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Subject: Unified Federal Policy
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Part 1

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Part 2

ARPA MESSAGE HEADER

Part 3

I strongly support the distinction between priority watersheds and watersheds designated for special protection. In some cases Category 3 watersheds (pristine/sensitive aquatic systems), as defined by the Unified Watershed Assessment, have subbasins that are significantly impaired and what makes these watersheds Category 3 is simply downstream dilution. The UFP should recognize the need to cleanup impaired subbasins. Criteria for selecting these subbasins simply should be whether the waters are impaired and/or listed on the State as such.

The proposed policy is limited to Federal lands. This is most impratical. Those drafting this statement are not cognizant of the patchwork Federal-private land boundaries, and the fact that flowing water knows no property boundaries. This limitation could jeopardize favorable outcome of the policy. In some watersheds, a federal land position of say 20% could be the most significant land position in the watershed; however, from a restoration viewpoint, a 20% holding may be insiginificant if the pollution sources are all on private land. Further, in numerous watersheds with more than 60 - 80% federal lands, again the worst pollution sources are on private lands. Under "Key Elements of the Proposal", the statement is made that "only those portions of watersheds that are directly managed by Federal agencies". Note that the Wyden Amendment authorizes BLM and USFS to carryout watershed restoration projects on private lands, if there is a significant benefit to biotic resources on federal lands. Suggest you build the UFP around the mandate of the Wyden amendment.

In part II.B.2. of the policy, it states that a process will be developed for identifying and desinating watersheds. This is unnecessary, there is already such a designation under the Clean Water Act.

The UFP almost completely misses the most important part of the watershed approach (its buried in the definitions), that is the risk based targeting approach of confronting the worst pollution sources first. This approach in pilot watershed cleanups has been shown to save millions of dollars.

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