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First name: Andrea

Last name: Imler

Organization: Washington Trails Association

Title:

Comments: Colville NF Forest Plan Revision Comments

Hello,

Please find attached Washington Trails Association's comments on the Colville National Forest's Forest Plan Revision.

Thank you,

Andrea

June 30, 2016

Colville National Forest

Attn: Amy Dillion, Forest Plan Revision Team 765 South Main

Colville, WA 99114

RE: Colville National Forest's Forest Plan Revision

Submitted via email to: colvilleplanrevision@fs.fed.us.

Dear Ms. Dillion:

Thank you for the opportunity to provide comments on the Colville National Forest (CNF) Proposed Revised Land and Resource Management Plan (Forest Plan).

Washington Trails Association was founded in 1966 and is the country's largest state-based trail maintenance and hiking advocacy non-profit organization with more than 14,000 members. Washington Trails Association's mission is to "preserve, enhance, and promote hiking opportunities in Washington state through collaboration, education, advocacy and volunteer trail maintenance." In 2015 Washington Trails Association volunteers contributed more than 140,000 hours (\$3.5 million in donated labor) of trail maintenance on federal, state and local lands with 4,400 volunteers across the state, including on the Colville National Forest.

Each year, millions of outdoor recreationists spend \$21.6 billion on outdoor recreation in Washington. Statewide, outdoor recreation supports 200,000 jobs, exceeding the number of jobs in both the technology and aerospace industries. In addition, \$2 billion in local and state taxes are collected annually as a result of outdoor recreation. The Colville National Forest provides a diverse landscape that hikers enjoy recreating on year-round through a wide variety of experiences from day hiking to backpacking in wilderness and snowshoeing. The unsurpassed beauty and wild nature of the Colville draws people from around the state to hike and camp on the forest, which fuels our state's outdoor recreation economy.

Washington Trails Association has followed and commented on proposals from the Colville National Forest since the forest began its public process and we appreciate the work that has gone into producing a Proposed Revised Land and Resource Management Plan (Forest Plan) for the Colville National Forest and the opportunity to comment on it.

In general, WTA supports many aspects of the Preferred Alternative for its direction on forest and recreation management including restoration-based land management where restoring and maintaining ecological resilience of forests, watersheds and habitats are the main focus. The Plan Revision also has sound road density goals for watershed health and habitat connectivity/climate adaptation purposes, while maintaining access to

important recreation infrastructure such as trails and campgrounds. WTA does request some specific changes and additions to the Preferred Alternative that we feel create a stronger and more balanced Forest Plan. Our comments are below.

Nonmotorized Trails & Acreage

As the Recreation Report states, "Demand for access to the Colville National Forest for recreation purposes has increased steadily over the past 26 years since the last forest plan was developed." Between 2010 and 2040, Washington's population is expected to grow by about 2,250,000 persons, reaching 8,970,500 in 2040.¹ With this increase in population, an increase in demand for access to the Colville National Forest for recreation purposes will almost certainly occur and the need to prepare for the increased pressure on our public lands through new nonmotorized trails and better maintained existing nonmotorized trails.

According to the 2013 Washington State Statewide Comprehensive Outdoor Recreation Plan:

- *51% of Washington residents participate in "Hiking - Trails"
- *24.4% of Washington residents participate in "Bicycle Riding - Trails"
- *2.7% of Washington residents participate in "Off-roading-Motorcycle - Trails"
- *5.2% of Washington residents participate in "Off-roading - ATV/Dune Buggy - Trails"
- *3.9% of Washington residents participate in "Horseback riding - Trails"

Hiking and bicycle riding on trails (mountain biking) are far and away the most popular recreation activities in the state that can occur on the Colville National Forest.

The Colville National Forest's 2009 National Visitor Use Monitoring (NVUM) report states that "viewing natural features," "hiking/walking" and "relaxing" are the top three recreational activities on the forest.²

Yet, the draft Plan's Recreation Report does not suggest a change in the number of trail miles available for nonmotorized recreation trail opportunities. More surprisingly, while Preferred Alternative (Alt. P) increases the number of backcountry acres managed for summer motorized recreation trail opportunities, it does not increase the amount of acres for nonmotorized summer recreation trail opportunities even though non-motorized recreation are the top uses (#1 viewing natural features; #2 hiking/walking; #3 relaxing) of the Colville National Forest.

The Recreation Report states that the Preferred Alternative (Alt. P) would "maintain the same number of summer motorized and non-motorized recreation trail opportunities across the Forest as the No Action Alternative."³

The Recreation Report goes on to state that:

"Alternative P would increase the number of backcountry acres managed for summer motorized recreation trail opportunities from 13,571 acres in the No Action Alternative to 54,577 acres. This equates to a 400% increase in backcountry motorized (BCM) management area acres. These BCM areas would include all of the existing motorized backcountry trail opportunities on the Forest. Overall, summer motorized recreation trail opportunities would be allowed on 873,331 acres (79% of the Forest) across the Forest. Non-motorized recreation trail opportunities would be allowed on nearly 100% of the Forest's land base (excluding RNAs) and the opportunity for trails to exist in a non-motorized setting (including backcountry, wilderness, and recommended wilderness management areas) would equal 222,870 acres, equaling 20% of the Forest's land base.

