

September 14, 2016

Mr. Matt Dias
Executive Officer
California State Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, California 94244-2460

Re: Road Effectiveness Monitoring Funding Request

Dear Mr. Dias:

The California Department of Forestry and Fire Protection would like to request funding for a statistical review of EMC-2015-004, "Effectiveness of Road Rules in Reducing Hydrologic Connectivity and Significant Sediment Discharge."

At the July EMC meeting, it was noted that a statistical review should be performed before a final study design or budget could be completed for this proposal. It is estimated that the cost of a statistical review for this project would cost \$20,000 plus overhead.

The attached Phase I Concept Proposal provides considerable information on the project. This includes background information and justification, objectives, scope, EMC critical questions and FPRs to be addressed, principal investigators and collaborators, and an anticipated timeline

I will serve as the contact person, and can be reached at drew.coe@fire.ca.gov or (530) 224-3274. My mailing address is: California Department of Forestry and Fire Protection, 6105 Airport Road, Redding, CA 96002. Please do not hesitate to contact me with any questions you might have regarding this project.

Sincerely,

Drew Coe
Forest Practice Program Monitoring Coordinator

Project Number: EMC-2015-004

Project Name: Effectiveness of Road Rules in Reducing Hydrologic Connectivity and Significant Sediment Discharge

The following document is a proposal to monitor changes in key indicators of forest road performance that result from the implementation of the “Road Rules, 2013 Rule Package” (Road Rules). Roads can alter hydrologic and geomorphic processes in ways that can adversely impact aquatic ecosystems (Luce and Wemple, 2001). As such, an evaluation of the effectiveness of the Road Rules is vital to assessing the overall effectiveness of the California Forest Practice Rules in protecting aquatic resources.

This proposal is part of a tiered effort (Figure 1) to evaluate the effectiveness of the Road Rules, with a primary focus on evaluating the efficacy of the Road Rules in reducing surface erosion-related water quality impacts across a range of recurrence interval storm events. Road Rule effectiveness for reducing mass wasting and watercourse crossing failures will be evaluated separately using a Large Event (i.e., high recurrence interval, post-mortem) monitoring approach. In addition, we will also propose to implement a number of research effectiveness monitoring studies to more rigorously quantify the effectiveness of the Road Rules in reducing sedimentary impacts relative to narrative or numeric State water quality objectives (i.e., validation monitoring). For example, a research-level road effectiveness monitoring study might directly quantify sediment discharge on a treated connected road segment to determine if the implementation of the Road Rules resulted in a less than significant sediment discharge.

The primary EMC critical question to be addressed with EMC-2015-004 is:

- Theme 3—Road and WLPZ sediment

Are the FPRs and associated regulations effective in: (a) reducing or minimizing management-related generation of sediment and delivery to watercourse channels; (b) reducing generation and sediment delivery to watercourse channels when timber operations implement the Road Rules 2013 measures; and (c) reducing the effects of large storms on landslides as related to roads, watercourse crossings and landings.

Background

Regulatory

The Road Rules, 2013 rule package (Road Rules) was approved by the California State Board of Forestry and Fire Protection (BOF) in January, 2014, and became effective on January 1, 2015. While the Road Rules have many procedural and operational requirements, the Road Rules generally rely on performance standards to achieve the

desired outcome of avoiding or reducing significant adverse impacts to aquatic resources (see 14 CCR § 923 [943, 936] (b)). A major theme of the rule package is to prevent or reduce “Significant Sediment Discharges” from existing and planned roads. Significant Sediment Discharges are defined¹ as:

Soil erosion that is currently, or, as determined based upon visible physical condition, may be in the future, discharged to watercourse or lakes in quantities that violate Water Quality Requirements or result in significant individual or cumulative adverse impacts to the beneficial uses of water. One indicator of a Significant Sediment Discharge is a visible increase in turbidity to receiving Class I, II, III, or IV waters.

In turn, “Water Quality Requirements” are defined as:

A water quality objective (narrative or numeric), prohibition, TMDL implementation plan, policy, or other requirement contained in a water quality control plan adopted by the Regional Board and approved by the State Water Board.

