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State Water Resources Control Board
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Please accept the following photos and text as new input showing the need for much stronger monitoring requirements, enforcement, and consequences for failure by the U.S. Forest Service to halt water quality degradation caused by management activities on national forest lands in California. These comments focus on one specific area of the Stanislaus Forest as an example of sediment being discharged directly into receiving waters by poorly maintained forest roads and poorly located off-road-vehicle routes.

This major rut has been discharging sediment into a nearby creek for many years. Further up the road a number of boulders were placed to prevent through use. Nothing has been done to block use on the lower portion of the road. Nothing has been done to halt erosion pouring off the road into a nearby creek.

Instead, Forest officials recently gave legal approval to off-road-vehicle use on a steep, rutted user-created ORV route that parallels this road and adds even more sediment discharge into the stream. ORV tracks are visible on this adjacent road as shown in the photo.



This photo shows the Stanislaus Forest road upslope from the first photo.



Still further up the hillside, the rut is so deep that it nearly comes up to the waist of the person standing in the rut.



At the upper end of this fork of the rut, the "road" connects to the off-road-vehicle route, which continues even further up the slope.

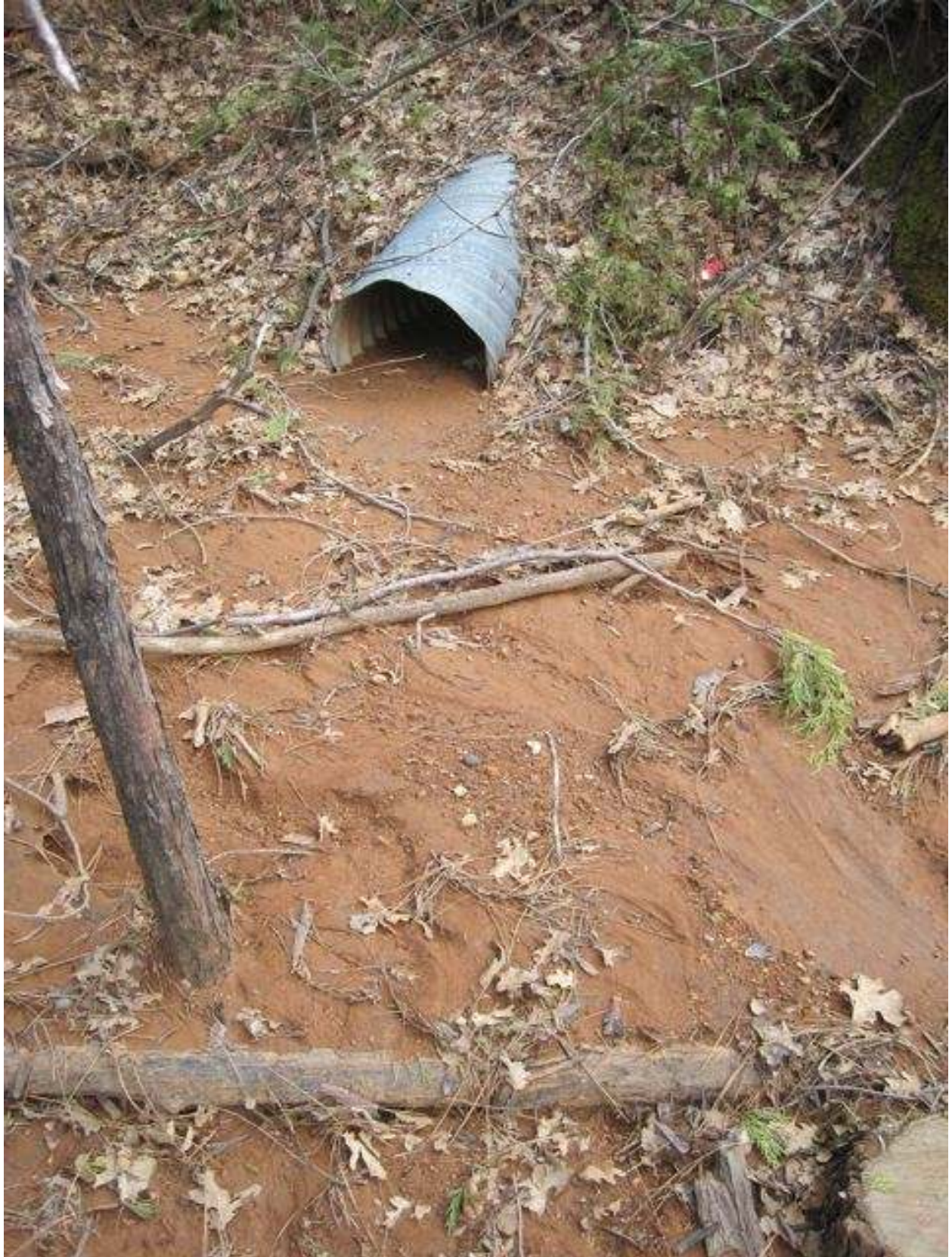
The picture on the following page shows the rut up on the off-road-vehicle route.





