

Comments from: Stephen Kiss, POB 67, Metaline, Wa.

ROADS AND MORTORIZED ACCESS

The current road system, if all roads were available for use at least for specific purposes, may be adequate. Closing old roads to build new roads that are more useful is a good goal. However, to set a target of 1 or 2 miles (open & closed) per square mile is hurtful to forest management. All forest management activities need access. Open roads should be open to all motorized vehicles. A road open to a 100,000 pound, loaded truck 70-foot-long should be open to a 200 to 1500 pound, 7-foot-long trail motorcycle, ATV, ORV or WATV.

Traditional uses of our forest roads allow for recreation, forest harvest, mining, grazing, gathering and fire suppression. All are very important aspects of multiple use.

Given the high poverty rate of Pend Oreille County (18.3 percent ****DEIS line 22854****) and an aging population (47.8 years' average ****DEIS line 22732****), the ability to access the Colville National Forest via motorized means is critical. Poorer residents need to have inexpensive recreational opportunities available. Local communities rely on forests for income employment and leisure. Forest dependent communities are more likely to experience social and economic consequences due to changes in forest management.

Having a low community resilience rating of .67 (****DEIS line 23001****) indicates Pend Oreille County will be least able to successfully adapt to social and economic changes brought on by management actions on the Colville National Forest. ****DEIS line 22964****: Pend Oreille County has a low economic diversity index.

A cap on road mileage at current levels is workable if closed roads are not obliterated but rather "mothballed" for possible future use. Why spend forest dollars to remove a road that was built with forest dollars only to possibly reconstruct for a future need with even more forest dollars?

The protection of endangered species (grizzly bear & cariboo) is currently impacting seasonal access to many areas. Given these protections, all open roads are not open year around.

Proposed road construction or re-construction to access minerals in management areas with road densities at or above standards would require amendments to the Forest Plan which will increase permitting timelines and costs and perhaps cause an operator to miss lucrative market conditions.

WILDERNESS

The Salmo-Priest Wilderness was designated in 1984 and currently has 43,348 acres, all in Pend Oreille County. The designation was actually set aside in about 1967 when a surveyed road from the Salmo Pass into the Salmo Basin was not built.

In 1963 the Selkirk School District, which serves the towns of Metaline Falls, Metaline and Ione, the closest towns to the Salmo-Priest Wilderness, had an enrollment of 750. In 1984 there were 437 students and today the enrollment is 230. Metaline Falls is 5 miles from the current Wilderness area and 2 miles from the Proposed Wilderness Area. In 1967, Metaline Falls had 3 gas stations, 2 grocery stores, a clothing store, a hardware store, a dentist, a hospital with a resident Doctor, an auto parts store, a drug store, a barber shop, 2 taverns, 2 auto repair shops, a movie theater, a cafe and daily rail service. Today, 1 grocery store, 1 cafe, 1 tavern/cafe, and a seasonal movie theater survive. Similar statistics are true of Metaline and Ione. Resource based industries have been the mainstay of northern Pend Oreille County for well over 100 years. They have come and gone for various reasons. Clearly the touted benefits of wilderness have not replaced the previous economy.

The proposed Salmo-Priest adjacent PWA will abut private land and also abut a paved, year round county road (Sullivan Lake Road). This PWA will also overtop some existing mining claims (Bluebird claims at Slate Creek) and an area of historic mineral production (Lead Hill Slate Creek). It will come within ¼ mile of State Highway 31. It will encompass the municipal surface water source (North Fork Sullivan Creek) of Metaline Falls and subject that area to less aggressive wildfire management, thus leading to the possible contamination of the town's only water source.

The proposed Abercrombie-Hooknose PWA will totally surround non-USFS lands, abut many private parcels, be within ¼ mile of several residences (within a few feet of some), and be within 1 mile of the Town of Metaline. This PWA lies 0 to 3,000'+ above and west of the populated valley and the towns of Metaline and Metaline Falls. This PWA will also abut a major Bonneville Power Administration power line that links Boundary Dam's 1040 MW, which is about 40% of Seattle's need, to the NW power grid. Any wildfire-caused interruption to this line could be devastating to the power grid and national security. The prevailing wind in this area comes from the southwest/west, thus any fire activity on this mountain range has the potential to drop hot ash/embers on the towns 2-3 miles from the ridge top. Towns in northern Pend Oreille County are identified as "urban wild land interface communities within the vicinity of Federal lands that are at high risk from wildfire". Common practice is to not aggressively fight wildfires in wilderness areas unless lives or structures are threatened. Given the poor forest health of these ridge tops (beetle killed trees) any delay in suppressing a fire could be catastrophic. Also, as proven last summer, limited fire fighting resources hamper the ability to fight fires in remote areas, possibly allowing low priority fires to grow to an uncontrollable size. This PWA also overtops a historic mineral production area.

