

Multiple Use Information and Resource Network
MUIRNet-News
...for the recreation advocate

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Barry Hill
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Barry:

Attached is a copy of the OHV BMPs where I have provided notes referencing changes and a few direct text changes.

I am in general agreement with the overall intent of the BMPs and I like how they reference the Forest Service Handbook section. This is the type of structure/format all BMPs should exhibit and aids adjustment of BMPs when it is found that the desired water quality standard is not being achieved. The design of BMPs should be based on site-specific conditions, technical, economic and institutional feasibility, and the water quality standards.

I do have three points of general comment.

-- The OHV BMPs are a Forest management tool dealing with designated OHV routes within the Forest. However, a significant source of funding for route maintenance and recreation management comes from the California OHMVR program. As such, it is important that close coordination occur between the federal and state agency to ensure that recreation opportunities are managed and maintained efficiently and effectively. The state OHMVR program does have guidelines to cover snow removal and other actions funded as part of their grant program.

Somewhere within the BMPs, I would like to see a reference to where both state and federal guidelines dealing with OHV related actions are coordinated to avoid issues where one is more stringent than the other or where they are in conflict. Such a situation could lead to confusion and potential of BMPs not being implemented in an efficient and effective manner.

-- The OHV BMPs referencing monitoring should be part of the monitoring section. Monitoring must be comprehensive to be effective. There are several of the OHV BMPs that reference "inspect" verbiage. That is a good point to refer to the monitoring section.

-- With respect to the "restoration", the text refers to "OHV damage". While there may be some OHV damage that needs to be restored, there is also potential for damage due to other causes. And, the "restoration" BMPs would also apply to damage from "other".

Routes within the Forests were created to provide access for some purpose. Assuming that they are now explicitly there for OHV recreation is a false assumption. As such, something other than "OHV recreation" has the potential to cause resource damage. The BMPs with a consistent use of OHV provide a bias that obscures the overall need to provide routes for access to the Forests.

Overall, the OHV BMPs reflect the type of specific language and reference to guidance that all other BMPs should reflect. As noted during the numerous meetings, the BMPs are viewed as clauses to be attached to permits; basically, a contractual clause. These BMPs provide a level of specificity not seen in the others.

The "science" component of implementing the BMPs and monitoring for effectiveness. Science is a useful tool for answering questions about facts. However, science cannot tell you what you SHOULD do with those facts. Adaptive management will be an important component in providing access and maintaining water quality standards.

Sincerely,

A handwritten signature in black ink, appearing to read "John Stewart". The signature is fluid and cursive, with a large, stylized initial "J" and "S".

John Stewart
California Association of 4 Wheel Drive Clubs
State OHV Stakeholder Representative