

Craig J. Wilson
LOWQ

REGION 3
FILE



PO Box 167, Boulder Creek, CA 95006 Ph/Fax(831)426-1697 JodiFredri@aol.com

October 26, 2001

Members of the Board
Central Coast Regional
Water Quality Control Board
81 Higuera St., Ste. 200
San Luis Obispo, CA 93401

DWQ Received
Division Chief's Office

MAY 14 2002

Dear Members of the Board,

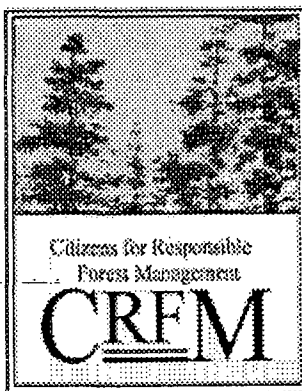
Citizens for Responsible Forest Management urges you to give serious consideration to the comments submitted by the San Lorenzo Valley Water District Board in their September 10, 2001 to this Board. We specifically reference those comments regarding a clarification in the listing of the San Lorenzo River *and its tributaries* as impaired for sediment. We agree that all the tributaries to the San Lorenzo should be considered as impaired and can only conclude from the following excerpt from the Draft San Lorenzo River TMDL Implementation Plan (pg 3), that your staff is also in agreement.

"The listing of the main stem and three tributaries to the San Lorenzo River prompted a watershed-scale analysis of sedimentation in this TMDL.As the receiving water of all its tributaries, conditions in the San Lorenzo River are a reflection of conditions in all tributaries, not just the three listed waterbodies, Shingle Mill Creek, Carbonera Creek and Lompico Creek. Thus, load reductions are necessary in all major tributaries and from all sources. Compliance with the Basin Plan as amended by this TMDL and Implementation Plan must be demonstrated in all waterbodies in the San Lorenzo River Watershed." (emphasis added)

We believe the San Lorenzo Valley Water District Board submission contains sufficient data to enable your Board to do one of the following: 1) change the 303d sediment impaired listing to read, San Lorenzo River and Tributaries, or 2) change the number of miles from 25 (main stem only) to 60 miles. or 3) include a policy clarification statement such as -

"A watershed-scale analysis of sedimentation has shown that conditions in the San Lorenzo River are a reflection of conditions in all its tributaries. Therefore, the listing of the San Lorenzo River as impaired for sediment references and includes all its tributaries."

To further support our assertion that all the tributaries can and need to be included, we submit seven pages of photographs of several of the San Lorenzo River tributaries. The photos were originally submitted by the County of Santa Cruz to the Board of Forestry to encourage that Board to approve special Forest Practice Rules to further protect the water quality and habitat of Santa Cruz County streams. Unfortunately, the Board of Forestry chose not to approve those proposed rules.



PO Box 167, Boulder Creek, CA 95006 Ph/Fax(831)426-1697 JodiFredri@aol.com

August 31, 2001

Angela G. Carpenter
Central Coast Regional
Water Quality Control Board
81 Higuera St., Ste. 200
San Luis Obispo, CA 93401

DWQ Received
Division Chief's Office

MAY 1 4 2002

Dear Angela,

I am writing in regards to the request of the City of Santa Cruz Water Department to list Majors Creek in Santa Cruz County as impaired for sediment. As a 30 year resident of the watershed, I completely concur that the creek is degraded and urge you to list it as impaired for sediment.

Twenty years ago, my then seven year old son used to catch trout in the clear pools of Majors Creek south of Smith Grade. On hot summer afternoons, my friends and family would head for the creek where we cooled off in swimming holes so deep the water covered our heads while standing. Since then those pools have filled with sediment and have never scoured clean. Today, with a few exceptions, one can walk the same stretch of creek without getting ones knees wet.

In addition to the resident trout which inhabit the creek, the watershed supports California red-legged frogs and Western Pond Turtles. I have spotted red-legged frogs on my property and a neighbor, who's property fronts directly on the creek, has also observed red-legged frogs on her land. In addition, I have observed Western Pond Turtles on two separate occasions in two locations at least 1/2 mile apart, close to the banks of the creek.

Over the past twenty years I have observed numerous sources of sediment dump into Majors Creek, the majority a result of human activity. I have spent many hours on foot and on horseback traversing the watershed in and adjacent to the various branches and tributaries of Majors during that time. As Chair of the Sierra Club Forestry Task Force for more than 15 years and as Executive Director of Citizens for Responsible Forest Management, I feel that my observations have been informed and accurate.

Following is a list of various sources that have delivered sediment into the creek in the past (not necessarily in chronological order), including some which continue to be problems.

CULVERT FAILURES

Public Roads:

In 1982 a substantial slide occurred at the Empire Grade end of Smith Grade delivering an unknown quantity of earth and asphalt into the creek system. While the slide was a direct result of the excessive rains that season, neighbors who were present in the early 1950's, when the County re-routed that segment of Smith Grade, chided the engineers because, they said, there was a spring at that exact location. After the road failed in '82, water was observed running at the base of the slide directly under the location of the failed road bed.

In 1998 a major segment of Smith Grade failed at a culvert crossing where a section of the East Branch of the creek crosses the road. This culvert clogged as a result of woody debris most likely deposited as a result of upstream logging. Logging operations in that reach of the creek had been allowed to take place in the "alluvial plane", or the channel of the creek bed itself. This failure also deposited substantial amounts of earth and asphalt into the creek. The culvert has been replaced with another culvert built with a cement headwall.

