



United States
Department of
Agriculture

Forest
Service

San Gabriel River
Ranger District

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File Code: 2330/2520

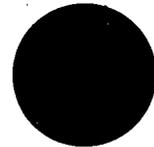
Date: January 16, 2006

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Selica Potter, Acting Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I street, 24th Floor
Sacramento, CA 95814



303 (d) Deadline: 1/31/06



Dear Ms. Potter:

Thank you for the opportunity to comment on the proposed changes to the section 303(d) list. The following comment pertains to the East Fork San Gabriel River Trash TMDL. I propose to have the actual TMDL modified from zero, year round to something more achievable such as non-zero and/or allowing for some periods of elevated trash levels. I am submitting this proposed change because the East Fork San Gabriel River Trash TMDL dated May 25, 2000 allows for some amount as stated on page 3 under Margin of Safety, "...as the narrative objectives for trash in the river may allow for some amount as long as it does not cause nuisance or beneficial use impairment." The Trash TMDL also states that the trash deposition occurs during the warm months of the year, generally June through September. During the off peak months of fall and winter, litter deposition is negligible. I believe that the Forest Service has made significant progress in the past 5 years to warrant the above mentioned proposed change from zero, year round trash TMDL.

Though the Forest Service has not met the target of zero trash as prescribed by the East Fork San Gabriel River Trash TMDL, it has made a tremendous, good faith effort moving towards the target in the last five years. The Forest Service will continue to address the trash problem through execution of the TMDL implementation plan and associated monitoring. The following information is provided to show what has been accomplished since our "East Fork San Gabriel River TMDL Implementation Plan was approved at the end of calendar year 2000.

Since the East Fork was placed on the 303(d) list in 1996 and 1999, the Forest Service has been making significant progress in trying to attain the numeric target established by the TMDL. I was not aware that it had been moved off the section 303 (d) list during the 2002 listing cycle only because a TMDL had been completed. The TMDL Implementation Plan consists of the following four sections:

- 1) Solid Waste Management
- 2) Environmental Education/Communication
- 3) Monitoring
- 4) Timeline



Solid Waste Management:

The two primary measures the Forest Service employed to attain the numeric target for trash was to increase the number of trash receptacles located in the East Fork and to increase staffing levels available to do litter pickup. The latter includes the use of volunteers and partners. In terms of trash receptacles, the following changes have occurred since the year 2000:

<u>Location</u>	<u>2-yd dumpsters in 2000</u>	<u>2-yd dumpsters in 2005</u>
Follows	2	4
Oak Park	3	10
El Doradoville	1 (no 32-gal cont)	2 (6-32 gal containers)
Coyote Flats	1 (no 32 gal cont)	1 (3-32 gal containers & 4-59 gal containers)

The Forest Service added 10 additional 2-yd dumpsters and 9-32 gallon and 4-59 gallon containers to the four East Fork locations from the year 2000 to the present.. All of the additional trash receptacles were placed along East Fork Road except for the 4-59 gallon containers which were placed down near the river at Coyote Flats. The increase in trash collection capacity equals 20 additional yards for the dumpsters and approximately 2 yards for the 32 and 59 gallon containers. Additional 2 yard dumpsters were not placed along the East Fork Road due to the narrow road shoulders. In these locations and where the public can park their vehicles, the gallon containers were placed.

In the year 2000, there were only two full-time Forest Service employees and, on average, 5-10 community service volunteers (on weekends) that were assigned to work in San Gabriel Canyon. In addition to the East Fork, however, the employees were also responsible with cleaning and maintaining the rest of San Gabriel Canyon which also receives high levels of use. The California Environmental Project, a non-profit organization, also provided some employees to work in San Gabriel Canyon. The employees grouped into "Eco-Teams" and spent the majority of their time in the stream areas of the San Gabriel River educating the public on the importance of keeping the environment clean, handing out trash bags and picking up some ground litter. The organization ceased to exist after the 2002 summer season.

In 2005, the Forest Service had 10 employees working full-time in San Gabriel Canyon. They were not, however, dedicated to work only in the East Fork as the entire canyon needs management as stated above. This represents a 5 fold increase in employees working in the canyon. During the summer months, 1-3 employees spent the majority of their time addressing the trash issue by handing out trash bags and making public contacts in addition to removing trash. The community service volunteers still work in the canyon but their average numbers have dropped since 2000 from 5-10 on weekends to 2-4 on weekends. The reason for the drop is the increased competition for their services from other city, county and state government entities over the last five years.

