

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

First name: Nettie

Last name: LaDoux

Organization: Stevens County Commissioners

Title:

Comments: Official Comment

Hello Ms. Dillon,

Commissioner Parker attempted to hand-deliver our comment to you a few minutes after 4:00 and your door was locked. He just put the original in the mail for you and a copy for Supervisor Smolden.

Please let us know if you have any questions,

Nettie LaDoux

Asst. Clerk of the Board

Stevens County Commissioners

509-684-3751

July 5, 2016

Amy Dillon, Forest Environmental Coordinator

& Plan Revision Team Leader Attn: Forest Plan Revision Team Colville National Forest

765 South Main Street, Colville, WA 99114 Dear Ms. Dillon:

Please accept these comments on behalf of the 44,000 residents of Stevens County in regards to the Colville National Forest's Draft Revised Land Management Plan (Forest Plan Revision).

#### Introduction

Stevens County opposes the proposed plan revision (Preferred Alternative P) and firmly believe the only believe the responsible decision is to select the No Action Alternative. While we appreciate the renewed efforts of the Colville staff to finish the proposed plan revision the past 3 years, we believe that the faulty start and excessively long time frame of this planning process has yielded a product that is deeply flawed and could be damaging to the surrounding community. This would be inconsistent with National Forest Objectives.

Stevens County does not make this statement lightly or with capricious or malicious reasoning. Our true desire is to see a plan developed that addresses the true key issues currently extant in the Colville National Forest and we believe that when this planning process was initiated -12 years ago - those key issues were not yet emergent. We believe it would be negligent for all involved to adopt a forest-wide direction document that does not adequately address the key issues of overstocked, beetle and disease infested landscapes. We will support a plan that contains robust strategies to achieve healthy, resilient landscapes across the forest boundaries that reflect not just good stewardship policies, but also good neighbor policies consistent with protecting county customs, culture and economic stability.

Stevens County takes seriously its responsibility to guard the customs, culture, economic viability and public safety of the residents of this county. To that end we have invested literally hundreds of hours of time with forest staff, the plan itself and the people of the county. We

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strive to carry the larger interest of all the people and we believe we have done the background work to do that well.

We have worked to express our perspective through the Congressionally- mandated forum of coordination - a process that we believe is yet to be finished . We believe the Forest Service has an obligation to protect our economy to the maximum extent allowable by law, and that the alternatives as presented fail to meet that mandate.

Stevens County is committed to fight for the long term sustainability and quality of life of our residents for future generations. We will take the necessary steps, the necessary time and actions needed to remain a committed productive partner for a truly successful outcome .

#### Proposed Wilderness

##### Abercrombie Hooknose

Stevens County is opposed to the addition of wilderness in the Abercrombie/Hooknose region. The proposed addition does not conform to the intent of the Wilderness Act of 1964 in several ways and is a potential threat to public safety for the residents of Stevens and Pend Oreille counties.

Private inholdings exist within the confines of the proposed addition, with public access roads 'cherry stemmed' into the area to provide ingress/egress. The long term consequence of a Wilderness designation poses an unacceptable risk to private property and safety due to the unrealistic management rules associated with this designation.

Grazing allotments are currently active within the proposed expansion and the inefficiencies associated with restricted management will increase costs to the producer and over time will make those allotments economically unfeasible thereby negatively impacting the economy of Stevens County. Your response to Coordination request #61 indicates that restrictions on grazing management will be a hardship to the grazing permit holders and potentially eliminate grazing in the long term.

We have documented evidence of prior commercial activity of several types that is easily recognizable to anyone who cares to investigate for themselves .

The Stevens County Community Wildfire Protection Plan of 2015 indicates that this proposed expansion to existing Wilderness encroaches on sensitive areas of the Wildland Urban Interface and would pose a fire threat to several communities adjacent to the proposed expansion. The towns of Metaline and Metaline Falls would be caught in a 'pincer' with wilderness on two sides and already limited roads for egress due to the geography of the area. Highly valued infrastructure exists in this area and could become at risk because of no management of the forest structure . The entire 'Proposed Wilderness Area' is under the Wildland Urban Interface overlay which lead us to believe that is noncompliant for wilderness designation , done in violat ion to law and inconsistent with local fire protection plans.

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For these reasons Stevens County will not support a Proposed Wilderness designation and respectfully requests a designation proposal that will allow timber harvest as a tool so that future challenges to forest health can be addressed .