At the same time, further upstream a second culvert failure (#1) occurred where the creek crosses under Smith Grade. This failure was caused by logging road failure just upslope at a culvert crossing (#2a & 2b) on what is currently State Park lands. Much of that logging road slipped, overwhelming the Smith Grade crossing and forcing the creek to bypass the culvert and undermine the road. The upslope culvert is still in place waiting to fail further.

Private Access Roads:

Two culvert crossings that serve residents south of the East Branch of the creek have failed completely delivering large volumes of earth into the watercourse. One of those failed on three separate occasions, beginning in the early 1980's, and was finally replaced by a bridge, and the other was rebuilt and is currently in place in the creek. A third culvert on private property south of Smith Grade also failed approximately 20 years ago delivering a large quantity of soils directly into the main stem at that time.

Logging Roads:

In addition to the culvert crossing on Grey Whale mentioned above, numerous logging roads criss-cross the State Park lands of Grey Whale Ranch in the watershed of the East Branch of Majors. Several of these culverts plus other segments of road failure along what is know as the Woodcutters Trail (#3a & 3b) are on-going with sediment delivery. In addition, a branch trail off the Woodcutters has several culvert failures (#4), including a culvert delivering water into the opposite bank currently undermining a clump of redwoods and surface erosion which enters the creek. Some of these culverts were installed under CDF approved Timber Harvest Plans and others were illegally installed under CDF approved Firewood Exemptions.

More logging roads exist on the north side of Smith Grade on State Parks land, are not currently being maintained by State Parks, and may also be contributing sediment.

The bridge approach on Grey Whale Ranch which serves the Don Campbell property was put in under a Timber Harvest Plan and is currently used as a residential access road as well as a log haul road. While the Campbells do maintain that road, the crossing approach was cut through a 15' +/- bank of sand just upslope of the creek channel. While currently shored up it has the capacity to deliver sediment into the creek.

OTHER HUMAN ACTIVITIES:

Bank Clearing:

Ongoing clearing of under-story has occurred along a 1/2 mile stretch of creek bank along the west side of the Paisley property (#5). Many of the woody stems up to 5" in diameter have entered the creek contributing to downstream log jams. One such logjam is of such a magnitude as to be a contributing factor in re-routing the stream flow and undercutting the steep creek bank. This section of bank became unstable after the property owner re-opened an old logging road directly above the slide area and the creek below. Large chunks of earth fell into the creek bed as well as trees which uprooted after the road was reopened.

Illegal Logging and other activities:

In the 1980's, 40 acres of the watershed on the Meyer's property along the West Branch of the creek were clearcut with slash deposited directly into Class III drainages (#6), then covered over with soil. Following rains, the soil was washed into the creek and more soil was graded over the uncovered slash. This again washed into the creek. The County required erosion control measures and replanting of the site, but it is unknown how that area has recovered. The slash was not required to be removed from the Class III.

Also, in the 1980's, Paisley placed a pump in the creek and took a bulldozer to the creek bed creating a dam (which failed) from slash in the creek and bulldozed soil from the creek bed. CDFG was informed and stopped any further activity at that location. The pump was abandoned.

A road illegally put in probably as early as the late 1970's, on what is now the Brown's property, failed directly into the mainstem of Majors Creek most likely in the 1980's.

Other roads leading directly to the creek exist on several private properties in the watershed. Many of these are unmaintained and may continue to bleed into the creek.

NATURAL SOURCES

Landslides:

Certainly land-sliding can be considered a natural part of sediment delivery into the creeks of the Santa Cruz Mountains. Two particularly significant slides exist that I am aware of along Majors Creek. The first is on Gray Whale Ranch along a tributary to the East Branch. Contributing factors may include an adjacent trail (previously an old log road) or increased sediment in the creek bed, leading to high flows reaching above bedrock and undercutting the higher sandy soils. The elevated level of the creek bed may be a result of upstream logging activities.

A second area of land-sliding exists in the gorge area further downstream. While it is not clear whether there have been contributing factors to this slide, there is evidence of human activity in that area of the creek including old water lines running along the bank.

Feral Pigs:

Feral pigs are found in large numbers (some groups with as many as 20 pigs) on State Parks lands as well as the private lands of Don Campbell. While feral pigs can be considered 'natural' sources of sediment delivery, they are not a native species and, in fact, were introduced in the past to provide sport for hunters.

The above list is most likely incomplete, but does give a picture of the types of activities which have impacted the creek over the past 20+ years. While the bulk of the watershed is in State Parks hands, there are several residential properties in the watershed. These range in size from 3-365 acres in size. The State owns lands both above and below the privately owned section. Logging activities, access roads, culvert failure and bank clearing are the main impacts from those private parcels.

The main activities on State owned lands which are negatively impacting the creek are the same as those from privately owned lands, minus bank clearing.

I understand that enforcement actions and/or working with property owners to get voluntary compliance may be the quickest way to correct the current problems. However, I do not believe that those measures should replace efforts to list Majors Creek as impaired for sediment. At least 600 acres of private forest land are found within the Majors Creek watershed. A 303d listing of the watershed would require any future timber harvest activities to comply with more stringent Forest Practice Rules. For this reason alone, I believe this creek should be listed. In addition, I would expect that an impaired listing would be useful in accessing funds for restoration efforts.

Enclosed are photos of a number of the hotspots, past and present. I also have a parcel map showing the location of some of the problems areas which I can make available. I would also be happy to take any members of the RWQCB on a tour of these sediment sources.

Thank you for your time and attention to this matter.

Sincerely,

Jodi Frediani
Executive Director