



# Water Quality

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## **Eligible Objectors & Interested Persons for this issue:**

- WildEarth Guardians
- Sierra Club/Alliance for the Wild Rockies
- Conservation Northwest

## **Objections:**

- The final Environmental Impact Statement (FEIS) and revised Land Management Plan (LMP) do not adequately address the impacts from forest roads (including system, unauthorized, and temporary roads).
- The road-related plan components in the Colville's revised LMP fail to provide resource protections, in violation of regulation.
- Plan components fail to ensure water quality is maintained; best available science demonstrates that forest roads are a primary cause of water quality degradation.
- The revised LMP does not prevent destruction or adverse modification of critical habitat for threatened and endangered species. It allows new roads in key watersheds with ESA critical habitat for aquatic species, so long as there is no net increase in system roads that affect hydrologic function.
- The revised LMP objectives are inadequate because they lack time-specific parameters, fail to achieve or work toward desired conditions, or are missing. An example relates to restoring aquatic organism passage and deferred maintenance related to roads.
- There are no Objectives, Standards, or Guidelines that address maintenance of the road system with regard to: maintenance levels, levels of use, or available funding.
- Since road density desired conditions do not consider closed maintenance level 1 roads [in No Action Alternative], they do not adequately address the potential impacts of the road system on hydrologic and aquatic function and habitat.
- The road-related plan components in the revised LMP create exceptions and allowances for road-building activities that will cause or contribute to a violation of water quality standards in violation of the Clean Water Act.
- The hydrologic analysis bases a lot of impacts on water quality (and therefore on fish) on the sediment risk from roads. However, the impacts of logging due to elevated water yield impacts and compacted soils are not evaluated. This has led the FEIS to underestimate impacts on fish populations.

## **Resolution Options Proposed by Objectors:**

- Revise the road-related plan components in the revised LMP to ensure they comply with the Clean Water Act. [WildEarth Guardians]
- Modify MA-DC-FR-05, Travelways, Roads (LMP p 107) and MA-DC-GR-05, Travelways, Roads (LMP p 109) to include all roads in the road density calculation. This would include open, closed, and hydrologically stabilized roads. [Conservation Northwest]