##### Sa Imo-Priest Adjacent

Stevens County is opposed to the Proposed Wilderness designation for the Sa Imo-Priest area. Public safety for the towns of Metaline and Metaline Falls must be protected for long term viability and revitalization efforts in norther Pend Oreille County.

Encroachments into the Wildla nd Urban Interface can increase the risk of fire danger to those communities.

Perhaps the most serious issue is the potential for economic damage to future mining interests in this region. Stevens County has not seen an inventory and analysis done for existing mining claims and especially we see no reference that would indicate the Forest Service has collaborated with the existing operation of Tech mining in Metaline Falls. Any negative impacts to the economy of northern Pend Oreille County will directly impact Stevens County.

For these reasons Stevens County will not support a Proposed Wilderness designation and respectfully suggest a designation allowing future timber harvest to occur in this region..

#### Quartzite

Although a Quartzite wilderness is not part of Alternative P (preferred alternative), the mere chance that the Regional Forester could pick and choose from various alternatives, poses a large threat to a master planned resort chosen and developed considering the managed risk potential. Right now, that forest is severely overstocked; ripe for disease, infestations and a catastrophic level fire with no chance of containment within its borders. The Flowery Trail Homeowners Association is a "Firewise, at-risk community". Property owners are committed to actively managing their properties by thinning, removing underbrush and unhealthy forest conditions to reduce their risk. If the Quartzite proposal for wilderness designation makes it into the final plan, these homeowners face even greater risk, since firefighting efforts within a wilderness designation is like trying to extinguish a house fire with a squirt gun.

This proposal for wilderness barely meets the minimum size requirement for consideration as an expansion. The shape of the area necessary to encompass 5000 acres is tortuous, contorted and unacceptable. It lies adjacent to Flowery Trail Road, 49 Degrees North Ski Area and an abundance of private land, all of which will be at risk due to no management for the foreseeable future. For this reason Stevens County also opposes changing the management designation from MA 7 to Backcountry. This area must be actively managed in order to ensure public safety, forest health and provide economic benefit to the region.

#### Kettle Crest

Stevens County is opposed to any Proposed Wilderness designation to the Kettle Crest area.

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This area does not have a shape profile to adequately provide a wilderness setting as outlined in the Wilderness Act of 1964.

Further, under the current use designation, it provides excellent experiences for back country use by both motorized and non-motorized recreationists as well as allowing for several successful grazing allotments to operate. The continued grazing on the public lands is necessary for forest health, fuel reduction, economic vitality for the county and it brings income back to the Forest Service .

Even the Kettle Crest Conservation Group states on their website that the Kettle Crest "...feels more like a wilderness that many crowded wilderness areas in the Cascades!" That would support the current designation that exists on the Kettle Crest.

#### Wilderness Summary

Stevens County will oppose expansion of wilderness on the Colville Forest for several and various necessary reasons.

Historically, the Colville has been considered a production forest and the addition of wilderness acres will not add to the enjoyable use, health, public safety, customs, culture and economic stability of Stevens County residents in particular or the populace in general.

When first enacted, wilderness designation was afforded to 9.1 million acres with another 5.5 million acres of "potential wilderness" to be reviewed and decided by the Secretary of Agriculture within fifteen years (by 1991). Today, wilderness designation exceeds 109 million acres nationwide; 3.6 million acres, or 7% of all land in Washington State. With Northeast Washington residents already suffering the major impact of nonproductive land, loss of tax base and increased risk to public safety, it hardly seems fair to further tailor a once healthy, productive forest to the "wilderness-experience seeking people". The current wilderness acreage contained in Salmo-Priest is adequate for current and future 'local needs'. Statistics do not show any substantial need for wilderness expansion and the risks associated with this designation are emergent and unacceptable.

The current Salmo-Priest Wilderness is under-utilized and does not enhance our local economy. Stevens County does not support the addition of more land that is forever taken out of management and will become a greater hazard to public safety.

#### Access/Road Densities

Stevens County is opposed to the inclusion of specific road density prescriptions as a desired condition of the proposed plan revision. While we recognize that the road network within current forest boundaries is an important focus, it is also very complex, interrelated and controversial. An arbitrary number for road density is not acceptable.

