IDAHO CONSERVATION LEAGUE

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Palouse Ranger District
Attn: Jeffery Lau, Acting District Ranger
1700 Highway 6
Potlatch, ID 83855

February 2, 2023

Dear Jeff Lau:

I am writing on behalf of the Idaho Conservation League (ICL) to comment on the proposed Action for the Longleaf Project. ICL has been protecting Idaho's environment since 1973. We represent over 25,000 members and advocates who care about Idaho's land, water, air, fish and wildlife. ICL protects these values through public education, outreach, advocacy and policy development.

Purpose and need

The stated purpose of the Longleaf project is "to reduce the risk from, and extent of, insect and disease agents within the project area and to move the forest toward the desired future conditions as described in the Clearwater Forest Plan" (Scoping Notice, page 5). In order to achieve these goals, the Forest Service proposed 1,605 acres of regeneration timber harvest, 207 acres of commercial thinning, and 1,488 acres of non-commercial treatments.

Other project objectives listed in the Scoping Notice include:

- Address insect and disease infestations with appropriate treatment prescriptions.
- Plant western white pine, ponderosa pine, western larch as appropriate for site potential, and maintain western redcedar where feasible within the project area, to improve resiliency of the landscape to future disturbance.
- Determine long-term transportation needs including a road system that can be efficiently maintained while minimizing impacts to resources.
- Decrease sediment sources to maintain or improve water quality and aquatic habitat.
- Manage natural fuels accumulations and treat activity generated fuels.
- Provide forest products that contribute to the sustainable supply of timber products from National Forest System lands.
- Where appropriate, enhance existing Pacific yew and retain large and/or decadent western redcedar for cultural and wildlife benefit.

(page 7).

ICL appreciates the fact that the Forest Service has identified the need to reduce sources of sediment from national forest lands in the project area. As discussed below, Long Meadow Creek is listed as an impaired waterway under the Clean Water Act (CWA) due to the unnaturally high sediment loads in the watershed. The Forest Service has identified approximately 5.4 miles of road decommissioning to help with this goal. However, we suspect that more is needed. In fact, we are concerned that any reductions in sediment loads achieved through the proposed road decommissioning will be off set by the amount of proposed new and temporary road construction (1.3 miles and 27 miles respectively).

We also note that Long Meadow Creek and Elk Creek are listed as impaired due to nutrients. Grazing appears to be a major contributor to these high nutrient loads. The Forest Service should consider whether or not to reduce or eliminate grazing or change grazing management practices in the project area in order to comply with the nutrient and bacteria loads required under the CWA.

Just as much weight should be given to restoring water quality and fish habitat in the Longleaf Project area as responding to the conditions of the forest.

Water quality

Congress passed the Clean Water Act (CWA) in 1972. The purpose of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters" through the reduction and eventual elimination of the discharge of pollutants into those waters. 33 USC § 1251(a). In addition, the CWA establishes an "interim goal of water quality which provides for the protection and propagation of fish, shellfish, and wildlife." Id. at § 1251(a)(2).

To meet these goals, the CWA requires the establishment of water quality standards. Water quality standards are promulgated by the states and establish the desired condition of each waterway within the state's regulatory jurisdiction. 33 USC § 1313(a). Water quality standards under the CWA are required to include three elements: (1) one or more designated "uses" of that waterway; (2) water quality "criteria" specifying the amount of various pollutants that may be present in those waters and still protect the designated uses, expressed in numerical concentration limits and narrative form; and (3) an antidegradation policy (with implementation methods) to protect all existing uses. 33 USC §§ 1313(c)(2), 1313(d)(4)(B); 40 CFR Part 131, Subpart B.

Section 303(d) of the CWA requires all states to identify and prioritize water bodies that do not meet water quality standards. For those water bodies on the § 303(d) list, states must develop water quality improvement plans, called total maximum daily loads (TMDLs). TMDLs specify the pollutant load reductions needed in order for those water bodies to achieve water quality standards and fully support designated beneficial uses.

The Longleaf Project is located in the Long Meadow and Elk Creek Watersheds. The Idaho Department of Environmental Quality's (IDEQ) CWA § 305(b) Status Report (2016) lists the beneficial uses of these waterways. Existing beneficial uses of Long Meadow Creek are salmonid spawning, cold water, and secondary contact recreation. Designated beneficial uses are cold water and secondary contact recreation. (IDEQ, 2002). These beneficial uses have been impaired by sediment, temperature, nutrients and bacteria.

The primary sources that contribute sediment to Long Meadow Creek above the natural background rates are roads, mass failures, and streambank and riparian area erosion (Table 1). Roads contribute

2,366 tons of sediment per year, streambank and riparian erosion contributes 370 tons per year, and mass failures contribute 268 tons per year. In comparison, the natural background sediment load is 1,402 tons per year.

Table 1. Sediment nonpoint source load allocations for Long Meadow Creek. (Adapted from IDEQ, 2002).

Source	Pollutant	Load allocation (tons/year)	Load reduction (tons/year)	Time frame for meeting allocations (years)
Roads	Sediment	674	1,691	5
Mass failures	Sediment	27	241	5
Bank erosion	Sediment	185	185	5

The 2002 TMDL for the Lower North Fork Clearwater Subbasin calls for a sediment load reduction from roads in Long Meadow Creek of 1,691 tons per year. Furthermore, IDEQ recommended that "new road construction should be limited as much as possible in this drainage to ensure the goals of the TMDL are met." A five-year timeframe for attainment of this load reduction was set. However, Despite the preparation and approval of a TMDL Implementation Plan in 2004, Long Meadow Creek remains listed as impaired due to sediment. ICL does not have access to information to determine what sediment load reductions have occurred since the approval of the TMDL and Implementation Plan, if any. It is also unclear what share of this load reduction the Forest Service is responsible for, but the agency's land holdings in the watershed encompass a significant portion of the drainage.

The Forest Service should work with the Idaho Department of Environmental Quality in an effort to quantify what sediment load reductions have occurred in the Longleaf Project Area, if any. The two agencies should also attempt to determine if additional sediment load reductions are needed to achieve the load reductions listed in the TMDL and what share of those load reductions the Forest Service will be responsible for. This information should be discussed in the environmental analysis, and if Forest Service sediment load reductions are needed, then the agency should incorporate actions into the Longleaf Project to achieve those sediment load reductions. The Forest Service may also have to consider reducing the amount of proposed road construction and timber harvest.

The environmental analysis should also describe how the project complies with the water quality standards in the Clearwater Forest Plan.

I would like to thank you for the opportunity to comment on the Longleaf Project. I look forward to reviewing the environmental analysis and continued engagement in the planning process. Please feel free to contact me if you have any questions about my comments.

Sincerely,

Brad Smith
North Idaho Director

References

Idaho Department of Environmental Quality. (2002). *Lower North Fork Clearwater River Subbasin Assessment and TMDL*. Lewiston, ID.

Idaho Department of Environmental Quality. (2004). *Lower North Fork Clearwater River Sub-basin TMDL Implementation Plan*. Lewiston, ID.