

Tahoe Basin Fire Chiefs

March 30, 2012

Mr. Don Jardine, Chair
Members of the Board of Directors
Mr. Harold Singer, Executive Officer
Lahontan Regional Water Quality Control Board
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

**Re: Proposed Waste Discharge Requirement (WDR) and permit approvals
USFS/LTBMU South Shore Fuels Reduction and Healthy Forest Project**

Dear Chairman Jardine, Board Members, and Executive Officer Singer:

As core members of the Tahoe Fire and Fuels Team (TFFT), the Tahoe Basin Fire Chiefs (Basin Chiefs) are writing to reinforce our support for the U.S. Forest Service Lake Tahoe Basin Management Unit (LTBMU) *South Shore Fuels Reduction and Healthy Forest Restoration Project*. We understand and appreciate that members of your staff have engaged in extensive and detailed discussions with LTBMU staff in developing Lahontan's proposed Waste Discharge Requirements (WDR).

We have had our fuels management professionals review the proposed WDR and conditions of project approval prepared by Lahontan staff. Our professionals understand the difficulty in utilizing the **Final Environmental Impact Statement** (August 2011) to develop waste discharge requirements while acting as lead agency under the California Environmental Quality Act (CEQA). However, we remain concerned that the final requirements will increase project costs, cause further implementation delays, and significantly reduce the number of acres that can be treated with the funds available.

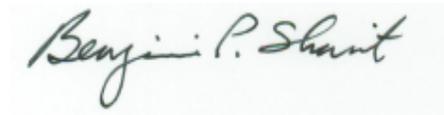
We respectfully urge your Board and staff to more fully embrace the important work and specific recommendations of ***The Emergency California-Nevada Tahoe Basin Fire Commission Report*** (May 2008) - particularly those in Category 1: Environmental Protection; Category 2: Issuances of Governance; and Category 4, Forest and Fuels Management. The Commission conducted numerous public meetings, listened carefully, and reviewed more than 200 recommendations submitted for their consideration. Members and their support staff worked diligently for eight months to develop their findings and recommendations.

Finding 12 of the Fire Commission Report reads:

" ... projects in California are subject to an additional layer of permitting requirements by the Lahontan Regional Water Quality Control Board (LRWQCB). This added layer has resulted in project delay, increased costs for permitting and project implementation, deletion of critical components of projects, and reduced project scope due to its imposed increased costs. There is a need to create a greater consistency in permitting requirements in the Tahoe Basin so that priority projects for fuel reduction in areas subject to fire hazards will be undertaken according to relative need rather than ease of permitting."

This year marks the 5th anniversary of the devastating Angora Fire and the Washoe Fire near Tahoe City. Given the relative lack of snowfall and precipitation of the winter just past, the Basin Chiefs, Forest Service, CAL FIRE, Nevada Division of Forestry and other fire professionals of the Tahoe Fire and Fuels Team anticipate a particularly dangerous fire season ahead. Consistent with the findings and recommendations of ***The Emergency California-Nevada Tahoe Basin Fire Commission Report***, we urge the Lahontan Regional Water Quality Control Board to more fully integrate your role with fire and public safety professionals to ensure the timely and cost-effective implementation of vital fuels reduction projects in the Lake Tahoe Basin. A watershed destroyed by fire will not protect water quality.

Respectfully submitted,



Benjamin P. Sharit
Chief, Tahoe Douglas Fire Protection District
Chair, Multi-Agency Coordination Group (Fire MAC)
Tahoe Fire and Fuels Team and on behalf of the Tahoe Basin Fire Chiefs

cc: Honorable Members, Tahoe Basin Fire Commission
Members, Fire MAC and Tahoe Fire and Fuels Team; Tahoe Basin Fire Chiefs
Ken Pimlott, Director, CAL FIRE, RPF #2550
Bill Holmes, Northern Region Chief, CAL FIRE
Kelly Keenan, Unit Chief, Amador-El Dorado-Sacramento-Alpine Unit, CAL FIRE,
RPF #2356
Brad Harris, Unit Chief, Nevada-Yuba-Placer Unit, CAL FIRE
Mary Huggins, Division Chief, Tahoe Basin/Alpine County, Amador-El Dorado-
Sacramento-Alpine Unit, CAL FIRE, RPF #2507
Pete Anderson, State Forester Firewarden, Division of Forestry, State Department of
Conservation and Natural Resources
Nancy Gibson, Forest Supervisor, USDA Forest Service, Lake Tahoe Basin Management
Unit (LTBMU), Forest Service Region 5
Kathy Murphy, Staff Office, Vegetation Urban Lots Fire and Fuels, USFS LTBMU
Mike Vollmer, Forest Management Program Coordinator, Tahoe Regional Planning Agency