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Walker Creek on the Klamath National Forest - current condition and likely future

Felice Pace <unofelice@gmail.com> Sat, Aug 5, 2017 at 1:46 PM
To: "Matt St. John, EO" <[redacted]>, Patricia Grantham <[redacted]>, Jim Simondet <[redacted]>, "Jeff Marszal, Ranger, HCRD, KNF" <[redacted]>
Cc: Greg Laurie <[redacted]>, Fred Blatt - NCWQCB <[redacted]>, Forest Fortescue <[redacted]>, "Dean Prat, NCRWQCB" <[redacted]>, Don Flickinger <[redacted]>, Will Harling <[redacted]>, Tom Wheeler <[redacted]>, Kayla Baker <[redacted]>, Susan Fricke - Karuk Tribe <[redacted]>, Karuna Greenberg <[redacted]>, Toz Soto <[redacted]>

Dear NCWQCB Executive Officer St. John, NMFS Klamath Supervisor Simondet, KNF Supervisor Grantham and District ranger Marszal,

On August 1st I had the opportunity to inspect conditions and road failure recovery work in the Walker Creek Watershed of the Klamath National Forest. I had been informed at the Happy Camp Ranger Station that the road was open and passable, that is, that I could reach the ridge and descend the Tompkins Creek Watershed. That turned out not be be the case; but I did have the opportunity to inspect roads in the lower 2/3 or so of the watershed as well as some of the completed legacy site and storm failure repair sites. Because it was after work hours; that could be done safely as I confirmed with workers leaving the watershed.

One thing was immediately apparent: there are many road failure sites that were not included in the FS California storm damage on-line map and database. Also evident was the large amount of sediment stored in the lower gradient reaches of stream channels, especially Walker Creek's main channel. It was also clear that the largest road failures delivered sediment to Walker Creek and/or tributaries. The largest landslide failures that delivered sediment to stream channels were from inner gorge road locations. It appeared that the largest and most numerous of these inner gorge road failures were along Road 40N64 which switchbacks as it climbs out of the inner gorge of Walker Creek.



A couple of the inner gorge road failures along Rd 40N64_Walker Creek_8-1-17

In order to understand conditions today it is necessary to review a bit of history. Walker Creek was already roaded and largely cut over when the Northwest Forest Plan was adopted in 1994. Then came the storm event of 1996-1997. There were extensive road failures in Walker Creek watershed. In one of them about 1/2 mile of road slid down the mountain and into the creeks. Among other extensive damage, the private home below the Route 97 Walker Creek bridge was buried up to the window sills with fine sediment (mud). KNF roads were responsible for that and lots of other damage.

After the 96-97 storm event a few roads and road segments were decommissioned. However, roads which were and remain at high risk for catastrophic failure in future storm events were reconstructed or repaired. There has been subsequent "stormproofing" type road treatments but in spite of those there were dozens of road failures in the Walker Creek Watershed during winter 2016-2017 storm events. **Some of the same road system sites that have failed in previous storm events, failed again last winter.** In spite of that, and with the blessing of the NCWQCB and (apparently) NMFS, those same high risk road sites are being reconstructed.

The method by which the legacy inner gorge site near the bottom of FS Road 40N65 has been "fixed" illustrates that Forest Service managers know that that site is virtually certain to fail again.A large culvert was installed with the inlet and outlet areas rock armoured. A rolling dip was also installed but not, as is typical, on top of the culvert but rather immediately below and hydrologically disconnected from the crossing.

The logic of this design is as follows: the crossing is going to fail again. When it does the rolling dip will prevent the water and sediment from going down the road but rather will deliver it to the stream. The cost of reconstruction, and perhaps the amount of sediment delivered to the stream channel, will be reduced. This "legacy" sediment site is, therefore, not "fixed"; it will continue to fail and to deliver large amounts of sediment to Walker Creek in future storm events. The treatment will likely reduce the amount of future sediment delivery; the legacy site is mitigated but not eliminated.

