MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
DIVISION OF PLANNING AND RESOURCES
9th Floor (213) 217-6119

FAX

147

TO: USDA- Forest Service

COMPANY NAME/FACILITY:

FAX NUMBER (Include Area Code): 801 517-1021

NO. OF PAGES (Include Cover Sheet): 4

DATE: 24 APR 00

FROM: Harry Ruzgerian

DEPARTMENT/OFFICE:

OFFICE TELEPHONE NUMBER: 213 217 6082

REMARKS: ☒ Urgent ☐ For your review ☐ Reply ASAP ☐ Please comment

COMMENTS:

NOTE: Please call if you do NOT receive all of the pages.

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

147

April 24, 2000

FEDERAL EXPRESS

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

Notification by Facsimile: (801) 517-1021

Dear Sir or Madam:

Comments on the Proposed Unified Federal Policy for Ensuring a
Watershed Approach to Federal Land and Resource Management

The Metropolitan Water District of Southern California (MWD) appreciates the opportunity to submit comments on the Proposed Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management (proposed policy), which was published in the Federal Register on February 22, 2000.

MWD provides supplemental water supplies to nearly 17 million people living in a six county region in southern California. Our sources of drinking water supply are surface waters conveyed by aqueduct from the San Francisco Bay/Sacramento-San Joaquin Delta (Bay-Delta) in northern California and the Colorado River. The watersheds for each of these sources of supply are very large and include federally owned and managed lands. In the case of the Colorado River Basin, about 75 percent of the land within the Basin is owned and administered by the federal government or held in trust for Indian tribes. MWD's primary interests in both the Bay-Delta and Colorado River watersheds are pursuing source water quality improvement and water supply reliability.

While MWD strongly supports a watershed management approach to more effectively protect and improve water quality and the health of aquatic ecosystems, the framework should be broadened to ensure consideration and coordination of all watershed management goals and objectives. As you refine the proposed policy MWD urges you to consider the following comments.

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700 N. Alameda Street, Los Angeles, California 90012 • Mailing address: Box 54153, Los Angeles, California 90054-0153 • Telephone (213) 217-6000

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Watershed management plans and programs need to give consideration to all water resources management goals and objectives for watersheds, including water quality protection and/or improvement, water supply availability, water supply storage, flood and erosion control, and aquatic ecosystem protection objectives. Such coordinated approaches improve the effectiveness and efficiency in maximizing the potential overall improvement and protection of watersheds in meeting watershed management needs. Coordination in watershed management goals and programs, approaches, assessments of watershed functions and conditions, habitat restoration, remediation, environmental clean-up, and watershed monitoring will help provide necessary consistency between federal, state, tribal, and local government watershed management efforts to most effectively meet all needs.

The proposed policy includes several factors for the identification of watersheds that are a priority for protection, management and improvement. MWD recommends that these factors include the designation of watersheds that are sources of drinking water supply as priority watersheds. In recent years, growing emphasis has been placed on drinking water source protection to protect public health and meet the requirements of current and future drinking water regulations. MWD believes implementation of a watershed management approach for drinking water protection is important both in cases where source water quality needs to be improved, and in cases where source water quality is good and needs to be protected.

MWD also recommends that the federal agencies utilize the information developed under the Safe Drinking Water Act (SDWA) Source Water Assessment Program when identifying priority watersheds and water quality improvement actions to be implemented. The information developed under the Source Water Assessment Program will provide an understanding of the potential threats to source water quality for drinking water supplies and help identify necessary protection measures.

We further recommend modifying the proposed policy's goal to meet "Clean Water Act responsibilities ... to the *same extent as non-governmental entities*" (emphasis added). Non-governmental entities are frequently slow to take actions necessary to protect water quality as is evidenced by the substantial number of impaired waterbodies. Federal agencies should set a leadership role in meeting the requirements of the Clean Water Act rather than following a lower standard.

MWD believes the coordination of federal agency efforts to improve and protect water quality on a watershed basis is especially important in multi-state watersheds, such as the Colorado River watershed. The Colorado River is a large component of southern California's regional water supply, and its relatively high salinity levels cause significant economic impacts on water customers in MWD's service area. The federal-state Colorado River Basin Salinity Control Program is an example of a program in which the U.S. Department of the Interior (Interior) has

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taken a watershed approach to a water quality issue with much success with the implementation of the Basinwide Program. Unfortunately, the level of federal funding in recent years for Interior's program has been insufficient to meet the salinity control activities schedule in order to maintain the state adopted and federally approved water quality standards. To address high Colorado River salinity levels, the U.S. Department of Agriculture (USDA) implements its portion of the Colorado River Basin Salinity Control Program as part of the Environmental Quality Incentives Program (EQIP). To date, insufficient federal funding has been allocated through EQIP for Colorado River Basin salinity control projects. One of the reasons this has occurred is that the process for evaluating EQIP proposals has not taken into account the downstream benefits of salinity control--an incomplete approach from a watershed perspective. As a result, these proposals were not ranked as high as they should have been had the benefits on an interstate and international scale been considered. MWD believes the Colorado River Basin Salinity Control Program would benefit from the incorporation of watershed management goals into federal program implementation, as outlined in the proposed policy.

Thank you for your consideration of our comments. We look forward to working with the federal agencies involved in land and resource management in the Bay-Delta and Colorado River watersheds on implementation of the proposed policy. If you have any questions on our comments, please contact Ms. Lynda Smith at (916) 650-2632 or Mr. Jan Matusak, at (213) 217-6772.

Very truly yours,

B. Arakawa

for Stephen N. Arakawa, Manager
Water Resource Management Group

LAS:hmr:cmk

cc: Mr. Gerald R. Zimmerman
Executive Director
Colorado River Board of California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203-1035

Mr. Jack A. Barnett
Executive Director
Colorado River Basin Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

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