The Pend Oreille Mine, north of Metaline Falls, is currently operating and exploring for more economically viable resources and currently owns or leases proven mineral deposits in the PWA (Salmo-Priest Adjacent). They employ approximately 235 people at a very good wage, which is a very significant number in a county with a population of 13,000. Expansion of the Salmo-Priest Wilderness could severely impact future operations of the mine. Any known or currently undiscovered mineral deposits in Congressional designated wilderness will be foregone and not

available for exploitation to support domestic or global demand and provide for national security.

The addition of 16,710 acres of wilderness to the Salmo-Priest, all in Pend Oreille County, creates economic hardship. The creation of Abercrombie-Hooknose 37,660 acres, mostly in Pend Oreille County, will severely reduce the amount of natural resources possibly available to the future generations. A roadless area could possibly be undesignated but a wilderness is akin to a National Park and virtually impossible to undo.

With private ownership in the valley floor in the northern 25 miles of Pend Oreille County averaging less than 3 miles wide, there is little room for any economic development.

Currently, grazing is not allowed in the Salmo-Priest Wilderness so one can assume this regulation will apply to the Salmo-Priest adjacent PWA.

The DEIS states that an evaluation showed a need for additional wilderness on the forest. Who did this evaluation and what were the factors showing the need? Currently 3 percent of the forest is wilderness (all in Pend Oreille County) and it has a very low visitation rate.

Recreational trails in currently roadless areas can be maintained using power equipment, thus at less expense than in a wilderness.

The National Visitor Use Monitoring survey estimates less than 1% of visits to the forest are to a designated wilderness area. None of the survey respondents reported overcrowding in designated wilderness during their visit. These findings suggest that current designated wilderness is adequate to satisfy recreational demand for wilderness. **Deis line 23264-269******

****Deis line 22711**.** With a population density of 9.3 people per square mile (1/10th the state average and 1/9th the national average) and 75 percent of the county being forested, it is hard to imagine needing to set aside more “wilderness”. I do not believe that the PWA's have met the test of need.

Recommended wilderness is the most restrictive management allocation in all alternatives.

VEGETATION MANAGEMENT

The proposed alternative states there are 650,000 acres (about 60 percent of total forest land) suitable for timber production with a projected treatment of 6,000 to 12,000 acres per year, it will take between 50 and 100 years to treat these suitable lands. An entry schedule of every 50 years is not going to reach or maintain desired conditions for forest health, habitat, fire resistance or any other objective. An entry every 100 years leaves the forest in worse condition than it is today. To suggest a projected timber sale quantity of 48 million board feet per year, (**DEIS line 2684**), while the long term sustained yield capacity is twice that amount, is not moving the forest to a better condition, especially when the projected timber sale quantity is not necessarily even a target number. With over 42 percent (449,430 acres) **DEIS line 2435 to 2437, pg. 77** of the Colville National Forest experiencing more than 25 percent basal area loss due to insects and disease, projected between 2013 and 2027, a more aggressive approach must be taken to restore forest health. The proposed move away from hard and fast limitations on cutting trees greater than 21 inches DBH will promote structural and landscape complexity based on site specific objectives and result in a more diverse, healthier forest.

An aggressive program during the life of this new forest plan can result in a much healthier, fire resistant forest that will benefit future generations. With the stated fact that only about 60 % of the Colville National Forest is suitable for timber production, there is still roughly 500,000 acres that will not be managed for timber production and available for other values.

A very small amount of verbiage is used to address vegetation management as it relates to potential timber harvest while many pages are devoted to other uses. For example, General Restoration, which covers a large number of acres, gets less than 2 pages, while nationally designated trails gets 4 pages in chapter 3. Table 178 illustrates the impact of timber related jobs: 2.5 timber jobs for every recreation job and 9 times the wages. **DEIS line 17444**. With 65.5% of the land area in Pend Oreille County being tax exempt, the extraction of resources and recreation on the Colville National Forest is vital to the economic and social future of Pend Oreille County.

The recent history of uncharacteristic level of fire, insect and disease activity will likely continue into the future. This indicates the need for expanded access and restoration efforts to restore resiliency.

If efforts are not increased to restore resiliency through vegetation management, all values (scenic, recreation, watershed, grazing, cultural resources, special uses, wildlife, etc.) are at risk of harm due to wildfire possibly accelerated by climate change.

GRAZING

Although all alternatives indicate the same amount of land suitable for livestock grazing..."it is estimated that maintaining at least 6 to 8" of residual stubble height could equate to a 10 to 50% reduction of AUM"... ****Line 18698****

Stubble height, handling/watering facility, wider riparian areas, and protection of threatened or endangered fish redds constraints will dampen economic contributions to local economies and threaten the continuation of a way of life. ****Line 18866****

Additional standards or changing a guideline to a standard will put permittees at a higher risk of being in non-compliance with the allotment management plan. ****Line 18998****

OTHER

Any hindering to hydroelectric development should be avoided given the environmental impacts to the entire planet of burning fossil fuels to produce electricity.

Thank you for the opportunity to comment.

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