



United States
Department of
Agriculture

Forest
Service

San Bernardino National Forest
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State Water Resources Control Board
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I am writing in response to the recent proposal by the State Water Quality Control Board (State Board) to list Holcomb Creek and Crab Creek as impaired water bodies on the State's 303(d) list via the Proposed 2010 Integrated Report. The proposed listing indicates that Holcomb Creek and Crab Creek are polluted with Total Dissolved Solids (TDS) primarily from unknown sources.

The U.S. Department of Agriculture Forest Service (USFS) manages 29,260 of 30,231 acres (97%) within the Holcomb Creek watershed and 2,578 of 2,687 acres (96%) within the Crab Creek watershed as part of the San Bernardino National Forest. A primary objective of the USFS in managing these lands is to improve and protect watershed conditions (USDA Forest Service Strategic Plan, 2007). The USFS recognizes its responsibilities to protect water quality and supports the efforts of the State Board to enforce the Clean Water Act and the California Water Code through revision of its 303(d) list of impaired water bodies. With the objective of basing listings on the most current and accurate information, I offer the following information on water-quality related projects that have and will continue to improve conditions in Holcomb Creek:

1. The San Bernardino National Forest is using \$700,000 in American Recovery and Reinvestment Act (ARRA) of 2009 funds in Fiscal Year 2010 (FY10) to close unauthorized off-highway vehicle (OHV) trails and decommission routes in the upper Holcomb Creek area, as specified by Figure 1. This work will reduce sediment delivery, reducing turbidity.
2. Following the 2007 Butler II and Slide Fires, a hydrologic restoration project on 90 acres of meadow habitat (Cienega Redonda and Cienega Larga) was implemented to repair gullies in the meadows, close unauthorized routes, and decommission a road to reduce sediment loading and restore proper hydrologic function. Location of this work is shown on Figure 2.
3. Also following the 2007 Butler II and Slide Fires, the San Bernardino National Forest has implemented extensive road maintenance and road reconstruction activities using a variety of funding streams (of over \$500,000) to improve the running surfaces, stream crossings, and drainage in the vicinity of springs. In FY09 and FY10, over 25 miles Forest Service Roads 3N16, 3N14, 2N13, and 2N68 were accomplished. Pictures showing before and after examples of the work indicate the level of improvement.
4. The Crab Creek crossing with 3N16 has been a photo point for the Deep Creek-Green Valley Lahontan Timber waiver since 2008. Twice a year, the crossing is assessed for increased



sediment loading and turbidity due to fuels related issues. Sediment delivery issues from 3N16 are also addressed. Attached photos show a progression in the crossing.

5. Under the Butler/Slide Lahontan Timber Waiver, additional riparian corridors along Crab Creek and Holcomb Creek will be monitored for increased sedimentation and resulting turbidity caused by fuels related activities. If any such occurrences are found, the adaptive management protocols will both repair any damage caused to the riparian areas and will add additional BMPs to prevent future problems.

These data indicate that overall water-quality conditions in the Holcomb Creek and Crab Creek watershed within national forest boundaries are continuing to improve.

Water quality on the national forests in California has been protected since 1981 through a Management Agency Agreement (MAA) between the State Water Resources Control Board (State Board) and the USFS. This MAA provides for a USFS Water Quality Management Program (WQMP) that is based on Best Management Practices (BMPs) developed for a wide variety of USFS resource-management activities. These BMPs were certified by the State Board and approved by the U.S. Environmental Protection Agency (USEPA). The MAA also specifies that Legacy water quality problem areas will be fixed when funding sources become available.

The State's Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (2004) supports the use of BMPs and MAAs as the primary mechanisms for meeting water quality standards on public lands. As described in this policy, successful MAAs are more efficient than direct regulation by the Regional Boards, limit unnecessary duplication of effort, and leverage limited staffing and financial resources.

In addition to the ongoing specific projects mentioned, Holcomb Creek has been found eligible in the 2005 Forest Land Management Plan under the Wild and Scenic River Act (WSRA). Of its 15 mile length, approximately 6 miles are preliminarily classified for 'Wild' designation and 9 miles for 'Recreation' designation. Both segments have outstandingly remarkable values for scenery, wildlife, and botany. Congress enacted the WSRA to preserve select river's free flowing condition, water quality and outstandingly remarkable values. The Forest Plan provides management direction to protect the free-flowing character, potential classification, and outstandingly remarkable values within a ¼ mile corridor from either side of the centerline of Holcomb Creek until a suitability study is completed and final recommendation to Congress regarding river designation is made.

According to the Lahontan Regional Water Quality Control Board, a TMDL for TDS would be implemented using the narrative objectives for Sediment, Settleable Materials, Suspended Materials, and Turbidity as defined in the Basin Plan. The San Bernardino National Forest believes that the information provided above shows that our adaptive management strategies and best management practices to address roads, fuels, and recreation programs is currently addressing sediment, suspended materials, and turbidity to the extent that background levels are not exceeded and nuisance levels are avoided.

Thank you for the opportunity to comment on the proposed listing. If you have any questions, please contact the San Bernardino National Forest hydrologist Robert Taylor at 909-382-2660.

Sincerely,

/s/ Gabe Garcia (for):
JEANNE WADE EVANS
Forest Supervisor

cc: Scott R Tangenberg
Robert G Taylor
Mary Najera