STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway Coeur d'Alene, ID 83814
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Brad Little, Governor
Jess Byrne, Director

December 13, 2021

By email: Kerry.arneson@usda.gov

Kerry Arneson
US Forest Service Idaho Panhandle National Forests, Supervisors Office
3232 West Nursery Road
Coeur d'Alene, ID 83815

Subject: Idaho Department of Environmental Quality Comments on the proposed Character Fire Salvage Project.

Dear Ms. Arneson:

The Idaho Department of Environmental Quality (DEQ) has reviewed the project documents for the proposed Character Fire Salvage project (Project). We offer the following comments:

DEQ understands the agency's urgency to meet the following objectives[1]:

- Recover economic value of forest products in a timely manner to contribute to employment and income in local communities and avoid loss of commodity value.
- Reduce hazards threatening human health and safety.
- Re-establish forested conditions and/or facilitate recovery to meet management objectives outlined in the Forest Plan.

In meeting these objectives, DEQ encourages the Forest Service to design and implement the Project such that Idaho's beneficial uses are protected to the extent practicable.

Consistency with TMDLs

Project activities must be consistent with load allocations specified in the applicable Total Maximum Daily Loads (TMDL) for surface waters in the Project area (IDAPA 58.01.02.055.05). Where TMDLs require a load reduction, the proposed activity must show a net decrease in the pollutant(s) of concern, and the full amount of load reduction should occur within a reasonable timeframe. Water bodies that may be impacted by salvage efforts, as well as their status[2], are listed in Table 1. While sediment and temperature are the primary pollutants of concern for this project, DEQ requests that the Forest Service also consider the potential presence of metals in watersheds where those metals are contributing to beneficial use impairment.

[1] From the *Character Fire Salvage and Restoration Project Interested Party Scoping Letter*.
[2] Take from Idaho's 2018/2020 Integrated Report, accessed at http://mapcase.deq.idaho.gov/wq2020/.

Table 1. Status of water bodies within the Project area that do not support the Cold Water Aquatic Life beneficial use, listed east to west.

Water Body Name	Assessment Unit	Pollutant(s) causing impairment	TMDL
West Fork Eagle Cr.	ID17010301PN008_02	Temperature	Temperature
Eagle Cr.	ID17010301PN007_03	Sediment	Sediment
Prichard Cr.	ID17010301PN004_04	Cadmium, Lead, Zinc, Sediment, Temperature	Sediment, Temperature
North Fork Coeur d'Alene R.	ID17010301PN001_05	Flow regime modification, Physical substrate habitat alterations, Sediment, Temperature	Sediment, Temperature
Beaver Cr.	ID17010301PN003_03	Cadmium, Lead, Zinc, Sediment, Temperature	Sediment, Temperature
Carpenter Cr.	ID17010301PN003_02	Cadmium, Zinc, Sediment, Temperature	Sediment, Temperature
Cedar Cr.	ID17010301PN001_02	Temperature	Temperature
Cinnabar Cr.	ID17010301PN001_02	Temperature	Temperature

Portions of the planned clearcuts in this project are in close proximity to the North Fork Coeur d'Alene River in Assessment Unit (AU) ID17010301PN001_05. This AU has a TMDL for sediment and temperature. The portion of the river near the turn-off to Old River Road on the west side of the river is at the toe of a steep mountain slope with very little riparian buffer to protect the river from upslope disturbances. Clear cutting with heavy machinery in this area may lead to a significant increase in sediment delivery, which is not aligned with TMDL goals. The use of Best Management Practices, retaining uphill vegetation, and timing activities appropriately to avoid surface run-off during the salvage operation is highly encouraged.

The Project includes plans to plant desirable species in non-harvest areas, including riparian areas. DEQ is supportive of this project component and encourages the Forest Service to perform such activities near water bodies that have been assigned a temperature TMDL or are otherwise impacted by thermal loading.

Mining and Metals

This area is heavily influenced by historic and active mining activities. Metals, including cadmium, lead, and zinc are contributing to beneficial use impairment in some water bodies (Table 1). Disturbance from Project activities has the potential to mobilize and transport metals to surface water in areas that have been impacted by mining. Is the Forest Service aware of mining activities — historic or ongoing — that have taken, or will take place within the Project area? For example, does the Forest Service have active leases within, or adjacent to the project area?

Agency Coordination

DEQ appreciates coordination with US Forest Service staff. If you have questions regarding these comments, please contact Chantilly Higbee by calling (208) 769-1422 or via email at Chantilly.Higbee@deq.idaho.gov.

Sincerely,

Chantilly Higbee
Water Quality Compliance Officer
Idaho Department of Environmental Quality