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*Bill
subject
to see
what
this
is all
factually
true*

Document No. _____

WHITE HOUSE STAFFING MEMORANDUM

DATE: June 7

ACTION/CONCURRENCE/COMMENT DUE BY:

NOON TOMORROW, 6/8

SUBJECT: RADIO TALK: RE ENVIRONMENT
(6/7 - 1:00 p.m. draft)

ACTION FYI			ACTION FYI		
VICE PRESIDENT	☐	☐	HARPER	☒	☐
MEESE	☐	☒	HERRINGTON	☐	☐
BAKER	☐	☒	JENKINS	☐	☐
DEAVER	☐	☒	McMANUS	☐	☐
STOCKMAN	☒	☐	MURPHY	☐	☐
CLARK	☐	☒	ROGERS	☐	☐
DARMAN	☐	☒	ROLLINS	☐	☐
DUBERSTEIN	☒	☐	VERSTANDIG	☒	☐
FELDSTEIN	☐	☐	WHITTLESEY	☒	☐
FIELDING	☒	☐	BRADY/SPEAKES	☒	☐
FULLER	☒	☐	BAKSHIAN	☐	☒
GERGEN	☒	☐	FISCHER	☐	☒
			HENKEL	☐	☒

REMARKS:

Please provide any edits directly to Aram Bakshian by noon tomorrow, with an information copy to my office.

Thank you.

RESPONSE:

(RR)
June 7, 1983
1:00 p.m.

PRESIDENTIAL RADIO TALK: ENVIRONMENT
SATURDAY, JUNE 11, 1983

My fellow Americans:

I think it is time to clear the air and straighten the record on where my Administration stands on environmental matters. I know you've heard and read a million words about where others think we stand. Now how about 5 minutes of the truth?

A couple weeks ago when Bill Ruckelshaus was sworn in as Director of the Environmental Protection Agency, he very graciously pointed out that when the National Agency was first created 13 years ago, with him as its first director, California was the environmental leader of the Nation. Having been Governor of California at that time, I was and am very grateful to Bill for those kind words. Let me just say I feel now as I felt then about environmental matters.

But that's enough about me. The Secretary of Interior, Jim Watt, is the target for those who are convinced this Administration is out to level the forests and cover the country with black top. Someone in the press the other day said if Jim discovered a cure for cancer, there are those who would attack him for being pro life.

Let's go back a little first and set the stage. Jim rides herd on all the national parks and some 80 million acres of national wilderness. There are other things like wildlife

refuges which ups the total considerably. Actually the Federal Government owns one-third of all the land in the United States.

When he came to Washington 2½ years ago, Jim found our national parks had been allowed to deteriorate to the point that they failed to meet standards for health and safety. This has been corrected. Provision has been made to protect endangered wetlands and prevent development of unique, low-lying offshore islands.

Not too long ago, a firestorm was raised about our wilderness lands and a perception was created that Secretary Watt was turning some of these lands loose from wilderness classification and Government ownership.

I should point out that wilderness lands are areas of such wild beauty that they are totally preserved in their natural state; no roads or trails violate them and no structures of any kind are allowed, and there are still 80 million acres of such land.

So what was the firestorm all about? Well, hang on and follow me closely. Several years ago, legislation was passed calling for a study of some 174 million acres of land to see if any or all of it should be declared wilderness and added to the present 80 million acres. Conditions were imposed in the legislation to ensure that wilderness standards would be met. If, for example, there were roads on the land, it was ineligible. It was ineligible if there was any dual ownership by other levels of government or if title to mineral rights was held by

individuals or governments. Also, any package had to contain no less than 5,000 acres to be eligible.

The study had been going on under the previous administration and some 150 million of the designated 174 million acres had already been turned down by the previous administration as being ineligible for wilderness classification. Think hard now. Do you recall hearing one word about this or any attack being made on anyone in the previous administration? I don't.

When we arrived, there were still 24 million acres to be studied. A few months ago, another 800,000 acres -- less than 1 million -- were rejected as not meeting wilderness qualifications. The reaction was instantaneous -- nuclear explosive in size and nationwide in effect. Jim Watt was giving away wilderness land. Our children and grandchildren would be deprived of ever seeing America as it once was.

Well, that firestorm gave way to a new one. Secretary Watt is now accused of selling leases for coal mining on Federally-owned land for \$100 million less than the coal is worth.

The Department of Interior sold the leases at auction for \$65 million. The Department analysts had estimated its worth at only \$55 million. But up on Capitol Hill, a House subcommittee staff had estimated it at \$60 million higher, but they had also underestimated by \$40 million on just one of the auctioned tracts the cost of removing the dirt and rocks to get to the coal. Two tracts didn't even get an opening bid. And forgotten in all the

uproar is that when coal starts coming out of the ground on those leases, the Government will get a royalty of 12.5 percent. That's 12.5 cents for every dollar's worth of coal. Incidentally, it is expected that coal from these leases won't come on the market for about 10 years.

