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Comment Analysis Enterprize Team
Attn: OFP, Building 2, Suite 295

Unified Federal Policy, for Ensuring Watershed Approach to Federal Land and Resource Management
Federal Register: February 22, 2000 (Volume 65, Number 35)
Notices: Page 8839-8840. Volume 65, Number 35, Pages 8833-8839.

Comments: Review of the Department of Interior Secretary Bruce Babbitt and U.S.D.A. Secretary Glickman's announcement of the, unified federal policy for ensuring a watershed approach to federal land and resource management falsely leads the reader to believe this policy only applies to federally managed land and resources. This proposed policy potentially impacts all private, state, and local governments lands.

With terms such as "Significant" and "Resources" left undefined within this document, federal agencies could potentially delineate every watershed with a wetland, migratory bird or endangered species within its boundaries.

Once watersheds are delineated (some 20,000) by some federal agencies and then to access the existing and potential condition of watersheds and classify them. Note: "clean water or other natural resource goals" are not outlined in the document. In fact under point 2(6), The document states that management goals will be identified and incorporated into watershed management plans, programs and actions, at a later date.

Furthermore point 2(5) of the plan states that watershed assessments and management will be based on good science but goes on in "Glossary of Terms" to say that "assessment will be conducted using existing date, where available" and "data gap may suggest, collection of additional data."

E.P.A. assessment of water quality has been anything but good science. In 1999 an E.P.A. report led Congress to believe that agriculture polluted 70 per cent of the nation's streams. In other 1999 documents, E.P.A. states that 40 per cent of U.S. waterways are still

The forest service roadless proposal. The U.S. forest service has no legal authority to put in place a moratorium on road building and reconstruction. This right is reserved by Congress and Congress alone. Secondly, if the U.S.F.S. move forward with this proposal, the forest service will be violating the national forest management act, federal lands policy management act, Federal roads and trails act. multiple use and sustained yeilled act., general mining law and N.E.P.A. The bottom line is that the U.S.F.S. moratorium is illegal.

The law under the Clean Water Acts is still relatively undefined non-point source pollutions. It was not intended for that, so it is an illegal action. It was only for point source pollution. The Unified Federal Policy for Ensuring Watershed Approach to Federal Land and Resource Management should be withdrawn.

Singned, Lily Greenhalgh

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