ALASKA MINERS ASSOCIATION, INC.
3305 Arctic #202, Anchorage, Alaska 99503 • (907) 563-9229 • FAX: (907) 563-9225 • www.alaskaminers.org

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May 24, 2000

USDA-Forest Service
Content Analysis Enterprise Team
Attn: UFP
Building 2, Suite 295
5500 Amelia Earhart Drive
Salt Lake City, UT 84116

FAX to (801) 517-1021
e-mail cleanwater/wo__caet-slc@fs.fed.us

RE: Unified Federal Watershed Approach to Federal Land and Resource Management

Dear Sirs,

Thank you for the opportunity to comment on this proposal. The Alaska Miners Association is an industry support organization with approximately 1000 members. These members include individual prospectors, geologists, engineers, suppliers, small family mines, junior mining companies, and major international mining companies.

We oppose use of a Unified Federal Watershed Approach to Federal Land and Resource Management concept. We oppose this concept for both the legal and practical reasons.

From a legal standpoint, "watershed management" has not been authorized by the Congress. Furthermore, watershed management by combining the Bureau of Land Management and the Forest Service would require combining and mixing the land and resource management statutes and regulations of the numerous agencies and this cannot be done legally without change in statute.

The current planning and management activities of the BLM, NPS, USF&WS, USFS, U.S. Army, etc. are each already terribly complex and cumbersome and each has been modified by numerous court and administrative rulings. To combine these functions of the agencies would contradict those planning and management requirements. The result would be revived legal actions from numerous groups to force application of conflicting settlements and decisions that had been previously reached.

From a practical standpoint, the current planning and management activities of each agency is already terribly complex and cumbersome. To combine these would result in even greater complexity and even greater inefficiency for the agencies. The focus and objectives of the agencies are also usually different and to combine these would result in conflicting requirements.

There is no justification for a "Unified Federal Watershed Approach to Federal Land and Resource Management" because it is seldom the case that different agency lands are juxtaposed on the same local watershed. It is only on a macro or extreme macro scale that agency lands are on the same watershed.

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The greatest need for federal land and resource management is to simplify the requirements that agencies must follow. The "Unified Federal Watershed Approach to Federal Land and Resource Management" would do the exact opposite and we urge this approach not be followed.

Sincerely,

Steven C. Borell, P.E.
Executive Director

cc: Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young
Governor Tony Knowles

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