

Data Submitted (UTC 11): 7/5/2016 7:00:00 AM

First name: Tim

Last name: Coleman

Organization: Northeast Washington Forestry Coalition

Title: NWFC Secretary

Comments: Comments re Colville National Forest from NEWFC

Please accept these comments on behalf of the Northeast Washington Forestry Coalition.

Thanks for all your hard work.

Timothy J. Coleman

NEWFC Secretary

NORTHEAST WASHINGTON

FORESTRY COALITION

www.NewForestryCoalition.org

July 5, 2016

Amy Dillon

Forest Plan Revision Team

Colville National Forest

765 South Main

Colville, Washington 99114

RE: Comments on Proposed Revised Land Management Plan for the Colville National Forest and Draft Environmental Impact Statement

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

Dear Amy Dillon,

The Northeast Washington Forestry Coalition (NEWFC) would like to thank the Colville National Forest (CNF) for the opportunity to comment on the Draft Revised Colville Forest Plan and the Draft Environmental Impact Statement (DEIS) associated with this plan. We appreciate the extraordinary effort by the Forest to accomplish this complicated and essential project in a timely fashion since undertaking the project.

These comments are meant to be constructive. They are divided into general comments that are directed to policy issues that may have been set by the region (Region 6) or the Washington DC office of the Forest Service. Comments also address literature citations and assumptions thereof in the DEIS and the Planning Team interpretations of NEWFC guidance as a basis for Alternative B.

A. Influence from the Washington DC Office and Region 6 Office on the CNF Plan Revision

We understand that the plan must be reflective of what is possible at the current and projected budget allowance by Congress for the management of federal lands. The policy direction does not seem to recognize opportunities for increases in the "footprint" of management (restoration) due to innovative ideas such as the CNF A to Z project as well as the interest and efforts by Congress to expedite vegetative management. Acceleration of restoration activities will avoid uncharacteristic insect and disease problems, as well as, uncharacteristic wildfire. We also understand that for the sake of efficiency it is not advisable to construct a departure schedule from the

projected allowable sale quantity (ASQ) for each of the six alternatives. We feel that the appropriate process for insuring the use of innovation and changes in policy, as well as, adjustments and prioritization must be in the minds of the planners and decision makers and should be addressed as soon as possible after a final forest plan is approved. It is apparent that use of the current budget as a target for restoration/production will not result in objectives being met in a reasonable period. We ask the CNF to recognize this deficiency and plan to address the need for acceleration of restoration through a departure schedule as soon as possible.

B. Non-declining Even Flow

We are convinced that the non-declining even-flow methodology does not address forest restoration problems of middle-aged, overstocked stands. Non-declining even flow won't get the CNF to more resilient forest stands or restore the historic range of variability in nearly all plant association groups. The even-flow sustained yield concept, as per direction from Region 6, dated April 14, 2011 (file code 1920), to the planning teams for the Colville, Malheur, Okanogan/Wenatchee, Umatilla, Wallowa-Whitman National Forests specifies that the departure schedules may be included as part of the Revised Forest Plan when:

- 1) It is possible to reduce significantly or prevent high mortality losses,
- 2) It is possible to improve timber age or size class distribution,
- 3) Implementation of the base sale schedule would have a substantial adverse impact upon a community (or communities) in the economic area of the forest,
- 4) It is reasonable to expect a better attainment of overall multiple use objectives.

We submit that all four of these criteria are currently indicated for decision-making purposes on the CNF Plan Revision.

We are concerned that the definition of "forestland not appropriate for timber production" may be misconstrued under Criteria A, B, and C on page 12 of the guidance supplied in the April 14, 2011 to the individual forests. If techniques such as helicopter logging are considered over significant portions of the landscape (which may be the case in small diameter stands on the CNF) these lands could be considered by a future administration as not appropriate for timber production. This would fly in the face and be a direct conflict with the goals of creating resilience, sustainable stands, and the whole concept of multiple use objectives over the forest.

