162

POPE & TALBOT, INC.

April 21, 2000

USDA Forest Service
Content Analysis Enterprise Team
Attn: UFP, Building 2, Suite 295
5500 Amelia Earhart Drive
Salt Lake City, UT 84116

Dear Sir/Madam:

Below are my comments the ***"Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management"*** published for comment in the federal register on February 22, 2000.

The narrative language from the Clean Water Action Plan prefacing this particular key action, contains the following statement: ***"Activities such as road building, logging, mining, grazing, hydrologic modification, or excessive recreational use can degrade the integrity of these watershed and require actions to reduce their harm." (Clean Water Action Plan, page 30).***

Based on the above language it is apparent that the intent of this proposal is based on the notion that virtually all land use activities degrade watersheds, regardless of the method in which they are conducted.

The policy is extremely vague. In reading the policy, one would question why it has even been published it is so lacking in specifics. This is an issue that could have likely been addressed had adequate NEPA analysis been conducted to identify and define the specific issues.

The vagueness of the UFP language creates a real concern for those individuals and businesses who rely on proper management of federal lands, as well as for private landowners whose property and resources are intermingled among federal lands. Before anything can be implemented the language needs to be clearly defined and presented to the public for comment.

The policy completely ignores the primacy of State's that have delegated authority for implementing the Clean Water Act. Again, it appears the policy is yet another attempt, as can be seen in the proposed TMDL regulations, to circumvent the role and primacy Congress intended for the states in implementing the provisions of the Clean Water Act.

The policy appears to substantially modify the management approach to federal lands without Congressional approval. We question the agency's determination that rule

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changes are not necessary and substantial changes in federal land management processes can be implemented with a two-page policy.

In closing, we would offer that if the federal land management agencies are truly interested in resource management on a watershed basis, then a sincere commitment needs to be made to work with State and local governments. Jointly the entities can discuss the development of a common process for approaching watershed management including a consistent understanding of the type of credible data necessary to assess watershed health. As well, the federal agencies must recognize the primacy of States in implementing the Clean Water Act, and most ***importantly*** recognize and respect the rights of those landowners with property located within these watersheds.

Thank you for the opportunity to comment.

Sincerely,

W. Kenneth Lee

W. Kenneth Lee
Black Hills Timber Manager

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