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Organization:

Title:

Comments: Forest Plan Revision

See Attached

James Pena

July 5, 2016, 2016

Regional Forester

Region 6, US Forest Service

Forest Plan Revision Team

Amy Dillion- Forest Plan - Revision Team

Colville National Forest

Colville Supervisor Office

765 South Main

Colville, WA. 99114

Re: Draft Colville National Forest Proposed Land and Resource Management Plan

Dear Sir:

These are my comments to Colville National Forest Plan Revision,

The Stevens County Cattleman's Association will be submitting Formal written comment that I support and hope you give proper consideration. I defer to the expertise of the organization for most of my comment. I do however wish to add the following.

I appreciate the fact that you currently have excellent people working on the Plan, I do however believe it has some fatal flaws. I have records and saved messages that have been sent to the Plan Revision Team disputing the current boundaries of the roadless area inventories. I have been told the boundaries will be finalized at a later date.

The Boundaries in all of the alternatives are flawed. The PWA's, IRA's or current roadless inventories have roads and logging activity very much evident in them. The Abercrombie PWA boundary was moved to include the Hartbauer Timber Sale Area for an example. When this issue and other examples have been brought to the attention of the Plan Revision Team, we are told it will be dealt with later. It is impossible to effectively comment on a plan that is making decision on how to manage areas that are being inaccurately defined.

The public input process was manipulated by Margaret Hartzell, the Team leader , during the early part of the process. This was recognized in a public meeting by then Forest Supervisor, Brazell. He explained that as the decision maker he had been present in those meetings and he could be trusted to make decisions based on the actual input. The process then changed to a different decision maker. I would argue the process should have restarted.

\*Numerous Standards and Guidelines, as described in the DEIS (e.g., MA-STD-RMA-11; FW-STD-VEG-02; Line 1350, Table 9) will require surveys and monitoring at a scale of intensity and complexity that cannot possibly be achieved without huge increases in personnel, budget, and expertise, across the Forest. It's a libelous action to stipulate a standard that cannot/will not ever be measured with a statistically replicable degree of accuracy. The stipulation of a standard that cannot be measured constitutes a Fatal Flaw in this document.

\*The DEIS stipulates blanket standards for stubble height retention in riparian areas, across the Forest (MA-GDL-RMA-09). This is a grievous error. The growth potential for hydrophytic vegetation is highly site and species specific and it does not constitute a gauge of riparian health. The implementation of this expectation will certainly result in inappropriate management and unnecessary constraints on families who hold vested grazing rights on the Forest.

\*MA-STD-RMA-01 requires that "properly functioning RMA's shall be maintained." Properly Functioning Condition (PFC) is a highly subjective assessment that is intended as a tool to facilitate interdisciplinary collaborative discussion. There is no way to numerically measure or replicate a subjective assessment. By

definition, this cannot be a standard - because it cannot be measured. This is a Fatal Flaw in your document!  
\*This document is fraught with contradictions (e.g., FW-DC-VEG-09-12 vs FW-DC-VEG-13) that, in and of themselves, constitute Fatal Flaws.

The management of the Colville National Forest is an important factor for the long-term health of Stevens, Ferry and Pend Oreille Counties. For these communities and for local cattlemen, the proper management of the 42 grazing allotments on the CNF is crucial to maintaining the 98 jobs and \$1.5 million that grazing generates for the local economy each year.

While the economic loss this DEIS would precipitate is concerning, the social-economic impact must also be considered. Most young people, who aspire to ranch for a living, take over a family enterprise. Hard working parents and grandparents have produced self-sustaining ranches that can be passed on. Those young people who are able to take over the ranch and stay in the community will become the next elected officials, volunteer firefighters, coaches and 4-H leaders of the coming years. But if ranching is not a realistic option for making a living, many young people will be forced to move away from the area.

Thank You for your consideration,

Scott Nielsen 509-738-2607

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