American Water Works Association
Government Affairs Office

Dedicated to Safe Drinking Water

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Suite 640, Washington, DC 20005
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Mat 24, 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:

Comments on the Proposed Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management

The American Water Works Association (AWWA) appreciates the opportunity to submit comments on 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.

Founded in 1881, AWWA is the world's largest and oldest scientific and educational association representing drinking water supply professionals. The association's 56,000-plus members are comprised of administrators, utility operators, professional engineers, contractors, manufacturers, scientists, professors and health professionals. The association's membership includes over 4,000 utilities that provide over 80 percent of the nation's drinking water. AWWA and its members are dedicated to providing safe, reliable drinking water to the American people.

AWWA commends the interagency team that developed the proposed policy. AWWA believes that it provides a good framework for pursuing a watershed management approach to more effectively protect and improve water quality and the health of aquatic ecosystems. As the proposed policy is refined AWWA urges you to consider the following comments.

The proposed policy includes several factors for the identification of watersheds that are a priority for protection, management and improvement. AWWA recommends that these factors include the designation of watersheds that are sources of drinking water supply as priority watersheds. In recent years, growing emphasis has been placed on drinking water source protection to protect public health and meet the requirements of current and future drinking water regulations. AWWA believes implementation of a watershed management approach for drinking water protection is important both in cases where source water quality needs to be improved, and in cases where source water quality is good and needs to be protected. This change should be reflected in the core federal policy goals and explicitly stated in both Section II.B.1.b. and by expanding II.C. of the policy to clearly address drinking water supplies.

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AWWA also recommends that the federal agencies utilize the information developed under the Safe Drinking Water Act (SDWA) Source Water Assessment Program when identifying priority watersheds and water quality improvement actions to be implemented. The information developed under the Source Water Assessment Program will provide an understanding of the potential threats to source water quality for drinking water supplies and help identify necessary protection measures.

We further recommend modifying the proposed policy's goal of meeting "Clean Water Act responsibilities ... to the same extent as non-governmental entities" (emphasis added) by adding language that directs Federal agencies to set a leadership role in meeting the requirements of the Clean Water Act. Some non-governmental entities are slow to take actions necessary to protect water quality as is evidenced by the substantial number of impaired waterbodies across America.

Thank you for your consideration of AWWA's comments. If you have any questions regarding these comments, please contact me or Steve Via in AWWA's Washington D.C. office at (202) 628-8303.

Best regards,

Tom

Tom Curtis
Deputy Executive Director

JC/shv

cc: Charles Fox, U.S. EPA/OW
Cynthia Dougherty, U.S. EPA/OGWDW

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