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Lassen County Farm Bureau

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April 17, 2000

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

Dear People:

The Lassen County Farm Bureau would like to submit the following comments on the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. Lassen County is almost 70% public land, and we have strong concerns regarding the document. Many of our members have been actively involved in the State of California's voluntary approach to watershed management, which we strongly support. California has many local voluntary watershed groups which have proved effective. Our concern is that these locally driven groups will be replaced with a federally controlled process that will interfere with the ability of private parties, local governments, state officials, and regional waterboards to work cooperatively to make appropriate assessments of waterbodies and create their own water quality enhancement programs.

It is inappropriate to use the California's Unified Watershed Assessment that the state submitted because it's cover letter states it was not meant to be used as the basis for any regulatory requirements nor require the establishment of Total Maximum Daily Loads for any watersheds. This assessment was only meant to be used for targeting federal funding for the fiscal years of 1999 and 2000. It also clearly stated that California's development of an Assessment does not imply any acceptance, rejection, or endorsements of other key actions in the Clean Water Action Plan.

California's Watershed Assessment relied solely on information that had already been gathered by various sources, some scientific, but most were qualitative and narrative and no decisions can be based on these disparative data sources. Only 7 percent of California's streams have actually been surveyed using monitoring data.

Lassen County has a patchwork of private land intermingled among public land. We do not want private landowners to be unfairly impacted or regulated through a massive federal program. State water rights need to be respected.

Thank you for your consideration of our comments.

Sincerely,

Steve Fortin, President
Lassen County Farm Bureau

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