Now voices are being raised on the Hill saying that a moratorium should be put on the leasing of all coal-bearing Government lands. Totally forgotten is the fact that the American people as customers will end up paying for that coal. Included in the price will be the cost of the lease and even that 12.5 percent royalty. As for that moratorium: The Federal Government owns 60 percent of all the coal in the Western United States and another 20 percent on adjacent land, privately owned, and can't be mined until the Government leases are opened up. What happens to the price of coal if a moratorium blocks 80 percent of all the Western coal from ever coming on the market?

It seems to me Secretary Watt not only protected the Government's interests; he had consideration for the ultimate consumer -- you and me.

Thanks for listening and God bless you.

THE WHITE HOUSE
WASHINGTON

June 3, 1983

FYI
File
Sittmann

MEMORANDUM TO THE FILE

Wildlife Meeting - MKD
June 2nd Fuller
11:00 a.m. Khedouri
(30 min.) Sittmann

1. Subject: What can be done to turn around down slide of support for the President by environment
2. Talk with State and Local and regional leaders, get out, away from D.C.
3. Blitz like we've done for education
4. Get adequate polling information
5. Get Scheduling to list ideas
6. Policy's may not change but we could go symbolic
7. Set-up meeting with:
 - MKD
 - Watt
 - Fuller
 - Ruckleshouse
 - Darmen
 - Khedouri
8. Get people on Hill involved - set-up meeting with President

Bill
These are
good - are you
making copies
for follow up?

Issue Group
- env. Bluff mtg.
6/13
7:00 am

road
444-6700



NATIONAL WILDLIFE FEDERATION, 1412 Sixteenth Street, N.W., Washington, D.C. 20036 (202) 797-6842

Office of the Executive Vice President

May 5, 1983

Mr. Michael Deaver
Deputy Chief of Staff
The White House
Washington, D.C. 20500

Dear Mike:

Pat Parenteau and I wish to thank you for the opportunity to have lunch with you and Bill Sittmann on May 2nd. We both came away feeling encouraged about our conversation and the potential for positive opportunities in the future.

As promised, I have enclosed some demographic information about the membership of the National Wildlife Federation.

As you also know, we determined from another poll in July 1981 (again, by an outside firm) that our membership strongly supported President Reagan in 1980, but overwhelmingly rejected Secretary Watt's philosophy on 10 of the 11 issues surveyed. Further, in our recent 1983 members poll on environmental issues (reported in National Wildlife, April-May 1983, page 32) 61 percent rated President Reagan's environmental record "poor," 27 percent rated it "fair," and only 12 percent rated it "excellent" or "good." Relevant information is attached, and I would be happy to discuss it further if desired.

Mike, let me close by saying that we sincerely appreciate your efforts to understand our views on important public policy issues. The strong commitment of the National Wildlife Federation to the principles of wise resource utilization and responsible environmental protection are shared by the vast majority of Americans. I must also stress that while we are anxious to open a process for discussing conservation policies, we are at the same time looking for substantive results. We have suggested several areas where the Administration could either modify its present policy (e.g., acid rain controls, asset management program), or initiate new conservation efforts (e.g., wetlands conservation, water policy reform). These exemplify the kind of meaningful changes that our membership and the American public are looking for.

Thank you, and I look forward to pursuing appropriate opportunities with you in the future.

Sincerely,

Jay

JAY D. HAIR

Enclosures

THE WHITE HOUSE

WASHINGTON

May 2, 1983

MEMORANDUM FOR MICHAEL K. DEEVER

FROM: T. A. D. THARP 

SUBJECT: National Marine Fisheries Service Position

The position of Regional Director for the Southwest Region of the National Marine Fisheries Service at the Commerce Department will become vacant tomorrow when the current Director, Mr. Ford, resigns. It has not yet been determined whether this is a career or non-career SES position. Evidently, Secretary Baldrige is aware of Congressmen Lagomarsino's and Badham's interest in Charlie Fullerton for this job. Let us know whether you want to push for the non-career status so Fullerton has an opportunity for the position.

THE WHITE HOUSE
WASHINGTON

May 24, 1983

Shirley:

At some point next week we would like to set-up a meeting with Mr. Deaver, Craig Fuller, Bill Sittmann and Fred Khedouri (OMB) for thirty minutes on National Wildlife Federation.

Please get back to me.

Thanks!

11:00 a.m.

DONNA L. BLUME

MKD/Shirley/Pat: —

Bill
res note.

Per CLF, the attached is "sensitive" and
no further distribution should be made.

Thanks.

Adele

THE WHITE HOUSE
WASHINGTON

May 18, 1983

MEMORANDUM FOR MICHAEL K. DEEVER

FROM: CRAIG L. FULLER

SUBJECT: Review of the National Wildlife Federation
12 Point Program

*Bill
This is highly
sensitive.
Kedouri is right
we have little
room. Lets get
together with
CJ & Khedouri*

Fred Khedouri and I have conspired on a number of issues to find a little breathing room between rigid philosophy and practical political realities. This makes the attached response even more significant. There is not much that can be done substantively with Jay Hair's proposals. I think we would be better off with an education-like strategy where we set the agenda--we don't appear to be able to work off the environmentalist's agenda at all. We could promote the positive actions that have taken (and there are some) and involve the President in a number of events/activities around the country.

