



Central Sierra Environmental Resource Center
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March 31, 2010

Gaylon Lee - Forest Activities Program Manager
State Water Resources Control Board
1001 I Street, 15th Floor
Sacramento, CA 95814

Dear Gaylon:

The State Water Board has asked for input related to the proposed Water Quality Management Plan waiver or discharge permit for the wide range of projects and activities approved or allowed by the U.S. Forest Service on national forest lands within California.

Biologists, botanists, and other members of our staff have spent the past two decades actively doing field monitoring of logging, road maintenance and construction, fuels treatments, livestock grazing, and other actions on national forest lands. Road systems on the national forests are discharging vast amounts of sediment into streams and rivers. Livestock are seasonally contaminating forest streams and lakes at unhealthy, unsafe pollutant levels. Those impacts are cumulatively exacerbated by even worse watershed management on private timberlands that are often laid out in a checkerboard pattern amidst Forest Service lands or are located adjacent to public forest land.

At least in the central Sierra Nevada region, the Forest Service generally does a fairly good job of implementing BMP's that require water bars to be placed on steep skid-trails after logging operations. The agency does a consistently good job of preventing significant watershed damage from most of its prescribed burning operations or from the shredding and disking operations that are intended to reduce fuel loads to decrease the intensity of wildfires. The agency does a good job of educating backpackers to camp at least 100 feet away from streams. The USFS minimizes water pollution from campgrounds.

But despite statements and claims made by well-intended Regional staff and staff from individual national forests, the Forest Service does an extremely poor job of managing watershed impacts and water quality degradation from roads, off-road-vehicle routes, and livestock grazing. Roads are poorly maintained. Cows are not managed. They roam throughout the summer season -- concentrating along streams and in wet meadows -- significantly degrading water quality and the health of watersheds.

Photos are often more revealing than many pages of site-specific complaints by our staff scientists or other staff at our Center. Please look with an open mind.

These first two pages reflect what the State Water Board, Forest Service land managers, and the general public desire to see for waters on national forest lands.



Bourland Meadow is one of the few forest meadows on the Stanislaus National Forest that is NOT grazed by livestock because it is a research natural area.



The following pages of photos reflect vivid examples of water quality impacts and widespread watershed degradation caused by the vast web of forest roads and by livestock use on national forest lands in California.



This road rut diverts sediment-laden water from Forest Road 3N86 into Hull Creek.



Off-highway-vehicle routes that cause obvious harm to watershed resources...





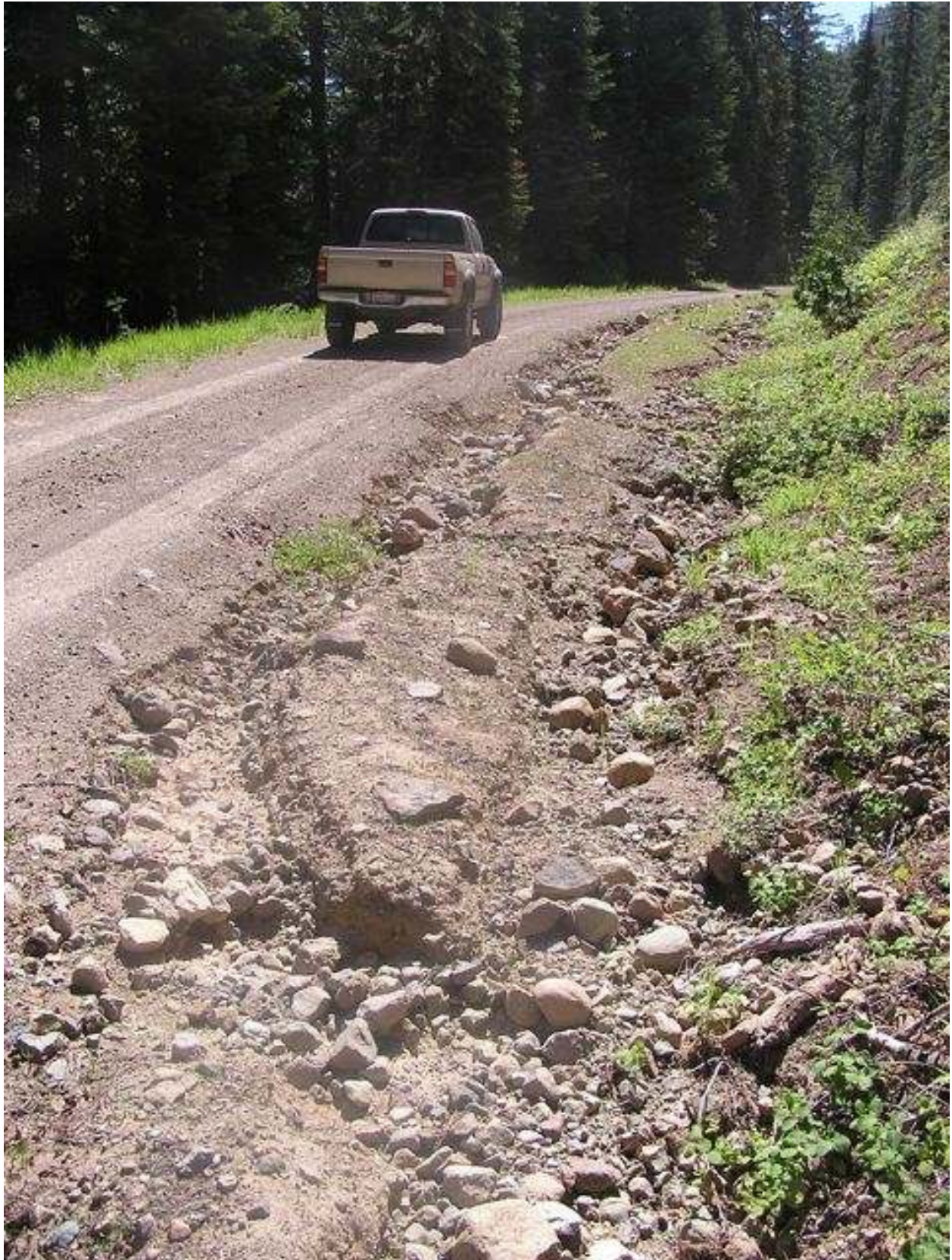


This off-highway-vehicle route was recently legalized, becoming part of the official system as a route that will have some "tread hardening" to reduce future rutting.

Many recently approved Stanislaus Forest OHV routes run straight up hillsides, sending water down slope into receiving waters during major storm events.



The road system is even more extensive than the OHV routes. Stanislaus Forest officials admit they are at least \$55 million short of needed road maintenance funds.



This rutted road runs on a hillside close above the South Fork Stanislaus River.





Then there are countless watershed and water quality impacts from livestock grazing, trampling of stream-banks, pocking of wet areas, and damage to springs.





This kind of visible watershed impact is underscored by CSERC water quality monitoring which shows that forest streams in heavily grazed areas are contaminated by high levels of fecal coliform, *E. coli*, and total coliform.



When the rains or snowmelt flush through the streambed, crumbled chunks of bank wash away, further widening the stream as cattle hooves crumble more each season.



Springs are required in US FS planning documents to be protected along with fens, seeps, and wetlands. Cattle don't read the planning documents. It is rare for a spring or seep to be fenced or excluded from this kind of typical livestock damage.



**Submitted by John Buckley, executive director
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