

2. Erosion Control Plan (PRACTICE: 2-2)

a. Objective: To limit and mitigate erosion and sedimentation through effective planning prior to initiation of construction, reconstruction, maintenance and decommissioning activities, and through effective contract administration during construction.

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Comment [WW1]: Add "reconstruction" and "decommissioning" to the list of activities requiring an erosion control plan.

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b. Explanation: Land disturbing activities can result in short term erosion. By effectively planning for erosion control, sedimentation can be controlled or prevented. Within a specified period after award of a contract (presently 60 days prior to the first operating season in Timber Sale Contracts, per C6.3) the purchaser will submit a general plan which, among other things, sets forth erosion control measures. This period varies for public works contracts. Erosion control plans are either included in contract clauses, specifications, and drawings, or are required as a submittal for review and approval. A contractor's plan includes proposed methods, materials, schedule, and on-site Erosion Control Supervisor. Operations or construction of public works cannot begin until the Forest Service has given written approval of the plan. The plan recognizes the mitigation required in the contract. A similar plan is required of miners and special use permittee's.

Comment [WW2]: The purchaser (contractor) should be required to submit an erosion control plan, not a plan that "among other things" has some erosion control elements in it. The erosion control plan should be prepared by a qualified and experienced person who is licensed or certified to produce such plans. This would be a geologist, engineering geologist, engineer, or CPESC-certified erosion control expert. The state of the practice is greatly advanced and should no longer be left as a side-duty of someone who is not experienced and state-licensed or certified.

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Force account work that includes land disturbance has an erosion control plan developed jointly between engineering, project manager, crew supervisor, and hydrologist, with Line Officer approval. Materials, equipment and labor in implement the plan are included in project budget.

Comment [WW3]: Somewhere there needs to be a specific write-up detailing the required contents of an erosion control plan and how it is to be prepared and implemented. The contractor needs this, and we need to see it to verify it is adequate for protecting water quality.

c. Implementation: Design engineers develop detailed mitigation using an IDT. The detailed mitigations are reflected in contract specifications, drawings, and basic contract clauses. The intent of mitigation is to prevent construction-generated erosion, as well as that generated from the completed road, from entering watercourses. The requirements for local agencies, and regional State Water Quality Control Board, may include more stringent requirements, including a restricted operating season, and mandated methods and/or materials. These, too, are incorporated into the erosion control planning for Forest Service projects. This practice is commonly applied to all road construction through contract clauses and specifications and will apply to road construction for timber sales, mining, recreation, special uses and other roadwork on NFS lands.

Comment [WW4]: This may be the "intent" but to have no discharge from this type of work is generally not realistic or possible. You can minimize it.

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Comment [WW5]: There should be 2 elements: 1) implementation monitoring (making sure BMPs are actually installed and installed correctly), and 2) effectiveness monitoring (making ... [1]

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Erosion control monitoring for effectiveness during contract construction work is performed at varying intervals, usually as an incidental work item, by the contractor. Assurance is provided by COR and/or inspector. Contractor is encouraged to regularly check local weather predictions to events that could compromise erosion control measures, such as localized heavy thunderstorms. Operations may be suspended immediately if erosion control measures fail. Monetary fines may be passed on to contractors who fail to comply with approved erosion control plans or to make corrections to ineffective methods.

Comment [WW6]: This is not much of a BMP. There should be a specific requirement for inspections and r ... [2]

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Contracted projects are implemented by the contractor or operator. Compliance with contract specifications and operating plans is ensured by the COR, ER, or FSR through inspection and feedback communication.

Comment [WW7]: This is all about implementation. Who is responsible for performance? In other words, wh ... [3]

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There should be 2 elements: 1) implementation monitoring (making sure BMPs are actually installed and installed correctly), and 2) effectiveness monitoring (making sure they are working and they are adequate). Both BMP types need performance standards spelled out for the contractor.

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This is not much of a BMP. There should be a specific requirement for inspections and repairs of erosion control measures, and these requirements should carry through the life of the contract. Once the contract has officially ended, it should be the continuing requirement of the USFS to conduct continuing BMP inspections and repairs for a designated period.

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This is all about implementation. Who is responsible for performance? In other words, who does the Water Board cite with a violation?