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First name: Brad

Last name: Smith

Organization:

Title:

Comments: Forest Plan Comments

To whom it may concern:

Attached, please find my comments on behalf of the Idaho Conservation League regarding the draft Forest Plan. Please let me know if you have any questions.

Sincerely,

Brad Smith  
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Idaho's leading voice for conservation

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Colville National Forest Plan Revision Team 765 South Main St.  
Colville, WA 99114

May 12, 2016

Subject: Forest Plan Revision

To whom it may concern:

Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness-values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting human health and the environment.

I am writing on behalf of the Idaho Conservation League to comment about the draft Forest Plan for the Colville National Forest. Being outside of Idaho, ICL does not normally get involved in issues pertaining to the Colville National Forest. However, I am writing to comment about a specific issue that has implications beyond the forest-the management of recommended wilderness areas.

It is considerably unfortunate that "[m]echanized and non-motorized travel may occur in recommended wilderness" under the draft Forest Plan (MA-GDL-RW-02, Page 124). This is contrary to the direction of many recently adopted forest and travel plans, particularly in the Northern Region of the Forest Service. As you are likely aware, the Idaho Panhandle and Kootenai National Forests recently adopted revised forest plans, which

prohibit the use of motorized and mechanized vehicles within recommended wilderness areas. This direction was adopted because it is necessary to preserve both the wilderness characteristics of these areas and their eligibility for inclusion in the National Wilderness Preservation System until Congress decides whether or not to act on the agency's formal recommendations. This direction is particularly important in an era when the rate of proliferation of motorized and mechanized use of the National Forest System is undergoing exponential growth.

What good are the Forest Service's recommendations for wilderness if the agency has no intention of following them? The recommendations are hollow. They are meaningless. The Colville is simply trying to punt to Congress, except that Congress will not touch the ball if there is a constituency opposed to the designation of an area as wilderness because they use it in a way that is contrary to the Wilderness Act.

When the Forest Service allows motorized and mechanized uses within an area that the agency recommended as wilderness, there are only two possible outcomes. The most likely outcome is that Congress will never give serious consideration to designating the area as wilderness because it will engender opposition and therefore, wilderness legislation for the area would never pass out of committee. Even when Congress does take up the issue, boundaries are modified to exclude portions of recommended wilderness areas where non-wilderness uses occur. This may result in the evisceration of an area or the dissection of an area so that it doesn't include all of its component parts.

The Colville's management direction for recommended wilderness areas also undermines all of the other national forests that have argued against allowing motorized and mechanized uses in these areas. The Environmental Impact Statements for the Idaho Panhandle, Kootenai, Gallatin, and many other National Forest Plans correctly point out that motorized and mechanized uses reduce opportunities for solitude and primitive and unconfined modes of recreation, and consequently, these uses erode the wilderness characteristics of these areas. When the Colville suggests something different, it undermines all of the other national forests.

The schizophrenic personality of the agency on this matter results in public confusion and distrust of the federal government. When local citizens come to accept wilderness recommendations on the Idaho Panhandle National Forest where nonwilderness uses are prohibited, they become confused and resentful when they hear that the Colville is doing something different.

I strongly encourage the Colville National Forest to reconsider its proposed management direction for recommended wilderness areas. Only a small fraction of the forest is currently designated as wilderness. Without a strong wilderness recommendation from the Forest, then there may never be any additional areas in northeast Washington added to the National Wilderness Preservation System.

Sincerely,

Brad Smith  
North Idaho Director