



California

Public Employees for Environmental Responsibility

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April 14, 2010

Gaylon Lee
State Water Quality Control Board
By email: ForestPlan_Comments@waterboards.ca.gov

Barry Hill
USFS Region 5
By email: Bhill@fs.fed.us
Re: Comments on WQMP revision – Forest Roads BMPs

Dear Gaylon and Barry:

Thank you for the opportunity to provide comment on the U.S. Forest Service Water Quality Management Plan revision and BMPs. My personal observations over the past 25 years that I have been involved in road and trail management with the Forest Service is that BMPs are good intentions that usually get no further than that, for a number of reasons. Shifting priorities, budget cuts and lack of accountability too often interfere with actually maintaining road and trail systems or closing problem routes.



OHV route on Placerville District



Illegal OHV use adjacent to a road on the Placerville District. Only halfhearted and ineffective efforts have been made to stop the use.



Failed culverts are common. This failed culvert results in sediment to creek at top of photo.



Another failed culver, this one on a motorcycle trail.



OHV approach to Rock Creek. This trail funnels sediment several hundred feet with no effort to keep the sediment out of the creek. This is a designated OHV trail.



Bottom of OHV trail in photo above, where trail enters Rock Creek.



Bottom of trail in above 2 photos, looking up the OHV trail.



A

nother OHV trail, designated in the Eldorado's recent Travel Management Plan. Trail captures a spring a half mile from where it enters creek.



Sediment in creek from OHV trail in photo above.

The above photos illustrate road and OHV routes that are currently contributing to sedimentation on the Eldorado National Forest, despite BMPs. All but one of these examples is a system road or recently designated OHV route. The revised Water Quality Management Plan must ensure that the impacts to water quality currently widespread on our National Forests will finally be corrected in a timely fashion.

Sincerely,

Karen Schambach
California Field Director