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Sent: Monday, March 15, 2010 3:47 PM
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Subject: Analysis of Road Rule Task Force plead of March 3, 2010

Attachments: BOFForest Road Constuction and Maintenance Guidelines Appendix A.doc; BOFROAD Construction and Maint. Guidelines Version 2.doc

Pete/Chris--At the last meeting of the Forest Practice Committee I said I would begin to compare the latest version of the proposed road rules against the recommendations of experts on the subject. Attached is an analysis of the proposed rule package verses the recommendations of the Scientific Review Panel, Legon et al, 1999 and the Weaver and Hagans "Manual for Forest and Ranch Roads"

The preliminary conclusion that I reached as a result of this analysis was that although the proposed rule package has a number of improvements, there are still some areas that need strengthening. These are:

- 1.The SRP report identifies the three year limitation of the maintenance period as a major issue. The SRP states that all permanent roads and crossings should be maintained through out their useful life.
2. Providing specific guidance on how roads and crossings are to be hydraulically disconnected from watercourses. The rule package (see Pg 60, 923.6, J (2)) specifies hydraulic disconnection to the extent feasible which could be difficult to enforce. In addition, this section of the rules calls for rocking roads used during the winter where necessary. The question here is who determines when this is necessary? The landowner, CDF, NCWRCB etc. Lastly, this section of the rules (Pg 59) 923.6 (j) (1) states that if visibly turbid water from a road or landing with an inside ditch may reach a watercourse and cause a turbidity increase in the receiving watercourse. In addition, the rule package states that the inside ditch above a crossing can be as long as 300 ft. while the SRP recommends 100 ft. The question here is how will the increase in turbidity requirement be measured and who will measure it? Is there a upper limit for the allowable increase in turbidity (NTU units) in the receiving watercourse?
3. The rule package specifies that new roads need to be no closer than 100 ft. from a WLPZ boundary. Weaver and Hagans recommend for a slope of 50%, a distance of 250 ft between the road and a watercourse. Assuming a Class I buffer of 100 ft. in this case, the Weaver and Hagans recommendation would be 150 ft from the road to the WLPZ boundary not 100 ft.
4. The rule package suggests that roads on slopes greater than 65% would be allowed. Both Meehan and Weaver and Hagans recommend not locating roads on slopes above 50-55%. If it is necessary to locate roads on slopes above 60% then full bench construction with no side cast is the recommended approach.
5. The Road Rules Task Force does not recommend a minimum culvert size while the SRP recommends that the minimum culvert size is 18 inches for crossings and 12

inches for ditch relief culverts.

In order to better understand the scope of the Road Rules Task Force recommendations, I would appreciate it if you could supply me with some additional information. This is a lengthy list so feel free to take whatever time you need to pull it together. Here is the list: I have referenced the page number in the plead within the parenthesis ()

1. A sample of a typical winter operating plan
2. Sample of enforceable road and crossing construction specifications
3. Sample of a crossing upgrade with sensitive conditions (Pg 76, 92313 (i), Pg 91, 923.13 1034 (1) (b))
4. Sample of a crossing design showing how inside ditch drainage is managed and performance standards for ditch drains. (Pg. 52, 923.5 (b) (c))
5. Criteria used to bring existing culverts up to standard i.e. 100 year flow, fish passage etc. Pg 71, 923.11 (c))
6. Specific erosion control measures for roads with grades greater than 15%, 500 ft in length. Pg 92, Amend 1034.16 (ii)(5)(A))
7. Sample from a THP where a RPF has proposed methods of preventing overflow diversions at a crossing. Pg 70, 923.10 (g))
8. Criteria for culvert replacement and analysis method to determine the design of the new culvert, including fish passage considerations.

Hopefully this will not be too much of a burden for you. I appreciate your sending me the list of other road construction resources. I will start reviewing them as well. Also, I talked with Danny Hagans at the Salmonid Restoration Federation conference this week about the road rules package. He was kind enough to offer to attend one of the Road Rules Task Force meetings to discuss the issues that they are working on. Please talk with Tom Spitler to see if this can be arranged.

Thanks,

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