We need to give Ruckleshaus some time. I would like to work with him and involve Lee Atwater and Fred Khedouri in developing a list of ideas for presentation to the Outreach Strategy Group.

Lets discuss this further at your convenience.



EXECUTIVE OFFICE OF THE PRESIDENT

OFFICE OF MANAGEMENT AND BUDGET

WASHINGTON, D.C. 20503

May 17, 1983

MEMORANDUM FOR CRAIG FULLER

FROM: FRED KHEDOURI *FK*

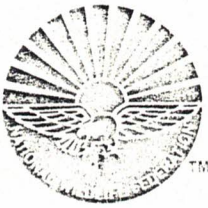
SUBJECT: National Wildlife Federation "Twelve Points"

I regret to say that there is not much opportunity for accommodation with the policy changes suggested in the National Wildlife Federation list. All of the suggestions would require a reversal of efforts by this Administration to change policies that were put in place during the Carter years, with only one exception (water project cost-sharing).

If I had to place a simple characterization on the proposal, I would be hard pressed to call it "moderate environmentalism." In addition, a number of the proposals call for a direct repudiation of highly visible policies that have been vocally defended by their proponents within the Administration for more than two years.

Examples of these include:

- Changing the basis of coal leasing back to "demand for production" (item 2); Watt's intent in putting more reserves on the market was to deliberately lower the cost of production in order to enhance coal use. He would come absolutely unglued if compelled to change this policy.
- Reducing the timber sale program to 10 billion board feet per year; raising the Forest Service sales targets has been the single highest priority of Assistant Secretary of USDA John Crowell. I have had an appeal from them in every budget cycle when I tried to cut them back from 12.5 billion feet to 11.8. Crowell would probably resign -- no kidding -- if forced down to 10 billion feet. (Item 5)
- Wetlands acquisition of the magnitude proposed in item 4 would cost several hundred million dollars; the Section 404 wetlands protection regulations that we are asked to withdraw were a priority item of the Vice President's Task Force and were actually relatively uncontroversial with the big wetlands proponents in the Congress, such as Senators Chafee and Baker.
- Implementation of a groundwater policy (item 9) has been reviewed and rejected in the CCNRE.
- Item 7 would call for the most severe sulphur dioxide control measures ever proposed in the name of acid rain control; the cost to utilities has been estimated to run as high as \$50 billion to comply.
- Item 12 would call for a complete reversal of many foreign policy stands taken at great pain by the U.S., such as on Law of the Sea.



NATIONAL WILDLIFE FEDERATION

1412 Sixteenth Street, N.W., Washington, D.C. 20036

202-797-6800

*No meetings
referred
- Recommendations of steps on road to Environmental Recovery*

TWELVE ACTIONS FOR INCLUSION IN

THE PRESIDENT'S 1983 ENVIRONMENTAL MESSAGE

Conservation Foundation

April 1983

White House Conference on the Economy and the Environment

Executive Summary

Ernest Walton Lister

The following is a summary of proposed recommendations for Presidential actions contained in "Twelve Topics for the President's Environmental Message," NWF (April, 1983):

- Environmental Defense Fund.

1. Allow disposal of public lands only on the basis of the following criteria:
 - A. BLM Disposals: Sale only after lands are declared excess in the context of a Resource Management Plan adopted in accordance with existing BLM planning regulations.
 - B. National Forest Disposals: Proposed sale submitted to Congress only after lands are declared unnecessary to meet multiple-use objectives in the context of a Forest Management Plan adopted in accordance with existing U.S. Forest Service planning regulations.
 - C. GSA Disposals: Sale only after consideration of programmatic environmental impacts within the context of a programmatic environmental impact statement. No land sales will occur based on pre-determined monetary targets.
2. Suspend coal leasing through FY 1984. New Leases, including Preference Right Leases, will issue only on the basis of existing demand for production (not for reserves) and only pursuant to duly-promulgated and adopted land use plans.
3. Accord renewable resource management co-equal status--in full-time staff and dollars--with commodity production programs within the Department of Interior.

4. Request sufficient appropriations to acquire all wetlands authorized for acquisition that have been designated by the U.S. Fish and Wildlife Service as threatened, including all habitat necessary for the protection of threatened or endangered species. All funds authorized under the Wetland Loan Act shall be requested for appropriation. Withdraw Department of Army regulations, promulgated in July, 1982, which exempt a majority of the nation's wetlands from site-by-site permit requirements.
5. Reduce U.S. Forest Service annual timber sale targets from over 13 billion board feet to no more than 10 billion board feet through FY 1986, and prohibit cutting in areas with highly erosive soils or with high fish and wildlife habitat values.
6. Direct that state surface mining regulations conform to strong federal environmental design criteria aimed at minimizing the environmental impacts of coal production.
7. Support legislation requiring a 10-million-ton reduction in annual sulfur dioxide emissions in the eastern 31 states by 1993, prohibit relaxation of existing clean air plans that would increase sulfur dioxide and nitrogen oxide emissions over existing levels, and support field testing of innovative pollution control technologies to control acid rain.
8. Direct the Department of Interior to assert and quantify federal reserved and non-reserved water rights for multiple-use purposes, including fish and wildlife.
9. Announce a comprehensive ground water contamination policy that includes the following elements:
 - A. A policy of non-degradation of existing aquifers.
 - B. A commitment to complete, within three years, the requisite remedial investigation/feasibility studies for all 419 high-priority hazardous waste sites, plus all federal facilities that meet EPA's high-priority criteria.
 - C. A substantial tightening of existing hazardous waste site regulations, including the elimination of land disposal where treatment is technically feasible.
 - D. Drinking water standards for organic as well as inorganic constituents.
 - E. An immediate ban on the direct injection of hazardous wastes into all aquifers that are hydrologically connected to drinking water supplies.