The determination of future ASQ should take into account that the ASQ has not been met on the CNF for several years. This has resulted in the current insect and disease, and fire hazard problems on the CNF. Even-flow sustained yield calculations for ASQ are inappropriate given the surplus allowed by the lack of management/harvesting during the past 20+ years. Note that NEWFC's side-boards/blue print included an increased level of management activities on the "active management" portion of the forest for 20 years to "set back the clock" closer to a historic range of variability relative to stocking levels, fuel loading, and insect and disease predations. We feel that with the projected increase in uncharacteristic disturbance and the likelihood of climate of change exacerbating those problems (as referred to in many portions of the revised plan) the accelerated "cutting budget" concept as proposed in Alt B is the most responsible and appropriate application of activity levels to avoid serious watershed, air quality, and cultural impacts during the next 20 year period.

C. Socio-Economic Considerations or Analysis

The most recent published literature regarding socio-economic emphasis seems to be related to local communities. The use of US Labor Department data and other generalized data is not adequate to analyze the impact of the forest plan to local economies. Furthermore, the analysis of the tri-county (Ferry, Stevens, and Pend Oreille counties) does not recognize the economic impact of the CNF management activities on the larger regional area inclusive of the general Spokane area. This does not give a full picture of the impact of the Forest from "leakage" as referred to in the Forest Econ report submitted as part of this comment letter. Additionally, there is inadequate analysis of the potential economic impact of a more highly developed recreation strategy on the tri-county area, which could include more wilderness recommendations as per NEWFC's suggestion (Alt B). The following socio-economic issues were identified as interest items that were either missed or dismissed. NEWFC asks that they be reviewed:

- 1.A 60% overstatement of total regional employment
- 2.Extreme differences in county economies are overlooked
- 3.Spatial redistribution and Stevens County concentration of effects
- 4.Role of Spokane dominance in both retail sales and commuter income
- 5.Missed poverty and diminished working age class demographics in Ferry Co.
- 6.Timber utilization that overlooks log imports (esp in cedar, biomass, & pulpwood)
- 7.Miss-categorization of large employers particularly in the medical sector
- 8.Wood sector production relationships not same as national average
- 9.Labor intensive aspects of forestry, particularly in restoration
- 10.Missed dominance of Ferry County Indian tribal employment
- 11.Role of retirement and second home sectors
- 12.Recreational RVD attribution problems (esp RV use locus)

D. Post Disturbance Restoration

During the May 2016 joint meeting held in Republic between US Forest Service and NEWFC, we discussed the need for post-disturbance rehabilitation collaboration guidance for future consideration. In 2009, some of the NEWFC taskforce people had started discussing under what circumstances timber harvest will be acceptable and desirable to help restore areas affected by uncharacteristic disturbances. NEWFC subsequently discussed with Laura Jo West the need for this guidance to be memorialized in the upcoming Forest Plan Revision. Unfortunately, with the change in leadership, the "message" was not relayed to the CNF plan revision team. NEWFC feels that it is imperative that the post disturbance restoration be addressed in the Forest Plan Revision due to the increase in forest health problems, and subsequent increase in uncharacteristic wildfire. NEWFC is willing to assist, through the collaborative process, in memorializing this guidance on the CNF.

E.Roads

NEWFC agrees on a Forest-wide policy of no net increase of roads.

F.Wildlife

Draft Land and Resource Management Plan, pg 19, states that the Kettle Crest is identified as a core area that is important for the recovery of Canada Lynx in Washington. Wildlife Habitats, pg 49, "Canada Lynx in the Colville National Forest includes a core area (Kettle Crest) that is important to the recovery of Canada Lynx in Washington". The forest does not have any designated critical habitat for Canada Lynx; please explain the incongruence of having a core area without a designated critical habitat.

The Kettle Crest and Selkirk Crest are the only two wildland complexes in the entire 1.1 million acre Colville National Forest. The proposed Kettle Crest SIA "recreation focus" would overlay wildlife seclusion habitats that provide critical breeding, rearing and migration linkages between the Rocky and Cascade Mountains. Focused recreation in the Kettle Crest would significantly degrade its habitat capabilities to sensitive wildlife.

