

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

Amador-El Dorado-Sacramento-Alpine Unit
2840 Mt. Danaher Road
Camino, CA 95709
Website: www.fire.ca.gov



March 30, 2012

TO: Lahontan Regional Water Quality Control Board
Attn: Harold Singer, Executive Officer
2501 Lake Tahoe Boulevard
South Lake Tahoe, California 96150

RE: COMMENTS TO PROPOSED WASTE DISCHARGE REQUIREMENTS
United States Forest Service Lake Tahoe Basin Management Unit
South Shore Fuel Reduction and Healthy Forest Restoration Project

Dear Mr. Singer:

On behalf of the Amador-El Dorado-Sacramento Unit (AEU) and the Nevada-Yuba Placer Unit (NEU), CAL FIRE thanks you for the opportunity to comment regarding the Lahontan Regional Water Quality Control Board's (LRWQCB) proposed Waste Discharge Permit Requirements for the United State Forest Service Lake Tahoe Basin Management Unit South Shore Fuel Reduction and Healthy Forest Restoration Project.

CAL FIRE appreciates the collaborative and permit streamlining efforts sought by LRWQCB staff regarding recent fuel reduction projects in the Lake Tahoe Basin. We recognize the level of staff time and costs associated with these efforts. We recall the extreme level of regulatory requirements, barriers, and lengthy timeframes to obtain approvals from the LRWQCB for fuel reduction projects in the Lake Tahoe Basin prior to the June 24, 2007 Angora Fire which destroyed 254 homes. These regulatory requirements, barriers, and approval delays imposed by the staff of the LRWQCB led to and were identified as contributing factors to the severity of the Angora Fire in the *Emergency California-Nevada Tahoe Basin Fire Commission Report* (FCR) released in May 2008. Specifically, FCR Finding 12 supports this conclusion, which specifically mentions barriers and over-regulation by the LRWQCB regarding fuel reduction efforts in the Basin. The supporting reasons and specific findings by the Fire Commission of FCR Finding 12 are included in the *Background and Supporting Evidence* section on page 159 of the *Emergency California Nevada-Tahoe Basin Commission Report*. These reasons and specific findings are based upon recorded testimony during the commission hearings to which CAL FIRE personnel contributed and witnessed.

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CAL FIRE continues to support and implement the *Emergency California-Nevada Tahoe Basin Fire Commission Report*. Doing so allows us to further meet the CAL FIRE Mission, which is to serve and safeguard the people and protect the property and resources of California. Supporting and implementing the *Emergency California-Nevada Tahoe Basin Fire Commission Report* also allows CAL FIRE to support and implement the *2010 Strategic Fire Plan for California*, the AEU Fire Plan, and the NEU Fire Plan, the latter two of which address the Tahoe Basin specifically. To further assist us in these endeavors, we request the LRWQCB support and implement all forty-eight Findings and ninety Recommendations of the *Emergency California-Nevada Tahoe Basin Fire Commission Report*. We request the support both indirectly as a supporting Basin agency and directly regarding those that pertain specifically to the LRWQCB, especially Recommendation 17 *Simplifying Regulations*, for this proposed and all future fuel reduction projects. CAL FIRE requests the LRWQCB assist us in safeguarding the people and resources of the Lake Tahoe Basin by joining us in continuing to support and implement to their fullest the *Emergency California-Nevada Tahoe Basin Fire Commission Report*.

If you have any questions, please contact me at (530) 644-2345. We look forward to continuing to work with LRWQCB staff to protect the lives, property, and natural resources of the Lake Tahoe Basin.

Sincerely,

Mary Huggins, Registered Professional Forester #2507
CAL FIRE Tahoe/Alpine Division Chief
Amador-El Dorado-Sacramento-Alpine Unit

FOR

Kelly Keenan, CAL FIRE Unit Chief
Amador-El Dorado-Sacramento-Alpine Unit

Cc (electronic): Ken Pimlott, CAL FIRE Director
Bill Holmes, CAL FIRE Northern Region Chief
Bill Snyder, CAL FIRE Deputy Director Resource Management
Duane Shintaku, CAL FIRE Assistant Deputy Director
Clay Brandow, CAL FIRE Watershed Specialist
Brad Harris, CAL FIRE Nevada-Yuba-Placer Unit Chief
Kelly Dreesman, CAL FIRE Assistant Chief