10. Announce a comprehensive federal water development policy that includes the following elements:
 - A. A commitment to environmental quality and water conservation as key elements of water policy at all levels of government.
 - B. Reinstatement of rules to guide federal agencies in their evaluation of water projects.
 - C. Non-federal cost-sharing of future resource development projects.
 - D. User fees, pricing, and repayment schedules that will repay the costs of federal investments in water resource projects.
11. Direct the Small Watershed Program of the SCS to emphasize soil erosion control and de-emphasize environmentally-damaging flood control and drainage activities, and direct the payment-in-kind (PIK) program to target wetlands, highly-erosive lands, and riparian flood plains as high-priority lands to be taken out of production under the program.
12. Restore the United States to a position of responsible leadership on international environmental issues by taking the following actions:
 - A. Support full funding of the United Nations Environment Programme (\$10 million), the Man and the Biosphere Program, and the Antarctica Research Program.
 - B. Direct immediate implementation of the Western Hemisphere and World Heritage Conventions.
 - C. Support UN resolutions calling for controls on hazardous exports and adoption of a World Charter for Nature.
 - D. Support controls on overseas sales of toxics and other hazardous substances banned from use in the United States.
 - E. Support OECD efforts to harmonize procedures among industrialized countries concerning the testing and control of toxic chemicals.

- F. Implement a Congressionally-mandated moratorium on ocean dumping of low-level radioactive wastes.
- G. Vigorously support international negotiations which seek protection of the earth's ozone layer.
- H. Support the Law of the Sea Treaty as already adopted by over 120 nations.
- I. Take immediate steps to implement the recommendations of the Strategy Conference on Biological Diversity (1981) and the Global 2000 Report to the President (1980).



NATIONAL WILDLIFE FEDERATION

, 1412 Sixteenth Street, N.W., Washington, D.C. 20036

202-797-6800

April 14, 1983

The President
The White House
Washington, D.C. 20500

Dear Mr. President:

Your recently announced intention to deliver a comprehensive Environmental Message within the next few months is welcome news. In light of recent events at the Environmental Protection Agency and other controversies surrounding the actions of certain Administration officials, the public is anxious to hear your personal views on the role of government in maintaining public health, conserving natural resources, and safeguarding our natural heritage. We hope you will take the opportunity to spell out the policies and principles that guide your Administration's environmental and conservation programs.

Attached to this letter are twelve priority issues that we urge you to address in your message. These are certainly not the only environmental issues facing us, but they are a representative sample of the concerns of our over 4 million members and supporters. To date, we have heard only from your appointed officials on these topics. Our members are very anxious to learn firsthand of your position on these key issues.

We look forward to your Environmental Message and would welcome any opportunity to discuss the issues raised in the attached document with you or with members of your staff in greater detail.

Sincerely,

JAY D. HAIR
Executive Vice President

Attachment



NATIONAL WILDLIFE FEDERATION

1412 Sixteenth Street, N.W., Washington, D.C. 20036

202-797-6800

TWELVE TOPICS
FOR THE PRESIDENT'S
1983 ENVIRONMENTAL MESSAGE

April 1983

JAY D. HAIR
Executive Vice President

Patrick A. Parenteau
Vice President
Resources Conservation Department

TWELVE TOPICS FOR THE PRESIDENT'S
1983 ENVIRONMENTAL MESSAGE
APRIL, 1983

1. SALE OF PUBLIC LANDS
2. COAL LEASING
3. RENEWABLE RESOURCE MANAGEMENT
4. WETLANDS PROTECTION
5. MANAGEMENT OF NATIONAL FORESTS
6. STRIP MINING
7. ACID RAIN
8. PUBLIC WATER RIGHTS
9. GROUNDWATER CONTAMINATION
10. FEDERAL WATER RESOURCES POLICY
11. SOIL EROSION
12. U.S. LEADERSHIP ON GLOBAL ENVIRONMENTAL PROBLEMS

TWELVE TOPICS FOR THE PRESIDENT'S
1983 ENVIRONMENTAL MESSAGE
April, 1983

1. SALE OF PUBLIC LANDS

The vast increase in public land sales proposed under this Administration's Asset Management Program is not scientifically based and threatens valuable wildlife habitat. Certainly, some federally-owned property retains little public value and should be sold. The Federal Land Policy and Management Act of 1976 (FLPMA) explicitly sanctions such disposal, but only after the proper development and implementation of Resources Management Plans as provided in the Act.

