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Karen Schambach

7/6/2010

CAPEER

Hi Barry,

I have added a few comments to several BMPs, tracking changes on the TWS edits (with which I concur), so you have them all together. In addition to the edits, I have general concerns about the format of the BMPs. While it may be clearer to Forest Service staff and contractors who work with these regularly, I believe the public might find it difficult to identify just exactly what each BMP requires of applicable projects. I'd like to see bullet points or some similar check list format to identify the actual management practices being required. If the references cited at the end of each BMP include the required management practice, those specific practices should be specified within the document. As noted by Regional Water Board staff and others at the last meeting, the cited references lack the specificity needed to ensure water quality protection, and the Forest Service should consider using the Cal Trans BMP model.

There should also be a BMP that specifies compliance with Forest Plan Standards and Guidelines or other direction, such as the Riparian Conservation Objectives in the Sierra Nevada Forest Plan Amendment. It is not sufficient to rely on NEPA to ensure this compliance, given the widespread use of Categorical Exclusions for road construction and maintenance.

Thanks,

Karen