

Carter, Katharine@Waterboards

From: Felice Pace <unofelice@gmail.com>
Sent: Thursday, March 27, 2014 2:06 PM
To: Carter, Katharine@Waterboards
Cc: Bruce Campbell; George Sexton; Joe Gillespie; Joseph Vaile; Karuna Greenberg; Kayla Baker; Kyle Haines; Petey Brucker; Susan Bower; Will Harling; Gary Hughes; Luke Ruediger; Barry Hill
Subject: Proposal to delist Canyon Creek (Scott River) above the wilderness boundary

This is a comment for the record on Draft

2012 Integrated Report - 303(d) List & 305(b) Report

Staff has proposed to delist Canyon Creek (Scott River) above the wilderness boundary for sediment and temperature. Here are the applicable criteria for delisting:

"Evidence of anthropogenic alterations to sediment conditions was assessed to determine compliance with the sediment water quality objectives. Sediment reference water bodies must meet the following criteria: 1) road density must be less than 0.19 km/km squared (0.30 mi/mi squared) with no significant failures (this road density value also signifies low past timber harvest intensity), 2) less than 10% of the drainage area is grazed and there are no Best Management Practices violations, and 3) mining activities have no significant sediment inputs. Water bodies with natural disturbance were included in the reference pool as a component of the natural variability in conditions."

Canyon Creek above the wilderness boundary does not meet criteria 2, i.e. more than 10% of this watershed is grazed. Grazing in the Canyon Creek Watershed within the wilderness includes most of Second Valley Creek, Deep Creek, Little Elk Creek and Red Rock Creek. There is extensive private and commercial horse packing use in Sky High and Red Rock Valleys.

Furthermore grazing monitoring I've conducted in this watershed shows that grazing has altered riparian shade - especially willow shade along streams and in wetlands. Grazing has also trampled banks and springs. Additionally, KNF BMP evaluations over the past 15 years (available on the KNF website) show that grazing BMPs on the KNF have not been effective at controlling impacts in about 50% of the cases monitored. This is FS conducted monitoring; 50% is not a passing grade. From these reports it can be inferred that BMP violations have occurred on grazing allotments in the Canyon Creek watershed above the wilderness boundary. If you read the 15 years of reports I'll bet you will find BMP violations in this watershed.

Furthermore, FS conducted a controlled burn in recent history in Red Rock and Sky High portions of the watershed which got out of control and removed lots of shade from Canyon Creek and tributaries within the wilderness. Recovery is in process but is not complete.

This area also has a large amount of recreational use. Cumulatively, grazing, horse packing and recreation have significantly impacted both sediment and riparian shade in Canyon Creek above the wilderness boundary.

For the above reasons this segment of Canyon Creek should not be delisted for either sediment or temperature and is not a good candidate for a reference stream. Because of poorly managed grazing (BMP effectiveness > 50%) KNF watersheds which have substantial grazing should NOT be used as reference streams. Please refer to the KNF's map of grazing allotments to determine which streams the KNF has proposed as reference streams (or which you are using as reference streams) have substantial grazing and therefore should not be used as reference streams.

Streams which would make good reference streams (unless FS has conducted extensive fire suppression within them within the last ten years) include: Wooley Creek, Stanshaw Creek inside wilderness, Etna Mill Creek, Dillon Creek, Upper North Fork Salmon (within wilderness).

Please include this comment in the record.

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"we must always seek the truth in our opponents' error and the error in our own truth."

- Reinhold Niebuhr