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Date: June 1, 2017

RE: Proposed rule changes to WAC 173-98 under CR 102 17-09-078.

Washington Environmental Council would like to submit the following comments regarding proposed amendments to WAC 173-98, *Uses and Limitations of the Water Pollution Control Revolving Fund*, under CR 102 17-09-078. We appreciate the opportunity to comment.

We specifically want to comment on the eligibility criteria for using Clean Water State Revolving Fund loans for land acquisition. The proposed changes to WAC 173-98-100 (20) includes additions for siting of water pollution control facilities (b), for riparian area protection (d), and for drinking water source protection (e).

We support these additions. However, we think that one category needs to be added: watershed protection. Recent research published by Perry and Jones (2017) and validated modeling conducted in the Nisqually Watershed (McKane et al., 2016), in which Washington Environmental Council participated with EPA and other partners, demonstrates that management at the watershed scale is important to prevent water quality issues. Modeling in the Mashel sub-basin of the Nisqually demonstrated that when entire forested watersheds, not just riparian areas, are comprised of forests 80 years old or older, they increase summer low flows by a factor of 5 compared to watersheds with forests that are 40 years old.

Standard industrial rotations produce watersheds with young forests. Younger trees use more water than older forests thereby making less water available during critical times for salmon. Stream flow deficits in late summer and early fall contribute to other water quality impairments such as low dissolved oxygen and high temperatures. They are also an issue for drinking water availability.

A healthy watershed and the ecosystem services it yields provide a steady stream of benefits to local communities creating a prosperous economy and healthy quality of life. The infrastructure provided by our forests includes benefits such as clean water and air, carbon storage, healthy fish, and timber. Other vitally important services include flood risk reduction, species habitat, and recreational values.

Bridging these benefits with funding sources requires us acknowledging them and increasing access to funds. Allowing Clean Water State Revolving Fund loans for land acquisitions at the watershed scale is crucial for being able to secure better management of our forests. Adding this category will make investing in these 'green infrastructures' and the management practices that support them, more of a reality for local projects that bring together local governments, small forest landowners and other NGOs like land trusts.

If these rule changes are successful, they could be one of the largest funding opportunities to elevate forests as infrastructure in our state. Please further amend WAC 173-98-100 (20) to include watershed-scale protection as an eligible category for land acquisition.

Sincerely,



Lisa Remlinger
Evergreen Forests Program Director



Paula Swede
Forest Policy Specialist

References:

McKane, R., B. Barnhart, J. Halama, P. Pettus, A. Brookes, J. Ebersole, K. Djang, G. Blair, L. Benson, P. Swede, J. Kane, J. Hall, C. Spiry, D. Steiner, L. Chang, M. Rylko, and G. Bonafacino. 2016. Integrated decision support tools for Puget Sound salmon recovery planning. Salish Sea Ecosystem Conference, Vancouver B.C. April 2016.

Perry, T.D. and Jones, J.A., 2016. Summer streamflow deficits from regenerating Douglas-fir forest in the Pacific Northwest, USA. *Ecohydrology*. DOI 10.1002/eco.1790.