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

January 30, 2013

RECEIVED
FEB 04 2013
Office Of The Executive

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

Mr. Dennis McLerran, Regional Administrator
EPA - Region 10
1200 6th Ave., Suite 900
Seattle, Washington 98101

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

Our three agencies have been in very active discussions on opportunities to restore the health of our streams and nearshore areas as part and parcel of our collective effort to address the Treaty rights issues associated with the continuing loss of habitat productivity of importance to salmon and steelhead populations and other fishery resources in the Pacific Northwest. In particular, we have been examining the adequacy of our current approaches to describing those riparian buffers in lower elevation landscapes that may be necessary to protect and restore important aquatic functions.

NOAA Fisheries has recently reviewed the current scientific information associated with this topic in order to assist us in identifying approaches that might help protect aquatic functions important to fishery resources. In this context, I am writing to recommend that you use on an interim basis the enclosed matrix of riparian buffers in programs EPA or the NRCS support or fund. I would also couple this with our request to join with us and others to refine the matrix based on best available science over the coming months. For your information, I have enclosed a brief synopsis of existing scientific information about the relationship between riparian buffers and aquatic stream functions important to Pacific salmonids in the low elevation agricultural landscapes of western Washington which I believe will help provide some meaningful background for our recommendation.

Several factors provide context for our recommendation. Numerous populations of salmon and steelhead in the Pacific Northwest are at risk of extinction and as a consequence, federally-reserved treaty rights to harvest these fish are also at risk. Degradation and loss of freshwater and estuary habitat are significant factors in the decline of these populations. Salmon habitat ranges from the forested areas of the upper elevations to the lower-elevation floodplains to the estuarine and near-shore habitats of Puget Sound. All of these areas provide vital functions in

the system as whole, particularly the lower-elevation and estuarine areas that are the focus of my recommendation. There are many ongoing efforts to rebuild Puget Sound salmon, including those of numerous state and federal agencies, tribal and local governments and the private sector. I am providing the enclosed matrix as NOAA Fisheries' recommendation for minimum riparian buffers in lower-elevation agricultural landscapes. Our technical guidance is intended to help shape recovery and rebuilding efforts effectively and to offer our technical advice on what aquatic functions fish need.

In some cases, our recommendations are framed in terms of ranges of buffer widths rather than point estimates, and expressed as probabilities of achieving desired outcomes. Local conditions and local circumstances matter, and may affect the choice of the riparian buffer most effective at achieving salmon recovery. Nevertheless, the scientific information does support conclusions about the probability of differing buffer ranges to provide a range of aquatic functions that are essential for water quality and salmon needs, as depicted in the enclosures. We are ready to work with project proponents, landowners, agencies, departments and tribes to provide technical advice and find solutions that will support salmon recovery.

The enclosed matrix has its origins in the Washington Agriculture, Fish and Water process (AFW), which occurred from 1999 to 2003 and included participation by state and federal agencies, tribal governments and diverse agricultural interests. One of the efforts undertaken in the AFW process was to identify riparian buffers for agricultural landscapes that provide adequate salmon habitat and are implementable. Several options were developed by the AFW caucuses. For the sake of clarity, the enclosed matrix displays the proposal developed by the federal caucus at the request of the AFW Executive Committee, Option 3. It was presented to the Executive Committee by NOAA Fisheries, along with several caveats which still hold true today: 1) there is a technical basis for the buffer table, supported by the refereed literature and other references; 2) it represents a coarse-scale classification; and 3) the goal of the matrix is to meet state and federal water quality standards and improve salmon habitat. NOAA Fisheries explained the numbers are within an advisable range, and stated there is flexibility to implement more complex approaches when looking at specific sites, so long as water quality protection and salmon habitat function are equivalent or better than that provided by our recommendations.

This history is relevant today as our view of the buffer table is unchanged. We supported its use in 2002, and we still support its use in 2012 as a guide for establishing interim minimum buffers for programs to promote good water quality and aquatic conditions important to salmon and other aquatic life. While the table identifies buffers as narrow as 35 feet for limited situations, in most settings buffers will need to be significantly wider than this to meet salmon habitat needs. We recommend protecting wider buffers where they exist and creating wider buffers where it is practicable and where local watershed conditions warrant. Further, we are convinced that any strategy to meaningfully increase the agricultural landscape's contribution to salmon recovery, as well as any strategy to sufficiently protect water quality, should contain a robust riparian restoration program.

If you have any further questions about this letter, please feel free to call me directly or Mr. Steve Landino, the director of our Washington State Habitat Office.

Sincerely,

William W. Stelle, Jr.
Regional Administrator

Enclosures

cc: Puget Sound Federal Caucus Agencies
Northwest Indian Fisheries Commission
Washington State Dept. of Ecology
Washington State Department of Fish and Wildlife
Washington State Department of Natural Resources
Washington State Department of Agriculture
Washington State Department of Health
Washington State Conservation Commission
Washington Recreation and Conservation Office
Puget Sound Partnership

Interim Riparian Buffer Recommendations for Streams in Puget Sound Agricultural Landscapes
November 2012
(Originally proposed as federal Option 3 for the Agriculture Fish and Water (AFW) Process, March 2002)

Channel Type	Habitat Functions	Composition	Buffer Width	Comments
Class I Constructed ditches; small non-fish bearing streams	Water quality protection; shade; sediment filtration	Grasses, trees or shrubs; may only need woody vegetation on one side of channel	As wide as necessary to meet water quality standards; can be determined by NRCS Field Office Technical Guide (FOTG)	Channels constructed for purpose of draining farmland. If dredged, dredging should occur when fish are absent or at lowest densities
Class II Fish bearing streams; natural and modified natural watercourses that are incised and cannot move	Water quality; LWD for cover, complexity; litter fall; shade	Site potential vegetation; trees where they will grow	2/3 Site potential tree height; 50 ft. minimum to 180 ft. maximum	Portions of natural watercourses that can no longer migrate laterally
Class III Fish bearing; natural unconfined channels	Same as above, but structural LWD essential	Same as above	3/4 Site potential tree height	Highly desirable to buffer entire channel migration zone (CMZ)
Class IV fish bearing streams confined by dikes or other hardened man-made feature	Water quality; complex cover; litter fall; shade	Trees and shrubs	Face of levee, from top of dike to Ordinary High Water (OHW) mark	
Class V Fish bearing intertidal and estuarine streams and channels	Water quality; food inputs; habitat complexity	Site potential vegetation (salt-tolerant sedges, shrubs, trees)	35-75 ft.; varies according to adjacent land use	