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## COMMENTS ON STAKEHOLDER PROCESS AS OF JANUARY 12, 2010

These are my comments, based on what I heard, the notes I took, the documents that were provided, and the intentions that were explained at the long January 12 meeting in Sacramento.

### ISSUE: WATER QUALITY MANAGEMENT PLAN

1. The WQMP is in need of a rewrite.
  - A. The objectives do not match the actions listed on the next three pages.
  - B. The WQMP objectives contain statements that are obscure at best and would be more informative if written in plain English. For example, #9 states “To employ a nested monitoring strategy involving different types of monitoring at different geographic scales.” What does that mean? Less monitoring or more? What does geographic scale have to do with results? What is a nested monitoring strategy and why is one proposed? Is nesting effective in protecting water quality?

Objective #7, for example, calls for a uniform process of BMP implementation. What is a uniform process of BMP implementation? How does that improve BMP implementation? What is a uniform process? How does such a process relate to some other kind of process? Is nesting better for water quality protection?

After the list of five actions, the document enters into the general procedures. Again, it cites BMPS and remediation of legacy sites, but does not mention restoration of recently damaged sites.

### ISSUES:

1. NO EXCUSES BMP Handbook.  
There is a need for a BMP handbook that is specific, detailed, and in which each BMP is related to the geography, geomorphology, climate, hydrology, soils, vegetation and proposed use/disturbance of the site.

For example, a user would be able to say – this site is high elevation, mountainous, steep, heavy thunderstorms, granitic soils, sparse grasses and shrubs – the use

proposed is use of an old road - - and then be able to determine, for example, how far apart to place the waterbars.

In the meantime, if a model is needed, the FS would be advised to look at the CalTrans handbook for a cookbook on how to develop basic BMP designs and implementation guidelines.

The Stakeholders should not be expected to engage at this level of detail. This is both technical and well-known information to most hydrologists and others.

The Stakeholders want to be assured that the BMPS are extensive, effective and will be implemented at specific sites, dependent on specific and detailed criteria. The criteria for implementing all the BMPs necessary to attain water quality protection must be clearly spelled out in the project documents so that the implementers, regulators and the citizens are fully aware of the design, contract requirements, effectiveness, and expected results.

Unfortunately, the current WQMP (or is it the MAA?) notes that the BMPs currently described are “neither detailed prescriptions nor solutions to specific non-point pollution sources. Rather, they are action-initiating mechanisms, processes, and practices...”

## 2. NO EXCUSES IMPLEMENTATION

Implementation of BMPs must be fully committed. While it is obvious to say it, BMPs that are not implemented are futile and may result in degraded water quality.

The Forest Service representative said that “We need to find systems that are as effective as possible to work with what we have”

Well, what does the FS “have”? Does that statement mean there is no intent on the part of the FS to put more resources into water quality protection? What is the current budget for BMP installation and effectiveness monitoring? What was the previous year’s budget for the same?

## 3. MONITORING

Is monitoring required of FS contractors? Is monitoring required for ongoing activities? Does the FS do all of the monitoring, or contract it out?

What is the process for shifting funds from one subject matter to another, such as monitoring? What \$ amount has Region 5 requested for the next fiscal year for monitoring BMPs? Is that an increase or decrease over the previous year?

Are all activities monitored for water quality impacts? Which are and which are not?

What percentage of monitoring budgets is designated for effectiveness monitoring of BMPs? What is the status of effectiveness monitoring? Is there a report? How many BMPs are covered in the report? Are the results general or specific? Is the effectiveness monitoring scientific or subjective (field observation)? Detailed or generalized?

Also, baseline data is critical to useful information. The results of monitoring can reveal pollution violations, but it is even more helpful to know what baseline conditions are before disturbance causes new impacts. How much baseline data has the FS collected in the past ten years? Is it compiled somewhere? Is it available to the public?

Stakeholders need to know the above information, in order to understand what has gone wrong and what has gone right in the National Forests in California in terms of protecting the citizens' and the state's water quality.

Bill Thomas, of the Cattlemen's group phrased it very well, when he said "Start with monitoring, and monitor and monitor." He also noted that monitoring is the check for performance results.

## 2. ADAPTIVE MANAGEMENT

The Forest Service representative said that "We need to find systems that are as effective as possible to work with what we have" Again, what is what "we have"? Does this mean the FS intends to do the same level of effort that they do today in terms of adaptive management monitoring and actual management?

Since monitoring is one critical key component of adaptive management, how do the responses to the earlier questions impact the quest for an adaptive management program for protecting the water quality of the state?

Further, the issue of adaptive management is clearly more complex than just saying the words. There are many protocols involved in developing a successful adaptive management program.

The Stakeholders await the report from the Adaptive Management sub-committee.

## 3. TRANSPARENCY AND ACCOUNTABILITY

For the Stakeholders, this may be the bottom line. There is no point in entering into improved efforts in the above three elements if there is not going to be significantly better transparency in decision-making, documents, process, and results, whether good or bad.

In addition, the FS must add a new cultural shift, focused on full accountability to the public, which owns the public land.