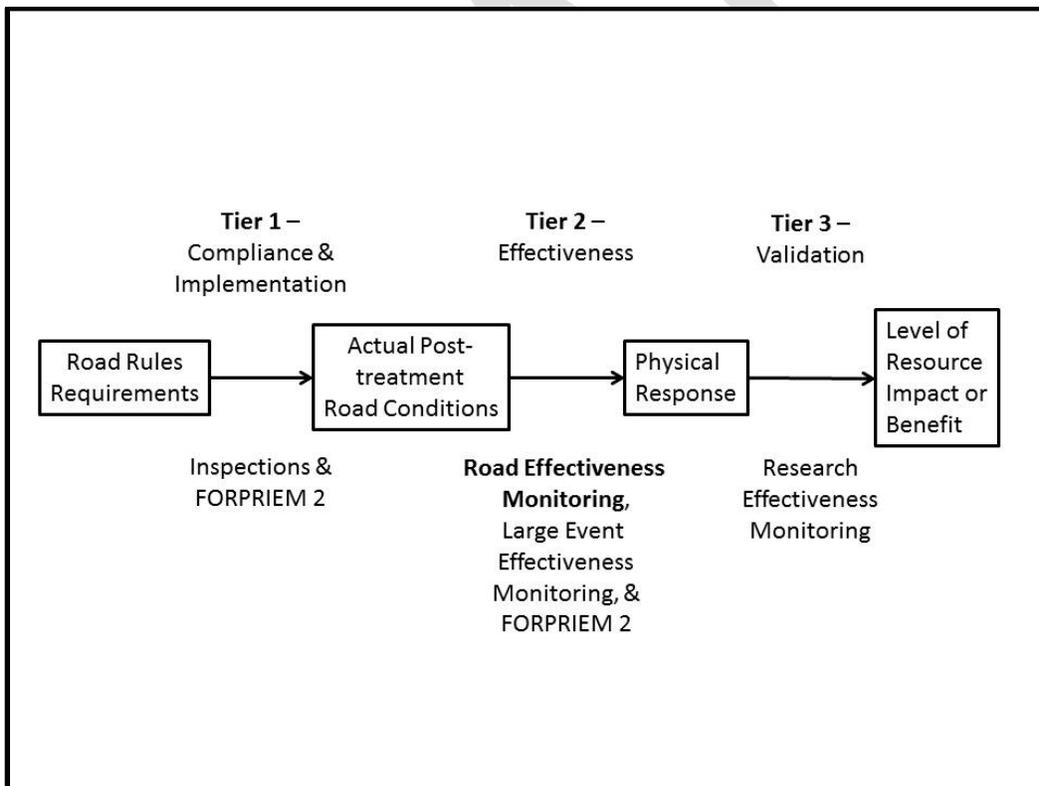


Figure 1. Schematic of a suggested tiered monitoring approach to address the Road Rules (adapted from Veldhuisen et al., 2000 and Raines et al., 2005)

¹ Forest Practice Rule definitions are found in 14 CCR § 895.1.

Under the Road Rules, the first step in eliminating or reducing Significant Sediment Discharges and complying with water quality regulations is to identify “Significant Existing or Potential Erosion Sites”, which are defined as:

A location where soil erosion is currently, or there are visible physical conditions to indicate soil erosion may be in the future, discharged to watercourses or lakes in quantities that violate Water Quality Requirements or result in significant individual or cumulative adverse impacts to the beneficial uses of water.

Once the Significant Existing or Potential Erosion Sites are identified, the rule language in 14 CCR § 923.1 [943.1, 936.1] (e) (1, 2, and 3) requires the RPF to submit an inventory of Significant Existing or Potential Erosion Sites along with a description of feasible treatment(s) to mitigate significant adverse impacts from roads and/or landings.

Treatments for Significant Existing or Potential Erosion Sites focus on “hydrologic disconnection”, which is defined as:

The removal of direct routes of drainage or overland flow of road runoff to a watercourse or lake.

If Significant Existing or Potential Erosion Sites cannot be hydrologically disconnected, 14 CCR § 923.5 [943.5, 936.5] (i) requires the use of erosion control measures to prevent Significant Sediment Discharges:

Where logging road and landing surfaces, road approaches, inside ditches and drainage structures cannot be hydrologically disconnected, and where there is existing or the potential for significant sediment discharge, necessary and feasible treatments to prevent the discharge shall be described in the plan.