¹ State of Washington Forecast of the State Population, November 2015 Forecast.

http://www.ofm.wa.gov/pop/stfc/stfc2015/stfc_2015.pdf

² U.S. Forest Service. 2009 Visitor Use Report, Colville NF, National Visitor Use Monitoring Data Collect FY

2009.

3 Colville National Forest - Forest Plan Revision Project. Recreation and Travel Management Report. P. 54

Furthermore, the Recreation Report seems to suggest that the experience hikers can have on a motorized trail system is equivalent to one that they may find on a non-motorized trail system by stating:

"Non-motorized recreation trail opportunities would be allowed on nearly 100% of the Forest's land base (excluding RNAs)..."⁴

The above statement does not take into account the experiential value of the non-motorized recreation trail opportunity in that hikers prefer having a non-motorized experience when they head out for a hike. In fact, many studies have been done that document the effects of motorized use on other recreationists, both direct and indirect. From one literature review:

Trails: "Compaction and erosion caused by off-road and all-terrain vehicles reduce the quality of recreational trails and require expanded management efforts to develop and maintain safe, usable trails."⁵

Recreation Impacts: "One of the most contentious impacts of ATVs is their conflict with non-motorized users including hikers and cross-country skiers. The noise and intrusion of the modern world into nature (particularly in distant or secluded areas) compromises the enjoyment of many user groups." And "the increasing numbers of visitors using motorized vehicles for recreation, though, creates significant environmental degradation and social conflict with other recreationists."⁶

Conflict between recreationists is often viewed through the framework of "goal interference attributed to others behavior."⁷ This conflict is more common between ORV users and human-powered recreationists.

"Feelings of conflict often occur among quiet users when they hear motor vehicle noise, witness acts of great speed and/or reckless behavior, smell exhaust, and see visible environmental damage. This all leads to reduced opportunity and displacement of non-motorized recreationists from places they would normally frequent."⁸ (emphasis added)

This "displacement effect" of non-motorized user is further evidenced "where trails are designated as multiple-use, heavy motorized use tends to cause other trail users to pursue opportunities at other locations in order to realize the desired experiences. There are numerous examples of non-motorized recreationists being displaced or leaving an area altogether where motorized use is common." ⁹ (emphasis added)

Given the information provided above, WTA questions the rationale behind increasing the amount of acreage for summer motorized use while leaving the opportunity for trails to exist in a non-motorized setting at an incredibly low amount (20%) of the forest's land base. This is especially pertinent given that hiking and biking are increasing in popularity while motorized recreation is decreasing at a statewide level.¹⁰ We disagree that the need on the Colville National Forest is for more summer motorized recreation trail opportunity acreage as proposed in the Preferred Alternative. Even though non-motorized trails "could be constructed anywhere on the Forest," as stated on page 55 of the Recreation Report, the experience most non-motorized recreationists want is in a non-motorized trail setting and the Preferred Alternative is lacking on additional acreage for a non-motorized trail experience. WTA would like to see the number of acres and trail mileage increased for non-motorized recreation.

4 Colville National Forest - Forest Plan Revision Project. Recreation and Travel Management Report. P. 54

5 Environmental and Social Effects of ORVs: An Annotated Bibliography and Research Assessment, Nov 2000, p.14, available online at <http://www.nature.nps.gov/sound/assets/docs/ohvbibliogVT00.pdf>

6 Ibid, p. 20

7 Jacob and Schreher, Conflict in Outdoor Recreation: A Theoretical Perspective, Journal of Leisure Sciences, Vol 12 (1980), No. 4, p. 368

8 Switalski and Jones, Off-road Vehicle Best Management Practices for Forestlands, Journal of Conservation Planning, Vol 8 (2012), p. 20, available online at

http://www.journalconsplanning.org/2012/JCP_v8_2_Switalski.pdf

9 Ibid, p 21

10 According to 2013 Washington State Statewide Comprehensive Outdoor Recreation Plan. Pgs. 74-75

One possible idea is to designate the Twin Sisters Backcountry Motorized area as non-motorized Backcountry given its proximity to the non-motorized Kettle Crest and user conflicts such as motorized noise and intrusion into the campgrounds near the Kettle Crest. Any motorized use and trail miles currently within Twin Sisters could be relocated to a Backcountry Motorized area that receives more use by the motorized community. Our understanding is that at the Colville National Forest collaborative forest planning Summit workshops in 2007 and 2008, there was broad agreement among the diverse stakeholders who participated to consider relocating motorized trails like those in the Twin Sisters area if it was necessary to reduce user conflicts.