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The benefits of a robust road system that functions properly should be considered desirable and valuable for public safety, fire suppression, wildlife corridors, firewood and other gathering activities and customary uses. We believe roads and forest access can be properly addressed at a project level unconstrained by artificial blanket statements of desired densities. Prescriptive densities have no specific benefit to forest health, public safety or the customs, culture and economic stability of Stevens County and its 44,000 residents.

Given the restrictions on road construction in Wilderness, Backcountry Non-motorized and Backcountry Motorized designations a prescribed density of 1 mile per square mile in Focused Restoration and 2 miles per square mile in General Restoration areas, would require the elimination of many miles of roads and would occur primarily in the management areas most suitable to the economy, culture and customs of Stevens County residents. This is prohibitively restrictive and absolutely damaging to the long term viability of Stevens County.

Please delete all references to prescribed road densities in the plan document and leave road prescriptions to be accomplished in site-specific applications when determined by actual existing conditions.

#### Production Targets

Stevens County opposes a production target level of 61 million board feet. We support setting production goals for the overall health of the forest, the economy and the customs and culture of Stevens County. As scientific data emerges about the twenty-year drop in timber harvest, the direct connection between diminished harvest levels and unhealthy, fire susceptible forests

is proven. Proper production goals must not be set by budget constraints in a forest-wide plan; budgets can change dramatically from shifts in administration policy and should not be constrained during a 15-20 year life span of a forest plan.

An appropriate production goal would more accurately reflect annual forest growth, currently estimated at more than 100 million board feet . For this planned production to be beneficial to forest health and to the economy, culture and customs of Stevens County we deem it necessary to set production goals well above that minimum limit for the life of this plan. This would allow accelerated projects that would clear up problems of overstocking, infestation and disease that have put our forested areas at risk, including state and private ground adjacent to forest boundaries and help address the problem of water quantity in the Colville Basin. Washington State currently utilizes the sustainable harvest concept for state trust lands and USFS should look at adopting this process.

The law of trajectory dictates that in order to hit a distant target you must aim high.

#### Grazing Considerations

The Draft Resource Management Plan and the Draft EIS contain numerous alternatives and guidelines that, if misapplied, could seriously impact the FS grazing specialists and permittees

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ability to manage allotments. Even if the references are not included in the final version, their presence in the draft is distressing enough to require comment at this time. The following are only a sample of those which make one wonder about the future attitude toward grazing from the Forest Service perspective.

\*Line 97 We have identified wildfire exclusion, historic grazing practices, and historic timber harvesting as the principal factors resulting in increased live tree stocking levels, increased levels of mid and late seral species, and homogenization of spatial patterns. Hessburg 1994 (line 24873) is the literature cited. How does grazing increase tree stocking levels that would lead to insect and disease problems? How will that be applied at the allotment level?

\*Line 2855 Notwithstanding that the footnote related to this section repeatedly refers to guidelines, inserting standards concerning stubble height, utilization and streambank alteration removes a manager's ability to achieve allotment goals. The literature cited (Clary 2000, line 24554) appears to be misapplied in this instance because it also commits the FS to monitor conditions that it has no ability to supply manpower for. It is also too specific to be in a resource plan and is more appropriate to be considered in an allotment plan or project level planning. We would like this section removed.

\*Line 17979 On a positive note, the range report points out the flaws and potential impacts to grazing by including the ARCS-mod as guidance for permittees. The report also underscores the importance of grazing to the economy of area. Please consider the importance of this information. This is a FS Grazing Specialist report so should carry credibility with the Regional Forester in his decision making process.

#### Coordination

There are several responses to coordination items that were/are not included in the draft plan. Specifically, #28, #34, #36, #45, #46, #47 and #54 are changes that are referenced to be made between the "public" version of the forest plan and the "final" plan. This denies the public the opportunity to comment on known changes, thereby denying due process of the public for adequate input. This also denies the County adequate opportunity to correct any misstatements. (Reference Follow-up List received via email from Janet Thrasher, Executive Assistant to the Forest Supervisor/CNF concerning Coordination meetings with County Commissioners -

September 2015.)

#### Water Quantity

The Forest Service acknowledges this is a difficult subject, but fails to adequately address the issue. The Colville River Watershed suffers from low flows and a basin closure for new water and/or water for existing rights. This is due in large part to a lack of watershed management. It is unacceptable to simply state this is a "hard issue" and say it will be okay "if" we manage other things. This is not consistent with watershed management and watershed science. The Forest Service does not include the subject in the draft EIS and is lacking in the Plan. Please add

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to the EIS and add a section in Plan, adequately addressing water quantity and send them back out for public comment.

