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Content Analysis Enterprise Team (INDIVIDUAL) Direct Dial 801-517-1037

From: Guy Martin Date April 24, 2000

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April 24, 2000

USDA – Forest Service
Content Analysis Enterprise Team
Attention: UFP, Building 2
Suite 295
5500 Amelia Earhart Drive
Salt Lake City, Utah 84116

Re: Comments on Proposed Unified Federal Policy on Watershed Planning

Dear Content Analysis Enterprise Team:

On February 22, 2000, the Department of Agriculture and the Department of the Interior published in the Federal Register a proposed policy statement regarding a unified federal initiative for "insuring a watershed approach to federal land and resource management." 65 Fed. Reg. 8834-40. The purpose of the policy statement is to provide a framework for federal resource management agencies to take watershed planning concerns into account in carrying out their actions and activities.

These comments on the policy statement are submitted on behalf of the Western Urban Water Coalition (WUWC). The WUWC consists of the largest water utilities in the West, serving 16 metropolitan areas in seven states and over 30 million western water consumers.[1] WUWC members own and operate water management, water supply and hydroelectric projects, including dams, water conduits, reservoirs, and other facilities involved in water supply, storage and conveyance, and power generation services.

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[1] The WUWC represents the following urban water utilities: Arizona – City of Phoenix, City of Tucson; California – Central Basin Municipal Water District and West Basin Municipal Water District ,Contra Costa Water District, East Bay Municipal Utility District, Metropolitan Water District of Southern California, San Diego County Water Authority, City and County of San Francisco Public Utility Commission, Santa Clara Valley Water District; Colorado – Denver Water Department; Nevada – Big Bend Water District, Las Vegas Valley Water District, Southern Nevada Water Authority, Westpac Utilities; Utah – Central Utah Water Conservancy District; and Washington – City of Seattle.

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As a general matter, the WUWC supports a careful and thoughtful analysis of federal activities from a watershed perspective. The proposed policy would establish useful principles that can guide such an effort. WUWC members typically engage in watershed-related analyses and management approaches in developing their own plans and activities. Our experience has been that when such an approach is properly utilized and developed through full consultation with affected stakeholders, it can lead to effective planning and water resource utilization decisions.

For these reasons, the WUWC generally supports the proposed watershed approach to federal land and resource management. However, there are several key principles which we believe must be incorporated into the policy before it is implemented.

First, it is essential that the policy itself reference the high priority that must be given to ensuring the continuing supply of high quality, reliable sources of drinking water. In the hierarchy of water supply uses, high quality and reliable public drinking water supply is essential, and deserves foremost consideration in the context of federal watershed planning activities. We therefore request that the policy statement make specific reference to such use of water supplies in the context of federal watershed management initiatives.

Second, it is essential that this watershed planning initiative not assume the form of an effort undertaken by federal agencies to preempt, or interfere with, water rights allocations and procedures established under state law. All too frequently federal planning efforts of this nature evolve into conflicts between federal, state, local and tribal governments over the control of water resources. This watershed planning initiative should not be used as a vehicle through which federal agencies seek to exercise primacy in this arena. To clarify this point, the watershed policy should clarify that it in no way affects the relationship between the federal government and other parties with respect to the allocation and use of water rights.

Finally, the success of the policy will depend to a large extent on how effectively the federal agencies incorporate other affected parties into the planning and decisionmaking processes. We are pleased that the proposed policy confirms the importance of such communication and cooperation. We request that specific reference be made to the inclusion of municipal water supply entities as affected stakeholders in watershed planning decisions. In addition, we request that the final policy statement reemphasize the important role for shared communication and

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cooperation with all affected stakeholders and establish checks and balances to ensure that federal decisionmaking will not proceed under this watershed policy in the absence of such collaborative efforts.

We appreciate the opportunity to comment on the proposed policy statement. If you have any questions about these comments, please contact me.

Very truly yours,

Guy R. Martin

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WESTERN URBAN
WATER COALITION
"For the Future of the West"

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