Trail Maintenance

WTA appreciates that the draft Forest Plan states an objective to annually maintain at least 20% of the forest's trail system. We would like to see this increased to at least 50% given the popularity of trails on the Colville National Forest. We also appreciate that the draft Plan identifies that within 15 years of plan implementation drainage, water crossings and trail layout would be improved, however the objective only mentions this occurring on "5 percent of the Forest's trail system designed for mountain bikes, motorized use and pack stock" and makes no mention of hiking trails. We request that hiking trails be included in the management direction for trail improvements and that the percentage is increased to match the needs of the forest; 5 percent over 15 years is a very small fraction of the trails that need improvement on the forest.

Recommended Wilderness & Special Interest Area

Recommended Wilderness

The 1984 Washington State Wilderness Act requires the Forest Service to analyze inventoried roadless areas for inclusion to the National Wilderness Preservation System. The Colville National Forest currently has one wilderness area, the Salmo Priest Wilderness. The forest is in need of additional wilderness areas to meet the growing demand to protect wildlife habitat and ecosystems and provide for wilderness recreation experiences. Currently there are no existing recommended wilderness on the Colville National Forest. The analysis conducted by the Forest Service determined that the "greater Spokane metropolitan area is underserved for wilderness recreation due to not having any wilderness within a 1-2 hour drive and that several PWAs on the Forest offer high contributions to the wilderness system."¹¹

We support the Colville National Forest's wilderness recommendations under the Preferred Alternative for Bald Snow, Abercrombie Hook and the Salmo Priest Adjacent. However we do not feel that the wilderness recommendations under the Preferred Alternative are adequate to meet the results of the Forest Service's own analysis.

In addition to the three recommended wilderness areas, WTA recommends that the following inventoried roadless areas are identified as recommended wilderness:

*Thirteenmile & Cougar Mountain: The Thirteenmile trail is of high value to hikers due to the lower elevation and early season access. The trail is also part of the Pacific Northwest Trail system. There is fantastic old growth "parkland" Ponderosa pine forest.

*Grassy Top and Hall Mountain: One of the best hiking destinations on the Colville National Forest. Grassy Top

and Hall Mountain trails can be used as part of a large backpacking loop route through rugged terrain. The Noisy Creek Trail (#588) is accessible from several campgrounds along Sullivan Lake for hikers interested in a shorter trip. These areas are also prime habitat for woodland caribou and bighorn sheep.

*Quartzite: A lower elevation inventoried roadless area; there is a trail to interesting rock formations overlooking the Chewelah Valley. Quartzite would be the closest recommended wilderness to Spokane.

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Kettle Crest Recreation Special Interest Area (SIA)

As identified in the Preferred Alternative, the Kettle Crest Recreation Special Interest Area is comprised of the Profanity and Hoodoo Inventoried Roadless Areas. The Kettle Crest is home to the very popular, Kettle Crest Trail, which is also where the Pacific Northwest Trail is routed. The Kettle Crest is particularly popular and an important place for hikers.

WTA also acknowledges that the Kettle Crest is important to the mountain bike and equestrian communities. The Kettle Crest is the largest inventoried roadless area on the Colville and features three peaks over 7,000 ft in elevation. There are superb day hike and backpacking options that offer a wild feel with excellent views. The Kettle Crest also provides incredible wildlife habitat for a number of species, including lynx, wolves and wolverine.

WTA appreciates the creativity in the Forest Service's attempt to meet the various interests of recreationists along the Kettle Crest. While we support the idea of keeping the Kettle Crest as a non-motorized designation to allow for mountain biking, hiking and horseback riding, we also have concerns with the limited nature of an administrative designation such as an SIA. Ultimately, WTA believes that the Kettle Crest is deserving of a designation that delivers lasting and permanent protection for not only recreation purposes but to protect wildlife and other unique values of the Kettle Crest.

Access - Roads

WTA supports the Colville National Forest's goal for road access under the Preferred Alternative in that it would "not be expected to result in a reduction in roaded access for developed recreation site and trail access since these opportunities are generally located along major travel routes. These major travel routes would typically be improved or rerouted (instead of decommissioned) to correct resource concerns in order to ensure continued access to the Forest's recreation infrastructure."¹² Furthermore, WTA requests that roads leading to recreation infrastructure be kept at a Maintenance Level 3 for passenger car use.

Management Area Direction

Nationally Designated Trails (NT)

WTA supports the management objectives for NTs on the Colville National Forest, including the Pacific Northwest National Scenic Trail (PNT). We appreciate the inclusion of language on the PNT regarding the identification of trail routes where none exist and to move the trail off its existing road alignments. We also appreciate the objective to relocate 10 to 15 percent of the PNT's trail miles currently located on roads into a nonmotorized trail setting within 15 years of plan implementation. However we would like to see the objective to relocate 10 to 15 percent of the PNT's trail miles increased to at least 30 percent within 15 years. As we understand it, that would mean rerouting 1 to 2 miles per year for the 50 or so miles of trail on the Colville that travel on roadbed, which seems reasonable.

Thank you again for the opportunity to provide comments on the forest plan revision. Please do not hesitate to contact me for further discussion or questions.

Sincerely,

Andrea Imler Advocacy Director

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