Land management decisions must consider the entire landscape, recognize abundance and scarcity of the land. Wild areas are spatially scarce - developed areas are abundant. A recreation focused managed overlaying scarce wildlife security areas is inappropriate. The abundance of opportunities for recreation-focused management currently exists on at least 80% of the Colville National Forest. To perpetuate healthy wild landscapes - that are unique in Region 6 USFS -- and that provide essential habitat to sensitive flora & fauna, it is essential to maintain the integrity and resiliency of The Kettle and Selkirk Crest Potential Wilderness Areas.

We ask the Forest Plan include standards and guidelines regarding rest-rotation in range management. Rest rotation will have significant positive impacts both to wildlife habitats for birds and wild ungulates - as Forest Service specialists have noted. "Rest rotation [is] the best thing for wildlife....." (December 14, 2011 Boulder

Complex environmental assessment, IDT Meeting Notes)

G. Misinterpretations of Alternative B Relative to the Proposed

We have been told that the "sideboards" for Alternative B were presented to the CNF Planning Team based on information provided to the CNF as early as 2007. It is unfortunate that there was apparent lack of communication regarding the dynamic nature of NEWFC's "sideboards" as new information and new considerations were presented during each project collaboration subsequent to the first blush of NEWFC's "sideboards". NEWFC's analysis accomplished by Derek Churchill during the formation of the blueprints indicated a 78 million foot ASQ on a 20 year cutting budget within NEWFC's active management area of approximately 400,000 net acres.

The gross acres inclusive of riparian management areas, pine martin and grizzly bear special emphasis areas were over 510,000 acres. That no volumes discussed in NEWFC's restoration areas, but we did/and have recognized that activities need to take place in those areas. Our thoughts were that each acre could not fully satisfy all of the desirous attributes for the CNF. Our guidelines for the restoration management area were very similar to the preferred alternative's focused watershed restoration guidance. We feel that there are opportunities through collaboration to merge the most desirable parts of Alternative B with Alternative P. Since we have not asked Mr. Churchill to project the ASQ to be removed from the "restoration" area we feel that there is a significant differential between the probable outcome of Alternative B versus the misinterpreted publicized (in the DEIS) ASQ of Alternate B. NEWFC had not discussed whether the "cutting budget" approach should be used on the "restoration" area. Our assumption was that the occurrence of disturbance would be allowed to take a course that would be similar to a no-action alternative based on the recent history of the lack of manipulation over the entire forest.

H. Kettle Crest Special Interest Areas

Special Interest Areas (SIAs) are a category of administratively designated area with outstanding natural characteristics or unique recreation or cultural values. The management objective of each special interest area is to protect for public use and enjoyment, special recreation areas with scenic, geological, botanical, zoological, paleontological, historical, or other special characteristics or unique values.

Whereas we laud the SIA concept, believing it has the potential for a beneficial relationship between recreation and rural community economic prosperity, we strongly disagree with locating an SIA overlaying Profanity, Twin Sisters and Hoodoo PWAs. All (Hoodoo PWA) or portions (Profanity and Twin Sisters PWAs) meet suitability criteria for wilderness management and are critically important to survival of sensitive wildlife.

The CNF-led Forest Planning Summit (March 2006 to January 2007) found strong support among stakeholders for retaining the "wilderness characteristics" of Potential Wilderness Areas (PWAs). While some participants expressed a desire for that objective to be achieved - they didn't like the wilderness name. Forest Summit participants did not endorse SIA in the Kettle Crest. During the Summit, then forest supervisor Rick Brazell proposed SIA and "Backcountry" instead of calling it wilderness. As summarized in notes published March 2007 ("Collaborative Agreements Talking Points") "Due to universal concern for how the [Kettle Crest] area is managed, the Forest Supervisor believes a special management area designation of less than [sic] 100,000 acres would be appropriate." As we know, Mr. Brazell demonstrated his awareness of Summit (and public) opposition to a Kettle Crest SIA when in the Proposed Action (2011) he recommended wilderness for Bald-Snow, Profanity and Hoodoo PWAs.