#### Specific Comments

Please include these specific comments for your record:

\*P4 line 97, places some responsibility on grazing practices for insect and disease conditions. Without science to support this claim please delete grazing. We would like to include reference to reduced commercial harvest levels, increased time, complexity and expense of NEPA and litigation avoidance strategies as main contributors to overstocked, infested forest conditions.

\*PS line 131, need to add a sentence acknowledging that any suggested expansion of wilderness area will exacerbate existing concerns over WUI fluctuations. Your last sentence makes no sense.

\*P25 line 640, please add a sentence addressing the need for increased active management as a tool to reduce the impacts of unplanned fire on air quality.

\*P35 line 892, references 40 acre opening limits w/o public notice. If USFS regulation allows a larger opening, please reference the largest allowed opening and rationale for the limitation.

\*P48 line 1257, we disagree that a 'no net increase' in road density conforms to good science or site specific, common sense treatment of key watershed protection. A better statement for forest-wide standard would reference road analysis as the determining factor for decision making and allow for professionals to do a proper job.

\*P62 line 1665, this section references mixed-use roads and we suggest that all system roads open to any motorized traffic be opened for motorized recreational use as those roads are not closed for hiking, horses, bicycles or any other form of conveyance.

\*P99 line 2762, this section should include treatment of insect and disease damaged trees and fuel reduction treatment to protect proper functioning of RMA's. The recent damage to riparian areas from fire in Eastern Washington forests makes this clear.

#### Economics and Social Systems

The economic impact analysis is flawed. It fails to give a clear picture of potential impacts to the local areas because it applies metrics at a county-wide scale. Economic analysis is a crucial part of any forest proposal and must be focused at the industry level and be precise. Please provide an analysis of the economic effects to the timber industry.

Analysis of effects for every alternative is filtered through a faulty lens and there is ample evidence of a predisposed bias because of this faulty lens. When the lens being used focuses on plant or animal species, and air and water quality, the impacts analysis for each alternative is

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evaluated by the degrading factors and will predominately be roads, harvest, grazing and recreation.

But what will occur if the lens is shifted and we analyzed the forest through the lens of fire danger due to overstocked, bug damaged and diseased forest stands? Would not roads, harvest, grazing and recreation activities be selected as benefitting factors? If economic benefit to surrounding communities were to become a primary evaluation tool, would this change the impact analysis significantly? Those of us living here think so.

We already know that current science and modern harvest techniques are being utilized daily by state and private land managers to create a wide variety of landscapes that are conducive to proper ecological functions and to economic benefit. Federal bureaucracy has become leviathan in its scope and Leviathan does not belong in the forests of America.

The Forest Service fails to include a small business impact statement. The planned revision must, to the maximum extent allowable by law, consider the local customs, culture and economic stability. The proposed revision fails to consider the impacts this plan will have on local infrastructure and the ability to manage the forest properly over the life of the proposed plan. We ask that that study become available for our consideration.

Respectfully submitted,  
BOARD OF COUNTY COMMISSIONERS

o  
Chairman Don Dashiell

5t\_  
Commissioner Steve Parker

BOCC:lld

Cc: Representative Shelly Short Pend Orielle County Commissioners Ferry County Commissioners

Enclosure(s) : Colville NF Plan Revision - Follow-up List from County Commissioners Meetings September 2015  
- How the Comments and Suggestions were Addressed in the Revised Forest Plan

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Nettie LaDoux

From: Sent: To: Subject:

Wes L. McCart  
Tuesday, July 05, 2016 9:27 AM Nettie LaDoux  
FW:

Attachments: 2015Dec17-CoCommissionerComments .docx

FY I

From: Thrasher, Janet - FS [mailto:janetthrasher@fs.fed.us] Sent: Friday, April 29, 2016 1:46 PM  
To: skiss@pendoreille.org; Wes L. McCart <wmccart@co.stevens.wa.us>; mblankenship@co.ferry.wa.us;  
6jment@gmail.com; Commissioners <Commissioners@co.stevens.wa.us>  
Cc: Dillon, Amy L -FS <adillon@fs.fed.us> Subject:

Colville NF Plan Revision  
Follow-up List from County Commissioner Meetings September 2015

