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Comments: The Washington State Department of Ecology (Ecology) appreciates the opportunity to provide comments on the Colville National Forest (CNF) Draft Revised Land and Resource Management Plan. As the designated state agency for carrying out the federal Clean Water Act (CWA) in Washington, our interests are focused on the plan elements that affect water quality protection.

Ecology recognizes the considerable effort that has gone into developing the draft plan and its supporting documentation. We further understand the considerable challenge it is to develop a plan that protects and restores the natural health of the CNF while also satisfying the interests of the diverse mixture of commercial and recreational users. We also want to note our appreciation for the CNF producing a draft plan that increases the overall level of water quality protection. Notwithstanding these recognitions, there are elements of the draft plan which create some troubling questions about whether water quality will be adequately protected.

Our concerns are generally framed by the following three issues:

- 1.The need to make it very clear in the plan that projects need to provide protection, equal or better than, that needed to meet the state's surface water quality standards.
- 2.The need to set more ambitious schedules for accomplishing road improvements.
- 3.The potential problem created by having vague and potentially lenient standards for the level of disturbance allowed within Riparian Management Areas (RMA).

Ecology cannot use the current CNF Plan and the programmatic Environmental Impact Statement (EIS) documents to reach a reasoned position that the forest will be managed in a manner that ensures state and federal programs established under the Clean Water Act will be attained. Ecology understands some decisions are best made at the site level, and we appreciate the statements in Chapter 3 of the DEIS which explain the intention to work with the state to bring waters into compliance with state water quality requirements. However, the broad statements describing desired conditions and objectives that are contained within the plan itself could be a source of conflict with meeting state regulatory targets. The plan should make clear that objectives are to be implemented at the project level in a manner consistent with meeting the state surface water quality standards (WAC 173-201A), and the programs established under the federal Clean Water Act to apply those standards. This includes meeting the water quality improvement targets established in the Total Maximum Daily Loads (TMDLs) and associated implementation plans for temperature and fecal coliform established for the Colville National Forest. This could be accomplished by strengthening the language in the project level direction statement to make it clear that state water quality standards would need to be complied with at the project level.

Determining the sufficiency of the plan to protect water quality and aquatic resources is complicated by the lack of site level requirements and the reliance on broad goals and objectives as the foundational guidance for implementing the preferred alternative. The plan contains desired condition targets that are problematically vague; (e.g. "maintained to prevent accelerated erosion", "in the range that maintains . . . integrity", "within the natural range of variation"). These are not meaningful targets. Because natural systems vary from healthy to unhealthy, these forms of general targets provide no practical directive. The plan sometimes pairs these targets with guidelines that seem to allow for broad choices in impact levels; (e.g. for sediment erosion the level of sediment disturbance is shown to go from low to very high erosion class - 30-75% loss of ground cover). Not only are these desired conditions vague, they are described in the plan as being only aspirations and not commitments to implement these goals and objectives at the project level. So again, they are not really useful targets to guide management, or to understand what level of management the CNF is proposing.

It is of note that where the state water quality standards are identified in the DEIS, they are not complete or accurate. The table summarizing water quality criteria in the DEIS leaves out important criteria and the state's CWA-mandated antidegradation rules. One example is the table lists only the 16°C temperature criteria while

some of the streams on the forest (mostly in the Pend Oreille watershed- WRIA 62) are now covered by a 12°C char spawning and rearing criteria. If the information in the DEIS is not accurate, it raises the question of what the CNF staff have been and will be using to determine site level objectives in implementing the plan.

Where the CNF Plan is explicit, it includes some potentially damaging standards for management. Based on the DEIS, it is clear the CNF managers understand that grazing contributes to an existing problem with providing healthy water quality and stream habitat/structure. As noted in the DEIS, Ecology and the CNF have been working to implement a CWA based Total Maximum Daily Load (TMDL) for temperature and fecal coliform pollution affecting streams on the CNF. It is surprising therefore that no significant changes are noted for grazing intensity in these riparian areas, and no desired conditions are included that relate to increasing shade or reducing fecal pollution. Rather than develop a plan towards reducing the water quality problems associated with grazing riparian areas, the plan allows grazing at an intensity that would damage 25% of the stream banks and remove much of the brush along the stream. This infers a rather frequent presence of cattle in and along the streams, and is counter to the increase in shade producing riparian vegetation requirement in the temperature TMDL. Based on the information provided it appears that infrastructure improvements to help reduce livestock related pollution may cover only a very small fraction of the RMAs over the life of this plan. These factors appear inconsistent with the goal of minimizing livestock effects to hydrologic function, and raises concerns about fecal coliform and sediment in streams, and about meeting the requirements of the CNF TMDL.

The objectives for accomplishing road and habitat improvements appear insufficient to address runoff of sediment into CNF streams and wetlands. The CNF is 1.1 million acres, with 5,221 miles of roads. According to the DEIS: most subwatersheds are rated impaired for road indicators, road densities are high enough to put most subwatersheds in the "fair" to "poor" categories and higher in riparian areas than across the forest in general, and 862 miles of roads are hydraulically connected to streams with 54% of stream crossings at high risk of sediment delivery. These statistics describe a road system in significant need of attention. Yet, the draft plan targets only 108 miles of road for treatment in the next 15 years. At this planned rate it appears it may take well over 100 years to disconnect the roads from the stream hydrologic network. The draft plan additionally sets a goal of having only 28% of the road densities at a level considered functional (<1 mi/mi²), and having 45% of the forest at road densities considered functioning at risk (1 - 2.4 mi/mi²). Setting aside the issue of having a goal of almost half of the road system targeting an at risk condition, the rate of road treatment in the plan does not seem capable of reaching even these modest targets. Careful targeting of the road improvement projects may result in greater overall gains in protection, but the plan and its supporting documents provide no clear basis for assuming this would be the case.

The draft plan includes an objective to manage the forests within the RMAs. Ecology understands the importance of managing stands that are in unhealthy conditions, and we are not advocating a hands off policy for the RMAs. However, we are concerned the CNF is applying its limited financial resources to thin riparian stands that provide shade to streams, rather than using those resources to extinguish sources of water quality degradation and correct stream crossing problems. We are additionally concerned with the lack of specific standards to guide this management. Ecology would be less concerned with the direct effects of managing the RMAs if the plan included some minimum standards designed to avoid causing or contributing to a violation of the state water quality standards at the project level (or at least a clear statement that this is a goal for site level management).

The above discussion is intended to illustrate why Ecology is concerned the draft CNF plan does not appear to adequately improve and protect water quality. In summary, Ecology recommends the final CNF plan:

*Provide more ambitious targets for disconnecting roads from the hydraulic network and for fixing inadequate water crossings.

*Set more protective standards to prevent grazing impacts to the water quality of streams and wetlands.

*Clearly acknowledge the need to meet state surface water quality standards at the project level.

Thank you again for the opportunity to provide comments to your process. The Department of Ecology remains committed to working with the USFS to develop an increasingly effective partnership for addressing water quality protection on the federal lands within Washington State.

If you have any questions or would like to set up a meeting to discuss our concerns, please contact me at: mark.hicks@ecy.wa.gov or (360) 407-6477.

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