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Fall River Resource Conservation District

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November 22, 2005

Craig J. Wilson, Chief
Water Quality Assessment Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Mr. Wilson:

The Fall River Resource Conservation District (FRRCD) is a non-regulatory special district of the state of California that encompasses an area of over one million acres, including the Fall River watershed. These watersheds are comprised of highly productive timber and agricultural lands and provide quality water, wildlife and aesthetic benefits including a world class wild trout fishery in the Fall River. In the past several years we have coordinated landowner, agency and public interest group efforts to study these watersheds and develop and implement numerous restoration projects.

After a thorough discussion and concurrence with CVRWQCB representative, Dennis Heiman, on November 15, 2005 the Fall River RCD voted unanimously to request that the SWRCB revise the descriptions in the 303(d) listing of Fall River to accurately reflect the impairment. Specifically we request that the "stressor" be changed from "sediment/siltation" to "historic accumulation of sand size sediment" and to remove "silviculture" and other items listed as current sources and replace it with "meadow channelization and other historic activities and catastrophic events".)

This correction to the listing description is critical for the FRRCD so that we can continue to receive excellent landowner support and cooperation along with grant funding necessary for projects needed on the Fall River and in the watershed. If the listing remains unchanged the RCD will lose cooperation from many landowners who will be forced to waste time and money addressing the added regulatory burdens associated with the inaccurate 303(d) listing description instead of focusing efforts to cooperate on the actual documented problems. Also to facilitate successful grant funding and cooperation from agencies to address the impairment, the cause of the impairment needs to be accurately stated in the listing.

The "impairment" in the Fall River currently consists of a slug of large grained, sand-sized material that began accumulating in the river during the late 1980s and early 1990's prompting local concern. More than a decade ago a public meeting was called to discuss the issue. At that meeting considerable concern was expressed over the potential negative impacts to aquatic vegetation and the wild trout fishery due to the sedimentation in the river. Questions also arose as to the information needed to provide the landowners, resource users, agency and the community with enough information to come to consensus on proactive solutions that might address the situation. Subsequently, the Fall River Resource Conservation District (RCD) received a 205j grant with the stated objective to "Address public concerns over the current problem of sedimentation and decline of the trout fishery and initiate a comprehensive watershed management program that will promote and restore the long-term health of the Fall River". Tetra Tech, Inc., a highly qualified environmental consulting company, was contracted to collect, review and analyze available information, meet with stakeholders and then develop a report and action plan.

A sedimentation and action plan for the upper Fall River was completed in May of 1998. Tetra Tech's action plan consisted of two major components--one to control the sources of sediment and the other to test the feasibility of sediment removal by a pilot dredging project. The sediment control problem was determined to be primarily from historic channelization of meadow functions in the watershed coupled with several catastrophic events (wildfire and railroad stream crossing failures). Channel erosion was determined by Tetra Tech to be the primary source of the sediment. The historic channelization for flood control of the large meadow between the river and upper watershed not only created a sediment source but also disrupted the meadows natural function to settle out large grain sediment during high flows which allowed large grain sediment from higher in the watershed to enter the river itself.

Since May of 1998 the Fall River RCD has successfully sought grant funding from agencies and received excellent cooperation and financial support from landowners, to complete many of the sediment control projects recommended in Tetra Tech's action plan. The following are some of the key projects completed:

1. Exclusion fencing along much of the river to reduce bank erosion by livestock
2. Control treatments & bank stabilization projects to reduce bank erosion by muskrats
3. Restoration of the Bear Creek Meadow on Thousand Springs Ranch to function as a sediment sink instead of a net sediment source.
4. Stabilization of two smaller meadows in the upper watershed.
5. Replaced the Bear Creek railroad crossing with a much more failure resistant crossing structure. The previous crossing failed in the past during two large storm events causing massive channel scouring downstream and sediment delivery.

Commenter has included several completed projects completed by the Fall River Resource Conservation District

6. Forest landowners have significantly reduced dangerous fuel loads on several thousand acres by biomass thinning small densely overstocked trees. This greatly reduces the risk of catastrophic wildfire and the resultant watershed impacts.
7. Also plans are under development for restoration of the Big Bear Meadow. At this time we are pleased to report that the critical components of the action plan calling for control of the sediment sources are nearing completion.

Now that the sources of sediment are being properly managed, there still exists impairment from the existing slug of large grain sediment in the river. According to Tetra Tech's report, even if the sediment control projects were to successfully prevent any additional sediment from entering the river the sediment already in the river would take hundreds of years for the system to naturally flush. (See "*Summary of Sediment Balance Results*", page 7.22, paragraph 7.4.4 of Tetra Tech's Final Report.)

Consequently, the Fall River RCD is focusing on efforts to complete the remaining critical piece of the action plan finalized in 1998 -the pilot dredging project. We are undergoing project site selection and development of a design plan and anticipate seeking funding in the near future. For us to have the success in this and any future projects to address the slug of sediment and non-native invasive weeds in the river along with continuing to monitor the work on controlling the sources we need the support of landowners and funding agencies. The current inaccurate description in the listing will lessen that support instead of maintain it to focus efforts on what needs to be done.

Again we request that the SWRQCB make the changes to the 303(d) listing description for the Fall River that both the Fall River RCD and the CV Regional Water Quality Control Board staff think are appropriate to properly focus efforts on addressing the impairment.

Thank you for consideration of this matter.

Sincerely,



Robert Rynearson
Board President