UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Region
7600 Sand Point Way N.E., Bldg. 1
Seattle, WA 98115

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Ms. Roylene Rides-at-the-Door
Washington State Conservationist
USDA - Natural Resources Conservation Service
316 W. Boone Avenue, Suite 450
Spokane, Washington 99201-2348

Mr. Dennis McLerran, Regional Administrator
U.S. Environmental Protection Agency – Region 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

Dear Ms. Rides-at-the-Door and Mr. McLerran:

I am writing to convey my support for slight modifications to the riparian matrix that I distributed on January 30 of this year. As Natural Resources Conservation Service (NRCS) staff developed guidance for implementing riparian restoration actions consistent with the matrix, they discovered that internal agency issues prevented the use of a 100-year soil site index upon which the matrix is predicated. It is my understanding that the NRCS is required to use soils data that are available on line, and that only 50-year soil site index data are so available. Fortunately, NRCS and NMFS staff crafted a workaround that requires only minor modifications to the matrix while enabling the use of 50-year soil site index data.

Buffers for two of the channel types on the matrix were to be set at minimums equal to either two-thirds or three-fourths of a 100-year-old site potential tree. Using the same fractions of a 50-year site index potential tree height, at least where site potential trees are conifers, would result in much narrower buffers. However, a review of conifer growth rates across a range of western Washington soil types suggests that modifying the matrix to set minimums at three-fourths and 100 percent of a 50-year old site potential tree height, respectively, would yield nearly identical minimum buffer widths as those in the original matrix. I support this modification as a practical accommodation to on-the-ground implementation.

In addition, I understand there are concerns that the matrix is too vague regarding type 1 channels. The intent is that type 1 channels not contribute to water quality problems downstream. Reference to the Field Office Technical Guide is intended to convey that the necessary width and composition of buffers on type 1 channels will vary depending on the adjacent land use and geomorphic setting.

To implement the recommendations in the matrix, when surface waters are present, water quality must be identified as a resource concern and appropriate combinations of best management practices (BMPs)[1] must be applied to ensure the associated farm operation will comply with water quality standards. For example, where pathogens are of concern, there is no support in the literature for buffers narrower than 35 feet. Therefore, we expect that type 1 channels on lands occupied by livestock or where manure is being applied will be treated with a combination of BMPs that will result in a buffer width of 35 feet or greater, e.g., a 15-foot wide hedgerow and a 20-foot or wider filter strip.

Lastly, I agree that channel type 4, leveed channels, should be removed from the list, as these features are managed according to Corps of Engineers' requirements.

I look forward to working with each of you in applying our shared authorities and responsibilities to dramatically improve habitat and water quality in the Puget Sound basin. If you have any further questions about this letter, please feel free either to call me directly or to contact Mr. Steve Landino, the director of our Washington State Habitat Office.

Sincerely,

William W. Stelle, Jr.
Regional Administrator

cc: Washington State Dept. of Ecology
Washington State Conservation Commission
Mike Grayum, Northwest Indian Fisheries Commission
Thomas Eaton, Environmental Protection Agency
Linda Anderson Carnahan, Environmental Protection Agency
Sherre Copeland, Natural Resources Conservation Service

[1] BMPs may include conservation practices found in the Field Office Technical Guide applied in manner that results in compliance with water quality standards.