



## Quartz Valley Indian Reservation

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Gaylon Lee  
Forest Activities Program Manager  
State Water Resources Control Board  
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### **RE: Comments on USFS Best Management Practices for Road Drainage and Rangeland Management**

Gaylon,

Thank you for this opportunity to comment on the revision to the US Forest Service's existing BMP's for road drainage and rangeland management on National Forest Lands. It is important to tribal communities to address management measures implemented by the USFS that are currently having such a great effect on the degradation of cultural resources. However, pollution prevention goes far beyond just implementing the appropriate BMP. I hope you find these comments useful in determining the best approach to water quality pollution prevention for the attainment of water quality objectives that meet all the beneficial uses of these watersheds.

### **REGULATORY CONTEXT**

We are unclear how these draft BMPs fit into the entire framework of how SWRCB proposes to regulate USFS land use activities. It is clear that BMPs, even if perfectly implemented, would not be sufficient to adequately address the impact of USFS activities on water quality.

A critically important issue that must be addressed is road location, given that roads on steep slopes, in unstable areas, and those near streams pose a far greater

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sedimentation risk than roads on ridge tops. Road density is another key issue. Even if a road system were perfectly designed and maintained (and the USFS system is not), if there are too many roads (i.e. greater than approximately 2-3 miles of road per square mile of land) then there will still be significant sediment and hydrologic effects on aquatic ecosystems. Moreover, due to limited fiscal resources available for road maintenance, the higher the density of roads that exist on the landscape the less chance there is that roads will be adequately maintained.

The best BMPs cannot overcome these factors.

Regarding grazing, the adaptive management framework proposed in the BMPs looks good on paper, but in practice the USFS grazing system has neither protected water quality nor been managed adaptively. For example, monitoring data from 1998-2006 indicate that in all years assessed, the Shackleford Creek and Kidder Creek allotments failed to meet effectiveness monitoring standards or were over-grazed (QVIR 2007). Nonetheless, the USFS proposed to continue grazing the allotments in these watersheds with minimal changes to management (KNF 2007).

The SWRCB's proposed new regulatory structure must set up a mechanism that will avoid such problems in the future.

The draft BMPs appear to be generally well thought-out. In the sections below, we offer some specific suggestions for improving the proposed BMPs.

## **ROAD DRAINAGE**

The objectives on page 1 appear to focus entirely on sediment issues, with no mention of the hydrologic impacts of roads. By short-circuiting subsurface flows and routing them into ditches, roads can increase peak flows and decrease summer base flows. Bringing these sub-surface waters to the surface can also increase water temperatures through exposure to solar radiation and ambient air temperatures. These are some of the important, though often overlooked, hydrologic and water quality effects of roads. We suggest therefore that the objectives be revised to include hydrologic effects. Objective 1 should be revised from "Minimize the erosive effects of water concentrated by road drainage features" to "Minimize the concentration of water by road drainage features and the erosive effects caused by concentration." Additionally, the following new objective should be added: "Lessen the hydrologic impacts of roads."

The draft road BMPs notes “possible adverse affects [sic] on water quality” (page 5) from rolling dips, but then does not elaborate on what those adverse effects are. Given how common plugged culverts are, and the potentially major sediment releases associated with plugged culverts, it is our opinion that techniques like rolling dips that reduce or eliminate the need for culverts would likely have less adverse impacts to water quality than the alternatives.

We were quite surprised to see that Weaver and Hagens (1994) was not mentioned in the references section or cited in the BMP text, as this Pacific Watershed Associates document is perhaps the most widely-used and well-respected handbook for minimizing the sediment and hydrologic effects of wildland roads. What is the reason why this document is not discussed?

### **RANGELAND MANAGEMENT ACTIVITIES**

In the section regarding monitoring requirements for Allotment Management Plans (AMP), on page 4 in the Rangeland Management Planning section, language should be added specifying that photographic monitoring of riparian habitat conditions should be required. Photo monitoring will help assess and track changes over time. Additionally, language should be added specifying that these photographs, as well as all other monitoring data, should be made publicly available on the Internet.

Similar language should be added to the monitoring section of the Rangeland Permit Administration section on page 5, specifying that photo monitoring be included as part of the Annual Operating Instructions (AOI) and that these photos be made publicly accessible on the Internet.

The draft grazing BMPs do not provide specifics about how monitoring of aquatic ecosystems should be conducted. We do not know if it would be appropriate for the BMPs to have such specifics, but if so then we recommend that the techniques and metrics suggestions by QVIR (2007) be included in the BMPs. We have attached that document for your review.

Sincerely,

Crystal Bowman, Environmental Director  
Quartz Valley Indian Reservation

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## REFERENCES

Klamath National Forest. 2007. Draft Kidder Creek and Shackleford Allotment Livestock Grazing Management Environmental Assessment. July, 2007. Scott River Ranger District, Fort Jones, CA. 65 p.

Quartz Valley Indian Reservation. 2007. Comments on the Klamath National Forest's Draft Kidder Creek and Shackleford Allotments Livestock Grazing Management Environmental Assessment. Letter to Peg Boland, KNF Supervisor. QVIC, Ft. Jones, CA. 20 p.

Weaver, W.E., and D.K. Hagans. 1994. Handbook for Forest and Ranch Roads - A Guide for Planning, Designing, Constructing, Reconstructing, Maintaining and Closing Wildland Roads. Prepared for the Mendocino County Resource Conservation District, Ukiah, California. 161 pp. Available online at: [http://www.krisweb.com/biblio/gen\\_mcrd\\_weaveretal\\_1994\\_handbook.pdf](http://www.krisweb.com/biblio/gen_mcrd_weaveretal_1994_handbook.pdf)