

Memorandum

AUG 31 '98

To : Mr. Lee Michlin
Executive Officer
Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403

Date: August 27, 1998

LMM *11/9/11* RK *[Signature]*

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FILE EDG:JB

CAG:TD 4-1-98

From : Department of Fish and Game - Region 1
601 Locust Street, Redding, California 96001

Subject : Public Report on the Triennial Review of the Water Quality Control Plan for the North Coast Region (Basin Plan)

The Department of Fish and Game (Department) has reviewed the subject report and provides the following comments. Section A describes the status of the 1995 Priority List water quality issues. Section B suggests new water quality issues for the Regional Water Quality Control Board (Board) to consider in the 1998 Triennial review.

A. Comments on Status of Specific Issues from the 1995 Priority List

Issue: Review Water Quality Problems in the Klamath, Scott, and Shasta Rivers.

As stated in our May 23, 1995, letter, we continue to urge the Board to give top priority to water quality issues in the Klamath basin. Keeping this system as a top priority will allow the Board to propose a future basin plan amendment that addresses water quality problems. We are pleased that past planning efforts have resulted in a Watershed Management Plan for the Klamath River area and a revision of the Watershed Management Initiative (WMI). The revised planning chapter was finalized on May 15, 1998, and sets forth a Board strategy for water quality protection and improvement. The Department requests a copy of the recently completed chapter.

Water quality monitoring has also been completed for a two-year period as part of a US Environmental Protection Agency (EPA) grant project. The product of this work effort will support the Klamath resource programs and the development of a "Total Maximum Daily Load" (TMDL) allocation by the year 2004. Has a report been issued for this water quality monitoring effort? If so, please forward a copy to the Department. If not, are there plans to issue a report?

With regard to the Klamath River TMDL, the Board issued a letter on January 14, 1998, which lists the North Coast Region Clean Water Act, Section 303(d) List of Waters Requiring the Development of Total Maximum Daily Load limits and implementation plans. The Department submitted a letter to the Board on December 1, 1997, with recommendations for additional constituents to be added to listed waterbodies and recommended additional waterbodies to be added to the list. In that letter we supported adding dissolved oxygen as a limiting factor for the Klamath River and recommended that sediment be added as a pollutant. Our comments were not included in the January 1998 update. We request again that sediment be added to the list at this time. If this is not possible it should be added before major efforts begin on the TMDL. The TMDL process should include and address all limiting factors of a waterbody at the same time.

The Triennial review public report also discusses administration of Clean Water Act (CWA) grants which support voluntary monitoring, planning and nonpoint source pollution control efforts whose primary goals have been to lower water temperatures, reduce nutrient loading and restore fisheries habitat in the Klamath basin. The Department supports these efforts and requests reports on the outcome of these voluntary efforts.

Issue: Consider Specific Objectives for Nutrients

Due to staff and budget limitations and higher priorities, there has been no Board staff effort expended to evaluate this issue. This was identified in the May 15, 1998, revision of the WMI Chapter as an issue in some watersheds. Board staff recommend that this issue be included in the 1998 Triennial review but at a lower priority ranking than in 1995. As stated in our May 23, 1995, letter, the Department supports the staff recommendation to consider specific objectives for nutrients. We have long been concerned with the difficulty of implementing narrative objectives for biostimulatory substances. Adoption of numeric objectives for ammonia, nitrite, nitrate and phosphate would protect beneficial uses and minimize potential eutrophication in important waterbodies. We believe this recommendation is consistent with Section 304 of the Clean Water Act which states that development of criteria for water quality should reflect the latest scientific knowledge.

Issue: Review the Water Quality Problems Which Result From Gravel Mining

We concur with Board staff regarding the need to evaluate water quality impacts of instream gravel mining operations. The Department suggests that the Board contact the County of Humboldt Extraction Review Team (CHERT) for information on potential impacts and best management practices to avoid impacts. The current CHERT Administrator Randy Klein can be contacted at: CHERT Administrator, 1360 Stromberg Avenue, Arcata, California 95521

B. Identification of New Water Quality Issues for Consideration on the 1998 Priority List

Issue: Amend Table 2-1, Beneficial Uses

1. Include the RARE beneficial use designation for all waterbodies having existing or potential coho habitat.

The Department concurs with Board staff that the table should be updated. We also suggest that with the potential listing of steelhead the Board include the RARE designation for waterbodies having existing or potential steelhead habitat. The table does not specify which species are in the waterbody. The streams we are adding are for coho and Tidewater Goby. If the stream already has the RARE designation, it is not included in our list. We are not including revisions for steelhead at this time but can provide that information if requested.

