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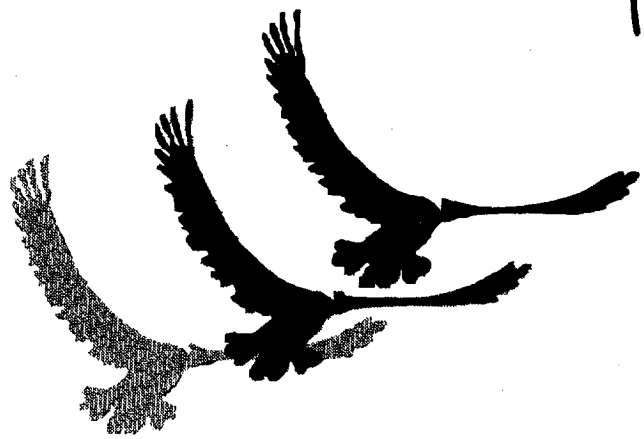

FAX TRANSMITTAL

date 4-24-00

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 # pages

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NOTE: Comments enclosed for the Proposed Unified Federal Policy for Ensuring a Watershed Approach to Fed. Land & Resource Management —

Thanks!

HIGH COUNTRY CITIZENS' ALLIANCE

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April 21, 2000

Content Analysis Enterprise Team
Room 103
USDA Forest Service
Federal Building
200 East Broadway
PO Box 7669
Missoula, MT 59807

Dear Team:

Thank you very much for putting the time and effort into the Proposed Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. High Country Citizens' Alliance is an 800 member, local, grassroots environmental organization working to protect all the natural resources in the Gunnison River Watershed. The Gunnison River Watershed is comprised of approximately 80% federal public lands and we heavily rely on the proper management of the local federal lands in order to sustain the surrounding ecosystems. Water resources are especially subject to degradation so we are pleased to see a document that calls the federal public land agencies to protect and restore watersheds. We support your effort and offer a couple of comments about the policy.

1. Please make sure that watersheds are prioritized in a way that recognizes the value of good quality watersheds. Many times, watersheds in good ecological shape are left alone. It is just as important to focus energy and attention on watersheds that do not need restoration but do need protection.

2. The current structure of the Forest Service and BLM will not adequately support the increased focus on watershed restoration and protection, especially with a scientific approach. For example, the forest that surrounds Crested

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Butte, the Grand Mesa, Uncompahgre, and Gunnison, has only one hydrologist who is located 2.5 hours away and extremely busy. The Gunnison field office has no employees with water/hydrology expertise and because of this, we have seen many decisions occur in the past without any real sensitivity to watershed issues. This is also occurring in the local BLM field office, with their hydrologist working out of another watershed and also very busy. I have no doubt that both field offices will attempt to follow the new watershed policy as best they can, but they will do so with backgrounds in forestry, range sciences, and wildlife biology. Please ensure that the commitment to expertise is part of the watershed policy.

3. We believe that protection of riparian areas, as well as the area upland of riparian areas, is an integral part of watershed protection. Many times, the focus is on actual rivers and streams and their immediate surroundings. We would like to see a policy that recognizes the whole watershed.

4. As part of the policy to review use authorizations and licenses on federal public lands, we would like to see language that shows a strong commitment to protect and restore watersheds. In other words, use permits should not be re-issued or issued if the use will only have a negative effect on a the health of a watershed. Watershed protection should be a baseline for management decisions regarding use authorization and licenses on federal public lands.

5. All watersheds should be managed to achieve water quality standards and comply with anti-degradation requirements. We would like to see the policy utilize Best Management Practices (BMPs) to achieve these standards, as BMPs are a good management tool. We would also like to see the policy review and upgrade BMPs as often as necessary and require monitoring for compliance and effectiveness.

6. Finally, please assure us that there is a mechanism for public participation in the watershed decisions on federal public lands and that public concerns will be addressed.

Again, thank you for your commitment to watershed protection and your recognition of the value of science as well as local input to the process. We look forward to the final product.

Sincerely,

Kinna

Kinna Ohman
High Country Citizen's Alliance

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