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[Watershed Restoration Principles] [Loose]

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# THE PACIFIC RIVERS COUNCIL

formerly THE OREGON RIVERS COUNCIL

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## MEMO

**TO:** Jack Ward Thomas, Jim Pipkin, Jim Lyons, Katie McGinty  
**FROM:** Bob Doppelt  
**RE:** Watershed Restoration Principals and Monitoring  
**DATE:** June 10, 1993

This memo is in response to a request yesterday from Jack Ward Thomas for a proposal to implement and monitor effective restoration procedures.

First, I want to reiterate once again that PRC does not support any investments in watershed restoration without first establishing clear and effective protections for the best remaining habitats and watersheds (i.e. refuges or key watersheds) and riparian areas on permanent and ephemeral streams regionwide (east and west-side). As you know, over 125 top scientists have already stated their support for these principles.

Without clear and effective protections, restoration activities will at best prove ineffective, and at worst may be viewed as just a cynical attempt to appease dislocated workers through essentially make-work programs. We believe that a large majority of fisheries biologists and aquatic ecologists will agree with our concerns.

We have already stated our proposal for protections (see Framework and Rationale for Legislation and Entering the Watershed).

After, and only after effective protections are in place, carefully planned restoration can begin. We propose the following procedures to implement and monitor effective watershed restoration:

### **I. Establish Independent Interdisciplinary Scientific Oversight and Review Committee.**

The charge to this committee would be to: 1) establish the overall approach and criteria, and to propose federal land rules and regulations for integrated and aligned watershed and salmon habitat recovery strategies regionwide; 2) review and certify restoration projects that are currently "on the shelf"; 3) review and approve specific watershed restoration strategies, workplans and budgets created by each Forest and/or BLM district, and; 4) review and supervise the monitoring program.

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We recommend that the Thomas Scientific Working Group be continued and expanded with the addition of representatives from professional scientific societies, agency staffs, privates etc. The team should be charged with the task of developing the details of the systems stated above. Over time, the need for and workload of the team should diminish as new agency procedures become institutionalized and staff skills are upgraded.

## **II. Establish the overall restoration approach and criteria, and propose Forest Plan rules and regulations.**

A consistent overall approach to restoration must be agreed to, specific criteria established to implement the overall approach, and then specific rules and regulations must be adopted so that specific strategies and projects conform to the overall approach regionwide. There is a wide variety of views on how to approach restoration. Without an agreed-upon consistent game plan, projects are certain to be scattered across the landscape and funds expended with claims of ecological benefits and success, but little evidence to prove it.

There is ample scientific evidence that the traditional watershed and fish habitat restoration approaches have failed because they have not addressed the root causes of degradation. Instead they tend to address distress symptoms in the worst-looking or most degraded reaches using generic techniques. We must avoid repeating past mistakes by allowing agency staff not apprised of the new watershed restoration approach to plan and implement the traditional, failed types of restoration projects. We must prohibit poorly planned and implemented projects, and we must avoid implementing projects in watersheds that are either beyond recovery or unlikely to recover (examples of both are rampant today). Too much is at stake, and too few resources are available.

For example, there is growing agency movement towards using pool, glide, riffle criteria as objectives for restoration (pieces of wood, boulders per mile etc). This provides a measure to monitor the amount and type of work done, but will generally not prove useful to restore or measure ecosystem health. The agencies are planning at the wrong space and time scale. Criteria must be established to move the agencies away from the reach level to the watershed level, with realistic time schedules (we must understand that there will be no quick fixes).

To briefly summarize our position, we propose that the overall approach must prioritize restoration steps and resources as follows:

Step 1) protect the remaining healthy habitats at the watershed level, as well as riparian areas on permanent and intermittent streams.

Step 2) "secure" the remaining healthier key watersheds and habitats by completing a watershed assessment (see draft Budd Creek watershed assessment by Pacific Watershed Associates), then identifying and diffusing or eliminating the threats to the remaining healthy areas (for example, by treating chronic and catastrophic problems from roads etc).

Step 3) develop locally-tailored watershed level recovery strategies that emphasize stream function recovery (not fish habitat) through riparian restoration and very carefully selected large woodjam projects aimed at reconnecting the stream with the riparian area and floodplain in areas close by the remaining healthy habitats (a fundamentally different approach than the typical in-stream structure focus).

Steps one and two must be completed prior to initiating step three to make almost any investment worthwhile.

The science team must formally establish this approach, develop criteria for implementing it, then propose rules and regulations to insure proper implementation and enforcement.

