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Carlsbad Soil and Water Conservation District
114 S. Halagueno St. - Room 137, Federal Building - Carlsbad, NM 88220 - (505) 885-5751

USDA Forest Service
Contents Analysis Enterprise Team Attn: UFP
Building 2, Suite 295
Salt Lake City, UT 84116

4-11-00

Comments: Unified Federal Policy for ensuring a Watershed Approach to Federal Land and Resource Management.

To USDA and DOI:

The Carlsbad Soil and Water Conservation District has reviewed your proposed policy for Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management and offer the following comments.

Our first concern is the lack of effort to involve private land owners in the decision making process. In watersheds where mixed ownership occurs what takes lands and what happens on Federal and State lands can impact private lands. To truly have a unified policy all owners must be involved. This policy appears to completely usurp private property owners right.

Most of the items listed in the policy are so broad and general it shared to determine the overall effects of any item. There is no specific actions and needed funding and funding sources are not addressed at all.

Specific Federal agencies that are going to abide by this policy should be identified. These agencies that provide cost-share or technical assistance such as the Natural Resources Conservation Service or Farm Services Agency could have a direct impact on private lands if this policy becomes mandatory through those programs.

We have concern that this policy is being established under the guise of the Clean Water Action Plan, which is under litigation on many issues thereby raising question of the legality of the whole process.

Since we did not receive a copy of this information until just recently and have not had the opportunity to compare this policy to existing legislation such as, Clean Water Act, we are unable to comment on these issues at this time. The Carlsbad Soil and Water Conservation District requests you extend the comment period by 60 days.

Thank you.

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Sincerely,

Ridley Gardner

Ridley Gardner
Chairman, Carlsbad SWCD

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