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May 12, 2000

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

Re: Comments on the 2/22/00 draft version of the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management:

1. Federal lands should serve as a model by meeting the same, if not higher, standards required of states and the private sector. The government needs to set a date when water quality standards in degraded watersheds on federal land must be attained. The government should also assure the protection of high quality/sensitive watersheds by a certain date.

2. Federal agencies should not engage in activities that degrade water quality. They should not allow permits without determining first that the permit will protect water quality. This provision is often ignored in land management decisions.

3. Priority watersheds should be considered an Outstanding National Resource Water (ONRW), and a mechanism should be in place that recommends to state or tribal agencies that the watershed be classified as such. Federal land managers should treat priority watersheds as ONRWs.

4. Monitoring of Best Management Practices (BMPs) should be required and regularly reviewed and revised.

5. A Public Petition Process should enable citizens to ask for the selection of watersheds in need of special protection and should insist that a federal agency and state or tribe respond to the petition in a timely manner.

6. Data from Water Quality Assessments should be used for management and regulatory decisions. Federal Lands should be allowed to become models for collaborative data gathering and analysis to be integrated into water quality reporting under the Clean Water Act.

7. Federal agencies should not be allowed 10 years to satisfy CWA biennial reporting requirements but should be held to the 2 year reporting that states and tribes are.

8. Federal agencies must commit financial resources to this policy's goals. Without adequate funding, the policy is ineffective.

Thank you.

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