

PH 171472001 17:00 FROM TO 1070200100 P.02

Salmon River Restoration Council

25415 Sawyers Bar Rd. PO Box 1089 Sawyers Bar, CA 96027
tel: 530-462-4665 fax: 530-462-4664 e-mail: info@srrc.org

May 14 2001

2002 303(d) List Update
Reference #13

Dear State Water Quality Control Board:

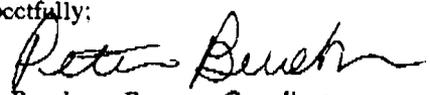
The following comments are submitted by the Salmon River Restoration Council to your review process regarding the impaired watershed status for the Salmon River. There are some errors in the way that the Salmon River is currently listed and we would like to offer some corrections. These corrections are consistent with what the federal and state land management agencies and the Klamath River Fisheries Task Force reflect in their management plans and other assessments, such as the Salmon River Sub-Basin Sediment Analysis (De La Fuente/ USFS -1994) and the Subbasin Restoration Strategy (Draft USFS/Restoration Council - 2000).

The Salmon River is listed as being impaired due to temperature and nutrient. There is not an excessive loading of nutrients in the Salmon River system. In fact many describe the Salmon River as being nutrient deficient for anadromous fisheries needs. Instead of being listed for "nutrient and temperature", the Salmon River should be listed for " sediment and temperature" .

Currently the Salmon River is identified as the "Klamath/Salmon". This should be changed just to read the "Salmon" River. The Salmon River is very similar in size to the Shasta and the Scott Rivers which are both listed separate from the Klamath. In addition, all segments of the Klamath River are already listed as independent segments (such as: Iron Gate to Scott and the Scott to Witchepec and Witchepec to the mouth.. The Salmon River should be listed as itself the "Salmon" River and not in conjunction with the Klamath River.

Perhaps the mistaken linking of the Salmon with the Klamath lead the past reviewers to conclude that the Salmon has excessive nutrient loading. This incorrect listing has been particularly problematic to our organization because several of our proposals were not considered for funding in the past Proposition 13 funding cycle because our proposals were addressing sediment and not nutrient. Please see the two enclosures for details about the proposal rankings. The incorrect listing makes it quite difficult for us or others to effectively restore the Salmon River watershed.

Please make these corrections to the description of the Salmon River in the impaired status listing. If you have any questions please do not hesitate to contact me or other specialists who work in our office. We appreciate the great work that the Board does and look forward to working with you and providing any other information to you about the Salmon River.

Respectfully:

Peter Brucker - Program Coordinator

NONPOINT SOURCE CONTROL PROGRAM RATING SHEET

Proposal number # 223 Cost \$ 89,100 Host Score 75
Proposal title Salmon River Cooperative Noxious Weed Management Program
In 6 Counties? No
Proposal type [per 79114(a)] Local Watershed Management Plan- An Environmental Assessment for Controlling Spotted & Diffuse Knapweed population on Salmon River
Reviewer's name and initials Bernadette Reed (BGR)

Scoring criteria* (0-100):

Points:

* The full text of criteria (below) can be found in the RFP

- 1. Project can sustain benefits for 20-years (0-5) 3
- 2. Project meets requirements of 79114(a) (0-5) 5
- 3. Project is technically sound and effective per wq (0-5) 3
- 4. Project will achieve measurable water quality improvements (0-10) 8
- 5. Project implements Management Measures per California's NPS Program Plan (0-5) 3
- 6. Project implements activities in an established plan (0-5) 4
- 7. Project contributes to more effective watershed management (0-5) 3
- 8. Proposal includes measures of project success (0-5) 4
- 9. Project has adequate stakeholder involvement and local input (0-10) 9
- 10. Project contributes to ongoing NPS implementation throughout project area (0-5) 5
- 11. Project is ready to proceed and is fully functional (0-10) 7
- 12. Project addresses pollution in a Category 1 UWA watershed (0-5) 4
- 13. Project implements activities identified in a WRAS or equivalent (0-5) 4
- 14. Project consistent with WMI Chapter (0-5) 3
- 15. Project is a high priority for this organization (0-15) 10

Summary/additional comments: The Salmon River is an impaired waterbody for nutrients and temperature. Removing noxious weeds has been a 6-year on going program. Noxious weed removal is not addressed in the Salmon River WMI and is not a high priority for this region. Reduce pesticide use and improve the riparian zone are encouraged. GIS & GPS are utilized in this proposal. There is a strong volunteer involvement.

NONPOINT SOURCE CONTROL PROGRAM RATING SHEET

Proposal number #225 Cost \$100,000 Host Score 68
Proposal title Salmon River Community Restoration Program In 6 Counties? No
Proposal type (per 79114(a))
Reviewer's name and initials Carrie Lukacic

Scoring criteria* (0-100):

Points:

* The full text of criteria (below) can be found in the RFP

- 1. Project can sustain benefits for 20-years (0-5) 3
- 2. Project meets requirements of 79114(a) (0-5) 3
- 3. Project is technically sound and effective per wq (0-5) 2
- 4. Project will achieve measurable water quality improvements (0-10) 5
- 5. Project implements Management Measures per California's NPS Program Plan (0-5) 5
- 6. Project implements activities in an established plan (0-5) 2
- 7. Project contributes to more effective watershed management (0-5) 5
- 8. Proposal includes measures of project success (0-5) 3
- 9. Project has adequate stakeholder involvement and local input (0-10) 7
- 10. Project contributes to ongoing NPS implementation throughout project area (0-5) 5
- 11. Project is ready to proceed and is fully functional (0-10) 5
- 12. Project addresses pollution in a Category 1 UWA watershed (0-5) 5
- 13. Project implements activities identified in a WRAS or equivalent (0-5) 2
- 14. Project consistent with WMI Chapter (0-5) 5
- 15. Project is a high priority for this organization (0-15) 10

Summary/additional comments: The proposal is for watershed restoration and monitoring in the Salmon River watershed. The proposal states that the watershed is impaired for sediment and temperature however the watershed is actually impaired for nutrients and temperature. The proposal has two parts. The first is for monitoring the implementation and effectiveness of past and present restoration and management activities and the second is for implementation of minor restoration projects. The monitoring proposal is fairly detailed and will focus on determining past restoration and the objectives of these projects. Monitoring will be used to determine if the objectives were met and how the project is doing for fish habitat improvement. The restoration component includes fish treatment and additional monitoring of 100 miles of road system to determine what improvements needs accomplishment. The restoration program is not clearly defined especially given that the proposal states that the projects were already detailed in previous planning documents. The points given for each criteria reflect the unclear implementation program. It is difficult to determine if the program is technically sound and will have sustained benefits for 20 years. Recommend addition of more detail to the restoration program, including monitoring and evaluation of water quality improvement and sustainability.