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First name: George Scott

Last name: Fahey

Organization: Sugar Pine Spring Water LP

Title: Manager of the General Partner

Comments: Sugar Pine Spring Water LP (SPSWLP) is a USFS Special Use Permit (SUP) Permittee on the Stanislaus National Forest. The scope of the SUP is the diversion, conveyance, and use of Federally Certified spring water for its bulk wholesale to CA licensed Water Bottling Plants as a food-grade product regulated by the FDA. Pursuant to Title 21 CFR § 165.110[a]&[b], FDA regulations require testing of the sites' spring water annually. For twenty-eight (28) years an FDA Title 21 analysis has been conducted by SPSWLP. The 2023 Title 21 testing results are attached for your review and consideration. SPSWLP is extremely concerned the USFS has proposed the use of herbicides above 4,500-MSL between the N. Fork of the Tuolumne and Clavey Rivers. That area described is the recharge source for the four (4) SPSWLP spring sites, which are diverted and used pursuant to CA SWRCB Permit Nos 20784 & 21289. Spring water tainted with herbicides is worthless as a source for bottled water, which is currently not the case. If herbicides are used, then the risk of a SPSWLP spring site being tainted exists; therefore, as the General Manager of the SPSWLP General Partner I emphatically OBJECT to any USFS herbicide use above 4,500-MSL between the N. Fork of the Tuolumne and Clavey Rivers.