



United States
Department of
Agriculture

Forest
Service

Eldorado National Forest

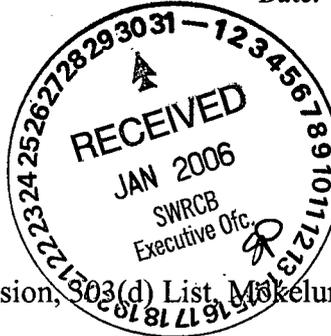
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File Code: 2530-33

Date: January 27, 2006

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



303 (d) Deadline: 1/31/06

Subject: Comments on the Proposed Revision, 303(d) List, Mokelumne River, and Cosumnes River.

Dear Ms. Potter:

The Eldorado National Forest has the following comments concerning the proposed 303(d) listing of reaches within the Cosumnes and Mokelumne River basins.

We request that you reconsider your proposal to list the Cosumnes River Basin for Exotic Species. Exotic species are abundant in aquatic ecosystems throughout California, often intentionally so, as demonstrated by the purposeful planting of non-native game fish by the State of California in water bodies throughout the state. We understand that the intention of the State of California in this proposed action of listing is to protect beneficial uses of waters under the PL92-500 "Clean Water Act", and we urge you to do so with prudence. The impact of non-native species on native warm fresh water species abundance is specific to the lower reaches of the watershed, and should be treated accordingly. The proposed listing should state a specific reach of the river, and a specific exotic species, so that the placement of a river segment on the list can have significance and be used as a tool for future improvement of its impaired condition.

As stated in the "Weight of Evidence" for the proposed list, a physical barrier in the lower watershed where the identified effected beneficial use of "Warm Freshwater Habitat" occurs protects reaches in the upper watershed from invasion of the exotic species. No exotic species were identified in the upper watershed, which is designated as a Cold Freshwater Habitat in the California Regional Water Quality Control Board's 1998 Fourth Edition of the Water Quality Control Plan (Basin Plan) for the Sacramento River and San Joaquin River Basins.

We also would like to request that you reconsider your proposal to list the Mokelumne River, Bear River, Lower Bear River Reservoir, and Sugar Pine Creek for copper. We concur with the portions of the letter signed on January 26, 2005, signed by Alan Soneda, and submitted by Pacific Gas and Electric Company (PG&E) pertaining to your proposed listing of these river segments for copper. We have actively participated, including our staff aquatic and watershed



specialists, within the collaborative process to assist PG&E in determining if there is a significant water quality issue and to actively seek a solution to mitigate any potential impacts that operations of their hydroelectric facilities may have on water quality within the Mokelumne River system. As stated in PG&E's letter, "Between 2001 and 2005 significant facility modifications were made to allow for the implementation of a new flow regime specified in the 2001 license that was designed to mimic the natural unimpaired hydrograph for the Mokelumne watershed. This new flow regime was officially implemented in October 2005 and water quality data under this new flow regime must be evaluated before any listing decision can be made. The listing proposals for the Bear and Mokelumne Rivers were made using data collected under the old flow regime, and in earlier years, using analytical methods that may not be appropriate for 303(d) listing purposes according to the State's listing policy."

We urge the State Water Resources Control Board to work with PG&E and their collaborative partners (Ecological Resource Committee) to continue to investigate this very interesting river system, to learn what background levels of copper are in this specific river and geologic setting, and to work with the very committed group as they attempt to mitigate any potential copper related impact, so that this river system will have water chemistry that is consistent with the background levels that it's aquatic ecosystem has evolved with.

We appreciate the opportunity to comment on the Revision to the Federal Clean Water Act Section 303(d) list of Water Quality Limited Segments for California, for the above segments on the Mokelumne River and the Cosumnes River. As a liaison to the Ecological Resource Committee for the Mokelumne River Project, we have a strong interest in evaluating and preserving the Project's water quality. And as managers of the lands in both river basins we are committed to protecting the quality of their waters.

If you have any questions regarding this matter please contact Cheryl Mulder at 530- 621-5246 or Beth Paulson at 530-642-5174.

Sincerely,



JUDIE L. TARTAGLIA
Acting Forest Supervisor

cc: Jane LaBoa, Kathy Hardy, Beth A Paulson, Cheryl Mulder, Robert H Hawkins, Brian Staab, Michael Valdes