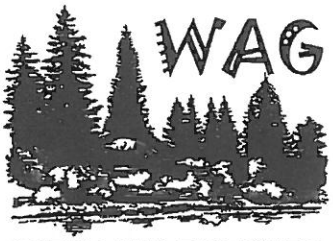
NORTH FORK



COEUR D'ALENE RIVER

Coeur d'Alene River Ranger District
ATTN: Beaver Creek Responsible Official
2502 East Sherman Ave.
Coeur d'Alene, ID 83814

July 22, 2013

RE: USFS Beaver Creek Project

Dear Beaver Creek Responsible Official:

The North Fork Coeur d'Alene River Watershed Advisory Group (WAG) is writing to support the proposed Beaver Creek Project, and to provide comments and suggestions. The WAG is a stakeholders' advisory group to the Idaho Department of Environmental Quality, and was created according to Idaho statute to advise the Department in development and implementation of water quality improvements. Our diverse membership includes representatives from local government, private landowners, mining interests, federal agencies, foresters, agriculture, the Coeur d'Alene Tribe, state government, and recreational users. Duties of the WAG include recommendation of specific actions needed to control point source and nonpoint sources of pollution within the North Fork Coeur d'Alene River Subbasin. This letter represents consensus from WAG members from the WAG perspective and may not reflect all of the individual positions of WAG members and member agencies.

The WAG supports Alternative 2 of the proposed Beaver Creek Project and would like additions considered from Alternative 3. We also suggest two other WAG priority sites be addressed that were not included in either alternative.

We strongly support the economic impacts and benefits of the proposed harvest and jobs, we support the improved forest health and wildfire risk management goals of the project, and we enthusiastically support the water quality improvements and improved watershed conditions that could result from full implementation of the project.

Water quality and watershed condition in the Beaver Creek Watershed have been a high priority for the WAG. Water quality-related issues in the watershed include widespread stream channel instability and erosion (particularly in the mainstem), flooding of roads and failures of stream crossings, overwidened channels and degraded aquatic habitats. Water quality impairments in the watershed include sediment, temperature, and metals. A sediment total maximum daily load (TMDL) and a draft temperature TMDL

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have been developed to prescribe load reductions needed to attain water quality standards. Our cooperative Beaver Creek Watershed Assessment documented these issues and the Forest Service Beaver Creek Project will address many of the Watershed Assessment's recommendations.

Objective 3 of the project is to improve water quality and aquatic habitats by restoring water quality and watershed conditions to meet water quality standards and bring aquatic habitats towards an enhanced condition. Similar watershed restoration projects have been successful in sediment-impaired waters within the North Fork Coeur d'Alene River Subbasin. Watershed-scale restoration in Upper and Middle Tepee Creek, Steamboat Creek, and Yellowdog Creek led to attainment of cold water aquatic life support and the streams are no longer considered impaired by sediment. We hope similar can be said of Beaver Creek in the future, but it will take significant effort and investment.

In addition to proposed road treatments in Alternative 2, we suggest that roads proposed for treatments in Alternative 3 be fully considered for the most appropriate treatment to provide for access and water quality needs. We suggest that road access needed for vegetation management, fire, and recreation be maintained. The Beaver Creek Watershed Assessment identified some problem areas for sediment delivery to streams on many of these roads in Alternative 3. Those roads should be maintained and problem areas treated (e.g., culvert maintenance, water bars, etc.) by the Forest Service, partners, and/or volunteers to reduce sediment loading to streams. The WAG offers our assistance to help identify and provide resources for such an effort.

We suggest you consider providing trail access at some stream crossing removal sites on treated roads. Some of the closed roads are used by hikers, horseback riders, hunters, and others who find the steep grades at some stream crossing removal sites difficult to navigate. Where possible and appropriate, trail access with a small ford would be appreciated by these recreationists.

In addition to the Alternative 2 upgrades and replacements of 8 culverts for aquatic organism passage, we suggest that the 4 culverts under Rd 456 identified in Alternative 3 be treated. Alternative 2 opens up 4.5 miles of habitat for access by fish and other aquatic organisms. If the additional 4 culverts could be treated, the number of miles opened for access doubles to more than 9 miles. These projects will have anticipated benefits to water quality as well as aquatic organisms.

The culvert under Rd 456 at Prospect Gulch will be upgraded under Alternative 3. The WAG suggests that this culvert be a priority since the impacts to Prospect Gulch in terms of harvest, water yield, and possible channel instability are higher than other subwatersheds in the project area.

In addition to the culvert replacement on Carpenter Gulch, we suggest that the nearby bridge on Rd 2361 be maintained and stabilized to prevent washout.

The WAG suggests that the large slide on lower Beaver Creek shown in Appendix I of the Beaver Creek Watershed Assessment be addressed either through this project and EIS or through a separate project and NEPA clearance. There is an example of stabilizing a similar slide on Prichard Creek by the Bureau of Land Management including an Environmental Assessment that could be used as a resource.

We would like to thank the Forest Service for participating in the WAG, for providing presentations and updates about this project, and for cooperating to complete the Beaver Creek Watershed Assessment.

The WAG is planning additional water quality improvement projects in the Beaver Creek Watershed on private lands. We would like to work together as you implement this Beaver Creek Project and beyond to restore this important watershed.

Signed,

Kajsa Stromberg
- for the North Fork Coeur d'Alene WAG