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#### Colville National Forest Plan Revision Substantive Comments

In 1963, the Selkirk School District, which serves the towns of Metaline Falls, Metaline, and Lone, was the closest to the Salmo-Priest Wilderness and had an enrollment of 750. In 1984, the enrollment was 437. 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 there is 1 grocery store, 1 cafe, 1 tavern and a seasonal movie theater that survive. Similar statistics are true of Metaline and Lone.

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 and tourism have not replaced the previous economy.

The Pend Oreille County Board of Commissioners has a duty and obligation to the people we serve to protect the local tax base and the value of private property, promote economic stability, advance the customs, culture and heritage of the county, and provide for future generations.

Under NEPA law, the Forest Service must consider the objectives of local plans and how they should deal with the general requirements a county has of the surrounding public lands in order to meet the responsibilities counties have for the socioeconomic wellbeing, safety, and culture of its citizens.

Below are the required changes needed to meet these obligations.

#### Wilderness:

Towns in northern Pend Oreille County are identified as "urban wildland interface communities within the vicinity of Federal lands that are at high risk from wildfire". The position that "fire is a tool" puts human life and property at risk. Prevailing winds from the west are a fire hazard to the private property and the power lines in the Abercrombie-Hooknose area. This is very concerning to us and our goal is to reduce this risk to protect our industry, infrastructure, friends, family and neighbors.

The Wilderness areas are a fire hazard because they are not managed and fires are left to burn. According to this plan, wilderness is currently underutilized (less than 1% of visits to the forest are to designated wilderness) and does not meet the criteria of need for more wilderness. There is no crowding in the wilderness that warrants an increase. PWA will encompass the municipal surface water source (North Fork Sullivan Creek) of Metaline Falls and subject that area to less

aggressive wildfire management or preventive vegetative management thus leading to the possible contamination of the town's only water source in the case of a wildfire. There are several areas where PWA will abut private land or a paved, year-round county road (Sullivan Lake Rd) in the plan. Current mining claims exist in areas west of Salmo-Priest. There is a proven mineral deposit in this area.

We value tourism, but wilderness has not increased tourism in this county. Most of the additional increase in proposed wilderness is in Pend Oreille County with 74% of total proposed and currently designated out of the whole CNF. This amounts to a 135% increase of proposed wilderness to this county. The Board of County Commissioners' main focus is the health, safety, economic vitality, and jobs for our citizens. There has been very little economic increase to the county with the addition of wilderness. Much of the tourism relates to the Pend Oreille River.

Currently, there is no destination lodging relating to forest service tourism and wilderness.

PWAs that become wilderness instead of roadless will result in a degradation of existing trails when only hand tools may be used for maintenance and will be an adverse condition for tourism.

Therefore, we require these changes to meet our obligations:

- \*No additional potential wilderness to the west side of the Salmo-Priest wilderness.
- \*No potential wilderness abutting private property or year-round roads.
- \*There is no acceptable potential wilderness area on the west side of the Pend Oreille River Valley.
- \*We object to the Forest Service purchasing additional land that removes land from the tax rolls.
- \*We object to any Wilderness surrounding private land as it makes it landlocked.

#### Road Density and Access:

An aging population and ability to access the CNF by motorized means is critical for local tourism. Reduction of road density will cause more problems in the future when responding to management needed to prevent fire or to respond to fire. A road open to a 100,000 pound loaded 70-foot-long truck should be open to a 200-1500 7-10-foot-long ORV/WATV. Some roads are closed for endangered species protection for a specific time period but do not require permanent closure. 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. The economically disadvantaged (poverty rate is 18.3% in Pend Oreille county) also need inexpensive recreational opportunities as well as access to resources to gather and sell. We support wise financial use of the People's tax money. Why spend forest dollars to remove a road that was built with forest dollars only to possibly reconstruct the road for a future need with even more forest dollars?

Therefore, we require these changes to meet our obligations:

- \*No net loss of existing roads.
- \*Mothballing of roads for future use is preferable and more affordable to obliteration.
- \*Make all roads that are open to highway legal vehicles open to ORV/WATVs.

#### Forest Health - Vegetative Management

The Board of County Commissioners supports a more aggressive approach to reach forest health. The proposed action is inadequate to reach the goals needed to accomplish a healthy forest.

Counties often fall behind on road maintenance. At some point it is almost impossible to catch up and the roads begin to fail. Your own data suggests a systematic failure will occur if a specific and accurate goal is not established. This problem is a budget problem, and we can relate.

However, a plan that fails is a poor plan.

According to this plan, 60% of the forest is suitable for fiber removal. With aggressive sustainable healthy forest goals this still leaves 500,000 acres that will not be managed for timber production and is left available for other values. With timber jobs being 9 times the wages of a recreation job and 2.5 jobs per each tourism job, more management is crucial to the health, safety and welfare of our county.

A projected timber sale quantity of 48 million board feet per year, while the long term sustained yield capacity is twice that amount, is not an appropriate goal.

Timber is a renewable resource. We support resilient forests and a resilient community. We can do that through dedicated management.

Therefore, we require these changes to meet our obligations:

- \*The plan must have a correct management projection based on desired forest health not based on current budget levels or blanket standards.
- \*We expect more open and clear language and consistency with industry standards by using million board feet instead of 100 cubic board feet.
- \*Timber sales must be the same as long term sustainable yield capacity.
- \*Unharvested wildfire areas should be salvaged to protect from future fires.
- \*Overstocked forests must be prevented to restore a balance of water quantity and water quality.

#### Grazing:

The narrow Pend Oreille River Valley naturally limits agriculture land to only about 3%. Cattle producers depend upon a summer range to graze cattle on the 59% of Federal lands so that haying can be done on the river valley pastures where the cattle return to in the winter. This information is supported by Land Ownership information in the Pend Oreille County Comp Plan figure 2.1 and table 2.5.