The Preferred Alternative's emphasis on recreational uses in the proposed Kettle Crest SIA in Alternatives P & O, biases recreation uses above the needs of sensitive wildlife species, such as lynx, wolverine and grizzly bear. Forest Service staff have stated in public meetings, and the DEIS repeatedly references, that management objectives in the Kettle Crest SIA as a "recreation focus."

The Kettle Crest and the Selkirk Crest are the only two wildland complexes in the entire 1.1 million acre Colville National Forest. The proposed Kettle Crest SIA "recreation focus" overlays wildlife seclusion habitats that provide breeding, rearing and migration linkages between the Rocky and Cascade Mountains. Focused recreation in the Kettle Crest would significantly degrade its habitat capabilities to sensitive wildlife.

The abundance of opportunities for recreation-focused management currently exists on at least 80% of the Colville National Forest. To perpetuate healthy wild landscapes - that are unique in Region 6 USFS -- and that provide essential habitat to sensitive flora & fauna, it is essential to maintain the integrity and resiliency of The Kettle and Selkirk Crest Potential Wilderness Areas.

We ask Forest Plan drafters to take a fresh look at the potential economic benefits of locating SIAs where they abut or are near to rural communities that can provide and will benefit most from SIA infrastructure development and tourism. We offer the proposed Calispell Recreation SIA as one example.

I. Special Interest Area Recommendations

The economies of Ferry, Pend Oreille and Stevens Counties could greatly benefit by increased access and facilities for all types of recreation on the Colville National Forest. Proposals for motorized and non-motorized loop trails, trailheads and signage move forward slowly, if at all. Special Interest Area with a recreation focus would support rural economic growth, provide opportunities for communities to work together and enhance recreation in a popular area of the Colville National Forest..

Special Interest Areas (SIAs) are managed as an integral part of the National Forest System with management emphasis placed on protecting the unique values for which each special interest area was designated. In this Forest Plan, special interest areas represent a special type of management area that overlays the forest-wide and specific management area (i.e., Backcountry, Backcountry Motorized, Scenic Byway, National Scenic Trail, Focused Restoration, and General Restoration) direction that applies to the land base within each special interest area's boundary. In other words, each special interest area has its own distinct management direction that supports the unique values for which it was designated.

In addition, each special interest area incorporates the management direction contained in the underlying Management Areas to support the multiple values and resources (range, timber, wildlife, fire, hydrology, etc.) available within each special interest area. The other values and resources that exist in each special interest area should be managed to a level compatible with each special interest area's unique values as well as the overall management objectives contained in the Forest Plan. If a conflict in management direction is identified between the special interest area specific management direction and the underlying management area direction, the special interest area-specific direction would apply.

1. Proposed Calispell and Baldy Special Interest Areas

Description: The Calispell SIA (98,997 acres) is located along the east and west slopes of the Pend Oreille/Stevens County divide, running from Chewelah Peak to Lone. This SIA was identified by both motorized and non-motorized recreation interests as well as Pend Oreille and Stevens Counties, and the Northeast Washington Forestry Coalition.

Elevations of this area range from 2500 feet to over 6000 feet. Motorized and non-motorized trails begin in dense conifer forests and dispersed camping attracts residents of Pend Oreille, Stevens, Spokane counties, as well as visitors from north Idaho. Approaching the altitude of 5000 feet elevation, old growth forests give way to meadows interspersed with clusters of subalpine forest. Wildflowers are abundant in the meadows throughout the summer months and rocky outcrops offer pleasing views and topography.

Values: At the southern end the Quartzite Roadless Area has numerous creeks and off-trail hikes, rising far up

the southern flank of Chewelah Peak. A trail system was designed by the Forest Service a number of years ago, but never implemented due to a lack of funds. Creating the SIA would allow implementation of this project and expand recreational opportunities in the Horseshoe Basin, which currently has a well used motorized trail around the southern end.

