

## Tributary Work Group Comments on Draft Sediment TMDL Allocations

June 14, 2007

Revised July 3, 2007 Parsons response in blue text

Mel Vargas (Parsons, contractor to EPA and DEQ) presented the revisions to the sediment TMDLs as requested by the Tributary Work Group and DEQ at previous meetings. Allocations based on these model revisions were also presented. Additional items identified to be addressed are:

- Add information on where the paved road sediment contribution originated. (*i.e.*, 50% of unpaved road sediment delivery was assumed based on best professional judgment and some literature review)

*Response: Added clarification language to Section 5.3 and pages A-129, A-131.*

In all cases the sediment yield rates for paved roads were considered to be 50 percent less than the rate used for unpaved roads.

This rate was chosen using best professional judgment after a comprehensive review of the literature.

- Add explanation that on the grassland areas it was assumed that no conservation practices were in place.

*Response: Added clarification language to pages A-128, A-129 (RUSLE 2). As a corollary principle, it is assumed that once TMDL implementation is initiated, if it is found that soil erosion conservation practices have been in place, a credit for sediment load reductions achieved by existing BMPs can be incorporated into RUSLE and quantified.*

The inclusion of rural residential grassland with agricultural grassland was an appropriate conservative assumption to apply since it is likely that over a 10-year period this grassland could reasonably be expected to be disturbed, thus generating more sediment load than permanent grassland.

- Add explanation as to whether it is assumed BMPs are in place on forest lands/forest roads.

*Response: Added clarification language to page 77 and A-122.*

The model coefficients used assume that Forest BMPs and practices in compliance with the Idaho Forest Practices Act or better are in place for harvest and forest road construction and maintenance.

- Discuss in implementation section how the city and county will be engaged in implementation since they have not been attending WAG meetings regularly.
  - It was noted that on City owned property in Little Sand Creek that representatives of the City are working with the BLM to identify restoration priorities.

*Response: This is an issue that will be addressed in more detail during the implementation phase.*

- In tables that indicate “0” acres of roads, add a notation that this does not mean there are no roads in the basin, but that the acreage is negligible.

*Response: Added footnote to Tables 5-6, 5-8 and 5-9 and Tables A-3 through A-23 (not in A-17 or A-21).*

**\*\*Note:** While roads are present, the acreage for roads is not provided because the area (acreage) is insignificant when compared to the overall area of the watershed.

- There was discussion regarding the contribution of sediment from harvest estimated in North Gold Creek.

- IDL may review the document and harvest delivery coefficients.

*Response: No revisions needed.*

- It will be noted that the sediment delivery coefficients from harvested areas are conservative when the harvest is on an upland area. The conservative assumption is that all sediment generated has potential for delivery to the stream, while in upland harvest areas it is likely that some of the sediment would be captured by buffers, etc before reaching the stream.

*Response: Added clarification to page A-122.*

For harvested forest lands, the same sediment delivery coefficient was used regardless of whether the harvested area was on sloped or upland areas. This should be acknowledge as a conservative approach since the sediment delivery coefficient is based on the premise that all sediment generated from forest areas has the potential for delivery to a stream, whereas in an upland harvest area it is reasonable to assume that some of the sediment may be captured by riparian areas.

- More explanation of types of harvest that are included in the “harvested area” land designation will be included. It will also be noted that data for harvest were only available from USFS.

*Response: Added clarification language to Appendix A, page A-122.*

To the extent data was available, the effects of forest harvest practices on sediment yield rates were also considered. Using GIS, 76 different forest harvest practices as catalogued by USFS in the Idaho Panhandle National Forest were queried to determine the extent of their use in the watersheds addressed in the Pend Oreille Tributaries Sediment TMDLs. Only nine specific activities listed below were identified in conjunction with the harvesting periods for which data were available.

- There is a data gap regarding harvested areas on private lands.

*Response: Added language to page 63, Section 3.2.*

Given the limited amount of data on forest, agriculture, and urban BMPs utilized in the Upper Pack River, Gold Creek, Rapid Lightning Creek, Sand Creek and Schweitzer Creek, and North Gold Creek watersheds, the modeling approach assumed no sediment BMPs were in place.

Additional information on forest harvesting (date and scale) from privately managed lands would improve modeling of sediment loading estimates in Upper Pack River, Gold Creek, Rapid Lightning Creek, Sand Creek and Schweitzer Creek watersheds.

- Note that areas highlighted in yellow in the draft document that is posted on the web are currently under revision by Parsons. Generally these areas will have additional information added.

*Response: Request that WAG refer to revisions made to Section 2.4 Status of Beneficial Uses.*