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Surfrider Foundation®

SAN DIEGO COUNTY CHAPTER

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April 21, 2000

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

RE: Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management

Dear USDA-Forest Service Content Analysis Enterprise Team,

We respectfully submit these comments on the February 22 draft version of the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. The San Diego County Chapter of the Surfrider Foundation represents more than 2000 coastal recreation enthusiasts in San Diego County working towards the preservation and enjoyment of our region's beaches, bays, and estuaries. In addition, we are working closely with numerous land-use organizations and our regional water board to address watershed impacts from inland sources and federal facilities. We genuinely feel this draft policy should, at the very least:

- Ensure that the federal government is held to the same standards as everyone else;
- Protect priority watersheds;
- Allow adequate public participation; and,
- Allow 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, it should serve as a model for the nation by setting more stringent goals such as assuring protection of high quality and sensitive waters, and setting aggressive schedules for compliance with water quality standards.

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

Existing and planned Best Management Practices (BMPs), though useful and a good idea,

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must be regularly reviewed and revised. The effectiveness of certain BMPs on water quality is often not quantified, so likewise, their impacts are usually left unknown. 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 water bodies 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 2 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.

Thank you offering an opportunity to submit comments on the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. We hope you consider our comments as you finalize this new policy.

Sincerely,

Marco Gonzalez

MARCO A. GONZALEZ, ESQ
Chairman

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