Altogether, the Road Rules require a stepwise process to identify and treat erosion sources that pose a risk to aquatic resources, and this process is illustrated in Figure 2. In the context of this study, effectiveness of the Road Rules will be assessed based upon the degree to which roads/landings are disconnected from the watercourse network after implementation of the rules.² Changes in the controlling variables or conditions that drive sediment production will be assessed for hydrologically connected road segments so that the relative magnitude of sediment delivery can be estimated.

² Guidance on how to achieve hydrologic disconnection is provided in Technical Rule Addendum No. 5 and in Weaver et al. 2014.

Technical

A monitoring methodology for evaluating the effectiveness of the Road Rules should account for the important factors controlling road sediment production and delivery. Road erosion is the result of the interaction between erosive forces, such as rainfall intensity and runoff energy, and the availability of erodible sediment (Reid and Dunne, 1984; Luce and Black, 1999; Ziegler et al., 2000). Road design plays an important role on runoff erosivity because sediment transport capacity is proportional to road drainage spacing (Luce and Black, 1999) and the shape and width of the road tread can influence runoff patterns (Burroughs and King, 1989). Factors that influence erodibility include native soil characteristics, aggregate quality, road gradient, road age, grading, and vehicle traffic rates (Megahan, 1974; Burroughs and King, 1989, Luce and Black, 2001a; Ziegler et al., 2000; Reid and Dunne, 1984; Luce and Black, 2001b; Megahan et al., 2001).

