

# All About Access

After the last stakeholder group meeting devoted to reviewing the 8 draft BMP's almost word by word, I felt a review of the current 2000 practices was warranted to understand what was being recommended as an improvement to the existing guidelines.

I trust that a resubmittal or reiteration of all the comments the stakeholder group contributed during the meeting of June 22nd is unnecessary as those were all recorded during the session.

Therefore, the following constitute my comments on the proposed BMP's as submitted to the WQMP Stakeholder Group:

According to experienced Forest Service Road Engineers I have consulted, the current (2000) BMP's are written clearly and concisely, in such a way that they describe the intent of the management practices and the appropriate BMP application to a given situation.

In comparing the draft BMP's to the current practices, the draft proposals seem to be written in such a manor that they would diminish, rather than increase, the effectiveness of road engineering guidelines to reduce erosion, and protect water quality.

Also of note is the opinion that the proposed BMP's appear quite subjective to the professional eye, almost biased, and the inclusion of fines or the possibility of monetary fines for failure to enact management practices are inappropriate to BMP's

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and do not have a place in road management guidelines.

The most important outcome of this process should be BMP's that are able to be put into practice on the 18 National Forests in California to maintain and improve the many forested roads as pertains to water quality.

If, as it seems, these BMP's are not well written or well conceived, and they cannot be understood or appreciated by the very people expected to put them into practice, it would seem prudent to go back to the proverbial drawing board. In short, the draft BMP's do not seem to have been reviewed by experienced road engineers that understand the connection between hypothetical situations and actual on-the-ground conditions.

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