And here is where the sediment discharges into a creek that is now clogged with silt.





During the thinning fuels reduction logging project done two years ago, the Forest Service had crews cut down the cedars in the drainage that were killed by the deep sediment burying them with silt. There was no action taken to make any effort to halt the sediment from continuing to wash into the stream drainage.



CSERC has a video of staff digging in this specific creek drainage. Fresh sediment deposits of at least 16" in depth are easily dug down into with a shovel.

At the lower end of this sediment settling area, directly behind where this photo was taken, water was flowing from beneath the sediment and continued downstream.

On the same day that CSERC staff visited this stream site and photographed this egregious sedimentation, the staff visited two other streams where lower levels of dirt road discharge was crumbling into or washing into flowing streams.

In the same general area as the above road and ORV route discharge problems, this forest road had multiple locations where sediment washed off the road. In the top photo, the photograph is taken approximately 60 feet from the road at a settling area where sediment concentrated in a low spot.



This photo shows the silt washed off the road that accumulated at roughly 12" in depth at this spot in the forest. However, the sediment flow was visible all the way to a stream over 100' downslope.



The above photos (and a video available upon request) document clear evidence that Forest Service roads and off-road-vehicle routes are discharging sediment into streams at levels that exceed any acceptable limit for water quality and for prevention of harm to aquatic species.

While this site is an especially significant problem, it is accurate to point out that there are well over 2,000 miles of dirt and gravel roads on national forest lands just within the Stanislaus National Forest. There are hundreds of sites where ruts are diverting water and sediment. There are countless roads that are producing watershed impacts, including roads that have crumbling cuts and fills.

The current Water Quality Management Plan and Best Management Practices have not in the past decade, and are not at the present time, preventing degradation of water quality.

These photos were taken after the March 23, 2010 stakeholders committee meeting with the State Water Board and U.S. Forest Service staff, where the Forest Service expressed assurance that the agency's management is protecting water resources.

When local Stanislaus National Forest staff was provided with CSERC's report on the road and ORV route pouring sediment into the creek behind Cedar Ridge, the staff noted that the Forest was aware of the problem, but had no funding for correction. Staff noted that the recent approval of the ORV route in the Forest's "Motorized Travel Management Plan" was based on the awareness that the route needed mitigation treatment and seasonal closure.

It is CSERC's written comments that it is possible that grant funds may lead to eventual treatment to reduce sediment discharge at this highly visible problem area, but in the meantime, ORV use continues and the road and ORV both continue to pour sediment into the stream. **A lack of Forest Service funding for maintaining roads and ORV routes should -- in any new State Water Board waiver or discharge permit -- be directly tied to strict requirements to close motorized use where the agency is incapable of managing the motorized system in a fashion that prevents water quality violations.**

John Buckley, executive director

