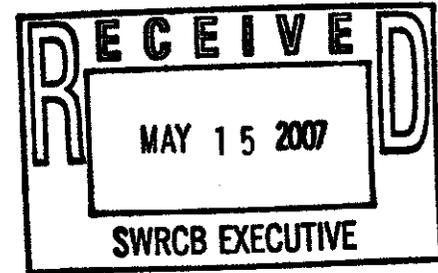


## **KLAMATH RIVERKEEPER**

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Re: Riparian and Wetlands System Protection Policy.

Thank you for the opportunity to comment on the proposed Riparian and Wetlands System Protection Policy. Klamath Riverkeeper supports this process and hopes that good planning and good enforcement policies are put into place as part of this process. We realize that Water Quality Objectives and watershed recovery is not possible in areas like the Klamath River without a policy such as this and applaud the effort. We wish to incorporate by reference the comments of the Coast Action Group and Center for Biological Diversity.

Due to the impacts of non-point sources and hydromodification to the riparian areas and wetlands of the Klamath River, we support alternative 4.

### **The State of the Klamath Rivers Wetlands and Riparian Areas**

California's riparian areas and wetlands are extremely important to the water quality and fisheries of the state. In the Klamath River, where many of the salmon species need riparian areas and flood plains for spawning, and where many people take their drinking and agriculture water from streams these areas are also extremely important. However our wetlands and riparian areas are not in good shape. Channelization, wetland and riparian grazing and streamside and wetland agriculture have effected waterways to the point that much of the riparian vegetation is stripped, agriculture waste regularly pollutes waterways and even wilderness lakes and whole rivers have E.coli present in the water.

The Klamath River is considered a prohibition watershed where point source pollution is not allowed. However many sewage plants are located in the riparian zones and experience flooding in the winter, non-point run-off is virtually unchecked, as is riparian bulldozing, grazing, and farming. Wetlands are regularly drained or used as sumps for chemical and nutrient run-off.

In an area like the Klamath, where the water levels range dramatically due to weather and water diversions, activities such as grazing and farming occur in areas in the summer that are underwater in the winter. Therefore storm run-off from agriculture, especially for the fall storms when fisheries are exposed to pollutants, are very important to the water quality and fisheries survival in the Klamath River.

Basin. In areas like the Lost River and wilderness lakes e.coli exposure is increasingly becoming a health issue due to intensive grazing. Riparian buffers for cows, limits on herd sizes, fencing, and other measures could be used as part of this policy to protect the public's health and beneficial uses of waterways.

### **Physical Integrity of the Aquatic Ecosystem**

Grazing activities within have resulted in altered stream channels that have led to bank erosion, deteriorated channels and increased width-to-depth ratios. Therefore, restoring—or even maintaining—the physical integrity of the aquatic ecosystems requires livestock to be excluded from all riparian areas. Although management practices may be used to reduce grazing-induced damage, riparian areas within the grazing allotments have suffered substantial damage. Respite from grazing in some situations should also be considered.

### **Sediment Regime of the Aquatic Ecosystem**

Grazing within riparian areas damages the physical structure of the water. Stream banks are damaged within the allotments due to grazing damage. Damaged banks result in increased erosion and increased sediment inputs to streams. Stream habitat has been degraded by sediment added from livestock trampling. An increase in sediment input will continue as damaged banks continue to erode. Appropriate management practices may diminish the rate of sediment input, but maintenance and restoration of the sediment regime requires the aquatic ecosystems be given a respite from grazing.

### **Riparian Plant Communities**

Cattle in riparian areas trample and consume aquatic and terrestrial plant species. Consumption and trampling result in the reduction of plant species that is intolerant of cattle-induced disturbance and an increase in the populations of plant species that are tolerant of the disturbance. Adjusting grazing management practices may reduce adverse impacts, but maintenance or restoration of species composition and structural diversity of riparian plant communities requires that riparian vegetation be given a respite from grazing.

Livestock grazing has substantially and detrimentally impacted the health of aquatic resources. Continuing to allow grazing in riparian areas will not restore conditions of the aquatic resources within California.

### **Species Protection**

The impacts of wetland draining, hydromodification, water diversions and riparian agriculture and timber impacts to aquatic species need to be assessed as part of this policy and the greatest protection possible need to apply to areas where fisheries are declining.