



National Wildlife Federation

National Advocacy Center

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March 22, 2019

The Honorable Jim Hubbard
Under Secretary for Natural Resources and Environment
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Via email

Dear Undersecretary Hubbard,

The National Wildlife Federation is America's largest conservation organization, representing over six million members, supporters, and affiliates across the country. We thank USDA for this opportunity to comment on implementation of the 2018 Farm Bill sections affecting the management of our National Forest lands. The 2018 Farm Bill includes many important provisions that will benefit soil, water, and wildlife, and we look forward to working with USDA to ensure that the programs are implemented in a way that maximizes conservation benefits to the fullest extent of the statute.

Title 8 – Forestry

Water Source Protection (Section 8404) and Watershed Condition Framework (Section 8405)

Given the critical importance that National Forest lands play in providing water to the American public, we urge the USDA to move forward immediately to establish the **Water Source Protection Program** to carry out watershed protection and restoration projects on National Forest System land, and to provide guidance and support for the agency to partner with communities to protect forest watersheds and provide reliable jobs for forest workers. This program recognizes the success of pilot projects involving cities such as Denver, Santa Fe and Eugene—collectively referred to as “Watershed Investment Partnerships”—and provides guidance to expand this practice to protect and restore the condition of National Forest watersheds that provide water to the end water users.

In addition, the National Wildlife Federation supports full implementation of the **Watershed Condition Framework** in all National Forest units, including identification and prioritization of watersheds for protection and restoration. Although the Forest Service completed a national watershed condition assessment under an administrative version of this framework in 2011, the newly adopted legislation requires the agency to coordinate with states, private landowners and the public to fully achieve its potential for watershed health and restoration. The National Wildlife Federation works with National Forest partners to implement priority watershed action projects, but we regularly encounter situations in which limited agency budgets competing demands on staff time constrain our ability to move projects forward for the benefit of watershed healthy, wildlife habitat and downstream water users. Large-scale and long-term investment will be necessary to complete all priority actions, and these priorities should be reflecting in forthcoming National Forest planning documents, along with metrics to assess progress toward achieving healthy watersheds throughout our National Forest system.

Recommendations of the Healthy Headwaters Alliance

The National Wildlife Federation is a member of the Healthy Headwaters Alliance (www.healthyheadwaters.org), a coalition of water utility managers, conservationists, public agency staff, scientists, community advocates, tribes, and businesses. Together, we guide and connect successful efforts around the region to multiply their impact and tell the stories of successful source water protection efforts to spread knowledge about these innovative approaches. The Healthy Headwaters website provides extensive reference materials that could inform implementation of the 2018 Farm Bill, including case studies of watershed investment partnerships and analyses of the cost-savings of investing in watershed restoration.

The National Wildlife Federation endorsed the 2016 Healthy Headwaters Policy Platform, crafted by this coalition and available at http://www.carpediemwest.org/wp-content/uploads/Policy-Platform-2016_Final.pdf. This policy platform supports implementation of the 2018 Farm Bill, as summarized here:

In the American West, water is the face of climate change. Everyone who lives here does, or will shortly, experience climate change most immediately and acutely through too much water at the wrong time, too little water over a long period of time, or through an increasingly unhealthful water supply.

A critical aspect of this changing water supply story is the resilience of forested headwaters. Western water providers and their customers depend on natural watershed processes to filter pollutants, control erosion, regulate temperature, attenuate floods, and buffer human activities from drinking water resources.

The mountain watersheds that provide over 60% of the drinking water to the American West are at great risk. Uncharacteristic wildfires, invasive species, and past forest management legacies are all exacerbated by climate change. These combined challenges threaten the ability of our forested headwaters to provide clean, reliable water to the millions of people who rely on it.

A. Make Long-term Watershed Health a Priority

In a changing and evolving climate, forested watershed and source water protection is critical. These steps will help to ensure more resilient forested watersheds.

1. Engage all landowners in the Watershed Condition Framework (WCF) outcomes
The US Forest Service's Watershed Condition Framework sets restoration priorities, guides the implementation of projects, and monitors the results of restoration work on the 15,000 watersheds of the National Forest system nationwide.

While many Forest Supervisors do, as a matter of good land policy, engage other landowners (public, private and tribal) in lands adjacent to the watersheds, they are not required to do so; nor is there funding available for them to work collaboratively with other landowners to develop joint action plans.

2. Provide dedicated, multi-year funding for the Watershed Condition Framework
By providing dedicated, multi-year funding for the WCF, Forest Supervisors will be able to more effectively develop and implement action plans to protect and restore watersheds.

3. Through state and federal legislation and policies, further acknowledge and empower local and regional stakeholder groups

Headwaters restoration and protection programs are best designed through collaborative processes that engage a full range of stakeholders including utilities, tribes, conservationists, the business community, elected officials, agency personnel, scientists, and citizens. Diverse collaboratives are a proven strategy for developing headwaters programs that are responsive to community priorities and attract broad-based public support and diverse funding streams.

Conclusion:

We appreciate the opportunity to participate in the USDA's listening session, and look forward to cooperating with Forest Service leadership and individual National Forests in implementation of the 2018 Farm Bill.

Sincerely,

Sarah Bates
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Senior Director, Western Water
National Wildlife Federation