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December 13, 2009

Members, State Water Resources Control Board
c/o Mr. Gaylon Lee
Forest Activities Program Manager
Division of Water Quality
State Water Resources Control Board
1001 I Street
P.O. Box 2231
Sacramento, CA 95812
Submitted via email to Forestplan_comments@waterboards.ca.gov
(Please confirm receipt)

**Re: Update of the Water Quality Management Plan for National Forest System
Lands in California**

Dear State Water Resources Control Board Members:

The State Water Resources Control Board and the USDA Forest Service have proposed a significant change in policies that affect the environment. The EIR/EIS is the established method for analyzing such policies, presenting costs and benefits, and involving the public in any major project that affects the environment. Workshops, agreements, collaborations, partnerships and stakeholder groups do not substitute for full disclosure and analysis of alternatives.

Too much of the background for the proposed policy changes seems to me nothing more than special pleading by the USDA Forest Service for relief from what it considers burdensome regulation. Streamlining, increased project certainty, reduced oversight, and centralization of regional decision-making are in themselves not obvious features for improving the environment. The proper role of the State Water Board and its Regional Boards is to regulate, under the Clean Water Act, those who affect the waters of the state.

The established structure of regulating water quality standards and non-point source pollution in California through the Regional Boards has served the public reasonably well. I can see no obvious reason for eliminating a regional oversight of water quality when the very nature of the national forests is itself regional. Nor can I see any compelling rationale for lessening the separation of

the regulating agency from those who potentially impact water quality. Scholarly research and practical observation show that performance in environmental stewardship works best when regulatory authority is clear, strong and separate. Such conditions do not impede cooperation on reaching mutual goals of maintaining and improving California's water quality and watersheds. Our economy today illustrates the weakness of allowing regulated entities to self-regulate and interpret what is good for society.

At present, the USDA Forest Service embraces the prime importance of protecting water from our national forests. But the Forest Service frequently changes direction about priorities.

The proposed changes in Water Board and USDA Forest Service relationships over protection of land and water in California are too important and complicated to be left to any group of stakeholders or to the agencies themselves. Nothing less than the thorough examination of alternatives by an EIR/EIS will do.

Sincerely,

Don C. Erman
Professor Emeritus, University of California
Former Science Team Leader, Sierra Nevada Ecosystem Project
Former Director, UC Centers for Water and Wildland Resources