Unfortunately, vast land disposals are being proposed by your Administration based on political, not resource, considerations. Instead of a "bottoms up" approach to disposal, the Real Property Review Board and OMB have decreed from the top that \$1 billion must be raised from land sales in FY 1984, whether or not this means selling off some of our most productive wildlife habitat. The U.S. Forest Service presently plans to seek Congressional authorization to sell over 6 million acres of national forest based on criteria that have nothing to do with the intrinsic value of the resources.^{1/}

^{1/}For example, one criteria for sale is whether more than 50 percent of the land within a forest is federally owned. Several national forests in the eastern part of the U.S. are not more than 50 percent federally owned because they were authorized by Congress for acquisition, not withdrawn from public land holdings, and this Administration has attempted to freeze new acquisitions. This is like selling a house solely because construction is only 40 percent complete.

The Bureau of Land Management presently plans to sell an additional 4.2 million acres, much of it outside of the Congressionally-mandated FLPMA planning process. The General Services Administration is also trying to dispose of over 60,000 acres of property without assessing the natural resource value of these holdings.

#1. We request that your environmental message explicitly abandon the present policy of basing public land sales on predetermined monetary targets and reinstitute a disposal program based on the contribution of public lands to multiple-use values and sound management principles.

2. COAL LEASING

The Department of the Interior plans to lease 20 billion tons of coal in the next eighteen months. This plan was established without due regard for the actual demand for coal or the potential adverse environmental effects. The plan threatens valuable public resources, including (1) critical wildlife habitat, (2) rangeland that is very difficult and costly to reclaim, (3) rich archaeological areas, and (4) unique fossil beds. The environmental analysis and land-use planning needed to identify such resources and develop effective measures for their protection has not been conducted. The Department has simply skipped over the planning and analysis stage to meet self-imposed lease sale deadlines.

Yet, there is no need to push billions of tons of new coal onto the current soft market. More than 80% of existing federal coal leases remain out of production and present estimates are that more than half of these existing leases will remain out of production through 1991. Interior's coal leasing plans will simply turn over another million acres of public lands to coal speculators, decades before the coal is needed and for a fraction of its real value.

#2. We request that your environmental message declare an immediate suspension of all coal leasing through Fiscal Year 1984, and direct that future lease sales be conducted only after the Department of Interior has completed the environmental analyses and land-use planning necessary to protect wildlife habitat and other resources in prospective coal lease areas.

3. RENEWABLE RESOURCE MANAGEMENT

The Department of Interior has the dual responsibility to both conserve and develop our public lands. Historically, the Department has met this dual responsibility by providing almost equal funding and staff for (1) conservation and (2) commercial exploitation of public resources. Under your Administration, however, this delicate balance has been destroyed. Your

proposed FY 84 budget reduces Bureau of Land Management renewable resource programs 47 percent from their Congressionally-approved FY 1981 levels,^{2/} while the commodity production programs have received substantial increases over FY 1981 levels.^{3/} Similarly, the total U.S. Fish and Wildlife Service budget has been cut 12 percent since FY 1981, although threats to refuges from development have substantially increased.^{4/} This imbalance makes it impossible for the Department to sustain an adequate renewable resources program in the face of accelerated public land development. With over 55 percent of our existing public rangeland and grasslands already categorized as overgrazed and overused,^{5/} this persistent underfunding and understaffing of resource management activities will unnecessarily destroy millions of acres of habitat.

^{2/}These programs are (1) wildlife habitat management, (2) rangeland improvement, (3) soil, water and air management, and (4) recreation management. Operational funds for these programs fell from \$158.9 million in FY 1981 to a proposed \$85.2 million in FY 1984.

^{3/}These programs are (1) energy minerals programs and (2) non-energy mineral development. The exact amount of these increases cannot be determined from available information since some activities within this classification have been transferred to the Minerals Management Service.

^{4/}Total U.S. Fish and Wildlife Service appropriated funds in FY 1981 were \$300.1 million. The Administration's FY 1984 request was \$265.4 million, including no funds for refuge acquisition.

^{5/}"Overgrazed" is defined as rangeland in which the quality of vegetation and soil is 20 percent or less of site potential.

#3: We request that your environmental message direct the Department of Interior to reprogram the Department's budget to assure that total resources devoted to renewable resource management programs--in full time staff and dollars--be no less than total resources devoted to the commodity production programs.

