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P.O. Box 1770
Rolla, MO 65402-1770
April 7, 2000

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

Dear CAET:

On behalf of the Phelps County Chapter for People for the USA, I submit these comments on the proposed Unified Federal Plan for watershed management. We are deeply concerned about the proposal. The idea of tapping into experts from other Federal agencies, State agencies, and the general public is sound and wise. What concerns us, is the politics behind such working groups.

I am intimately familiar with such a technical team formed over a decade ago to evaluate potential effects of mining on a particular watershed here in Missouri. After ten years, some of the technical team members recommend proceeding with proposed exploration activity, while some say more study is needed. Ten years is way too long. The budget spent in the last decade by the combined efforts of the Forest Service, Bureau of Land Management, U. S. Geological Survey Water Resources Division, Missouri Department of Conservation, Missouri Department of Natural Resources, etc. is much more than the cost of the proposed exploration. With another proposal being considered by the Forest Service to recover actual costs of field studies, the proposed exploration activity would be rendered uneconomic because science has taken second seat to politics. If all watersheds in National Forest lands were evaluated in a similar manner by a collaborative, integrated team, chaos will result. Land will be taken out of multiple use category simply by the cumbersome process that is inefficient and takes forever to complete.

We propose that the Forest Service modify this proposal. The Forest Service has many competent professional people who have successfully managed the Forests in the manner called for by Congressional Mandate. The Forest Service personnel should continue to be the only managers of the National Forests. They should form agreements, through memorandums of understanding or other similar arrangements, with other Federal agencies where experts can be accessed as needed. In addition, the public should have the opportunity to be involved in supplying input for Forest Service consideration. But, the difference between this and the proposed plan, is that the Forest Service would make a decision in a timely fashion and the decision would solely be the responsibility of the Forest Service. The input for the decision can be the result of a collaborative effort, but the decision should not be a collaborative decision.



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MAY 2000

I have worked for various mining companies in National Forests around the country for many years. In addition, I supplied data to the Forest Service for their first Forest Plan in the Mark Twain when I was with the Missouri Department of Natural Resources. I have seen a tendency, in the last decade, for the blurring of responsibilities amongst Federal agencies. I can guarantee that this blurring of responsibility works its way all the way down to the field level on specific projects adding costs to projects, often delaying projects for an extended period of time, and in general making management of site-specific projects generally inefficient. It would not be in the public's best interest to continue this trend and in fact endorse this trend through enactment of this plan.

Also, during my eleven year tenor at Missouri Department of Natural Resources, I saw how projects are prolonged in order to maintain additional grant money or guarantee job security or keep graduate students employed. I can see the same thing happening if this collaborative management system is adopted. It is an inherent nature of Government and Universities to prolong projects for these reasons.

Let Forest Service personnel manage the Forests with the ability to call upon experts from other agencies as needed and with the opportunity to solicit public input. But, also give the Forest Service the responsibility to make decisions in a timely fashion with that decision being solely that of the Forest Service and not that of a collaborative decision. In our opinion, that is the only efficient manner in which to fulfill the Congressional mandates of Forest Service mission in an efficient manner. If the mission needs changing, it should be through Congress who are elected representatives of the people, not through the voices of a few minorities (which include environmental groups and industrial groups as well). We view this collaborative approach to Forest management as a way in which the Forest Service can shirk its responsibility and spread the blame for unpopular or unsound decisions.

Sincerely,

Laurence M. Nuelle

Laurence M. Nuelle, President
Phelps County Chapter PFUSA

cc M. Welch, Midwest Field Director, PFUSA