
North Coast Regional Water Quality Control Board

November 8, 2017

Mr. Dock Chastain
Klamath National Forest
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jchastain@fs.fed.us

Dear Mr. Chastain:

Subject: Scoping Comments – Elk Creek Watershed Project

File: USDA – Klamath National Forest (KNF) (CW-754118)
Klamath NF Elk Creek Watershed Project (CW-841370)

On September 29, 2017, the United States Forest Service released a public scoping document for the proposed KNF Elk Creek Watershed Project (Project). We appreciate the opportunity to review and comment on the Project and wish to remain on the mailing list.

The purpose of the Project is to:

- manage forest stands to be more resilient;
- improve water quality to maintain and restore riparian and aquatic habitat;
- improve efficiency of system roads and trails;
- improve terrestrial habitat for northern spotted owl and Roosevelt elk; and
- improve the vigor and prevalence of Karuk cultural resources.

The Project planning area covers 45,922 acres. KNF proposes to treat approximately 10,550 acres within the planning area. Proposed actions include:

- 1,782 acres of commercial thinning;
- 1,256 acres of noncommercial thinning;
- 76 acres of hardwood enhancement;
- 18 acres of meadow enhancement;
- 153 acres of fuels reduction adjacent to private property;
- 823 acres of defensible fuel profile zone creation;
- 1,896 acres of roadside fuels reduction;
- 4,552 acres of underburning; and
- project-level travel analysis on National Forest System (NFS) roads within the East Fork Elk Creek and Lower Elk Creek 6th field watersheds.

The Travel Analysis for the Project found certain roads with legacy sites that are not in compliance with total maximum daily loads. The Project proposes legacy site treatment on NFS roads within the Project area and to:

- upgrade 10 miles of the NFS road system to management level 3;
- downgrade 15 miles of NFS road to management level 1;
- decommission 12 miles of road; and
- partially decommission 10 miles of road.

Please accept the following comments based on our review of the scoping document:

1. On page 10 of the scoping document KNF proposes to downgrade 13 miles of NFS system roads in the Project area to Maintenance Level 1. Maintenance Level 1 roads are typically blocked to vehicle traffic after use and receive only basic custodial maintenance. The 2012 National Core BMP Manual, Volume 1 (National BMP Manual) contains BMP Roads-6. BMP-6 provides guidance for Maintenance Level 1 roads is located on page 115 of the National BMP Manual and states:

Avoid, minimize, or mitigate adverse effects to soil, water quality, and riparian resources by storing closed roads not needed for at least 1 year (Intermittent Stored Service) and decommissioning unneeded roads in a hydrologically stable manner to eliminate hydrologic connectivity, restore natural flow patterns, and minimize soil erosion.

Roads not needed for access for long periods (greater than 1 year) may be put into storage (Intermittent Stored Service—Maintenance Level 1) to reduce maintenance costs. Level 1 roads receive basic custodial maintenance focusing on maintaining drainage facilities and runoff patterns to avoid or minimize damage to adjacent resources and to perpetuate the road for future use. The integrity of the roadway is retained to the extent practicable and measures are implemented to reduce sediment delivery from the road surface and fills and reduce the risk of crossing failure and stream diversion.

BMP Roads-6 also contains the following information regarding evaluating roads for storage:

Evaluate all stream and waterbody crossings for potential for failure or diversion of flow if left without treatment.

- *Use suitable measures to reduce the risk of flow diversion onto the road surface.*
- *Consider leaving existing crossings in low-risk situations where the culvert is not undersized, does not present an undesired passage barrier to aquatic organisms, and is relatively stable.*
- *Remove culverts, fill material, and other structures that present an unacceptable risk of failure or diversion.*

- *Reshape the channel and streambanks at the crossing-site to pass expected flows without scouring or ponding, minimize potential for undercutting or slumping of streambanks, and maintain continuation of channel dimensions and longitudinal profile through the crossing site.*
- *Use suitable measures to avoid or minimize scour and downcutting.*
- *Use suitable measures to ensure that the road surface drainage system will intercept, collect, and remove water from the road surface and surrounding slopes in a manner that reduces concentrated flow in ditches, culverts, and over fill slopes and road surfaces without frequent maintenance.*
- *Use suitable measures to stabilize unstable road segments, seeps, slumps, or cut or fill slopes where evidence of potential failure exists.*

If any Management Level 1 road used in the Project area currently contains culverted watercourse crossings, KNF should address in the DEIS how BMP Roads-6 will be implemented. If watercourse crossings will remain on Management Level 1 roads at the conclusion of Project activities, KNF should identify in the DEIS and the Waiver application how KNF plans to inspect and maintain Maintenance Level 1 crossings after the conclusion of Project activities.

Thank you for the opportunity to comment on the Elk Creek Watershed Project. We would appreciate receiving copies of the environmental documents and wish to remain on the mailing list for future KNF projects.

If you have any questions, please contact Forest Fortescue at (707) 576-2595 or Forest.Fortescue@waterboards.ca.gov.

Sincerely,

Dean Prat, P.G.
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