Grazing is an effective fire management tool. Grazing creates more foliage and stimulates improved topsoil.

The stated 10 to 50 percent reduction in AUMs as a result of shortened grazing seasons that would be required to attain the specified minimum stubble height values is unacceptable. A more reasonable plan is to take a holistic approach of overall watershed health and functionality rather than focusing on specific indicators that will result in failure of the producer.

The following conclusions that additional standards would result in a reduction of productivity and business viability is reason enough to reject these standards as stated.

"More constraining plan standards, and increased riparian area widths may increase time, labor and capital

expenditures by the permittee to manage allotments."

"Riparian exclusion fencing is one way to accomplish this standard and this method could make pasture moves more difficult if trailing routes are compromised as a result of additional fencing." "...these constraints applied across the entire Forest could dampen economic contributions to local economies if standards or guidelines are at risk of being exceeded and livestock have to be removed sooner than authorized."

Therefore, we require these changes to meet our obligations:

\*6- to 8-inch stubble height should not be a consideration of riparian health and should not be required.

\*Riparian area standards are too restrictive and must be revised.

\*Reliable grazing in PWA is highly unlikely and we do not approve of additional wilderness .

Recreation:

Recreation is not covered well under this plan revision.

The Pend Oreille County Board of Commissioners support continued collaboration on establishing Special Interest Areas within Pend Oreille County with a focus on proposed Calispell Special Interest Area. There are Potential SIAs in two areas that will provide both recreation, mining, grazing and timber sales in a broader area.

The economy of Pend Oreille County is stagnant and could greatly benefit by increased access and facilities for all types of recreation on the Colville National Forest. Approximately 59% of POC is owned by the Federal Government, the majority of it under the USFS 's jurisdiction.

Proposals for motorized and non-motorized loop trails, trailheads and signage move forward slowly, if at all. A Calispell Special Interest Area, with a recreation focus, could provide opportunities for communities to work together and enhance recreation in a popular area of the Colville National Forest. The Calispell SIA would enhance recreation and not impact existing recreation routes across the Forest and not conflict with efforts to promote more routes elsewhere.

The Batey Boulder Motorcycle Park has been sorely neglected and needs to be re-engineered and rebuilt to meet current standards. The CNF currently has plans to close this area or parts of the trail system due to perceived safety reasons. This is one more example of the CNF closing areas to the public with no regard to economic impact to the communities it surrounds. This SIA could help keep Batey Boulder Recreation alive and well by bringing in outside resources for reconstruction of a trail system as well as utilizing the trailhead for other motorized and non motorized purposes.

The boundaries of the Calispell Recreation Special Interest Area, as well as proposed recreation developments are shown on the attached map, Figure 1 .

Other areas of the Colville National Forest need to be included in the forest plan regarding recreation . There are only a couple of loop trail opportunities for motorized recreation within the CNF. A loop route for OHV's including opening Pass Creek Road to Priest Lake needs to be

established. The USFS roads in the Panhandle National Forest are all open to OHV travel!! This creates a destination recreation area and would enhance the struggling economy of the north end of Pend Oreille County.

Currently, Pend Oreille County is the only county within the CNF with Wilderness lands. This has been a drain on our economy as the trail system is not maintained or even completed due to the encumbrances on the wilderness designation for trail maintenance and construction. It is far too expensive to build and maintain trails when the use of mechanical resources is not allowed. To add more wilderness to our county would cripple the north end of the county even more than currently exists. We get very little out of the wilderness designation in regards to tourism dollars. Backpackers spend very little money in our communities. Bicycles are not allowed in

wilderness and this further cripples the economy as this is a fast growing tourism resource.

The USFS/CNF lands are a recreation paradise in Pend Oreille County that is closed to most recreationists. Our aging population in POC is finding it more and more difficult to use the public lands in our area. If you are young and fit, you can venture into the nations forest, but most in our area do not fit this category of recreationist. Many are not able to walk even a mile on a flat trail, let alone try to navigate through a wilderness that is overgrown with deadfalls and diseased timber.

The Board recently obtained new information to study relating to recreation that we have not been able to review. We have requested more time to review these studies.

The RCO Economic Impact of Outdoor Recreation in WA State study. This study shows how many jobs and how much economic activity in WA State are dependent on access to public lands. <http://www.rco.wa.gov/documents/ORTF/EconomicAnalysisOutdoorRec.pdf>

Region 6 Sustainable Recreation Strategy : This is the Forest Service's own document about how to improve recreation.

Therefore, we require these changes to meet our obligations:

- \*Additional time to review the economic studies relating to Washington State recreation and Region 6 and recreation.
- \*Continued collaboration on Special Interest Areas.
- \*Recreation that protects valid existing rights of mining and grazing as well as timber sales.
- \*Developments such as stock tanks, corrals and fences are part of the historic and cultural expectation for the forest, even in a SIA.
- \*The continuation and enhancement of Batey Boulder .
- \*Loop trails for motorized travel.
- \*Access for aged and disabled .

We are working on a map on an Eastside Recreation Area (Baldy's SIA).

Minerals & Mining:

Mining claims will be impacted with an increase of wilderness which will impact the economy of Pend Oreille County. Teck Cominco is one of the last private industry high paying jobs in Pend Oreille County.

Therefore, we require these changes to meet our obligations:

- \*The significant proven mineral deposits that would be swallowed up by potential wilderness must be prevented.

Approved for submittal by the Pend Oreille County Board of Commissioners July 5, 2016 .

Attachment: Map CNF SIA East side

Attachment: Map CNF SIA West side