Just north of Quartzite roadless area is the only ski area on the Colville National Forest - 49 Degrees North Ski and Snowboard Resort. Most of the resort is on the Colville National Forest and offers some of the finest skiing in the Inland Northwest, as well as summer trails for hiking and mountain biking. Just north of the resort is the Chewelah Peak Learning Center, a year-around center with lodging and kitchen facilities. Together the resort and learning center attract tens of thousands of visitors every year, and enhanced loop trails, signage and trailheads would increase opportunities and usage.

Travelling north, there are numerous motorized and non-motorized routes for hiking, cross country skiing and ATV's on Calispel Creek and its tributaries, the North Fork Chewelah Creek, Tacoma Creek, and Ruby Creek. The entire area has important camping, hunting, and riding opportunities for a diversity of recreational interests.

The adjacent Little Pend Oreille Wildlife Recreation Area has connector trails and long riding routes extend past the popular Little Pend Oreille Lakes. Lake Leo, Frater Lake, and Browns Lake are all very popular and Tiger Meadows is a beautiful meadow that is surrounded by forest that appears boreal in nature. Nearby communities that will benefit from the SIA designation include Chewelah, Usk, Cusick, Colville, Lone and Metaline Falls.

In addition to the recreation values, the Calispel SIA is extremely important to wildlife. The potential exists for recreationists to observe rare wide ranging species such as black bear, wolf, cougar, and bobcat across an array of diverse habitats. Portions of the area provide habitat for threatened and endangered species such as northern goshawk, gray wolf and wolverine. The area is well known for providing the unique opportunity to pass through most all these elevational habitat zones, from old growth cedar forest to sub-alpine peaks, in very short travel distances.

A second proposed SIA, The Baldys SIA (38,516 acres) was identified by both motorized and non-motorized recreation interests as well as Pend Oreille County and the Northeast Washington Forestry Coalition.

Bead Lake, King Lake, and Marshall Lake are all popular recreation sites and are interconnected with motorized and non-motorized travel routes. Of particular interest is the connection with Usk that provides a travel route from that community to Priest Lake in Idaho. In addition to the recreation values, The Baldys SIA is extremely important to wildlife. The potential exists for recreationists to observe rare wide ranging species such as black bear, wolf, cougar, and bobcat across an array of diverse habitats. Portions of the area provide habitat for threatened and endangered species such as northern goshawk, gray wolf, grizzly bear and wolverine.

Both Calispel and The Baldys proposed SIAs would provide outstanding four-season motorized and non-motorized trail opportunities and relative proximity to Spokane and communities surrounding the Colville National Forest. They would provide important economic benefits to rural communities in northeast Washington, and bring new investment to the area.

2. Proposed Swan-Cougar SIA

The proposed Swan-Cougar SIA (52,000 acres) is located on national forest lands south of Republic to the Colville Reservation, east to Hall Creek Rd and FS 2053 & 2054 and west to the Ferry County line. This proposed SIA was highly acclaimed by motorized and non-motorized recreation interests in Ferry County during the Phase I & II Recreation Travel Planning and is recommended by the Northeast Washington Forestry Coalition. This SIA provides outstanding four-season motorized and non-motorized recreation opportunities in close proximity to Republic, Curlew and Keller, providing an economic boost to the Ferry County economy. The Pacific Northwest Trail as well as Gibraltar, Ten Mile, Thirteenmile, Swan Lake, Fish Lake Trails provide excellent

non-motorized trail system that will eventually connect the Ferry County Rail Trail and Fairgrounds. The areas geology is amazing including dramatic cliffs, faults and views of the Kettle Crest. It contains vibrant meadows, old growth ponderosa pine, western larch, Douglas fir and hardwoods, coupled with lakes, streams and springs.

