



United States  
Department of  
Agriculture

Forest  
Service

Klamath  
National  
Forest

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Matt St. John  
North Coast Regional Water Quality Control Board  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403

Dear Mr. St. John

This letter is in response to the Draft Staff Report for the 2008 Integrated Report for the Clean Water Act Section 305(b) Surface Water Quality Assessment and the 303(d) List of Impaired Waters. The Forest Service agrees with the staff recommendation to de-list Wooley Creek for temperature, and to re-segment Wooley Creek as a separate sub-area of the Salmon River. However, we have concerns with some of the staff recommendations for listing tributary streams to the Klamath River for sediment.

Much of the evidence for sediment impairment relies on the Forest Service cumulative watershed effects models (line of evidence ID: 25696, 25698, and 25697). The report references a model run from 1999 that showed several watersheds over the threshold of concern for sediment (Table 4). Some of the streams in the 1999 assessment were over-threshold due to wildfires that burned the area in 1987. The Forest Service does not consider these watersheds as impaired because wildfires are a natural process that is part of the background sediment supply. In fact, one of the management goals in the Klamath National Forest Plan is the reintroduction of fire where ecosystems have evolved under the influence of wildfire. Regardless of how wildfire is accounted for, a more recent model run in 2004 showed that these watersheds have recovered from the fires and are now below the threshold for all three models. The 2004 assessment was mailed to your staff on March 3, 2009 and a summary of selected streams is shown in Table 1.

In addition to recovery from wildfires, the Forest Service has invested considerable effort in controlling sediment from the road system. The Forest has decommissioned over 30 miles of roads in Grider Creek and storm-proofed another 6.6 miles. In Thompson Creek, 15.6 miles of roads have been decommissioned. As a result, road densities have been reduced to 0.76 in the Grider Creek 6<sup>th</sup> field watershed, and 1.24 in Thompson Creek. The Forest Service does not have recent stream survey data, but we expect that values for embeddedness and fine sediment have been reduced as a result of reduced sediment inputs.

In the Portuguese and Ft. Goff watersheds, sediment loads are almost entirely from background sources and have not been significantly altered by human activities. In-channel conditions in these streams are some of the best available for this geology and channel type, and should be regarded as a reference for more managed watersheds.

The data referenced above shows that four of the parameters used to determine impairment are below the evaluation guideline in nine of the streams listed in Table 4 of the staff report. Using the weight of evidence approach described in the staff report, the available information indicates



that water quality standards have been met in these streams. Therefore, the Klamath National Forest recommends that the beneficial use support ratings be changed as shown in Table 1.

Table 1. Current road densities and model risk ratios from 2004. Risk ratios less than 1.0 are below the threshold of concern.

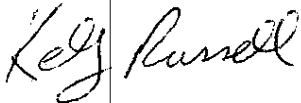
HUC	Watershed	Road Density	Landslide Model (GEO)	Surface Erosion (USLE)	ERA Model	Recommended Rating
18010209010101	Portuguese Creek	0.10	0.37	0.01	0.40	Fully Supporting
18010209010102	Fort Goff Creek	0.009	0.65	0.59	0.42	Fully Supporting
18010206110203	Rancheria Creek	1.02	0.65	0.59	0.42	Fully Supporting
18010206110204	Cliff Valley Creek	0.39	0.35	0.31	0.24	Fully Supporting
18010206110201	Upper Grider Creek	0.37	0.08	0.08	0.08	Fully Supporting
18010206110204	Lower Grider Creek	1.09	0.57	0.25	0.20	Fully Supporting
180102061102	Grider Creek, 6 <sup>th</sup> field	0.76				Fully Supporting
18010209010201	Upper Thompson Creek	0.12	0.05	0.02	0.07	Fully Supporting
18010209010203	Middle Thompson Creek	0.88	0.30	0.12	0.20	Fully Supporting
18010209010204	Lower Thompson Creek	3.33	0.81	0.34	0.36	Fully Supporting
180102090102	Thompson Creek, 6 <sup>th</sup> field	1.24				Fully Supporting
18010206100302	McKinney Creek	4.30	1.31	0.96	0.42	Not supporting

Water quality on the national forests in California has been protected since 1981 through a Management Agency Agreement (MAA) between the State Water Resources Control Board (State Board) and the USFS. This MAA provides for a USFS Water Quality Management Program (WQMP) that is based on Best Management Practices (BMPs) developed for a wide variety of USFS resource-management activities. These BMPs were certified by the State Board and approved by the U.S. Environmental Protection Agency (USEPA).

The State's Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (2004) supports the use of BMPs and MAAs as the primary mechanisms for meeting water quality standards on public lands. As described in this policy, successful MAAs are more efficient than direct regulation by the Regional Boards, limit unnecessary duplication of effort, and leverage limited staffing and financial resources.

BMP implementation and effectiveness are monitored annually by the USFS and reported to the Regional Board. Between 2003 and 2008, BMPs monitored on the Klamath National Forest were found to be effective in 96% of the instances monitored. I therefore feel confident that resource management activities on the Klamath National Forest provide a high level of protection for beneficial uses of water.

Sincerely,



*Sgt* PATRICIA A. GRANTHAM  
Forest Supervisor

cc: Barry Hill