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Title:  
Comments: October 29, 2018

Chris French, Objection Reviewing Officer Colville National Forest

RE: Objection regarding the Revised Colville Forest Plan

The Back Country Horsemen of Washington is a service based volunteer group that works to maintain our recreation facilities on our public lands in Washington State. We have 32 chapters located in communities throughout the state that perform infrastructure and trail work on lands managed by federal, state, and local agencies. In 2017 we invested over 66,000 hours of volunteer service of which over half was in trail maintenance with and without pack and saddle stock. A significant amount of our work is within Wilderness areas though we are finding it a growing problem to be able to move our pack stock on trails within Wilderness due to a backlog of maintenance including significant blowdown. Horses cannot step over logs the way foot traffic can. If we can't get our pack crews in, we can't perform the heavy work building bridges, puncheons, curb logs, water bars, and repairing trails nor can we move supplies for other work crews.

We did file a comment letter dated June 28, 2016 (Comment Letter #474) which for the most part supported Preferred Alternative P. There were 4. main points in our letter. 1. Support for the Kettle Crest SIA 2. Support for the amount of Recommended Wilderness Area (RWA) in Alternative P. 3. Support for continuing use of power and mechanical tools within RWAs. 4. Adding language that would encourage the use of Minimum Requirements Analysis (MRA) for clearing trails in Wilderness with chainsaws and other non-conforming tools without requiring unreasonable delays and restrictions. As we said in our letter "The trail closures due to lack of maintenance are becoming untenable and there are trails that will potentially be lost forever if all the tools and possible solutions are not brought into play in some specific and limited situations. These public lands must be made accessible to the owners of these lands, the American people, who pay for them. "

We appreciate that #1 and #2 have been supported. Furthermore, we appreciate the fact that a small amount of non-wilderness caliber acreage has been removed from Alternative P.

We do object to the fact that only mountain bike and chain saw use are supported to continue in RWAs as non-conforming uses for Wilderness. Other trail maintenance tools used outside of Wilderness such as wheelbarrows (powered and non-powered), excavators, drills, and motorized winches should continue to be allowed in RWAs. These uses can expedite trail maintenance and are temporary in nature. Faster repairs mean less impact on the roadless area experience. These uses do not depreciate the RWAs from being considered by Congress for Wilderness designation.

Furthermore, we disagree with the response to our request for specific support for MRAs.

Back Country Horsemen of Washington (BCHW), Is a 501 (c) (3) organization with 32 chapters across the state dedicated to: keeping trails open for all users; educating horse users in Leave-No-Trace practices; and providing volunteer service to resource agencies.

(USFS.) "Inside of wilderness, the Minimum Requirements Analysis process is available to managers to determine the minimum activity necessary to accomplish a management action. These are site-specific decisions and the process for making these decisions are clearly defined in policy. Because the proposed revised forest plan does not change law or policy, it would not be appropriate to include direction in the plan to require the use of an existing management tool (the Minimum Requirements Analysis) in a manner contrary to national direction."  
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Forest plans are exactly where guidance should be given to encourage the use of MRAs to address trail maintenance issues. The reality is that it is very hard to get MRAs approved when there isn't a dire emergency such as wildfire situations. Trail failures and logs across the trails present serious obstructions to the use of pack and saddle stock, putting at risk the lives of horses and riders. While upper management always say that getting MRAs approved isn't a problem, the reality is approval has been next to impossible. Congressional legislators are told that they should support new Wilderness because it is easy to get permission to use chainsaws to clear blowdown, such as with Senator Murray's statements in support of enacting the Wild Sky Wilderness. Do you know how many MRAs have been approved for Wild Sky? Very few. We very much want assurances in the Colville forest plan that every effort will be made to fast track trail maintenance tool approval with MRAs within designated Wilderness areas.