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USDA FOREST SERVICE  
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Regarding the Unified Federal Policy for Ensuring a Watershed  
Approach to Federal Land and Resource Management

Regarding consistent and scientific approach to the management of  
watersheds:"

1) Naturally occurring sediment is now to be considered as a  
pollutant, which will tend to make entire watersheds, which  
include in some area steep mountainsides, to be labeled at risk  
permanently, which will impact the permitting process for current  
users, for needed restoration work, for desirable new projects, for  
landholders in the entire watershed. This ~~would~~ tend to penalize  
unfairly residents and land users who are in no way responsible for  
the high TMDLs, and may indeed be working to prevent further  
degrading of the water supply.

2. Sedimentation is considered particularly a problem where fish  
are spawning, yet the TMDL limit is being applied in areas where  
fish do not spawn, have never spawned, and will not spawn due  
to high water temperatures.

3. The inclusion of sediment in the TMDL ignores the historic data  
which shows that through the entire California gold rush when the  
rivers were loaded with sediment from gold dredging, the fisheries  
population remained consistently high. Old timers in Trinity  
County tell of fish populations so dense you could catch fish with  
buckets, in their boyhoods, even after 100 years of gold mining on  
the rivers and streams.

Regarding collaboration with States, Tribes and interested  
stakeholders:

1. In Trinity County we had a massive burn, the Megram fire.  
Salvage operations to remove still usable burned timber and reduce

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<sup>fuels</sup>  
the ~~fuel~~ load is being held up by perhaps 18 months, long enough for the burned pine to become no longer worth salvaging. This is due to the thicket of regulations now in place to "protect" the watershed. Besides Federal regulations, there are State of California regulations that mimic the Federal. I'm sure this is part of the "cooperative" effort. By the time the necessary surveys, environmental impact statements, etc. have been completed, filed and acted on, the window of opportunity has long gone, in that the wood is no longer harvestable, the beetle infestation has gotten out of hand, or the topsoil has eroded into the stream. The end result is to destroy that which the goal was to save.

Sincerely,

Vicki Riley

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