3.Special Interest Area Advisory Group

The SIA Advisory Group could consist of county commissioners and representatives from local ranching, motorized recreation, non-motorized recreation, environmental, business and forest industry.' and other interested parties. The Advisory Group will work closely with the Colville National Forest to find funding and implement the plan.

J.Recommended Wilderness and Protected Areas

Less than 3% of the Colville National Forest is presently designated as wilderness - the least of any national forest in Region 6. We support and applaud wilderness recommendations made in the Proposed Action and carrying those forward in the Selkirk Crest in the Preferred Alternative. However, we are appalled that just a portion of Bald-Snow PWA has been recommended in the Kettle Crest and Profanity and Hoodoo PWAs completely dropped.

It is NEWFCs position that public opposition to wilderness is largely based on a long running misinformation campaign about wilderness management and tied to anti-government (privatization movement) political organizing. Key inconsistencies and inaccuracies repeated in the press, at public meetings (sometimes even from the Forest Service) and in personal conversations about wilderness include: 1) no hunting & fishing, 2) no berry picking, 3) no horse riding, 4) no humans allowed, 5) trails can't be maintained, 5) sanctuaries for wolves, 6), 7) wildfire can't be managed, 8) weeds can't be managed, 9) no cattle grazing, and 10) will hurt the local economy.

If these were true NEWFC wouldn't support Recommended Wilderness!

We note the uniqueness in the Kettle River Range and its lack of representation in the National Wilderness Preservation System. The CNF's PWA analysis rated Profanity, Hoodoo, Twin Sisters, Thirteenmile and Bald-Snow highly for several key criteria. These PWAs together with four adjacent Jackknife, South Huckleberry, Deer Creek, Owl Mountain and Cougar PWAs, is the largest wildlands complex between the Cascades and Rocky Mountains. Your wilderness evaluation found these areas important both for solitude of non-mechanized recreation, rare dark night skies for stargazing and for the needs of sensitive wildlife (seclusion habitat and for regional connectivity). The latter point is supported by substantial modelling and is of increasingly critical importance for adaptation to a changing climate, a priority objective of the current administration, as are the water quality and quantity services provided by wilderness.

The CNF's own Forest Planning Summit ending in January 2007 found strong support among stakeholders for retaining the "wilderness characteristics" of these areas. While some interests expressed a desire for that objective to be achieved through alternative labeling, i.e. Backcountry and Special Interest Area - Forest Summit participants did not endorse either as an alternative to Wilderness Management in the Kettle Crest. The facts were, however, the majority of Summit participants supported wilderness for the majority of PWAs.

We recognize that the Snow Peak Shelter in the Bald Snow PWA and mountain bike use of parts of Profanity PWA represent modest challenges, but these can be resolved or mitigated in ways that are fair, consistent with policy, and represent the best balancing of interests. There are numerous opportunities using existing trails and creating new ones connector routes that serve the interests of mountain bikers.

Exclusion of the north half of Bald-Snow PWA from wilderness management because of the Snow Peak Shelter is not supported by law. The Wild Sky Wilderness has a similar shelter (an old lookout) that Congress directed the Forest Service to continue its use. Compatible uses cannot be used to exclude PWAs from Recommendation for Wilderness.

1. Wilderness Additions

NEWFC recommends that the Preferred Alternative include, in addition to PWAs in Alternative P, the following in Recommended Wilderness:

- 1) Hoodoo PWA
- 2) Profanity PWA
- 3) Western half of Twin Sisters PWA
- 4) All of Bald-Snow PWA Thirteenmile PWA
- 5) Thirteenmile PWA

We ask that Recommended Wilderness be managed under regional guidance.

