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Department of Energy
Washington, DC

MAY 10 2000

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

Dear Sir or Madam:

The U.S. Department of Energy (DOE) has reviewed the proposed *Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management* published in the Federal Register on February 22, 2000. The Department generally supports the goals and objectives contained in the proposed Unified Federal Policy. DOE believes that the increased coordination and collaboration emphasized in the proposed policy along with consistent and scientific management approaches should strengthen existing watershed management initiatives.

The proposed policy recognizes that Federal agencies will implement the policy as individual agency laws, missions, and fiscal and budgetary authorities permit. This statement should be retained in the final policy to alleviate concern expressed by some field elements that implementation could imply extensive resource and budgetary commitments, and potential impacts on mission programs at regional levels. We request that the unique and differing natures of the missions of all Federal organizations be recognized when the final policy is implemented. Additional comments are enclosed for your consideration.

We appreciate the opportunity to comment on the proposed Unified Federal Policy. Should you have any questions regarding the enclosed comments please contact Lois Thompson at (202) 586-9581.

Sincerely,

Raymond P. Berube
Deputy Assistant Secretary
for Environment

Enclosure

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U.S. DEPARTMENT OF ENERGY COMMENTS ON
THE PROPOSED UNIFIED FEDERAL POLICY FOR ENSURING A WATERSHED APPROCACH TO FEDERAL LAND AND RESOURCE MANAGEMENT (65 FR 8834)

The following comments relate to definitions and the level of detail needed to implement the UFP effectively.

Key Elements of the Proposal (page 8836) and Section 1. Policy Goals, item (B). "Priority" or "special protection" watershed areas are not clearly distinguished in the text or the policy. The difference between a "priority" watershed and "special protection" watershed needs to be clarified. If these terms are defined in detail in other documents or regulations we recommend including specific cross-references.

II. Agency Objectives item B(4). "Restoration and adaptive management". Clarification of what activities might fall under "adaptive management" and "restoration" would be very useful. Again, specific cross-references to other documents, if appropriate, would be helpful in making the distinction between the two techniques.

II.D, item 5 "Coordinate monitoring". A coordinated monitoring and evaluation system will be developed to monitor water quality trends and improvements. It is not clear how this system will be developed and what its extent will be. For example, will it be a collaborative effort among Federal agencies?

II. Agency Objectives (A)2(a). "... we will assess the effect of our current and past action on the condition of watershed with significant Federal lands and resources ...". This comment is focused on future implementation of the UFP. More detail on the content and development of the assessments and the potential uses for these assessments would be useful. Criteria for watershed assessments and level of detail to be provided should be addressed. Additional questions that may need to be addressed include: 1) how will assessments affect existing plans for restoration/long-term stewardship and monitoring; 2) how detailed will assessments be, and who will conduct them; 3) will extensive resources (funds and personnel) be necessary to develop assessments; and 4) how will these assessments be used (i.e., for permitting, additional monitoring and restoration requirements, additional funding, and/or as public documents available to stakeholders, etc.).

Question #4. Page 8836: "What the best way is to develop partnerships with others when the Federal agencies begin implementation of this policy". Federal agencies currently work with stakeholders and interested parties in a variety of ways. However, if multiple Federal agencies are to collaborate effectively with State, Tribal, local and private stakeholders to implement the policy it may be necessary for their respective agencies to clarify the responsibilities and limitations placed upon Federal employees under existing laws and regulations that could restrict full participation in specific activities of watershed groups (e.g., circumstances where potential for apparent conflict of interest could exist).

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