145

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL # of pages ▶ 2

To USDA-USFS CONTENTS ANALYSIS TEAM	From BLM, WY. STATE OFFICE
Dept./Agency	Phone # c/o Rick Schuler (307)
Fax # (801) 517-1021	Fax # 775-6092

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

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

ADVANCE DRAFT - Comments on the Final Draft Unified Federal Policy

Dear Sir,

We are offering the following comments for consideration in enhancing the final Unified Federal Policy (UFP). In general, we support a watershed approach to natural resource assessments and land management actions. It should be emphasized in the UFP, however, this approach may be constrained by the management issues and resources involved. Also, the UFP addresses many of the resource issues and articulates management approaches that the BLM currently employs. This consistency will help ensure the acceptance and implementation of the policy.

More specifically, watershed assessments should be conducted on all watersheds, not just those with "significant Federal lands". The process should be prioritized for the Federal Land Management Agencies, however, so that watersheds having significant Federal lands or significant resources issues on the federal lands, will be assessed and treated first. Priorities for 5th or 6th Level subwatersheds should be coordinated with state agencies. Although the BLM may not be able to complete analysis on all lands within some watersheds, most states have many avenues for involving citizens in watershed management planning (e.g., watershed councils, conservation associations), to help address cumulative effects of all activities that occur within a watershed. The UFP really needs to emphasize that local citizen input is critical to developing that sound subwatershed-scale planning. Cooperation of the local citizens will only occur if they feel assured that their input is incorporated in the management of the public lands. Hopefully this assurance can somehow be emphasized in the plan as well.

In regard to developing a common science-based approach to watershed assessment, Federal agencies have countless evaluation and assessment procedures to draw from. It will be critical to use existing approaches as much as possible and encourage coordination in their application, but we should avoid investing a lot of resources and time in trying to develop "one size fits all" standard methods from the Washington or Regional level for application at the State level. With this in mind, it will also be critical to closely coordinate this effort with the State regulatory agencies which have established procedural guidance for the monitoring of water resource conditions, watershed plan format, and Best Management Practice implementation. This should be emphasized in the UFP.

Focusing available resources for the purpose of accelerating improvements in water quality and

CAET RECEIVED
APR 24 2000

145

watershed conditions in priority watersheds raises the concern that such focus will come at the expense of other priority programs. Full implementation of the UFP will result in an increased work load which will require *additional* long-term staffing to not only perform the immediate tasks of watershed assessments and planning but to establish the institutional memory and skills for long-term watershed management. This additional funding requirement needs to be addressed in the UFP in some manner.

In closing, watershed improvement takes time and can only be attained with full partnership of all landowners and stakeholders. This kind of cooperation can only be realized with well informed, knowledgeable partners. This requires a "down to earth" Information and Education (I&E) effort which demonstrates the benefits of good watershed management for healthy resource conditions and natural environmental processes, as well as the economic good associated with these values. The UFP would benefit from incorporation of an enhanced I&E section which clearly articulates how the Federal agencies will implement a well orchestrated, cooperative I&E approach (tools and products) which can be utilized by all agencies to share a common message with the public. Such an approach will encourage cooperation and promote better public support.

We appreciate the opportunity to provide this input to the preparation of the Unified Federal Policy and welcome any questions you may have regarding our comments.

Sincerely,

State Director

CAET RECEIVED
APR 24 2000