



California

Public Employees for Environmental Responsibility

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October 3, 2010

Barry Hill, Regional Hydrologist
Pacific Southwest Region
USDA Forest Service
1323 Club Drive
Vallejo, CA

Dear Barry:

Thank you for the efforts you and others at the Regional Office have made to determine Best Management Practices (BMPs) to reduce the impacts of Off Highway Vehicles (OHVs) on water quality on National Forest Lands. Due to the impacts motorized recreation can, and often do, impose on water quality, the inclusion of OHV BMPs is long overdue.

As others and I pointed out at the September WQMP Stakeholder meeting, the most important BMPs for preventing water quality impacts by OHVs are those addressing existing routes. Thousands of miles of OHV routes already criss-cross our forest landscapes. Many of these are currently impacting streams and aquatic life through sedimentation, stream bank damage and impacts to riparian areas, including meadows. The design of new routes can help to reduce future damage, but it is even more imperative that these BMPs also stop water quality impacts from ongoing use on existing routes.

We are concerned that those BMPs that do address existing use lack definition or specificity and do not provide land managers clear authority to close, even temporarily, routes causing damage. We also want to see consequences for land managers who fail to comply with BMPs.

Please incorporate the attached "track changes" Word document with our specific comments on the draft BMPs. Again, thanks for your efforts. I hope you will consider these comments when finalizing the OHV BMPs.

Respectfully submitted,

Karen Schambach
California Field Director

Att: Edited OHV BMP draft