

Central Valley Regional Water Quality Control Board

26 May 2016

Edith Hannigan, Board Analyst
VTP Draft PEIR Comments
Board of Forestry and Fire Protection
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COMMENTS AND RECOMMENDATIONS FOR CAL FIRE VEGETATION TREATMENT PROGRAM ENVIRONMENTAL IMPACT REPORT 2016

Central Valley Regional Water Quality Control Board staff has reviewed CAL FIRE's Vegetation Treatment Program draft Program Environmental Impact Report (VTP PEIR) dated March 2016. Staff is providing the following comments and recommendations for consideration by CAL FIRE.

1. Multiple references to HYD-2 and other Hydrologic and Water Quality-Related Standard Project Requirements appear throughout the document. Please update all corresponding sections to reflect the following:
 - a. If herbicide use is planned, the standard letter to the Regional Board should include the herbicide trade name or active ingredient and season of application.
 - b. Project maps should include at a minimum: topographic lines, watercourses and their associated classification, and roads within the project area of sufficient scale for desktop review.
 - c. The standard letter to the Regional Board should discuss any alternative mitigation measures to the Forest Practice Rules (14 CCR, Ch. 4&4.5) that are necessary to meet site-specific conditions and how those alternatives will provide equal to or greater protection to the beneficial uses of water quality.
2. Multiple references to HYD-11 and associated water drafting operations contain no reference to the use of absorbent pads underneath vehicles. At a minimum, it is recommended that absorbent pads or similar materials be made available at each drafting location in the event that leaking fluids are discovered during operations.
3. The VTP PEIR states that burning will not occur within any WLPZ unless a backing fire is allowed to enter the zone. However, when referring to burn piles, there is no specific mention of standard mitigations as it relates to the distance away from any WLPZ. Please clarify HYD-15 to include language about locating burn piles outside of the WLPZ corresponding to stream classification.
4. Table 4.5-1 and other tables contain information that is not directly attributed to a source. Please provide a reference or description for where information presented in each table has been obtained.

5. In Table 4.5-2, p. 4-264, there are several abbreviations of "BIOL", yet no definition is provided in the left column. Please include a definition for "BIOL".
6. Many references in the VTP PEIR discuss hydrologic disconnection of watercourses and roads to mitigate any potential discharge. However, hydrologic disconnection is not achievable in all cases. Please update the discussion to include a description of additional mitigations that may be used where hydrologic disconnection cannot be achieved.
7. On page 4-283, the 4th paragraph states that no new road construction or reconstruction is allowed under the VTP. In areas where road access is a limiting factor, please list any alternatives that may be available to project proponents.
8. Mitigation HYD-16 and page K-1, indicates that additional hydrologic analysis will be performed when the percent watershed disturbance exceeds 20 percent. The type of analysis is not described and this requirement is not sufficiently clear.
 - a. Provide the reference document(s) that explains the origin and significance of the 20% disturbance threshold statewide.
 - b. Please provide the type(s) of additional hydrologic analysis that will be conducted when disturbance exceeds the 20 percent threshold.

If you have questions regarding these recommendations, please contact me at Tal.Robinson@waterboards.ca.gov or (916) 464-4826.



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