123

Transmitted by fax to:
(801) 517-1021

WEST VIRGINIA RIVERS COALITION

April 24, 2000

USDA-Forest Service, Content Analysis Enterprise Team
ATTN: UFP
Building 2, Suite 295
5500 Amelia Earhart Drive
Salt Lake City, UT 84116

Dear USDA-Forest Service Content Analysis Enterprise Team,

On behalf of the West Virginia Rivers Coalition, I respectfully submit these comments regarding the draft version of the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management dated February 22, 2000.

The West Virginia Rivers Coalition represents over 2,200 individual members and 48 local, regional, state and national affiliate organizations seeking the conservation and restoration of West Viginia's exceptional rivers and streams.

We strongly believe that this draft policy should ensure that the federal government is held to the same standards as everyone else, protects priority watersheds, allows adequate public participation, and allows for adequate resources to fulfill the goals of this policy.

The federal government should be held to the same standards as everyone else who has to comply with federal environmental regulations. In fact, the federal government should not only meet water quality standards as mandated by the Clean Water Act, they should serve as a model for the nation by setting loftier goals such as assuring protection of high quality and sensitive waters, and setting a date for compliance with water quality standards.

To comply with the antidegradation requirements of the Clean Water Act, activities on federal land must also not degrade water quality. Federal agencies should not allow an activity until they first determine that the permit will not degrade water quality. This is often ignored in land management decisions.

CAET RECEIVED
APR 28 2000

801 N. Randolph Avenue • Elkins, West Virginia 26241 • (304) 637-7201
"Seeking the conservation and restoration of W

123

Best Management Practices, though useful and a good idea, should be regularly reviewed and revised. The effect of BMPs on water quality is often not measured so their effectiveness is not known. The policy should also require monitoring of BMP compliance and effectiveness.

We recommend that priority watersheds be considered Outstanding National Resource Waters (ONRWs). Federal agencies should recommend to state agencies that priority watersheds be designated as ONRWs. Even before this designation, state and federal land managers should treat priority watersheds as such.

Data collected from all waterbodies on federal lands should be used for water quality reporting under the Clean Water Act. The policy should explicitly provide that information gathered by and for federal agencies as part of watershed assessments will be used for Clean Water Act water quality reporting and assessment programs.

This policy allows federal agencies a 10 year water quality reporting schedule. Federal agencies should be held to the same two year reporting schedule state agencies have to comply with for the biennial review.

Citizens should be allowed to ask for the selection of watersheds in need of special protection through a public petition process. Current language about the involvement of stakeholders is inadequate and should include a mechanism for the federal agency and state or tribe to respond to a petition in a timely manner.

Finally, to achieve all these goals, each federal agency must commit to asking for adequate funding. Existing federal agency budgets do not contain sufficient funding to implement this policy. Without new funding and a commitment to this policy, the policy is ineffective.

We appreciate the opportunity to submit comments on the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. It is our hope that you will consider our comments as you finalize this new policy.

Sincerely,

Pamela C. Moe-Merritt,
Conservation Director
West Virginia Rivers Coalition

cc: Mr. Chuck Myers, Supervisor, Monongahela National Forest
Mr. Brad Campbell, Director, EPA Region III
Ms. Libby Chatfield, Technical Advisor, WV Environmental Quality Board

CAET RECEIVED

APR 24 2000