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THE
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April 7, 2000

R. JOE WAGNER
VICE PRESIDENT, EXPLORATION

USFS CAET, Attention UFP
Building 2, Suite 295
5500 Amelia Earhart Drive
Salt Lake City, UT 84116

Dear CAET:

These comments on the proposed Unified Federal Plan for watershed management are submitted by The Doe Run Company. We hold mineral leases in the Mark Twain National Forest under which we annually produce around 80% of the nation's primary lead. We also produce significant amounts of zinc, copper, and silver. For well over two hundred years, mining has been an integral part of Missouri's economy and we have been part of that picture for over 100 years (given some name changes along the way). In the last decade, we supplied 10,000 man-years of direct employment with a $450 million payroll. Royalties from mineral production paid to the Federal Government average over $3 million per year being the largest source of revenue from the Mark Twain Forest.

We have some reservation about the proposed Unified Federal Policy for watershed management of public lands. We agree with the overall principal that various government agencies and interested stakeholders have much to offer in the way of expertise and guidance. But, our chief concern is that such a plan will result in a myriad of technical teams throughout the nation that may be inefficient and underfunded in conducting the various assessment and monitoring activities required by the proposed plan. What we would rather see is that any one agency with primacy over lands in a given area have the ability to call upon experts from other agencies on an as needed basis through a memorandum of understanding or some similar arrangement. For instance, the Forest Service would manage watersheds within their jurisdiction and only call upon experts (such as hydrologists from the U.S. Geological Survey) as needed.

To have a integrated team manage each watershed on public lands will result in seemingly endless studies by one agency and then the other. We have witnessed such a technical team (headed by the Forest Service but with members from BLM, NPS, EPA, USGS, etc.) analyze for a decade a particular watershed and still various team members say they need on-going study to determine the effects of theoretical future activities. We feel that such an integrated approach to watershed management will end up in a jungle of government bureaucracy resulting in needlessly costly and inefficient assessments and ineffective management.

In summary, we support the input of a variety of government agencies and stakeholders into watershed management issues, but object to this grand plan as proposed in the Federal register. Let the professionals in the individual Forests manage the watersheds in an appropriate manner and call upon experts from other agencies when their input is needed for a particular situation.

Sincerely,

R. Joe Wagner

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Vice President, Exploration