4. WETLANDS PROTECTION

The nation's wetlands are an enormously valuable natural and economic resource. Wetlands improve water quality, reduce flooding, limit shoreline erosion, and provide food and shelter for many species of fish, shellfish and wildlife. The nation's multi-billion dollar recreational and commercial fishing industry depends on the fish and shellfish produced in wetlands. Nevertheless, our wetlands are disappearing at an alarming rate. We have already lost over 50% of our wetlands and continue to lose them at a rate of 450,000 acres per year.^{6/} In the upper Midwest alone, 50% of the prairie

^{6/}Status and Trends of Wetlands and Deepwater Habitats in the Coterminous United States, 1950's and 1970's, U.S. Department of Interior, Fish and Wildlife Service, Office of Biological Services (1982).

potholes were lost by 1950, with losses continuing at 48,000 acres per year.^{7/}

Much of this destruction is federally subsidized, primarily through agricultural support programs. Although wetlands are protected by law, your Administration has failed to enforce these protections. Secretary Watt has attempted to impose a moratorium on the use of the Land and Water Conservation Fund for wetland acquisition. He has also steadfastly refused to use funds available under the Wetlands Loan Act to purchase wetlands essential to the nation's migratory waterfowl. Meanwhile, officials in the Department of the Army, under the guise of "regulatory reform," are attempting to exempt a majority of the nation's remaining wetlands from site-by-site permit requirements under the Clean Water Act, the only effective federal regulatory program to protect wetlands. While not endorsing legislative action to restrict the program, your Cabinet Council on Energy and Natural Resources has given the Department of the Army the "green light" to seek such action on its own. Secretary Watt's proposed wetland conservation legislation (called Protect Our Wetland and Duck Resources or "POWDR") exempts over 90% of the causes of wetland losses and provides only token financial assistance for acquisition.

^{7/}Statement of Robert A. Jantzen Before the House Committee on Merchant Marine and Fisheries, Subcommittee on Fish and Wildlife Conservation and the Environment, November 20, 1981.

#4. We request that your environmental message (1) support a comprehensive legislative program to protect our remaining wetlands, (2) direct your officials to request funds from Congress to purchase critically threatened wetlands, and (3) direct the Department of the Army to withdraw its regulations, issued in July 1982, emasculating the wetland permit program.

5. MANAGEMENT OF NATIONAL FORESTS

Federal law requires that National Forests be managed for multiple uses including outdoor recreation, rangeland, timber, watershed, wildlife and fisheries. Unfortunately, the U.S. Forest Service has adopted a "top-down" management system that keys forest management to predetermined targets for sale of timber. These targets now call for about 11 billion board feet to be sold in FY 1983, rising to over 13 billion board feet in FY 1985. These targets will require that areas critically important to fish and wildlife be cut to meet inflated timber sale goals set in Washington. These high timber sale targets are totally unnecessary since about 35 billion board feet remains sold, but uncut.

One class of areas now facing pressure for cutting is old growth forests, which are of unique importance to many wildlife species as well as to commercial and other fisheries. Cutting will drastically reduce the ability of the land to sustain wildlife, and it is uncertain whether commercial timber can

ever be regrown in some of these areas. These high timber sale targets will also require forest supervisors to shift resources away from forest management to timber sale preparation, further ignoring the multiple-use mandate of the U.S. Forest Service. Your FY 1984 proposed budget reflects this fact, showing increased funds for timber sale preparation activities, while funds for fish, wildlife, and threatened and endangered species habitat improvement all decline.

#5. We request that your environmental message abandon existing plans for increasing timber sales and reduce annual cuts to less than 10 billion board feet to accommodate responsible environmental and fiscal management of our National Forests.

6. STRIP MINING

The federal Surface Mining Control and Reclamation Act of 1977 requires the Department of the Interior to protect the nation from the environmental impacts of the strip mining of coal. The heart of this program is a series of so-called "permanent program regulations" that set minimum environmental standards. These standards are established by the Department of Interior and implemented by state surface mining regulators through federally-approved state mining programs. Until recently, these standards consisted of specific environmental

design criteria requiring states to, among other things, (1) protect state-listed threatened or endangered species, (2) fence toxic waste ponds, (3) prohibit the use of most persistent pesticides, (4) protect nationally significant cultural properties, (5) assure safe construction of coal waste piles, (6) control road construction and design, and (7) restore strip-mined land to its approximate original contour. Unfortunately the Department of Interior is now seeking to replace these and other important design criteria with more vague "performance standards" that are difficult to review for effectiveness before they are implemented and difficult to police after they are implemented. In addition, both state implementation and federal supervision are being made more difficult through budget cuts. Indeed, the Department of Interior's own records indicate that the majority of major coal states are not now in full compliance with the federal Surface Mining Act.

#6. We request that your environmental message explicitly support the need for strong federal environmental design criteria aimed at minimizing the environmental impacts of coal production.

7. ACID RAIN

Over 50 million tons of sulfur dioxide and nitrogen oxide

are emitted into the air we breathe in the United States each year--primarily from coal-fired power plants and automobiles--and return to earth as acid rain. Highly respected scientific panels that have studied the effect of these emissions on our environment (including the National Commission on Air Quality, the Committee on the Atmosphere and Biosphere of the National Academy of Sciences, and the United States-Canada Acid Rain Work Group) have concluded that acid deposition is responsible for the acidification of sensitive surface waters in the United States and Canada, and that reductions from present levels would reduce further damage. Evidence is also mounting that sulfur deposition is injuring crops, forests and public health. Yet the United States is unique among industrialized nations in not only ignoring the acid rain/acid deposition problem, but making it worse. Your Administration (1) wants more studies before doing anything to solve the problem, (2) has opposed control legislation, and (3) has granted relaxations in state air quality plans that will increase sulfur dioxide levels 1.5 million tons over formerly projected levels. Last year, your Administration also supported changes in the Clean Air Act that would have allowed a doubling of nitrogen oxide emissions from new cars.

