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Gary Johnson
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Frank A. DuBois
Secretary

June 29, 1999

Mr. James R. Lyons
Under Secretary for Natural Resources and Environment
United States Department of Agriculture
14th and Independence Avenue SW
Washington, D.C. 20250

Dear Mr. Lyons:

This letter is to provide "early feedback on the general direction" of the draft *Proposed Unified Federal Policy for a Watershed Approach to Federal Land and Resource Management*. This draft proposal is an outgrowth of the Clean Water Action Plan (CWAP). As you know, litigation has been initiated against the Environmental Protection Agency (EPA) and other federal agencies involved with the CWAP.

The CWAP expands the EPA's authority under the Clean Water Act and the EPA's control over Bureau of Land Management and U.S. Forest Service lands. Among other allegations, the CWAP violates numerous related federal laws with potentially devastating effects on private property rights and ownership, and on the authority of states over water.

Toward this end, this proposal should be suspended pending resolution of the issues in the courts. Thank you for the opportunity to comment.

Sincerely,

Frank A. DuBois

FAD/rjw/ac

cc: Ms. Sylvia Baca, Assistant Secretary Lands and Mineral Management
United States Department of the Interior