federal water rights. CLUB 20 demands any efforts on watershed management most comply with State of Colorado Water Law and be derived through the state system.

CLUB 20 supports full funding for implementation of National Forest management plans, including agreed-upon timber harvest quantities, so that budget decisions do not harm the credibility of the public process. CLUB 20 believes the federal budget process threatens the US Forest Service's public credibility when budgets do not accurately reflect public agreements on levels and types of uses of forest lands. CLUB 20 encourages federal land managers to request full funding of all aspects of management plans in which there has been public involvement.

"Use the results of Watershed assessments to guide planning and management activities."

Again, CLUB 20 request and requires that Watershed assessments be consistent with the critical historical certainty afforded Forest Management Plans so that all concerned may reasonably rely upon such plans and decisions made in the preparation of the Forest Planning process. CLUB 20 opposes any attempt to circumvent the publicly crafted and adopted management plans for Federal Lands.

"Work closely with States, Tribes, local governments, and stakeholders to implement this policy."

CLUB 20 demands the participation of Colorado's Department of Natural Resources Executive Director or his designee in the review and approval of any Watershed Approach affecting Public Lands in the State of Colorado

"Meet our Clean Water Act responsibility to adhere to Federal, State, Tribal, interstate, and local water requirements to the same extent as non-governmental entities."

CLUB 20 demands any Watershed Approach be consistent and in conjunction with Colorado Water Law.

"Take steps to ensure that Federal land and resource management actions are consistent with Federal, State, Tribal, and, where appropriate, local government water quality management programs."

CLUB 20 demands any Watershed Approach be consistent and in conjunction with Colorado Water Law.

"Will the proposed policy affect water rights? No, nothing in the proposed policy is intended to adjudicate, determine, or otherwise affect water rights. The proposed policy does not affect current applicable laws, procedures, or regulations creating or determining water rights."

CAET RECEIVED

150

CLUB 20 opposes any attempt to rewrite, reinterpret or reexamine federal regulations to imply a federal reserved water right or attempts to exert a "by-pass flow water right" as a part of federal land use planning or permitting.

In document http://www.cleanwater.gov/upf/proposal.html it states *"7. We will help States and Tribes develop science-based total maximum daily loads (TMDLs)".*

CLUB 20 demands any Watershed Approach including the development of TMDLs be coordinated with the State of Colorado. CLUB 20 encourages the Colorado State Departments of Natural Resources and Public Health and Environment to review and study carefully the actions proposed by EPA regarding TMDL and formulate a report on the impacts of TMDL regulations on vital parts of Western Colorado's economy. CLUB 20 supports including in the State's report on TMDL regulations other existing programs employed in Colorado that achieve the same goal regarding water quality being sought by the EPA.

Thank you for the opportunity to provide input.

Sincerely,

Stan Broome

Stan Broome
President

CAET RECEIVED

APR 25 2000

150

"Voice of the Western Slope, since 1953"
A coalition of counties, communities, businesses & individuals

970 / 242-3264 ★ FAX 970 / 245-8300
P.O. Box 550
Grand Junction, Colorado 81502-0550
www.club20.org

April 19, 2000

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

RE: Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management

Dear Team Leader:

CLUB 20 is pleased to offer comments concerning the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. CLUB 20 is a coalition of counties, communities, businesses and individuals speaking as the "Voice of the Western Slope" on issues of concern in Western Colorado.

We have attempted to draft our comments from direct quotes from the Federal Register, Vol. 65, No. 35/ 2/22/00 / Notices.

Goals and Principles of the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management

"Use a consistent and scientific approach to managing lands and resources and for assessing, protecting, and restoring watersheds."

CLUB 20 supports and expects any Watershed approach be subject to the same reviews and appeals as other federal agency decisions, to subject findings to scientific peer review, to analyze the economic impact of decisions, and to require an advanced definition of recovery with specific goals.

"Identify specific watersheds in which to focus our budgetary and other resources and accelerate improvements in water quality and watershed conditions."

CLUB 20 opposes federal regulatory efforts to impose "by-pass" stream flow requirements through the permit process, in the absence of specific legislation and state action creating such

CAET RECEIVED
APR 25 2000