#7. We request that your environmental message (1) support legislation introduced by Senator Stafford requiring a 10-million-ton reduction in annual sulfur dioxide emissions in

the eastern 31 states by 1993, (2) declare a moratorium on State Implementation Plan (SIP) relaxations or other administrative actions or legislative initiatives that would increase sulfur dioxide and nitrogen oxide emissions over previously projected levels, and (3) support field testing of innovative pollution control technologies to control acid rain.

8. PUBLIC WATER RIGHTS

In our western states, he who owns the water owns the land. Until recently, the Bureau of Land Management (BLM) exercised its right to appropriate water for use on public land in the same manner and to the same extent that private landowners appropriate water for use on their own lands. BLM uses water for floodwater and sediment detention, waterfowl habitat, recreation, wildlife and livestock drinking, and other multiple-use purposes. Protection of these rights is crucial to effective multiple-use management of 341 million acres of BLM land, an area twice the size of Texas, most of which is located it in the arid West.

Unfortunately, under a policy adopted by BLM under your Administration, permittees or lessees of public lands are being encouraged to file either as exclusive holders or co-holders (along with BLM) of water rights for improvements on BLM lands used for stockwatering.^{8/} By encouraging private owner-

^{8/}Memorandum from Director, Bureau of Land Management, to Secretary, December 3, 1981. Subject: BLM Water Rights - Stockwatering.

ship of water rights on public land, this policy transfers effective control of public rangelands subject to such water rights to private interests. In addition, the Department of Interior has declared that the federal government has no authority to protect instream flows--flows critical to the health of fish and wildlife on public lands--on non-reserved federal lands.^{9/} Finally, the Department has recently announced that the federal water rights it has not given away can only be used for human and livestock consumption, not for fish and wildlife.^{10/} The living resources of our federal lands are being literally squeezed dry to accommodate private energy, grazing, and agricultural interests.

#8. We request that your environmental message repudiate this give-away of federal water, and that an aggressive program of quantification and assertion of federal water rights for multiple purposes (including fish and wildlife protection) be announced.

^{9/}Solicitor Opinion of September 11, 1981. Non-reserved lands are BLM lands that have not been designated for a particular use, such as wilderness or national recreation areas.

^{10/}Solicitor Opinion of February 16, 1983.

9. GROUNDWATER CONTAMINATION

Groundwater is an essential but vulnerable national resource. More than 90% of citizens living in rural areas, and 50% of all Americans, depend on groundwater for domestic use. Groundwater is very easily contaminated and, once contaminated, is very often economically or technologically impossible to clean up. Yet a recently released report of the Office of Technology Assessment found that 29% of the groundwater drinking water supplies of 954 U.S. cities with populations over 10,000 is contaminated.^{11/} EPA announced last year that organic chemicals, many of which are believed to cause cancer and other diseases in humans, have been detected in 45% of the public water systems that draw on groundwater and serve populations over 10,000. These chemicals have been detected in extremely high concentrations which exceed by several orders of magnitude those found in surface drinking water sources.

Despite the seriousness of the situation, the present Administration has failed to adequately implement existing laws to prevent contamination of groundwater or to develop a comprehensive policy on groundwater contamination. It has (1)

^{11/}Technologies and Management Strategies for Hazardous Wastes, Office of Technology Assessment (March, 1983), p. 5.

failed to vigorously implement the Superfund program completing clean-up at only four of 419 EPA-identified "high priority" abandoned hazardous waste sites and conducting pre-cleanup remedial investigation/feasibility studies at 32 more sites over the last two years, (2) failed to set uniform national standards for site clean-up, (3) allowed existing landfills to continue operating without taking remedial steps to comply with new standards designed to control groundwater pollution, (4) exempted small surface impoundments, "small" generators that produce 1,000 kilograms of waste per month, and hazardous waste burned in boilers from regulation, (5) failed, as required by law, to establish Underground Injection Control ("UIC") programs in states which do not have them, thus allowing continued direct injection of hazardous waste into aquifers, and (6) failed to test for, or regulate, organic constituents in drinking water,^{12/} although organics pose a much more serious threat to public health than inorganic constituents. Moreover, EPA has proposed to grant lifetime permits to many existing hazardous waste facilities, most of which are land disposal facilities, and has failed to take any enforcement action against 70 of the 109 facilities that it has found do not comply with existing regulations.^{13/}

^{12/}The one exception is the existing regulation of trihalomethanes.

^{13/}"EPA to OMB: Massive Noncompliance Found with Groundwater Monitoring," Inside EPA, April 1, 1983, at 1.

#9. We request that your environmental message announce the adoption of a comprehensive policy on groundwater contamination that includes (1) a policy of non-degradation of existing aquifers (2) a commitment to complete, within three years, the requisite remedial investigation/feasibility studies for all 419 high-priority hazardous waste sites, plus all federal facilities that meet EPA's high priority criteria, (3) a substantial tightening of existing hazardous waste site regulations, including the elimination of land disposal where treatment is technically feasible, (4) drinking water standards for organic as well as inorganic constituents, and (5) an immediate ban on the direct injection of hazardous wastes into all aquifers that are hydrologically connected to drinking water supplies.

