43

Pennsylvania Department of Environmental Protection

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Bureau of Watershed Conservation 717-787-5267

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

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

Dear Madam or Sir:

I am writing regarding the *Proposed Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management.*

Pennsylvania has been working for years to integrate a unified watershed approach within our own programs, the federally-funded programs that we administer, and our agency organization. Through these efforts, we encourage and support whole watershed-based planning and management on the local level by counties, municipalities and watershed associations. These are some of our accomplishments to date:

- We encourage and require coordination of our various state and federal programs that are based on watershed management and planning. These include the following programs: Section 319 Statewide Nonpoint Source Management, Coastal Zone Management, Stormwater Planning and Management, Stream ReLeaf (riparian forest buffers), Rivers Conservation, Coldwater Fisheries Management, Water Use Planning and Assessment, Source Water Management, Waterways Engineering, and Water Quality Assessment and Standards. To this end, we are expanding the use of watershed teams in our six regional offices and within our central deputate.
- We obtained federal approval for our Section 319 Management Plan Update in 1999, which is based on unified watershed planning and management. We expect federal approval shortly of our Coastal Nonpoint Pollution Program, also watershed-based in coordination with other programs.
- We are ahead of schedule on completing our statewide assessment of nonpoint source pollution, resulting in water quality data and other information on a watershed basis. Complementing this effort is our statewide GIS mapping system PASDA (Pennsylvania Spatial Data Access system), also based on watershed boundaries, that is available to the public via internet.

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- We continue to coordinate with local efforts to develop TMDLs (Total Maximum Daily Loads) for our high priority watersheds.
- Governor Ridge and the Pennsylvania Legislature have provided $650 million over the next five years through our 1999 Environmental Stewardship and Watershed Protection Act. Through this law, the Department of Environmental Protection has initiated its *Growing Greener* program which will infuse millions of dollars annually into locally-led unified watershed planning and management. This effort is being coordinated with all of the state and state-administered federal programs mentioned above.
- DEP has established an Office of River Basin Coordination, responsible for coordinating Pennsylvania's activities within our major river basins that are shared with other states and Canada. Additionally, we have long been active partners in national estuary programs for the Chesapeake and Delaware Bays, and in the Great Lakes Initiative through Lake Erie. The watersheds that drain to each of these areas have been the subject of watershed programs coordinated on all governmental levels for years.

In summary, Pennsylvania in partnership with its neighbors and federal agencies has made substantial progress in the past decade toward establishing and coordinating unified watershed planning and management. This provides the background on which our comments on your proposed watershed policy are based.

Our comments are as follows:

- The proposed policy states that the federal agencies will develop an approach to watershed assessment for their lands, including conducting the assessments for watersheds with "significant" federal lands and resources. It mentions "collaboration" with state and local governments. We are left wondering when in the process that collaboration will occur. How will the federal approach be made to mesh with the assessment approaches that Pennsylvania has already established, and that local groups are conducting through our grant programs, some of which are federally-funded? If federal ownership does not encompass an entire watershed, which is likely to be the case in Pennsylvania, how will the federal assessment approach be coordinated with work already done here? We think the policy should recognize that some regions have already made significant strides in unified watershed management. Determining the status of state and local efforts, and initiating relationships with them should be the first steps in the process.
- The proposed policy states that the federal agencies "...will expand opportunities for participation by interested stakeholders." These opportunities will occur through review of and comment on federal planning efforts, through allowing stakeholders to participate in monitoring and assessment, and by "seeking feedback" on key federal decisions. This appears to be saying that the federal agencies will establish the approach, the rules and the decisions, while the role of local entities will be to observe, and provide comments and participation when the federal agencies are ready. We think that the federal agencies should START with local planning and assessment efforts where these are based on established scientific methods. This should apply especially to planning and assessment efforts that have been supported through federal funds (i.e. through the Federal Clean Water Act). This would help to avoid unnecessary effort, duplication and confusion, and would ensure that the federal planning efforts respect and truly incorporate well-established local watershed efforts and objectives.

43

- On the positive side, the proposed policy would benefit areas where watershed assessment and planning have not started, or where federal lands do comprise most of a large watershed. It offers the promise of federal resources for local efforts that need help.

We appreciate the opportunity to comment on the proposed policy.

Sincerely,

Stuart I. Gansell
Director
Bureau of Watershed Conservation

cc: Tropea