

June 17th, 2018

Dear Forest Supervisors,

I am writing on behalf of Blue Mountains Biodiversity Project (BMBP) to request that your Forests submit their water quality data, such as stream temperature and sediment data, to Oregon Department of Environmental Quality (ODEQ) during ODEQ's current "Call for Data" which ends on June 29th. ODEQ has requested that agencies and the public submit water quality data for inclusion onto the state's Integrated Database, including for assessment for the 303d list.

During our ongoing research on timber sales and grazing allotment NEPA documents on USFS lands in eastern Oregon, BMBP has found numerous streams that exceed state water quality standards, yet repeatedly these violations do not appear in ODEQ's Integrated Database. ODEQ does not have water quality data for at least 46 streams in recent timber sales that are not meeting temperature and/or sediment standards according to USFS NEPA documents. These 46 streams reflect only the streams BMBP has had time to investigate in relation to recent timber sales; they are likely the tip of the iceberg of an even more widespread problem. Many of these streams support Threatened species such as Bull trout or Mid-Columbia River steelhead, and some are designated critical habitat. Water quality violations in these streams are often very severe, and exceed temperature thresholds for migration, spawning, or lethal limits for aquatic species such as Mid-Columbia River steelhead and Bull trout.

Without an accurate listing of which streams are violating water quality standards, it is impossible for either ODEQ or the Forest Service to develop plans to restore streams, address watershed-scale issues, or adequately protect aquatic species. The USFS's lack of reporting also makes it very difficult for the public to be informed about or have access to accurate information regarding these issues.

We are especially concerned that the USFS continues to log vast tracks of public forests, and is increasingly logging within streamside corridors. In addition, stream temperature warming and de-watering of streams due to climate change are exacerbating the ecological degradation and loss of habitat caused by logging, livestock grazing, and road-related impacts. The USFS often cites the absence of streams on the 303d list as part of their rationale for why logging adjacent to some of these same streams will not have significant impacts on water quality-- even though their own data reflects stream temperature violations that would almost certainly place these streams on the 303d list if ODEQ had the USFS's data. For example, Cougar Creek in the Camp Lick timber sale on the Malheur National Forest is Designated Critical Habitat for Threatened Mid-Columbia River steelhead, reaches 7-day max average temperatures of 74 degrees Fahrenheit according to USFS NEPA documents, and is currently slated to have commercial logging take place within its RHCA. Yet ODEQ's database shows no data for this stream. There are numerous other similar examples across the region.

I've attached an excel spreadsheet to provide a listing of which streams we've found thus far in recent timber sales that appear to be breaking state water quality standards but are not in ODEQ's Integrated Database.

Thank you for your attention in this matter. Please let me know if the USFS intends to submit data during ODEQ's call for data. You can contact me at 510-715-6238 or at paula.e.hood@gmail.com with any questions or further discussion. I will be in the field until June 20th, but available on June 21st.

For the Wilds,
Paula Hood
Blue Mountains Biodiversity Project