### **III. Scientific Review Of On-The-Shelf Restoration Projects.**

There is a need to implement some carefully selected restoration projects as quickly as possible. However, many of the projects that the agencies have already developed under the title of watershed restoration may at best be ineffective (not targeted within the overall approach stated above, and/or poorly planned and designed etc.) and at worse many may do harm (such as further incising streams by installing instream structures etc.) Candidly, few within the Forest Service or BLM are trained in ecosystem based, watershed level restoration. To the contrary, they have been trained to implement mitigation, not restoration measures. Existing projects must be carefully screened to insure that they meet the criteria for effective and cost-efficient restoration.

### **IV. Review and approve specific watershed restoration plans established by each Forest or BLM district.**

After the overall approach and criteria for watershed restoration are established, specific locally tailored watershed restoration plans must be designed. These must include specific goals, workplans, budgets etc. Funds should be approved for allocation to individual Forests and BLM districts only after review and approval by the interdisciplinary science review team.

### **V. Continuous Quality Monitoring Must Be Instituted**

We have endorsed significant public investment in watershed protection and restoration on federal lands throughout the Pacific Northwest. We endorse this provided that the investment includes a long-term dependable monitoring system which closely tracks the development and implementation of an effective overall approach, funding and specific work plans in the field.

We propose a system that would be comprised of qualified professional Resource Monitors, some of whom may be pulled from the existing Thomas Working Group, with others chosen from throughout the ranks and disciplines of the various agencies. This may be attractive to the agencies because it will provide some cushion to the need to reduce staff due to budget cuts. These monitors would be trained and given the authority to perform at least the following monitoring tasks:

- \* examine site level work plans to determine conformity with applicable protection and restoration goals and criteria and make recommendations for approval.
- \* track implementation of the work plans in the field on a near-daily basis.
- \* report to the interdisciplinary scientific review committee and responsible line officer at least every two weeks on the progress of projects overseen by the monitor.
- \* identify and report any deviations from the work plan and budgets immediately to the interdisciplinary committee and responsible line officer.
- \* identify areas where the implementation of work plans are not accomplishing objectives as intended and recommend changes to work plans.

This system could be entitled the "Continuous Quality Improvement Program."

#### 1. This System Should Replace the Existing Monitoring System

Continuous monitoring should be an integral part of the watershed (and land) management planning process on all federal lands and should replace the existing inadequate monitoring regimes. At present, very little on-site tracking is done, and monitoring reports do not accurately depict the actual conditions or trends of the lands and resources at issue.

#### 2. Continuous Monitoring Envisioned by NFMA Framers

Statutes and regulations already applicable to the Forest Service provide ample authority for the institution of a continuous monitoring system such as we envision. Section 6 (g)(3)(C) of the National Forest Management Act requires the Forest Service to promulgate regulations which specify guidelines for land management plans which:

"insure research on and (based on continuous monitoring and assessment in the field), evaluation of the effects of each management system to the end that it will not produce substantial and permanent impairment of the productivity of the land." (emphasis added).

This provision was intended to link monitoring to research -- monitoring from the field would be used to identify problems which required research to solve. (see 36 CFR § 219.28)

Existing agency regulations provide further support for continuous field monitoring. The NFMA regulations state that forest plan implementation shall be evaluated by an interdisciplinary team which shall recommend to the Forest Supervisor necessary changes in management and revisions to the forest plans. Monitoring is required to provide for: (1) quantitative evaluations of outputs; (2) documentation of prescriptions and effects, including changes in land productivity; (3) documentation of costs; (4) description of resources to be measured and frequency of measurements, expected

precision and reliability and evaluation reporting times; (5) compliance with restocking, suitability determinations, harvest area limits, and the level of infestation and disease. 36 CFR § 219.13(k). The regulations further state that the applicable management requirements, which apply to all forest resources, shall "guide the development, analysis, approval, implementation, monitoring and evaluation of forest plans." (36 CFR § 219.27).

The idea behind these provisions was that the agency should know about problems before they emerge -- and before they become obvious even to outside critics. Unfortunately, the agency has thus far failed to use the authority the framers of NFMA clearly presumed it already had to institute a feedback system of continuous field monitoring. It was not until 1989 that the Forest Service finally instituted a forest-level monitoring system. Unfortunately, this system is light on field work and long on paperwork, generally producing reports more suitable for public relations purposes than for tracking resource conditions on the ground.

We believe that the only way to ensure that the management requirements are actually met is to conduct hands-on, continuous monitoring by resource professionals who have been given the training, the time and the authority to do what is necessary to ensure that resources are protected and that public funds are applied as intended. They must be required to provide input to the interdisciplinary scientific review committee on a bi-weekly basis.

In summary, I reiterate again that we will not support any restoration that precedes complete and effective watershed and riparian protections regionwide. Further, we believe that clear and effective restoration procedures, criteria, rules and regulations are needed along with an effective monitoring program. Over time, as new agency procedures become institutionalized and staff skills are upgraded, the need for independent outside review and monitoring will diminish.