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June 30, 2017

Ms. Paula Wilson
Idaho Department of Environmental Quality

RE: Salmonid Spawning Use Designations

Dear Ms. Wilson,

Thank you for providing an opportunity for the Idaho Department of Lands (IDL) to comment on the Water Quality Standards Triennial Review. After reading the issue papers and attending one of your workshop presentations, we have concerns regarding the proposed changes to the Salmonid Spawning (SS) Use Designation. We understand that in order for the Idaho Department of Environmental Quality (IDEQ) to adopt new SS water quality criteria, you must specify, in rule, all waters where the SS criteria would apply. We also understand that IDEQ has developed a draft map showing the extent of SS designations using the 1:100,000 scale National Hydrography Dataset (NHD) vector layer, incorporating known fish spawning locations, and applying a predictive model to waters where SS is unknown. We believe that this map, if placed in rule, will conflict with valid fish surveys that have been conducted by IDL and other organizations to accurately identify salmonid and fish use. Furthermore, we believe that this map will be very difficult to update or edit once incorporated in rule.

IDL actively manages one million forested acres to make money for public schools and other Idaho institutions, and maintain the long-term health of these lands. We also administer the Rules Pertaining to the Idaho Forest Practices Act (IDAPA 20.02.01). Under these administrative rules, streams are classified as either Class I (IDAPA 20.02.01.010.60.a) or Class II (IDAPA 20.02.01.010.60.b). Class I streams are defined as important for the spawning, rearing and migration of fish, or they are used as a domestic water supply. Class II streams are usually headwater streams or minor drainages used by few, if any, fish for spawning or rearing.

To ensure compliance with the Forest Practices Rules, the IDL and our timber industry partners have invested a great deal of time and resources to developing accurate stream maps and classifying streams. In 2016 alone, the IDL conducted numerous surveys using electrofishing protocols that located several new points delineating the upstream boundary between fish-bearing and non-bearing waters. When new fish boundary points (FBP) are identified, they are incorporated into a stream layer that was derived by combining the 1:24,000 scale NHD layer with a synthetic stream layer that better reflects headwater stream networks. We believe that this process is much more dynamic and reflective of fish distribution. The end result of this considerable effort is a living map layer where edits to both the stream network and fish distribution are incorporated. Additionally, we anticipate that the future application of new technologies such as Light Detection and Ranging (LiDAR) systems will allow us to generate finer scale DEMs which will improve our ability to accurately map streams and predict fish distribution. When this occurs, our stream maps will be updated appropriately.

To summarize, we believe that the current strategy for mapping SS use designations, as displayed by IDEQ at the workshop presentations, conflicts with the more accurate, dynamic

FBP mapping process that IDL has developed with land-management partners and may misrepresent the distribution of self-sustaining salmonid populations in Idaho, especially populations of West Slope Cutthroat Trout. Also, we believe that any map depicting use designations in rule will remain relatively unchanged over time. The inability to update use designation maps as new information becomes available will ultimately handicap IDEQs efforts to protect designated uses.

We appreciate the opportunity to submit these comments. While the stream classification map discussed above is a work in progress, the IDL would be happy to share with IDEQ the locations of surveyed FBPs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig Foss". The signature is stylized and cursive, with a large initial "C" and "F".

Craig Foss
Division Administrator, Forestry and Fire
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