

SECTION 208 PLANNING: PERSPECTIVE FROM A
RESOURCE MANAGEMENT AGENCY

Robert G. Adams, Jr., Forester
U.S. Forest Service
Southwestern Region
New Mexico Department of State Forestry
208 planning

It is a pleasure to be here today, to participate in the Annual Water Conference, and to bring you greetings from the State Forester, Raymond R. Gallegos. Mr. Gallegos is keenly interested in meeting the goals and objectives of the Federal Water Pollution Control Act Amendments of 1972, (PL 92-500) and he shares the concerns of the speakers at this Conference as New Mexico develops its 208 plan and implementation procedures. The State Forester's direction is clear as to the involvement of the Department in the planning process - and its final product.

Previous speakers have established the role of the Environmental Protection Agency at the national level; the Environmental Improvement Agency at the state level; and the Natural Resource Conservation Commission in their state-wide efforts to conduct sediment studies and to develop agricultural best management practices. Further in the Conference, we will hear about public involvement through the statewide Public Participation Program that State Forestry actively supports. Our purpose then, is to describe the relationship of forestry in New Mexico to the overall process as we proceed through these comments, today.

Before going on, we felt that to help you understand what we are doing, some definitions are in order: First, the law utilizes the word "silviculture" throughout. Silviculture may be simply defined as the art and science of growing trees and is analogous to agriculture. However, we most often think of silviculture in the broader term of "forestry" or "forest management" that generally is defined as all activities that take place in the forest or woodland environment. Consequently, you may hear, in this paper and others, the terms silviculture and forestry used almost interchangeably. Second, some forestry activities that we will examine as potential sources of non-point water pollution are:

- Planting
- Wildfire
- Pesticide, herbicide, and silvicide application
- Thinning
- Slash disposal

Fertilization

Prescribed fire

Harvesting

Road Construction

We are also concerned with forest uses such as grazing and dispersed recreation. Third, as you have heard from earlier papers, we, too, are concerned with best management practices. Best management practices are defined in Federal Regulations, but for our purposes they may be described as processes to attain water quality objectives - such as the analysis needed to determine the number and location of water bars (road drainages) on a forest activity road.

Direction for our involvement is found in P1 92-500, and in delegated responsibility by the Water Quality Control Commission in coordination with the Environmental Improvement Agency. In addition the U.S. Forest Service, Bureau of Land Management and others are working very closely with us.

Potential impacts of 208 planning on resource management agencies and private or industrial land owners are at best difficult to gauge. Perhaps one way to view the process is that it is a codification of common sense forest practices backed by professional expertise and field knowledge. Our Technical Advisory Task Force is approaching 208 from a standpoint of review and assessment of current practices, to determine their relationship to water quality and to find out what our problems are. Then, we may recommend the development of new methods or techniques to achieve water quality goals and standards.

As a measure of the current impacts on forest management concerns in the State, perhaps it is appropriate to review activities in the field at this time. Nationally there are interdepartmental agreements and policy statements that provide direction to federal agencies. For example, the Forest Service of the Department of Agriculture, in its role of providing national leadership in forestry, is supporting the Environmental Protection Agency through the development of analysis procedures and guidelines for the selection of best management practices related to forestry activities nationwide. Closer to home, the Forest Service, Southwestern Region, and the Dallas Region of the Environmental Protection Agency have entered into an agreement that provides for support to New Mexico's planning process, including my present position.

At the state level many inter-agency agreements and memoranda of understanding directly, and indirectly, are a beneficial influence on the 208 planning process. The most striking example has been presented here today: The close relationship of the Department of State Forestry, the Natural Resource Conservation Commission, and the Environmental Improvement Agency has been discussed in this paper and by previous speakers.

The greatest impact on forest management agencies and institutions is time, itself. Time to study the intricate threads of inter-agency cooperation; time to assess and evaluate field practices and problems; time to study best management practices and alternatives in order to select the "best-of-the-best"; time to study existing institutional arrangements and programs to utilize them to the fullest in the implementation of 208 programs; time to study possible legislative needs in order to meet State and National clean water goals and objectives - all in time to meet a court imposed November 1, 1978 208 planning deadline!

In the long run implementation of 208 planning will influence forest land management. However, we feel that the application of forestry best management practices related to water quality will be an acceptable impact on management agencies, landowners and industrial operations because, in general, we are already doing most of these things and 208 gives us the opportunity to evaluate practices and reorder priorities in relation to water quality. We believe the early involvement in the planning process of representatives of broad aspects of forestry in New Mexico is the key to the development of acceptable best management practices and alternatives that will meet or exceed New Mexico's needs and the National goals and objectives for clean water. Further, our close working relationships with the other agencies involved is, we feel a strong point in the ultimate success of our program.