10. FEDERAL WATER RESOURCES POLICY

America is blessed with bountiful water supplies--about 675 billion gallons of usable fresh water from lakes, rivers, and streams per year. In contrast, we use only about 110 billion gallons per year, of which 82 percent is for agricultural irrigation. Domestic and commercial consumption represents only about 8 percent of our water budget. Nevertheless, water shortages exist, primarily because water is not always available when and where it is needed. Public authorities have addressed this problem by building large physical structures to

reduce the risks of droughts and floods, and to bring water and power to distant markets. However, much of our federal water investment has been demonstrated to be (1) economically inefficient, (2) inequitable in its distribution of water costs and benefits, and (3) unnecessarily destructive of the environment. Coordinated action is vitally needed to make sure our federal water investments are efficient, equitable, and compatible with environmental goals. Because most river basins overlap state boundaries federal technical, planning, and management assistance is essential.

Your Administration, to its great credit, has tackled the thorny issue of cost and benefit distribution by supporting the application of "user fees" to federally-supported projects, and by developing a draft policy that would require non-federal interests to pay a significant share of project costs. These measures should reduce political pressure in support of marginal projects that are simply a waste of taxpayers' money. However, your Administration has dismantled efforts to coordinate federal/state water planning by (1) abolishing all federally-funded River Basin Commissions, (2) eliminating the Office of Water Research and Technology in the Department of Interior, (3) stripping the U.S. Water Resources Council of its power to evaluate water projects, (4) rescinding the rules federal agencies use to plan and evaluate water projects, and (5) dropping the promotion of environmental quality as a co-equal objective of water resources planning. These actions

worse today than in the "dust bowl" days of the 1930's. With farm income currently at the lowest level since the depression, farmers cannot afford to implement expensive soil conservation measures themselves. To the contrary, ever greater concentrations of agricultural chemicals are now applied to our cropland to produce bigger harvests in an attempt to squeeze short-term profits from a fast disappearing resource.

A principle reason for the failure of our federal soil conservation programs is the fact that most federal assistance, administered by the Soil Conservation Science (SCS), is devoted to "structural" solutions such as flood control dams, irrigation systems, and drainage projects.

These "solutions" often inflict extensive damage to wetlands and riparian habitat, natural systems that themselves help to reduce flood damage and soil erosion if protected. Other "non-structural" solutions such as shelter-belts, no-till farming, and the elimination of agricultural subsidies are ignored.

#11. We request that your environmental message (1) direct the Small Watershed Program of the SCS to emphasize soil erosion control and de-emphasize environmentally damaging flood control and drainage activities, and (2) direct the payment-in-kind (PIK) program to target wetlands, highly-erosive lands, and riparian flood plains as high-priority lands to be taken out of production under the program.

12. U.S. LEADERSHIP ON GLOBAL ENVIRONMENTAL PROBLEMS

Until 1981, the United States set the standard for the world on issues relating to the conservation and wise use of natural resources. The force of our example has inspired many other countries, developed and developing alike, to tackle their own problems of pollution and natural resources degradation. Throughout the 1970's, the United States championed efforts to convince other nations to join with us in negotiating international agreements addressing global environmental issues and, through our demonstrated interest, vastly increased global awareness of the connection between environmental and economic progress.

Unfortunately, your Administration has effectively removed the United States from any leadership role on international environmental issues. One of your very first actions in office was to rescind a farsighted Executive Order (E.O. 12264) designed to discourage the sale overseas of toxic and other hazardous substances banned from use in the United States. Instead of working with other industrial nations to address problems posed by toxic chemicals, the United States is now actively opposing (1) an initiative proposed by the Organization for Economic Cooperation and Development (OECD) to harmonize procedures among industrialized countries concerning the testing and control of toxic chemicals, (2) negotiations

which seek protection of the earth's vital ozone layer, and (3) a moratorium on ocean dumping of low-level radioactive wastes, a stand inconsistent even with U.S. law.^{14/} The United States was also the only country in the world to vote against UN resolutions calling for (1) controls on hazardous exports, and (2) adoption of a World Charter for Nature.

Collection of data on global environmental and natural resources trends has also stagnated under your Administration and the U.S. has even pressured OECD to drop its work in this area. Important scientific research and conservation programs are being threatened with elimination because your proposed FY 1984 budget zeroes out funds for (1) the Man and the Biosphere program, (2) Antarctica research, and (3) implementation of the Western Hemisphere and World Heritage Conventions. Your Administration is also trying to cut the United States' contribution to the United Nations Environmental Programme (UNEP), the environmental conscience of the UN, to \$3 million, a 70 percent reduction from the 1980 level. Finally, your Administration has taken no action to carry out the recommendations of its own Strategy Conference on Biological Diversity held in 1981, or the Global 2000 Report to the President issued in 1980.

^{14/}A 1982 Amendment to the Ocean Dumping Act established

#12. We request that your environmental message reverse these actions and commit this Administration to restoring the United States to a position of responsible leadership on international environmental issues.