



DEPARTMENT OF ECOLOGY AND EVOLUTIONARY BIOLOGY  
621 CHARLES E. YOUNG DRIVE SOUTH  
BOX 951606  
LOS ANGELES, CALIFORNIA 90095-1606

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](mailto:forestplan_comments@waterboards.ca.gov)

**Re: Proposed changes to the water quality management plan for national forest system lands in california**

Dear Members of the State Water Resources Control Board:

As with others that I have talked with, I was quite surprised and concerned to learn that the State Water Resources Control Board and the U.S. Forest Service have proposed a significant change in policies that affect the environment. As I understand the issue, and there has been very little easily available public information or notice describing the full implications of this policy change, the State Water Board and the Forest Service have jointly decided that they would like to largely remove Regional Water Boards from regulating the Forest Service over projects that may affect water quality and non-point source pollution. This policy change would seem to me to have very significant implications. It would take the management of permits and reviews away from Regional Water Boards, centralizing authority in the State Board thereby greatly streamlining review and permit process for Forest Service activities. It would seem to also largely turn over major enforcement of BMPs, water quality monitoring, and other regulatory functions to the Forest Service itself.

Clearly, a full process of EIR/EIS is the established method for analyzing such a potentially significant policy change, presenting costs and benefits, and involving the public in any major project that affects the environment. Poorly advertised workshops and stakeholder groups do not substitute for full disclosure and a careful analysis of alternatives.

My concern is that the Forest Service has a very uneven record of environmental stewardship in California. Since much of the background for the proposed policy changes seems to be to offer Forest Service relief from what it considers burdensome regulation, it is not obvious to me that reduced oversight and centralization of regional decision-making will in any way act to increase efficiency or protection of the environment. Both the Regional Boards and

the State Water Board and should be involved in the regulation of those who affect the waters of the California.

The implementation of such a major shift in environmental policy and regulation deserves a full hearing through the EIR/EIS process and greater public participation. The stakes for California and our environment are too high to do any less.

Yours sincerely,

A handwritten signature in black ink that reads "Philip W. Rundel". The script is cursive and fluid, with the first name "Philip" and last name "Rundel" clearly legible.

Philip W. Rundel

Distinguished Professor of Biology