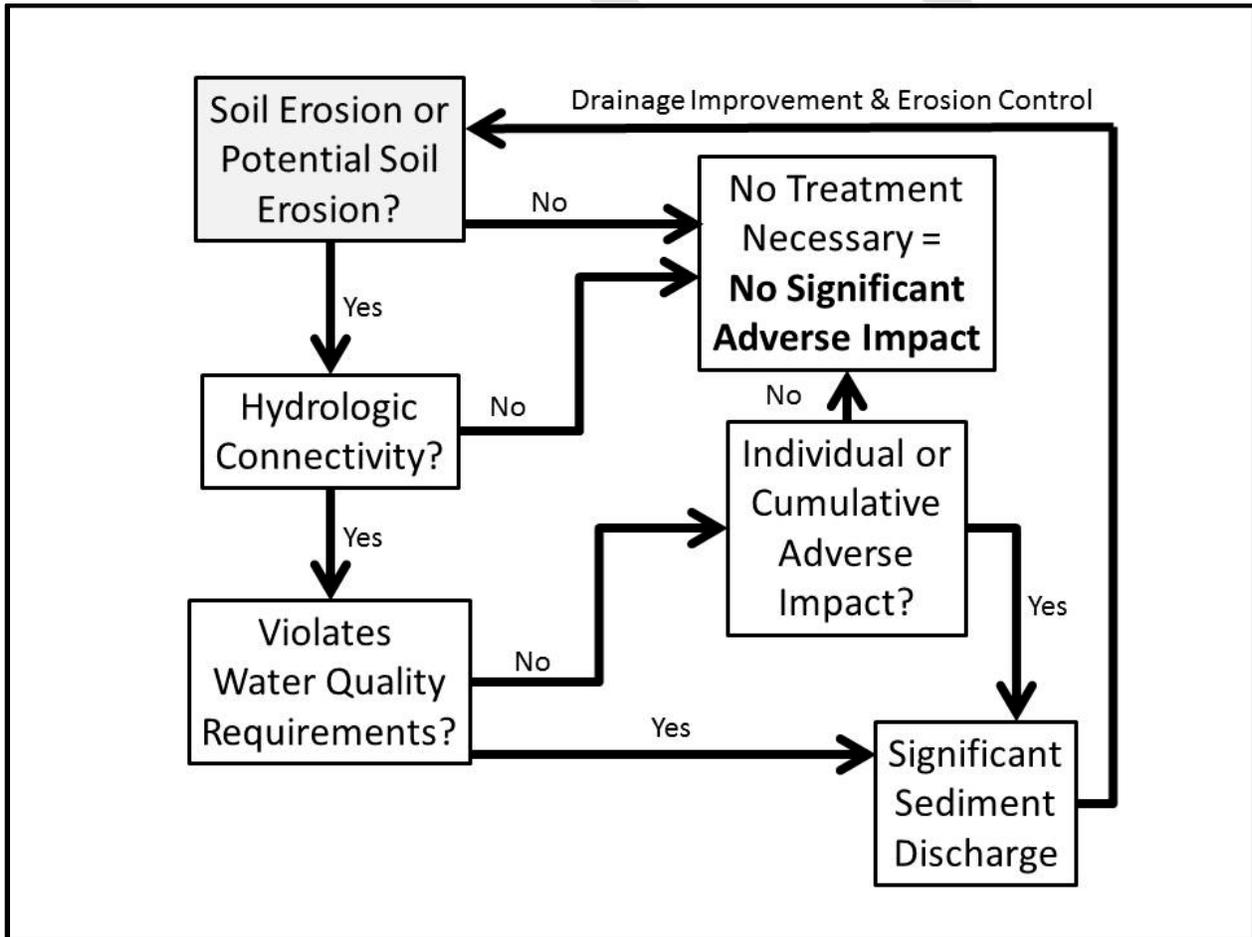


Figure 2. The stepwise process for avoiding or reducing significant adverse impacts to aquatic resources as required by the Road Rules.

The likelihood of resource damage from road-generated sediment is not only related to the magnitude of road erosion and runoff, but also the degree of linkage between road sediment sources and the watercourse network. According to the Road Rules, road sediment that is not delivered to the watercourse network does not constitute a significant adverse impact to aquatic resources. Therefore, the extent to which the Road Rules are effective in preventing resource impacts is largely dependent on road connectivity, or hydrologic connectivity, to the watercourse network.

General Monitoring Approach

This monitoring proposal will address how effective the Road Rules are at decreasing the magnitude of erosion, runoff, and sediment delivery at the road segment and plan scale.³ Uncertainty regarding the effectiveness of the Road Rules can be addressed by posing the following general monitoring questions:

General Monitoring Question 1: How many of the THPs are already in compliance with the road rule package (statewide and by region)?

General Monitoring Question 2: Have road attributes that affect surficial sediment production (i.e., surface erosion) and delivery improved after implementation of the Road Rules?

Since the connectivity and erosion potential of the connected road segment controls the potential for significant sediment discharge and rule compliance, these questions can be addressed through the development of the following specific monitoring questions:

Specific Monitoring Question 1: Has the length/area/percentage of roads draining to watercourses decreased after the implementation of the Road Rules?

Specific Monitoring Question 2: Have the road attributes affecting surface erosion for connected road segments improved since the implementation of the Road Rules?

These specific monitoring questions allow us to generate some initial testable hypotheses such as:

³ Some data on previous road rule requirements and their effectiveness exist from past monitoring work conducted as part of the Hillslope Monitoring Program (Cafferata and Munn, 2002). For example, 85% of gullies recorded on randomly located road transects and 70% of rills documented were judged to be caused by road drainage feature problems. Highly erodible surface material and steep road gradient were also frequently cited causes of rilling (see Table 11). Data collected from the FORPRIEM monitoring program (Brandow and Cafferata, 2014) may be able to be used to beta test some of the parameters being considered for Road Condition Monitoring.

H₀ 1: No reduction in road drainage connectivity to streams has occurred since implementation of the Road Rules.⁴

H_A 1: Road drainage connectivity has been reduced after implementation of the Road Rules.

H₀ 2: No improvement in road attributes that affect sediment production for connected road segments has occurred since implementation of the Road Rules.

H_A 2: Improvement in road attributes that affect sediment production for connected road segments has occurred since the implementation of the Road Rules.

Testing these hypotheses requires collecting road information at the THP/plan scale for hydrologically connected road segments. We will attempt to collect information on the conditions (i.e., variables) that drive sediment production and delivery pre- and post-Road Rule implementation.

The preliminary list of proposed monitoring variables is listed below (Table 1). Arrows indicate the dependence of sediment production and sediment delivery on increases in each road attribute (e.g., sediment production goes up as road length increases). These data can be used to test the null hypotheses presented in the preceding section. Changes in hydrologic connectivity can be measured pre- and post-treatments (Figure 3) to determine if there is significant reduction in road-to-watercourse linkage. Attributes influencing the relative magnitude of sediment delivery for connected road segments will also be tracked (Figure 4). If present, connected erosion features will be characterized and quantified using techniques similar to those from the Battle Creek Task Force Report (2011). For instance, the presence of rilling, gullying, or mass wasting will be noted and delivered sediment volume will be estimated.