This example illustrates the problematic mature of the NCWQCB's approach to sediment impairments on public and industrial forest lands. The NCWQCB allows FS managers to create new sediment impacts so long as it treats "legacy" sediment sites. But storm events combined with that FS management create more legacy

sites. Furthermore, the legacy site treatments often do not eliminate the site as a sediment source; at best they reduce the sediment consequences of the next road failure.

I wonder how many of the treated "legacy" sites are like the one I inspected, that is, not eliminated by the treatment because they are highly likely to fail again in a future storm event. It appears likely that since the 2014 fire more "legacy sediment sites" have been created than have been "treated" and that a significant number of the same high risk landslide road sites that were "treated" will fail again in future storm events. That is a recipe for ongoing perpetual impairment to the beneficial uses of Walker Creek which each of you is mandated by law and regulation to remove.

If you will refer to the KNF's Geomorphic Database (maps) and to the findings of the KNF's own study (as well as PSW's) of the 1996-1997 storm event on the KNF (DelaFuente, et al.) you will conclude that the sediment impairment of Walker Creek will continue so long as FS managers insist on keeping those high risk, high failure consequence roads. Therefore, the only real "solution" that will provide for the recovery of water quality to standard and of the beneficial uses of Walker Creek, including as coho habitat, is to get rid of more of those high risk/high failure consequence roads.

It is feasible to decommission many of the highest risk highest consequence sediment sites in Walker Creek. Currently both Road 40N65 and Road 40N64 climb from lower Walker Creek, through the inner gorge and on to the ridge systems and Lake Mountain. Both access roads are not needed to access the ridge systems and Lake Mountain Lookout. Therefore, one of those roads, or at least the inner gorge portions, should be decommissioned. It appears that decommissioning the inner gorge portion of FS Road 40N64 would provide the most bang for the buck in terms of eliminating future road failure nuisance sediment delivery to Walker Creek and the Klamath River. Decommissioning the inner gorge portions of Road 40N64 would, i believe, significantly reduce the likelihood that a future storm event will damage private homes and property along lower Walker Creek. Don't the folks in those homes deserve better protection from FS road-related debris flows?

Because eliminating a significant number of high-risk, high sediment consequence roads is the only method to recover the beneficial uses of Walker Creek, including as habitat for Coho Salmon, and to protect private property along the lower reaches of Walker Creek from debris flow impacts, that is what FS managers should do. It is also what the NCWQCB and NMFS should require in order to comply with the laws you a sworn to uphold.

After the 96-97 storm event Klamath Forest Alliance went to court to prevent KNF managers from reconstructing high risk roads likely to adversely impact Coho Salmon without considering options and environmental consequences (see attached article). We won for the FS the ability to consider decommissioning and, if I remember correctly, FS managers were subsequently permitted to use ERFO highway trust funds to decommission or upgrade roads, not just put them back as they were before. Unfortunately, after last winters storms, KNF managers did not conduct the environmental reviews that should have been conducted on road failure sites likely to adverse impact Coho Salmon but rather once again put back problem roads that are likely to fail again and again in future storm events and to significantly adversely affect and "take" Coho salmon. That is a recipe for perpetual impairment.

So how about it? Do you agree that future large storm events will create new legacy sediment sites along Walker Creek Roads as well as result in failure of some of the same legacy sites that failed in 96-97 and again last summer? Do you agree that, as a consequence, Walker Creek will not recover so long as FS managers do not decommission at least some of the high risk, high failure consequence roads? Do you agree that legacy site treatments cannot take away enough of the associated risk and consequences for recovery to occur?

If you do agree than let's do what is needed for recovery to occur. If you don't agree, I'd request that you to provide the thinking and analysis that you believe makes it OK to maintain so many high risk, high failure

consequence roads in the Walker Creek watershed.

The favor of a timely and substantive reply is requested. If you would prefer to discuss this matter on the phone, you'll find my number below.

Felice

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"There's a crack in everything; that's how the light gets in."

- Leonard Cohen

KNF ERFO lawsuit-precedent_frm RoadRipper.doc
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