2. Specific Comments on the PWA Wilderness Evaluations

Compatible uses cannot be used to exclude proposed wilderness areas (PWAs) from Recommended Wilderness. The following activities are compatible with wilderness designation were indicated as reasons that the Potential Wilderness Areas may not be recommended for wilderness:

- Wildland Urban Interface (which we define as .25 miles from a community and where fuels reduction is allowed within wilderness)
- grazing
- traffic noise
- city lights
- adjacent motorized activity
- adjacent private property
- existing recreation uses
- public controversy

3. The Summit - A Vote Not Counted

Alternative P is the Preferred Alternative (PA) and purported to be a mix of all other alternatives. Alternative O is supposed to represent agreements by participants of the Colville Forest Plan Summit that took place from March 2006 to January 2007, but it does not accurately reflect consensus agreements to maintain "wilderness characteristics" of Potential Wilderness Areas.

It is critically important to recognize that Forest Planning Summit participants wanted solutions and were willing to compromise. A majority of the NEWFC board participated in this process. The NEWFC blueprint wilderness proposals were strongly supported by most participants at the Summit. In a poll taken (Figure 1) by the Forest Service at the January 20, 2007 Collaboration Workshop on wilderness, part of the Summit process, the majority of participants indicated "strong support" of wilderness designation for 14 of the 18 PWAs (Inventoried Roadless Areas), while 16 of the areas received "strong" or "some" support for wilderness from the Collaboration participants. In general, these results are consistent with timber management and other elements of the NEWFC Blueprint that was actively debated by Summit participants. Although this was not reported in the Forest Service's official notes of the Collaboration Summit Round-Up on March 1, 2007 and submitted by The Wilderness Society in their comments to the Proposed Action.

These results are particularly illuminating due to the experience and knowledge of the forest that the participants of the Summit collectively represented. Importantly, this in-depth knowledge and the results of the inquiry are informed by the year-long shared information and collaboration. As such, these results must be interpreted as very well-informed opinions, especially when compared to the place-based workshops conducted after the Forest Summit that were much less collaborative and specifically segregated to address just wilderness, whereas the Summit addressed a plethora of uses and interests.

Figure 1. Recommended Wilderness - Votes of Participants at the Colville Forest Planning Summit

IRA Name ABCD Total A% A+B%

1 Salmo Priest Adjacent 28 11 13 190% 94%

2Hoodoo176132763%85%
 3Deer Creek198333358%82%
 4Grassy Top194332966%79%
 5South Huckleberry156242756%78%
 6Hall Mountain174332763%78%
 7Abercrombie Hooknose184623060%73%
 8Thirteenmile192532966%72%
 9Profanity191442868%71%
 10Bald Snow182442864%71%
 11Jacknife145262752%70%
 12Owl Mountain182362962%69%
 13Twin Sisters182452962%69%
 14Cougar Mountain153542756%67%
 15Quartzite126742941%62%
 16South Fork Mountain106742737%59%
 17Harvey Creek151310293%21%
 18Lost Creek12116205%15%

A = Strong Support as Recommended Wilderness Area

B = Some Support as Recommended Wilderness Area

C = Limited Support as Recommended Wilderness Area D = No Support as Recommended Wilderness Area

K.Economic Benefits of Wilderness and other Protected Lands

An October 2014 study by Headwaters Economics detailed how protected federal lands (such as Wilderness or National Parks) not only preserve unique landscapes, but have the potential to attract in-migrants such as baby boomers, which in turn help support a robust local economy. <http://headwaterseconomics.org/public-lands/protected-lands/insights-baby-boomers-move-near-protected-lands-help-drive-economies/>

The Baby Boom generation is retiring in droves (up to 10,000 each day), and many of these newly-minted retirees are on the move. But where are they moving to? The criteria are as varied as the retirees, and include housing, climate, and family. But as research by Headwaters Economics and others has shown, boomers are also moving to places with protected public lands.

Protected federal lands (such as Wilderness or National Parks) not only preserve unique landscapes and natural resources, but have the potential to attract in-migrants such as baby boomers, which in turn help support a robust local economy.

This chart shows the difference in migration rates between counties with low and high levels of protected public lands during the past 40 years for three different age groups: all seniors 55 and older, those 55-64 or "pre-retirees", and retirees aged 65-74. [These patterns also hold for each decade.]