Additionally, the data can be integrated into a single metric of sediment production through the use of models (e.g., SEDMODL2, Road:WEPP, GRAIP Lite). The benefit of modeling sediment production is that it incorporates the suite of interacting practices used to decrease road sediment production (e.g., road rocking and improved drainage). The disadvantage of modeling sediment production is that the absolute values of model outputs can be taken out of context. As such, it is suggested that modeled outputs be presented in a relative fashion, such as a percentage increase or decrease in sediment production relative to pre-implementation.

⁴ Hydrologic disconnection has been required for areas governed by the Anadromous Salmonid Protection Rules since 1 January, 2010.

Table 1. List of independent variables that control sediment production and delivery from roads. Arrows indicate the dependence of sediment production or delivery on increases in each road attribute.

Independent Variable	Sediment Production	Sediment Delivery
Road length	↑	↑
Road slope	↑	↑
Road width	↑	↑
Road drainage configuration (e.g., road shape - crowned, insloped, or outsloped)	↕	↕
Road surface (e.g., depth, hardness, breakdown components)	↓	↓
Wet weather traffic	↑	↑
Presence of erosion features (e.g., gullies) or ruts	↑	↑
Ditch length	↑	↑
Ditch width	↑	↑
Ditch condition	↕	↕
Soil type/erodibility	↕	↕
Drainage outlet condition	↕	↕
Cutslope height	↑	↑
Cutslope angle	↑	↑
Cutslope cover	↓	↓
Fill height	↑	↑
Fill cover	↓	↓
Distance from watercourse	↓	↓
Hillslope angle	↑	↑
Number of stream crossings	↑	↑
Road length connected to stream	↑	↑
Length of rocked road connected to stream)	↓	↓
Length of road abandoned/deactivated	↓	↓
Filter strip condition	↕	↕
Road construction quality/compaction	↕	↕
Watercourse Class	↕	↕

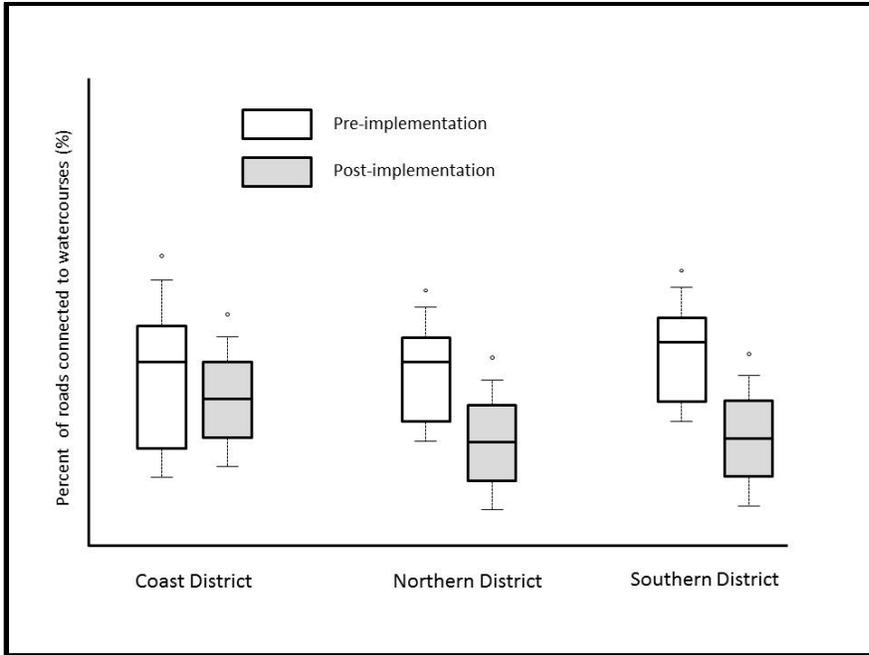


Figure 3. Hypothetical change in hydrologic connectivity for Timber Harvesting Plans by Forest Practice District pre- and post-implementation of the Road Rules. Reducing the length of connected roads decreases the likelihood for significant sediment discharges.

