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RE: USFS Road BMPs in relation to the Water Quality Management Plan

While we had some good exchanges at the June stakeholder meeting, I came home troubled about the amount of time it took to defend the quite general BMPs and the amount of time it took to drill down to such a few details.

Crystal Bowman's letter today, brings home one of the reasons it was such a lengthy conversation - we were not provided all the details that we needed. That significant oversight seems to throw an enormous hurdle into a difficult process at this time, and tests our effort to reach a place of trust.

Mike Chapel indicated at several time, in answer to our questions, that they depended on professional judgment. I read a San Francisco Chronicle story on Friday, July 2, 2010 that brought the issue of professional judgment home to me. In short, a high-speed rail forecast and model was critiqued by the Berkeley Institute for Transportation Studies, that found problems, including "making determinations based on professional judgment rather than data."

This seems to be the crux of the MP issue.

What we should be discussing is what is the MP and what is the data that it is built upon. Without that information, the generalized, non-specific BM's provided to us are clearly not intended to protect water quality, but may do so, as an unintended consequence. That is simply not good enough for the source waters of California.

Again, I note that Cal Trans has three volumes of BM's in order to efficiently and effectively deal with preventing and treating runoff from their construction sites and their completed road sites and their maintenance practices. The Cal Trans descriptions of BPS are accompanied by specifications, technical drawings, and a clear understanding of where a decision maker is to use what specific MP designs.

In addition, the Mendocino County Handbook for Forest and Ranch Roads, plus the 78-page Appendix B to the Water Quality and Habitat Protection Manual

for County Road Maintenance provides a good start for the FUSS to build a water quality protection manual for Forest Service Road construction and maintenance. As Appendix B states "This appendix includes standard designs and procedures for many of the structural and physical Best Management Practices (BM's) that are referred to in the Manual (Chapters 3 through 9). The best drawings and procedures were gleaned from a variety of manuals, guidelines, handbooks, and other references. Users of these designs are encouraged to refer to the original source for more detailed specifications of the particular MP."

The stakeholder group would be better informed if a stakeholder meeting could be devoted to a plan to develop such a water quality handbook for the FUSS, which would include presentations from Cal Trans and from Mendocino County. The stakeholder group should be provided key elements of both the CalTrans and Mendocino County BMP documents.

Future BMP subjects, including grazing, should be presented in a manner that includes all the documentation of protection of water quality, in order for the stakeholders to better understand the FS standards and

processes for water quality protection.

Thank you for the opportunity to comment.

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