We have reviewed the table and suggest adding RARE to the following streams:

- | | |
|--------------------------|--------------------------|
| 1. Shasta River | 13. Crescent City Harbor |
| 2. Scott River | 14. Bear River |
| 3. Salmon River | 15. Mattole River |
| 4. Klamath River (Lower) | 16. Ten Mile River |
| 5. Trinity River (Upper) | 17. Noyo River |
| 6. South Fork Trinity | 18. Big River |
| 7. Hayfork Creek | 19. Albion River |
| 8. Trinity River (Lower) | 20. Navarro River |
| 9. Illinois River | 21. Garcia River |
| 10. Winchuck River | 22. Gualala River |
| 11. Lake Earl | 23. Russian River |
| 12. Lake Talawa | 24. Laguna de Santa Rosa |

Numerous coastal tributaries to the Pacific Ocean from the Mattole River south to the Russian River have the potential for coho resources. Little River, Pudding Creek and Casper Creek are known coho streams.

Issue: Amend Section IV. Implementation Plans to Include TMDL Implementation Strategies for 303(d) Listed Waterbodies

As stated above, the TMDL process should include and address all limiting factors of a waterbody at the same time. Limiting factors such as temperature, sediment and large woody debris are closely linked in a functioning ecosystem. Best management practices for temperature control such as retaining dense riparian canopy closure and recruiting large woody debris into streams often work to improve bank stability and control sediment delivery to streams. In our December 1, 1997, letter, we provided a list of additional limiting factors to be added to streams already listed by the Board.

Table 1. In the public report the Triennial Review lists waterbodies scheduled for TMDL development between 1998 and 2001. We note that although the Board had listed temperature and sediment as a limiting factor for the South Fork Trinity River in the latest update of the list on January 14, 1998, it has been dropped from the listed pollutants in Table 1 for the Triennial Review. The EPA is the lead agency for the development of the TMDL for the South Fork Trinity and should be made aware of the additional identified pollutant.

The Department recommends that the following constituents be added as pollutants to the following listed waterbodies prior to development of the TMDLs:

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|--|---------------------------------|
| 1. Shasta River, sediment and nutrients | 7. Mad River, temperature |
| 2. Klamath River, sediment | 8. Redwood Creek, temperature |
| 3. Trinity River, temperature | 9. Noyo River, temperature |
| 4. Laguna de Santa Rosa, dissolved oxygen | 10. Russian River, temperature |
| 5. Americano Creek, dissolved oxygen, sediment | 11. Gualala River, temperature |
| 6. Van Duzen River, temperature | 12. Ten Mile River, temperature |
| | 13. Albion River, temperature |

We appreciate the Board's efforts to improve protection of waterbodies which are not currently meeting all beneficial uses. Department staff are available to answer questions and provide further information regarding biological resources and pollutants in these streams.

Issue: Update Section IV. Implementation Plans, Nonpoint source Measures with regard to logging, construction, and associated activities and herbicide wastes from silvicultural applications

This portion of the Basin Plan has not been amended since it was first adopted by the Board in 1971. We concur that significant changes have occurred in this program since 1971. We believe this recommendation is consistent with Section 304 of the Clean Water Act which states that development of criteria for water quality should reflect the latest scientific knowledge. Department staff are available to work with Board staff on this important amendment.

Mr. Lee Michlin
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This memo reflects the Triennial Review comments from both Northern California-North Coast Region (Region 1) and Central Coast Region (Region 3). It does not fulfill consultation requirements under the California Endangered Species Act.

If you have any questions regarding these comments, please contact Environmental Specialist Jane Vorpapel at (530) 225-2124.



Donald B. Koch
Interim Regional Manager

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