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First name: Fred

Last name: Blatt

Organization: NCRWQCB

Title:

Comments: On September 22, 2017, the North Coast Regional Water Quality Control Board (Regional Water Board) received a letter from KNF requesting comment on the Craggy Vegetation Management Project (Project) Draft Environmental Impact Statement (DEIS). The Project was developed by staff from United States Forest Service (USFS) to improve defensibility of the nearby communities of Yreka and Hawkinsville from wildfire, improve fire resiliency and improve forest health. The Project is located in the Happy Camp/Oak Knoll Ranger District of KNF.

The purpose of this letter is to provide KNF our comments on the Project DEIS. Additionally, we are providing you with information regarding compliance with Regional Water Board Order No. R1-2015-0021, Waiver of Waste Discharge Requirements for Nonpoint Source Discharges Related to Certain Federal Land Management Activities on National Forest System Lands in the North Coast Region (Waiver). Please see the Waiver of Waste Discharge Requirements section below for more information about the Waiver and Project specific comments.

#### Project Summary

Alternative 2 is the proposed action identified in the Project DEIS. KNF proposes 10,600 acres of treatments within the approximately 29,500 acre Project planning boundary.

The Project planning boundary primarily includes National Forest System (NFS) lands with a few private inholdings. Alternative 2 includes the following proposed activities:

1. 1,400 acres of fuel breaks and roadside fuel treatments;
2. 4,160 acres of prescribed underburning;
3. 900 acres of mastication;
4. 1,330 acres of thinning without removal of forest products;
5. 2,870 acres of thinning with removal of forest products;
6. 12 miles of existing road will be used as temporary roads for short-term access;
7. 2 miles of new temporary road construction; and
8. treatment of legacy sediment sites.

#### Waiver of Waste Discharge Requirements

As background, California state law assigns responsibility for protection of water quality within north coast watersheds to the Regional Water Board. The Regional Water Board implements and enforces the Porter-Cologne Water Quality Control Act ([ldquo]Porter-Cologne Act[rdquo]: Wat. Code, [sect]13000 et seq.) and the Water Quality Control Plan for the North Coast Region (Basin Plan). All KNF projects must comply with all substantive and procedural requirements of the Porter-Cologne Act (Water Code) and the Basin Plan.

The Basin Plan contains water quality objectives, implementation plans for meeting those objectives, and other policies, including State Water Resources Control Board (State Water Board) and federal policies, which are applicable to operations on NFS lands. Water Code section 13260(a) requires that any person discharging waste

or proposing to discharge waste within any region that could affect the quality of the waters of the state, other than into a community sewer system, must file with the appropriate Regional Water Board a report of waste discharge containing such information and data as may be required.

Pursuant to Water Code section 13260, Regional Water Boards prescribe waste discharge requirements (WDRs) except when it finds, pursuant to Water Code section 13269, that a waiver of WDRs for a specific type of discharge is in the public interest.

The State Water Board Policy for the Implementation and Enforcement of the Nonpoint Source Pollution Control Program (Nonpoint Source Policy) requires that nonpoint source discharges of waste be regulated by WDRs, waiver of WDRs, or prohibitions to ensure compliance with the Basin Plan. Additionally, the Project must be in compliance with

any total maximum daily load (TMDL) for the watersheds in which a project will occur.

The Regional Water Board developed and adopted the Waiver as a means for USFS and nonpoint source projects to comply with the Nonpoint Source Policy, the Water Code, and TMDLs. In order to receive coverage under the Waiver, a project must meet specific eligibility criteria and conditions. The proposed Project is a Category B timber harvest project that includes timber harvest and fuel reduction activities. The Waiver is available for review and can be downloaded at the following web address:

[https://www.waterboards.ca.gov/northcoast/water\\_issues/programs/timber\\_operations/timber\\_waiver/](https://www.waterboards.ca.gov/northcoast/water_issues/programs/timber_operations/timber_waiver/)

Please accept the following comments based on our review of the DEIS and draft Specialist Reports:

1. On page 25 of the DEIS, Project Design Feature (PDF) Watershed-16 states:

Perennial streams, even if dry, will not be crossed by skid trails. Intermittent channels may be crossed when dry and at locations designated by the Forest Service.

PDF Watershed-16 states that locations of intermittent skid trail crossings will be designated by USFS staff. Please provide a map depicting the locations of designated skid trail crossings on intermittent streams in the Final Environmental Impact Statement (FEIS) or in the Waiver application for the Project.

2. On page 39 of the DEIS, PDF Watershed-26 states:

Take-offs of temporary roads, skid and swing trails that intersect roads will be obliterated or effectively blocked to vehicle access following unit treatment.

Maintenance Level 1 roads are also 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, which provides guidance for Maintenance Level 1 roads. BMP-6 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.

[bull] Use suitable measures to reduce the risk of flow diversion onto the road surface.

[bull] 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.

[bull] Remove culverts, fill material, and other structures that present an unacceptable risk of failure or diversion.

[bull] 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.

[bull] Use suitable measures to avoid or minimize scour and downcutting.

[bull] 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.

[bull] Use suitable measures to stabilize unstable road segments, seeps, slumps, or cut or fill slopes where evidence of potential failure exists.

If any Maintenance Level 1 road used in the Project area currently contains culverted watercourse crossings, KNF should address in the FEIS how BMP Roads-6 will be implemented. If watercourse crossings will remain on Maintenance Level 1 roads at the conclusion of Project activities, KNF should identify in the FEIS and/or the Waiver application how they plan to inspect and maintain those crossings in the future.

3. Page 104 of the DEIS contains the following passage:

The effects to in-stream sediment would be significant and positive from addressing the legacy sediment sites in the watersheds. Approximately 29,200 cubic yards of potential sediment would be treated through the implementation of a legacy site treatment plan in compliance with the 2015 Waiver.

Please identify in the FEIS if the results of cumulative watershed effects modeling for the Project incorporate the effects of proposed legacy sediment site treatment.

Thank you for the opportunity to comment on the Craggy Vegetation Management 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 feel free to contact Forest Fortescue at (707) 576-2595 or [Forest.Fortescue@waterboards.ca.gov](mailto:Forest.Fortescue@waterboards.ca.gov).