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KERN COUNTY WATER AGENCY

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To Whom It May Concern:

This letter comprises the Agency's comments on the Clean Water Action Plan proposed Department of the Interior-Department of Agriculture "Federal Policy for a Watershed Approach to Federal Land and Resource Management."

Clean Action Water Plan Fact Sheet

Page 1, second paragraph: How will watersheds with several jurisdictions be managed? Which agency has precedence within a watershed?

Page 1, bottom of page: The policy proposes to take a "watershed approach" to Federal land and resource management. It goes on to list the bullet points of emphasis. There is no mention in these "points" of the people, towns, communities that depend on these watersheds for a water supply, power generation, recreation and flood control. How do these activities fit into the "watershed approach"?
Currently "identified high priority watersheds" should be listed so that the public can see whether their area is impacted by the policy.

Page 2: How would the public benefit from this policy? When the Federal government gets involved in local concerns, the problem tends to worsen. Local problems should have local control, not Federal control (see below).

Page 2: What lands and resources does this policy cover? It is impossible to separate a watershed into separate "land and resource" components. If the policy applies only to "Federal lands and resources," then how can it not impact adjacent or downstream agencies within the watershed? The policy will, by the very nature of watersheds, impact state and local agencies within the watershed.

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Page 2: The proposed policy will guide Federal actions. If the Federal government wants to help, it should provide the opportunity to allow local level agencies to have some control of in solving the problem, since they are most affected by the issue. The policy should provide for required cooperation with state and local agencies.

Clean Water Action Plan Policy

Policy Goals, principle 2: The policy should require Federal entities to enlist state and local agency assistance to "identify specific watersheds." Federal agencies should not attempt to do this without state and local input.

Principle 4: There may be instances where the policy should not be implemented, based on local conditions. Federal agencies should recognize this, and the policy should specifically state it.

Agency Objectives, item 1: This appears to be a unilateral Federal effort. State and local agencies should be encouraged to provide input as the Federal lands are defined and assessed.

Item 2: Identification of priority watersheds should involve state and local input.

Sub-item 5: What will constitute "good science"? California agencies on the state and local levels have had much experience with the "science" of some Federal agencies, and suggest clear requirements for peer review by independent scientists.

Sub-item 7: How will the recent court decision on the EPA's charge to develop TMDL goals affect this objective?

Sub-item 3: State and local agencies with specific jurisdictions may not welcome a Federally-induced stakeholder process. Cooperation with state and local agencies should be mandated.

The foregoing represent our comments on the proposed policy. Questions should be directed to Water Resources Planners Mary Lou Cotton or Kane Totzke at (661) 634-1400.

Sincerely,

Thomas N. Clark
General Manager

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