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Subject: Response to Draft UFP
Sender: Ronna!Simon /BLM (Ronna_Simon@blm.gov)
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Sensitivity: normal
Importance: normal

Part 1

FROM: Ronna.Simon / BLM
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TO: cleanwater / wo, caet-slc

Part 2

ARPA MESSAGE HEADER

Part 3

Please see my attached comments, and if you have any questions, feel free to contact me. Thank you for sending these out for review.
Ronna Simon

(See attached file: draft.response.3.31.2000.wpd)

Part 4

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MAR 31 2001

United States Department of the Interior

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March 31, 2000

USDA-Forest Service
Contents Analysis Enterprise Team
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Dear CAET:

I am a hydrologist with the BLM in Las Cruces, New Mexico and have reviewed the Draft Unified Federal Policy (UFP) for Ensuring a Watershed Approach to Federal Land and Resource Management (Draft Working Copy dated 1/21/2000). I have a couple comments that I wanted to pass along, and I hope they are useful.

In the Agency Objectives, item 3 under Section B describes the process of identifying BMP's, adjusting them when they are not effective, and mitigating impacts when unanticipated adverse effects to water quality result from implementation of BMP's. While Federal agencies are always involved in the feedback loop of monitoring and adjusting BMP's, I wondered how far the implied involvement of Federal agencies in BMP development was meant to go: BMP's are developed and administered by State agencies, with Federal agencies complying with them, as a minimum, and usually exceeding them in their planning documents. This means that there are times when there are no BMP's for certain activities (e.g., for grazing in certain western states), but there has generally been good cooperation between State and Federal agencies with this arrangement. I wonder, too, if this would require a change in enforcement of BMP's: does the UFP imply that there would be a change in enforcement responsibility on State and private lands? I don't foresee that happening, but perhaps the respective responsibilities of State and Federal agencies needs to be more clearly addressed.

Otherwise, the Goals and Objectives set forth in the Draft UFP are admirable, and I hope that personnel and budgetary constraints don't hinder implementation.

Sincerely,

Ronna J. Simon
Hydrologist