



File Code: 2530

Date: May 12, 2015

Mr. Patrick Lizon
Quality Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Lizon:

I appreciate the opportunity to review and provide comments on the Washington Department of Ecology's (WDOE) Proposed Fresh Water Quality Assessment and 303(d) List. The Forest Service is committed to protecting and restoring Washington's waters, as demonstrated by decades of science-based conservation and management of some of the state's most important watersheds. We are committed to full implementation of the Clean Water Act, including sections 305(b) and 303(d), which results in the assessment and 303(d) list. We appreciate the opportunity to comment on this assessment and recognize our participation as a critical opportunity to meet state and federal water quality rules and regulations in a proactive and collaborative manner.

We reviewed the proposed listings, changes in map representation, and participated in public workshops. You are to be commended for providing excellent public access to data, and clear summaries and presentations of the assessment and proposed changes. The proposal shows statewide increases in the numbers of listings by category with similar trends on Forest Service land comparing the 2012 final assessment to current proposed, though a higher percent of waterbodies the Forest Service have Total Maximum Daily Loads (TMDLs) or pollution control plans; we note a lower percent increase in impaired waters on the Forest Service compared to statewide (Table 1).

We support the change from Public Land Survey (PLS) to National Hydrographic Dataset (NHD) for water body designation; though this change results in an increase in the total area/miles listed for much the same point-collected data, the new system is consistent with national standards for referencing water bodies used in many water and other resource applications.

Of the 255 303d proposed listings on the Forest Service, 39 are new listings for temperature (18), toxics (9), dissolved oxygen (7), bacteria (3), and pH (2). We are concerned about increased temperature listings with the change in Char designation and suggest there may be opportunity for coordination to verify or confirm use. With warming climate and drought, the likelihood of water quality exceedances especially in hot dry years, increases. We are also concerned to see 10 lakes listed for toxics (Polychlorinated biphenal and Toxaphene).



On the Colville National Forest – we would like to know if the new bacteria listings will fall under the current approved TMDL and if so, it would be difficult to address under the current deadline. The additional listings may also increase expectations for sampling and compete with available resources to implement water quality improvement activities. We are interested in exploring other options including a 4B pollution control plan for both bacteria and temperature, and will be in discussion with WDOE Eastern Region staff on these questions.

For the Gifford-Pinchot National Forest – we agree the temperatures on the Category 5 streams exceed standards. About half of these listed streams are within or contribute to 3 of our high priority restoration watersheds, Lower Cispus, Muddy River and East Fork Lewis Creek, where we are implementing treatments to improve watershed conditions. On the Olympic, nine 303d streams are in priority restoration watersheds, and on the Columbia River Gorge four proposed 303d streams are in priority restoration watersheds. We are implementing protection strategies and restorative actions in these and other priority areas which are and will continue to contribute to improving water quality conditions.

Overall, water quality protection on Forest Service land has significantly improved in the last 20 years since implementation of aquatic conservation strategies commonly known as the Northwest Forest Plan, Pacfish and Infish, which amended the national forest land and resource management plans in the state. Other regional and national strategies that focus on water quality protection include, the Forest Service regional aquatic restoration strategy and the Forest Service's National Watershed condition framework which assess watershed condition, and prioritize and focus active restoration to improve watershed condition. Water quality Best Management Practices (BMP) for land management activities have been a regional requirement since the 1980s. A national BMP program now in place has renewed emphasis on BMPs and requires use of standardized monitoring protocols. One of the key components of BMP monitoring is identifying corrective actions and adaptive management needed to improve performance on water quality protection. Last year, we completed 47 BMP monitoring evaluations on Washington's National Forests including 15 for road management and 8 for vegetation management activities.

Thank you for the opportunity to comment. We look forward to continuing to work collaboratively and proactively with Ecology staff to address current and proposed listed waters and improve water quality in the state. If you have any questions, please contact Caty Clifton, Regional Water Quality and Water Rights Program Manager, at 503-808-2696.

Sincerely,



JAMES M. PEÑA
Regional Forester

Enclosure: Table 1. State 2012 Approved and 2015 Proposed Water Quality Assessment Categories Compared Statewide and USFS