



October 4, 2010

Kathy Mick, Barry Hill
Region 5
USDA, Forest Service
1323 Club Drive
Vallejo, CA 94592

cc: Gaylon Lee
James Giannopoulos

Dear Kathy and Barry:

At our last Stakeholders Committee meeting in Sacramento at the State Water Board conference room, you asked for us to provide very specific input to you prior to October 6th so that you could consider written comments in addition to the points of concern that were raised at the Stakeholders Committee session.

Enclosed with this cover letter are very specific comments as you requested.

Many suggested comments are submitted (as Kathy requested) with "show changes" edits for the OHV BMP's section. Please note that there are two levels of comments. First, there are comments such as Karen's and Stan's that attempt to modify existing wording to improve the clarity or the accuracy of the BMP's text or proposed conditions. While improving wording by deleting phrases such as "to the extent practical" may produce BMP's with stronger, clearer wording, improving BMP wording will not result in weak BMP's suddenly becoming meaningful and effective or eliminate the need to actually monitor water quality.

Accordingly, CSERC submits very specific comments for the OHV section with a number of strongly suggested additions that will actually result in the State Water Board and the public being able to measure the effectiveness of BMP's and water quality. CSERC urges the Forest Service to set conditions, test for BMP effectiveness, and provide for consequences if BMP's are not fully effective. CSERC strongly opposes the current loose "adaptive management" approach that simply relies upon the judgment of agency line officers to choose from a list of techniques and continue to adjust without consequences.

Our staff urges the Forest Service to move beyond well-intended management objectives that may never be achieved or effectively evaluated as to whether or not they actually prevent pollution. Instead, our staff urges the Region to make water quality a higher protection than continuing status quo management practices. **We urge the Region to embrace water monitoring at specific locations on each national forest where water quality has the highest potential to be contaminated**, rather than depending upon a Region 5 Water Study that may not reflect water quality conditions across the Region and will apparently not place water sampling locations directly downstream from sites where contamination risk is highest.

If you have any questions about our suggested edits, please contact me.

John Buckley, executive director