



United States
Department of
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Forest
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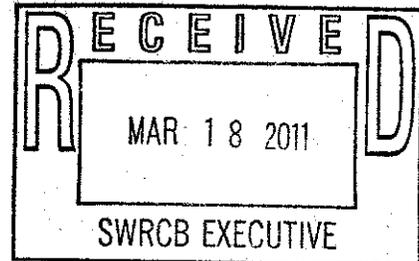
Lake Tahoe Basin
Management Unit

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File Code: 2500

Date: March 18, 2011

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000



Dear Ms. Townsend:

The purpose of this letter is to acknowledge that the U.S. Forest Service, Lake Tahoe Basin Management Unit (LTBMU) has reviewed the proposed "Water Quality Control Plan Amendments related to the Total Maximum Daily Load (TMDL) for Sediment and Nutrients in Lake Tahoe" (Amendments). We have participated in the agency review of the technical products that were developed throughout this process, and believe the proposed Amendments reflect a strategy based on the science presented in the technical products.

We also believe that much of the work that the Forest Service has implemented over the past decade, particularly related to forest road retrofits and obliteration, has already contributed substantially to achieving the desired load reduction milestones from Forest Uplands. LTBMU projects in progress, and planned for the next decade, will also contribute to achieving TMDL milestones related to Stream Channel Erosion and Forest Uplands. The TMDL strategy will also be integrated into our Forest Plan revision, currently scheduled for completion in 2012. The following comments relate more to what is not said in the proposed strategy rather than what is said.

1) The Amendments states that :

"The Regional Board will require forest management agencies to track and report load increases and load reduction activities to assess whether required basin-wide forest load reductions are occurring." (pg. 13)

It goes on to state:

"Responsible parties will be required to document and report previous year activities that may have increased or reduced pollutant loads and describe how the reported loading assessment was determined." (pg. 18)

The Amendments do not offer any requirements or suggestions on how this to conduct the assessment, therefore we expect to continue to utilize existing methods developed within our agency, which are based on established scientifically based monitoring, analytical, and modeling techniques, for the purposes of tracking and reporting. The LTBMU has a well established monitoring and evaluation program that has produced a variety of reports documenting changes



in sediment loading from various forest management activities, and continues to adapt this program to new science. Our past reports are posted on our publically available website.

2) The Amendments state:

“The Regional Board expects funding, implementing, and regulatory agencies to assist in developing a comprehensive TMDL monitoring plan within the first two years following TMDL adoption by USEPA.” (pg. 17)

The Amendments also describe the development of a Lake Tahoe Regional Stormwater Monitoring Program (RSWMP), in three phases. The development of this program is currently funded entirely through the LTBMU Erosion Control Grants Program, with the approval of the interagency group guiding the expenditure, the Stormwater Quality Improvement Committee (SQIC). Progress during the second phase, utilizing the LTBMU funding, has fallen fall short of the expected goals. The development of this program requires a level of coordination between the regulatory agencies, the science community, and local governments responsible for the management of municipal storm water that is simply not occurring at this point.

The Amendments also describes the continuation of the existing Lake Tahoe Interagency Monitoring Program (LTIMP) as an anticipated component of the TMDL monitoring program. This program has historically never required an adaptive management assessment on the monitoring design itself, to include an assessment of when and how the monitoring design should be modified to meet current and future needs and priorities.

This type of assessment is needed prior to continuing implementation of the current LTIMP program for the next 15 years, which is the first time a TMDL status and trend assessment is required as described in the Adaptive Management Section. An assessment of the current monitoring design is needed to ensure that the most essential components of the network are maintained, during times of limited funding, and are capturing data most relevant to an assessment of changes in TMDL loading from different source areas.

The Adaptive Management section of the Amendments should be revised (*as presented in italics*) to state:

“The Management System Framework will also support regular assessments of relevant research and monitoring findings, *to include assessment of the efficacy of the TMDL monitoring design.*” (pg. 17)

In summation, it is not clear what strategy or organization structure is going to be developed, and by who, to facilitate further coordination and development of the TMDL monitoring plan, including the outcomes described for RSWMP Phase I and II, or how this development will be funded. We believe the Basin regulatory agencies will need to provide strong leadership in

working with the funding and implementing agencies to develop this TMDL monitoring plan within the desired time frame stated above. The LTBMU looks forward to continuing to work with the Regional Board in the ongoing development and implementation of this important program.

Thank you for the opportunity to comment. If you have any questions please contact Sue Norman, Physical Sciences Group Leader, at (530) 543-2662.

Sincerely,



Jeff Marsola

jr JEFF MARSOLAIS
Acting Forest Supervisor

cc: Sue Norman, Barry Hill