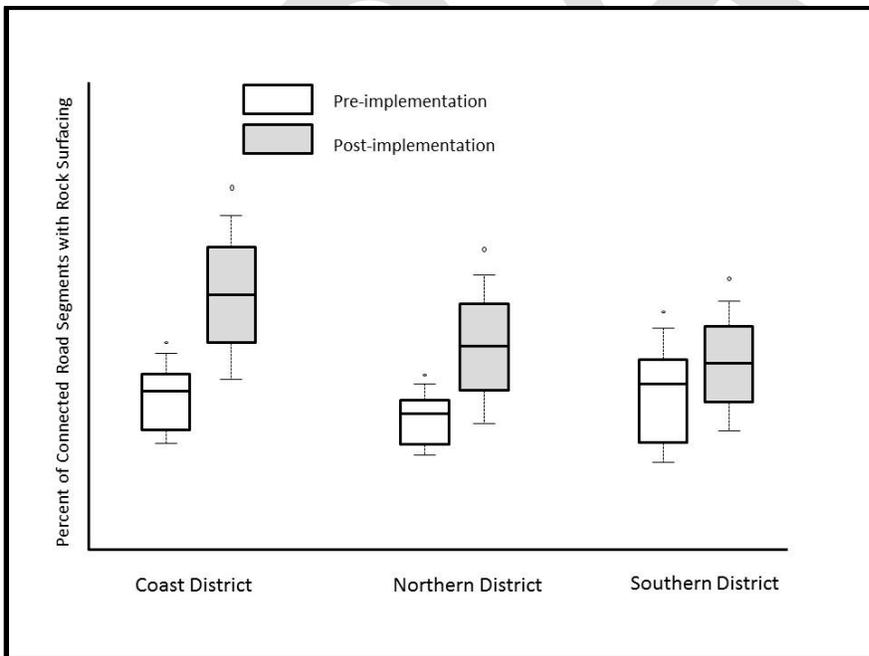


Figure 4. Hypothetical change in the percent of hydrologically connected road length with rock surfacing. An increase in the percent of connected road segments with rock surfacing will result in a lower likelihood of significant sediment discharge.

Sample Methods

Sampling will be performed pre- and post-treatment at the THP/plan scale. Sampling protocols and other statistical considerations will be formalized in the study design following consultation with a statistician. THPs and other types of harvesting documents (i.e., NTMPs, MTHPs, PTHPs) will be selected using a stratified random approach similar to that proposed for FORPRIEM ver. 2.0.⁵ Ideally, a contractor with earth science expertise could be hired to collect the field data, analyze the data, and produce preliminary and final reports.

Application in a Large Event Setting

The same concepts discussed above can also be applied following high magnitude disturbance events. For instance, pre- and post-winter changes in connectivity and road conditions can be assessed in areas subjected to wildfire or large stressing storms. The conceptual approach will be applied to the Boggs Mountain Demonstration State Forest road network (approximately 29 mi) to determine if the Road Rules are effective in achieving the desired outcomes in a post-fire setting.

Resource Benefit

This study will provide an opportunity to consider road improvement costs, likely collected as self-reported data on the sections found where the roads were upgraded to comply with the Road Rules package requirements. Costs could be collected per unit (e.g., mile) and then benefits assessed with the costs. While several different variables exist (e.g., high costs due to remote locations and distances for hauling rock, existing poor condition of legacy roads), it would be useful to look at the range of costs and the relationships between cost and effectiveness.

Principal Investigators and Cooperators

Drew Coe from the California Department of Forestry and Fire Protection will be the principal investigator (PI). Co-PIs will include Dr. Kevin Boston (Oregon State University), William Short (CGS), and Regional Water Quality Control Board staff. Partners from private industry are a possibility too.

Timeline

A statistical consultation will occur fall 2016 / winter 2017. A full study design will be written by the spring of 2017. A proposal to fund the full study design will occur in spring 2017. We anticipate two to three seasons of sampling, with results being reported in 2019/2020.

⁵ See the project proposal for FORPRIEM ver. 2.0. (EMC-2015-002).

Funding

This project will require funding for a consulting statistician, and this is estimated to cost approximately \$20K plus overhead. Once a sample size is determined, an approximate budget for the project can be determined. Funding for a contractor to perform the assessments will be necessary to perform the work. Cost estimates will be finalized in the study design phase.

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