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## Comments

The revised rule begins the much needed process to focus management efforts on keeping our publically owned watersheds healthy and providing clean water to downstream communities. A broader focus on ecosystem function is established, recognizing that the restoration of forests needs to improve the resiliency of watersheds and that ecosystem services provided by these watersheds, such as water filtration and carbon sequestration, are important objectives in the planning process. Specifically, forest plans are required to maintain, protect, and restore public drinking water supplies and minimize impacts of management practices to water quality and quantity. Though these first steps are important and a laudable effort after receiving 26,000 public comments, a larger coordinated effort is necessary to protect and restore the water that flows from our public forests.

The proposed rule misses the point on two key issues that would establish a clear path to the protection and restoration of wetlands, streams, and rivers on our National forests – the need for firm guidelines for the protection of streams, rivers, and wetlands, and the establishment of scientifically based, standardized guidelines to account for water flowing from national forests.

The first of these is the importance of forested riparian buffers – critical ecosystems that serve as wildlife corridors, maintain cold-water streams for fish, and filter pollutants from nearby roads, pastures, and forestry and mining operations. Improving riparian protection is perhaps the single best strategy the Forest Service can adopt to protect watershed health and water quality for downstream communities. In fact, these services are valued at \$1700 to \$8900 per acre per year. While the rule requires the establishment of a national riparian buffer width standard; embedded within the rule is a loophole that allows forest managers to adjust the actual width of forested land along streams – effectively eliminating any benefit derived from a national standard. Recognizing that each river or stream is unique, scientific studies show that a buffer of 300 feet effectively traps virtually all pollutants and provides sufficient habitat and migration corridors for aquatic and terrestrial species. This standard is already being applied in the Pacific Northwest. If established, required buffer widths would support groundwater infiltration, reduce sediment, naturally filter water and reduce stormwater costs to downstream communities.

The second barrier to protecting healthy watersheds and streams is the lack of a clear standard for monitoring the health of these systems. Think of monitoring like this – a good mechanic will perform a routine check up of all systems in your car – without a user manual or the right tools, this mechanic may miss a failing system – costing thousands more than preventive maintenance and decreasing the life of the vehicle.

The Forest Service has taken the first step in establishing a valuable monitoring program by recommending the initiation of regional monitoring plans and an adaptive management approach whereby monitoring efforts are evaluated every two years. However, without a nationally standardized monitoring system, little consistency will occur across forests and taxpayer money will continue to be wasted on the continued reinvention of the wheel and the lack of a clear user manual. Moving the Forest Service forward in setting scientifically based guidelines at the national level will ensure that our ecosystems are resilient in the face of increasing temperatures and more intense storms and droughts – all factors that will affect the quality and quantity of our drinking water and sustainable flows for wildlife. These guidelines must establish a network to monitor changes in water quality and quantity in

order to adequately address changing conditions across forest boundaries and for downstream communities as well as the regulatory requirements of the Clean Water Act. Additionally, the Forest Service must focus on the continued use of the Forest Inventory and Analysis system to monitor the health of forests and changes related to climate change.

### Individual(s)

<b>Organization Type</b>	Individual
<b>Email Address</b>	lh-segedy@americanrivers.org
<b>Name</b>	LISA HOLLINGSWORTH-SEGEDY, AICP
<b>Address 1</b>	150 LLOYD AVE
<b>City</b>	PITTSBURGH
<b>State</b>	PENNSYLVANIA
<b>Zip</b>	15218
<b>Country</b>	UNITED STATES
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