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STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
Division of State Lands

4/21/00

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

Dear Enterprise Team:

This letter summarizes our agency's comments on the proposed unified federal policy for ensuring a watershed approach to federal land and resource management.

- **More Details are Needed Regarding How the Broad Policy Goals Will Be Achieved**

Most of the proposed unified policy includes broad policy goals that are desirable, such as improving agency coordination. However, more detail is needed to explain when existing efforts by state, local and federal agencies are sufficient v. when additional steps and coordination are needed. Perhaps specific criteria could be developed to help delineate in detail when existing efforts are not sufficient and more federal involvement is needed. Also, more information is needed regarding the specific steps that will be taken to implement the unified policy.

- **More State and Local Participation is Needed to Finalize and Carry Out the Policy**

Given the important role state and local governments have in watershed planning and improving water quality, more input and participation is needed at the state and local levels. While comments on the proposed policy will help provide some of this input, more proactive efforts are appropriate. Workshops with state and local agencies, and

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water users of all types, should be conducted to work out and define the details of how best to finalize and implement the policy with the least amount of impact on existing programs and water users. This is especially important since the goals of the policy can not be achieved unless state and local interests fully participate in the finalization and implementation of the policy. Collaborative planning approaches should be used to help finalize and implement the policy and build partnerships with state and local interests. The Bureau of Land Management's Resource Advisory Councils are an example of how collaborative planning groups are successfully being used by a federal agency to finalize and implement its policies.

- **The Criteria Used to Designate Watersheds for Special Protection Need to Address the Effectiveness of Existing Efforts and Socioeconomic Impacts on Local Water Users**

The proposed policy requests input on what criteria should be used for designating watersheds for special protection and thus additional actions by federal agencies. As noted in an earlier comment, detailed criteria should be developed and applied when determining the effectiveness of ongoing efforts and thus the need for additional actions by federal agencies. Secondly, criteria should be developed that address the likelihood and significance of related socioeconomic impacts on water users. The incremental benefits occurring from efforts to improve water quality need to be directly compared to the related incremental socioeconomic impacts and other costs. We are concerned federal agencies could require their own staff, and the staffs of state and local agencies, to spend a great deal of time and money improving water quality in some areas by a relatively small amount, while causing significant and adverse socioeconomic impacts in local communities.

Thank you for providing an opportunity to comment on the proposed policy. Please call me at (775) 687-4364, ext. 235 if you have any questions regarding our comments.

Sincerely,

Mark Farman

Mark Farman
Resource Planner

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