In addition to the increase in Forest Service employees over the last five years, an intense effort

was made to increase the use of volunteers to assist with TMDL related river cleanups in the East Fork. The following table displays the results of this effort to date:

<u>Year</u>	<u>TMDL Volunteer Hours</u>	<u>Bags of Trash</u>	<u>Pounds Collected</u>
2001	2576	363	14,805
2002	2613	402	18,096
2003	2780	526	23,670
2004	2900	592	26,640
2005	2430	687	30,915

It is important to remember that these volunteer river cleanup efforts are over and above the trash that Forest Service personnel pick up and haul to the dump. That total still averages about 150 tons a year; as it did in the year 2000, approximately half of which comes out of the East Fork. What has changed in the last five years is the amount of trash that Forest Service crews and volunteers have to pick up themselves as more of it is being placed in the additional dumpsters and trash receptacles that have been provided. The net result of the additional capacity that has been provided and increased patrols along the river has been an approximately 50% reduction in the amount of trash that has to be picked up by hand. Though this represents a remarkable improvement in the trash load situation along and in the river, the numeric target of zero trash in the river has still not been achieved.

Another important advance in terms of solid waste management is the approximate 90% reduction in the use of charcoal barbeques along the San Gabriel River. Due to extreme fire conditions in the year 2002 and 2 major wildfires which burned 60,000 acres; the Forest Supervisor signed a special order prohibiting the use of charcoal barbeques along the San Gabriel River. This special order, along with a strong effort by fire and recreation personnel patrolling the river to enforce the order, has resulted in a dramatic reduction of charcoal briquettes being tossed into or along side the river.

Environmental Education/Communication:

In the year 2000 no bilingual roadside information/education signing, which emphasizes user benefits to be derived from maintaining water quality, existed in the East Fork. As of today there are five such signs located in the East Fork. There are also bilingual decals on each of the 2-yard dumpsters encouraging users to protect resources and place their trash inside them. In addition to the signage, Forest Service patrols along the river have increased significantly since 2002 when the special order prohibiting use of charcoal barbeques was implemented. Along with contacting the public and discussing the use of charcoal, pack it in/pack it out information is disseminated as well. Trash bags are also distributed to users with a bilingual message printed on them to deposit your trash in the trash receptacles provided. These bags are also handed out to each vehicle that stops at the San Gabriel Canyon Entrance Station to purchase an adventure pass or obtain information on their way into the canyon.

Another effort the Forest Service is making is the establishment of the San Gabriel Canyon Environmental Education Center located at Old Rincon Station. The goal of the environmental center is to bring local school children to it and conduct environmental education programs including the importance of keeping trash out of riparian areas to promote water quality. At this time the environmental education programs that occur there are in their infancy as programs and contacts with schools are being developed. However, we are anticipating an effective and successful program to be established there over the next few years. Currently, the District has a similar program occurring at the Mt. Baldy Visitor Center in San Antonio Canyon. Programs were attended by approximately 15,000 school children in 2005. We anticipate surpassing this number in San Gabriel Canyon in the next five years.

Monitoring:

Prior to 2003, monitoring of trash loads on the East Fork was done sporadically due to a lack of personnel to perform the monitoring and an agreed upon protocol to use for the monitoring. The survey forms varied as they were being developed. As a result, there isn't any baseline data for the trash loads on the East Fork from 2000 through part of 2003. Since then, however, a survey form has been developed and resources dedicated to conduct the monitoring survey.

Timeline:

The TMDL Implementation Plan was developed and implemented in 2000 with the goal of achieving the TMDL numeric target of zero trash within the river by April 1, 2003. The target of zero trash was not achieved by April 1, 2003 however; significant progress has been made in implementing the TMDL Implementation Plan. Establishing effective working partnerships with other agencies, conservancies, and private entities as well as obtaining grants to achieve the target of zero trash can take more than 3 years to achieve. Through the partnerships that have been established and the grants received, considerable progress has been made in the form of additional garbage receptacles, river cleanups, toilet facilities, trash bags, educational material, and public contacts.

I am pleased with the progress made to date in this endeavor and look forward to making even more progress in the future. If you require any additional information, please contact me.

Sincerely,



MARTY DUMPIS
District Ranger

Cc: Forest Supervisor
Regional Hydrologist