation and effectiveness are monitored annually by the USFS and reported to the Regional Board. Between 2002 and 2008, BMPs monitored on the Lassen National Forest were found to be effective in 89 percent of 502 randomly selected site evaluations. I therefore feel confident that resource management activities on the Lassen National Forest have provided a high level of protection for beneficial uses of water.

Some water bodies that are proposed for addition to the State's 303(d) list of impaired water bodies are within or downstream of the Lassen National Forest. The proposed listings have potential to significantly affect our use of federally appropriated funds and our management of NFS lands. Therefore, I encourage the Board to carefully weigh the available evidence and base its decisions on the proposed listings on adequate scientific information. I have the following specific comments and recommendations regarding the listing of the following water bodies, proposed for the 303d list:

### **Britton Lake**

The Lassen National Forest is actively protecting water quality in Lake Britton and its tributaries. Within the Hat Creek watershed, a tributary to Lake Britton, the Forest Service plans to implement the N49 and Old Station projects. These projects will reduce the risk of catastrophic wildfire and consequent water quality impairment. The Forest Service implemented \$27,000 in emergency watershed protection treatments on an unnamed tributary to Lake Britton following the Venture fire, which was part of the 2008 SHU-Lightning complex.

### **Butte Creek**

Samples sites used for collecting water quality data for listing Butte Creek for pH and mercury are 35 miles downstream of the Forest boundary. Tissue samples were taken from Black Crappie, Bluegill, Carp, Channel Catfish, Largemouth Bass, and Redear Sunfish. None of these fish can be found on National Forest System (NFS) lands. Rainbow Trout, Brook Trout, and Brown Trout can be found in Butte Creek within NFS lands. Unless evidence for impairment of

this water body on NFS lands is available, the listing should not include those upper reaches of Butte Creek within Lassen National Forest. Within the Butte Creek watershed, the Forest is working with the NRCS, Butte County Resource Conservation District, and Butte County Department of Public Works in implementing \$800,000 of watershed restoration on NFS and Bureau of Land Management (BLM) lands.

**Fall River**

The Lassen National Forest manages 5,206 acres of the 33,608 acre Fall River watershed. The NFS lands in this watershed include less than one mile of ephemeral streams tributary to the Fall River. The Lassen NF implements BMPs to control non-point source pollution from lands it manages within the Fall River watershed.

**Feather River, North Fork (below Lake Almanor)**

Both the Lassen National Forest and Plumas National Forest are planning restoration activities within the North Fork Feather River watershed downstream of Lake Almanor as part of the \$83 million settlement from the 2000 Storrie fire.

**Pit River**

Central Valley Regional Water Quality Control Board identifies agriculture/agriculture grazing as source of low dissolved oxygen, organic enrichment, and temperature, water in the Pit River. However, no data are presented to support these listings at this time. I recommend that you review the FEIS for re-licensing FERC Project No. 233 for water quality data and defer a decision on listing until adequate information is available.

Thank you for the opportunity to comment on the proposed listings. If you have any questions, please contact Hydrologist Andrew Breibart at 530-252-6456. Andrew has been in contact with Gene Davis of your staff.

Sincerely,

*/s/ Kathleen S. Morse*  
KATHLEEN S. MORSE  
Forest Supervisor

Enclosure