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USDA-Forest Service
Content Analysis Enterprise Team, Attn.: UFP
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April 24, 2000

Dear Team,

As you continue to develop a Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management, as announced in the February 22, 2000 Federal Register – Volume 65, page 8833, please consider the following comments made on behalf of United Four Wheel Drive Associations (United).

As the agencies embark on implementing a watershed approach, please consider adopting pollution prevention measures which enable motorized recreation while simultaneously protecting watersheds. United is concerned that the Unified Policy, in implementing pollution prevention measures, will implement Clean Water Action (CWA) plan suggestions without scientific support and in contradiction to the Chief's Natural Resource Agenda (USDA Forest Service), which pledges to focus on recreation.

The CWA plan has stated that it will be necessary to increase maintenance of forest roads and trails to protect water quality. In order to accomplish this protection, the CWA Plan has proposed to relocate and improve water quality protection to over 2,000 miles of roads and trails, and to decommission or obliterate 5,000 miles per year by 2002.

When creating and implementing the Unified Federal Policy, please consider road reconstruction instead of decommissioning or obliteration. Driving for pleasure has increased 1000% on National Forest System Lands since 1950 and is predicted to rise another 64% over the next few decades. This increase in demand points to the necessity of every mile of road. In the site-specific instances where road location and

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sedimentation is responsible for water pollution, alternatives to obliteration and decommissioning, **such as road relocation**, should be given the highest priority.

Thank you for carefully considering my suggestions. It is a pleasure to be able to partner with the agencies in making important land use decisions such as developing this Unified Watershed Approach Policy.

Very truly yours,

Carla Boucher

Carla Boucher, Esq.

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