The difference in migration is greatest for pre-retirees, who are likely to be active and enjoy outdoor recreation on these lands. The difference in net migration is smaller for older retirees, but is still significantly higher in counties with high protected public lands.

Previous research by Headwaters Economics has shown that protected public lands help to create a competitive economic advantage, contributing to growth in employment, population, and personal income.

Migrating baby boomers provide a unique economic stimulus, bringing along with them an influx of retirement and investment income. This income can then boost other parts of the economy, including the health care and retail sectors.

In another report (January 2013) Headwater's found that county-specific analysis that built on earlier work (West Is Best, December 2012) by Headwaters Economics that looked at the U.S. West's 286 non-metro counties as a region, and found a meaningful relationship between the amount of protected public land and higher per capita income levels in 2010. According to this analysis, the effect protected public lands have on per capita income can be most easily described in this way: on average, western non-metro counties have a per capita income that is

\$436 higher for every 10,000 acres of protected public lands within their boundaries. The study found that three economic measures were positively associated with protected public lands: per capita income (2010), growth in per capita income (1990-2010), and growth in per capita investment income (1990-2010). (Rasker, R., P.H. Gude, M. Delorey. 2013, Journal of Regional Analysis and Policy).

L.Watershed Management

Overall, we're appreciative of the improvements to the aquatic resource management from the proposed action in 2011. In particular, the Forest Plan's improves clarity for Riparian Management Areas to maintain conditions in properly functioning areas and to restore conditions in areas that are not properly functioning. Since activities outside of riparian areas will directly affect aquatic and riparian resources, a similar standard should be established forest wide to ensure aquatic conditions do not decline.

We commend the Preferred Alternative stubble height standards that will result in reduced surface and rill erosion during peak runoff and storm events. This is a win-win for producers and the environment: shrub-steppe ecosystems will be more resilient and resistant to invasive species incursions and forage nutrient qualities will improve with increased nutrient recycling, biodynamics of soil retention and soil creation.

M.Fire Management

NEWFC supports increased prescribed fire and fuels reduction, which have shown to reduce wildfire severity. (CNF CFLRP Annual Report: 2015) NEWFC supports the use of unplanned ignitions, on a case by case basis for all that meet guidelines as shown for MA-GDL-SIA-03 criteria (PL&RMP page 110). We ask that a specific Forest-wide guideline be developed similar to MA-GDL-SIA-03,

Regarding WUI fire management, the DEIS page 126 & 135 ; PL&RMP page 34: FW-DC-VEG -15, FW-DC-VEG-16. FW-OBJ-VEG-01 addresses the WUI, and CNF priorities as identified in the CWPPs. The Stevens County CWPP references the CNF following the Colville National Forest Fire Management Plan 2005. We are unable to find any referenced to the Fire management plan in the DEIS nor the PL&RMP.

N.Late-successional and old forest conditions

Alternative P would get rid of the Eastside Screens. Our question is what are you going to replace it with? A 150 year old tree should stay and spatial patterns, ie. Van Pelt, et al. should provide guidance, but what is your adaptive approach to make progress towards meeting ecological goals? Trees over 21" should only be removed in specific and exceptional situations.

Late-successional and old forest habitats are generally below their historic range of variability. Large and old trees and large snags are generally lacking in many forest types. To address this problem, the plan contains a standard to protect large snags over 20 inches in diameter, unless they pose a safety hazard. We request an equivalent standard be provided for large trees, as it would have both ecological and social benefits. Ecologically, it would improve conditions for wildlife, store carbon, and increase resilience to disturbance. Socially, we've learned that clear standards, such as provided by the Eastside Screens, increase planning and management efficiency and reduce controversy.

There is also a need to establish management direction for landscape spatial patterns, if historic spatial patterns are going to be restored.

Conclusion

We appreciate this opportunity to submit comments concerning the Colville National Forest Plan DEIS and we look forward to healthy and collaborative working relationship with the Forest Service in the future.

Sincerely,

Timothy J. Coleman

Secretary

Northeast Washington Forestry Coalition