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CENTRAL VALLEY SOIL & WATER CONSERVATION DISTRICT

3105 West Main Street ♦ Artesia, New Mexico 88210
Phone (505) 746-4121 ♦ Fax (505) 748-2609 ♦ Email cvswcd@pvtnetworks.net

April 13, 2000

United States Forest Service
Content Analysis Enterprise Team
Attn: UFP, Building 2, Suite 295
5500 Amelia Earhart Drive
Salt Lake city, UT 74116

Subject: Comments on the Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management

To whom it may concern:

After a review of the documents of the Clean Water Action Plan and the Goals and Principles for Ensuring a Watershed Approach to Federal Land, our Board of Supervisors for the Central Valley Soil and Water Conservation District have the following comments:

1) We have problems with how the scientific data that is mentioned is being used. For example:
   a) On the Total Maximum Daily Load (TMDL), we are concerned that the listing of "Natural" as a probable cause of pollutant. This implies that man can stop or remove natural occurrences in the watershed areas.

   b) What criteria was used to determine the priority of a stretch of a river? What does the priority mean? It seems that priorities based on TMDL determinations are being made before the completion of the needed investigations which decide the TMDL. Are these priorities being used to approve projects and funding for them? If so, we fee that this could cause some projects the be funded that do not really need it, leaving projects in dire need of funding to be overlooked.

2) We also have a great concern with your plan to establish two million miles of conservation buffers. This plan will affect private property rights. We strongly believe that this will cause harm to industry and tax base of state and county governments. Has an economic impact statement of the cost of this type of plan been performed? Fully realizing that because this is a federal action, we believe NEPA is required to complete Environmental Impact Statements or Environmental Assessments on every action that is to take place. We do agree that there are areas that we can work together on to help watersheds. Brush control, the use of fire and logging in forests to decrease soil erosion for water quality and quantity are just a few. We are strong in our opinion that federal agencies cannot develop one plan to solve all problems for the different regions in the United States for watershed, rivers or wetlands.

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We thank you for the chance to be able to comment on this plan. We would like to be kept updated of your plans and we would like to take this opportunity to request that a public hearing be held in our area in order to let more people comment on this plan.

Sincerely,

Lewis Derrick

Lewis Derrick
Vice-Chairman

LD:tvk