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Kappel_Shari/wo_caet -slc@fs.fed.us

04/21/00 12:13 PM

To: lesliewatson@fs.fed.us
cc:
Subject: Forw: comment letter

----- Message from kriverkeeper/Internet///////RFC-822/kriverkeeper#a#mindspring#f#com@sv8 on -----

To: cleanwater/wo_caet-slc@sv8

Subject: comment letter

see attached

Katherine Baer
Upper Chattahoochee Riverkeeper, Gainesville Office
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Check our web site at: http://www.chattahoochee.org/ A.doc

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P.O. Box 1720
Gainesville, GA 30503

USDA Forest Service
CAET
Attn: UFP
Building 2, Suite 295
5500 Amelia Earhart Drive
Salt Lake City, UT 84116

April 19, 2000

RE – Proposed Unified Federal Policy for Watershed Management

To Whom it May Concern:

The Upper Chattahoochee Riverkeeper (Riverkeeper) is a nonprofit, membership based organization dedicated to the protection of the Chattahoochee River, its tributaries and watershed, located in North Georgia. We are writing on behalf of our over 2,000 members throughout Georgia and the United States.

In general, we are in support of the Proposed Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management (Policy) as part of the Clean Water Action Plan. Any actions that can improve water quality in the Chattahoochee River Basin are sorely needed. Riverkeeper is especially pleased to see you emphasis on adaptive management, whereby management strategies addressing environmental problems can be revisited as new information becomes available. Too often we observe the tendency to either "lock" resources up for long periods of time, or the reliance on one management strategy heavily influenced by paradigms that may be out-of-date. Furthermore, the clear prerogative to base watershed management on sound science is essential.

There are two specific comments we would like to make. First, coordinated monitoring is one of the Agency Goals (4.5), which we endorse. In our own River Basin it is clear that agencies often are not aware of what data other agencies are collecting. We would like to suggest that you also add to this goal – enhanced data management and availability of this data to the public. While citizens can access data from some agencies (e.g. EPA) fairly easily, there are other agencies (e.g. U.S. Forest Service) where it can be quite difficult. Effective watershed management requires input from all stakeholders, and thus providing data regarding the status of federal resources is meaningful and necessary.

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Second, while Riverkeeper believes that the emphasis on watershed management is excellent, we also believe that there must be an emphasis on flow regulation as part of this effort. The Policy places emphasis on watersheds with a large amount or percentage of federal land, which is logical. However, there are many cases when federal agencies (e.g. U.S. Corps of Engineers) have a major impact on the health of a watershed or river basin via flow regulation despite managing only a small proportion of the actual land base within the watershed. That is certainly the case in the Apalchicola-Chattahoochee-Flint River Basin, where operation of federal reservoirs greatly affect the timing and magnitude of instream flows and subsequently impact habitat, water quality and biodiveristy throughout the river. Because of this, we encourage you to include flow regulation to improve watershed health as an objective of the Policy.

Thank you for this opportunity to comment.
Sincerely,

Katherine Baer
Director of Headwaters Conservation

770-538-2619

cc: Erwin Topper, U.S. Army Corps of Engineers

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