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Rivers Alliance
of Connecticut

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: Comments on the February 22 Draft Version of the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management.

Dear USDA-Forest Service Content Analysis Enterprise Team,

Rivers Alliance of Connecticut respectfully submits these comments on the February 22 draft version of the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. We genuinely feel this draft policy should: 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, they should serve as a model for the nation by assuring the 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.

Best Management Practices should be regularly reviewed and revised. Despite their name, some of these BMPs are out-dated and fail to represent state-of-the-art practices currently available. Therefore, the policy should also require monitoring of BMP compliance and effectiveness.

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.

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This policy allows federal agencies a 10-year water quality reporting schedule. Federal agencies should be held to the same 2-year reporting schedule that 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,

Margaret Miner
Executive Director

The Rivers Alliance of Connecticut is the statewide coalition of river organizations and individuals formed to protect and enhance Connecticut's rivers by promoting sound river and watershed policies, uniting and strengthening the state's many river groups, and educating the public about the importance of river conservation. The Rivers Alliance is a registered non-profit organization, whose 800 members includes over 100 organizations, the combined memberships of which exceeds 60,000 individuals.

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