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Regarding the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management

Redarding consistent and scientific approach to the management of watersheds:"
1) Naturally occuring sediment is now to be considered as a pollutant, which will tend to make entire watersheds, which include in some area steep mountainsides, to be labeled at risk permanently, which will impact the permitting process for current users, for needed restoration work, for desirable new projects, for landholders in the entire watershed. This will tend to penalize unfairly residents and land users who are in no way responsible for the high TMDLs, and may indeed be working to prevent further degrading of the water supply.

2. Sedimentation is considered particularly a problem where fish are spawning, yet the TMDL limit is beng applied in areas where fish do not spawn, have never spawned, and will not spawn due to high water temperatures.

3. The inclusion of sediment in the TMDL ignores the historic data which shows that through the entire California gold rush when the rivers were loaded with sediment from gold dredging, the fisheries population remained consistently high. Old timers in Trinity County tell of fish populations so dense you could catch fish with buckets, in their boyhoods, even after 100 years of gold mining on the rivers and streams.

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Regarding collaboration with States, Tribes and interested stakeholders:
1. In Trinity County we had a massive burn, the Megram fire. Salvage operations to remove still usable burned timber and reduce

the fuels load is being held up by perhaps 18 months, long enough for the burned pine to become no longer worth salvaging. This is due to the thicket of regulations now in place to "protect" the watershed. Besides Federal regulations, there are State of California regulations that mimic the Federal. I'm sure this is part of the "cooperative" effort. By the time the necessary surveys, environmental impact statements, etc. have been completed, filed and acted on, the window of opportunity has long gone, in that the wood is no longer harvestable, the beetle infestation has gotten out of hand, or the topsoil has eroded into the stream. The end result is to destroy that which the goal was to save.

Sincerely,

Vicki Riley

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