



Sierra Forest Legacy

Protecting Sierra Nevada Forests and Communities



November 19, 2011

Ms. Jeanie Townsend Sent via Internet commentletters@waterboa
Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Ms. Townsend,

The following comments/ materials pertain to the revised State-USFS Waiver and are in addition to our prior timely submission and comments at the previous Waiver hearing.

We are including Watershed Improvement Needs (WIN) inventory data we have received from the USFS in response to a FOIA Request dated July 5, 2011. Many of the forests have not yet responded with inventory data, and so the FOIA is still in process of being fulfilled. As presented in my public comments at the first State Waterboard hearing, there is an alarming number of legacy and ongoing water quality impacts ("legacy impacts") on the eleven national forests in the Sierra Nevada. I requested the Waterboard examine the Forest Service WIN inventory data because it highlights the ongoing failure of the existing BMP program to avoid adverse water quality impacts from logging, road-building, culvert failures, grazing and other stressors on public lands. These data sheets highlight problems, that magnitude of which demonstrate recent ongoing harm to water quality and aquatic resources. The BMP program must address these legacy issues with a clear timeline for restoration and strengthening measures that will halt this ongoing significant degradation.

The Forest Service FOIA request is ongoing and we will continue to highlight to the Waterboard and USFS that need to address these alarming legacy issues with appropriate BMP's and adequate monitoring.

Sincerely,

Craig Thomas, Executive Director
Sierra Forest Legacy
P.O. Box 244
Garden Valley, CA 95633

List of Materials

- 1. WIN Inventory data from Sequoia National Forest**
- 2. WIN mapping on Sequoia National Forest; two 2'x3' color maps showing WIN mapping**
- 3. Photos of WIN sites on Sequoia National Forest**
- 4. WIN inventory data on Plumas National Forest**
- 5. Win Inventory data on Inyo National Forest**
- 6. Win Inventory data on El Dorado National Forest (submitted separately in electronic format)**