Janet Bach Thrasher  
Executive Assistant to the Forest Supervisor  
U.S. Forest Service Colville National Forest Supervisor's Office  
p: 509-684-7163  
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7/5/2016

Colville NF Plan Revision

Follow-up List from County Commissioner Meetings September 2015

How Comments and Suggestions were Addressed in the Revised Forest Plan

During meetings with Ferry, Stevens, and Pend Oreille County Commissioners on September 10, 11& 17 of 2015 the following items were determined to need further discussion and possible changes to the current version of the revised forest plan. The ID team discussed the comments and suggested changes and the following list displays how the requests were addressed or why they were not addressed.

Typos and grammatical errors identified by the commissioners have been addressed, but those individual items are not listed here.

1-Request: Chapter 1 Introduction - add AUMs across allotments for the entire forest .

Response: Introduction pg. 3 - "Over the most recent 10-year period , the Forest has supported an average of 29,500 animal unit months of forage for cattle grazing. "

2-Request: Chapter 1- Ecosystem sustainability : Add verbiage about balance between two competing things (lines 82-88).

Response: Introduction pg . 4 - this was reworded related to balance between county & Forest Service (FS) goals. "There is a need to find balance between demand for social and/or economic use and maintaining functioning aquatic and terrestrial resource habitats over the long-term."

3-Request: Chapter 1-Timber production: Add "historic" to timber harvest for clarification.

Response: Introduction pg. 4 - "historic " added for clarification .

4-Request: Chapter 1-Timber production: add a clarifying statement to distinguish between mill generating jobs and the other ancillary part, to help paint the picture.

Response: Introduction, pg . 3 - added for clarification "Approximately 10% of the annual volume sold by the Forest is non-commercial material such as firewood or biomass."

5-Request: Chapter 1-Timber production: include timber offered for sale, but not sold.

Response: This information won't be included in the draft plan. Volumes sold and harvested by fiscal year is available, but volume offered is not available in the FS records

6-Request: Chapter 1-Timber production: be clear about the suitability and the reasoning behind choices made for land management allocations (how it ties to constraints).

Response: This is currently in the vegetation report, DEIS and project record. This may need wording change between draft & final .

7-Request: Chapter 1- Fire Management: would like the plan to incorporate the benefits of fire

Response: Introduction , pg. 4 - "fire plays an important role...." paragraph added

Changes made to Revised Forest Plan Based on Comments from County Commissioners January 2016

8-Request: Chapter 1-Overlapping management direction - consider changing the wording in the plan, to provide more clarity on what that actually means

Response: Forest-Wide Direction - Introduction, pg. 23, MA Desired Conditions - added statement "Utilizing the most restrictive plan direction provides guidance and protection for resource-based or socially sensitive functions provided by National Forest system lands."

9-Request: Chapter 1-Plan Structure (pg. 13) - include something about maps being a plan component.  
Should be stated that maps are part of the plan.

Response: Plan Structure, pg. 14 - "maps" was added as part of the Plan Set of Documents

10-Request: Chapter 1- Roles & Contributions/International Level - Hydro power production section (pg. 19)  
- Grand Coulee is not a Columbia River treaty dam, make sure treaty language is accurate. Need clarification to make sure Grand Coulee is not part of the treaty

Response: Roles & Contributions/International Level, pg. 19 - statement regarding the Columbia River Treaty removed from paragraph.

11-Request: Chapter 1-Roles & Contributions/State & Local Level - Diversity of wildlife species (pg. 21)  
- need reference for statement about "home to 65% of WAs white tailed deer population."

Response: Roles & Contributions/State & Local Level, pg. 21 - reworded for clarification "Northeast Washington harbors the largest White-tailed deer populations in Washington. White-tailed deer provide an important recreational, economic, ecological resource, contributing to local economies by attracting hunters to the area. The Washington Department of Fish and Wildlife identifies two areas that are managed for white-tailed deer that include portions of the Colville National Forest. The Okanogan Highlands is comprised of 25% national forest land and the Se/kirks is 26% national forest land."

12-Request: Chapter 1- Roles & Contributions/State & Local Level The state fish and wildlife plan states that elk are nonnative, that the state introduced .

Response: Forest Service will follow up with WDFW to make sure WDFW elk plan wording and the FS wording in the revised plan reflect same information. Based on further review, statements in the draft plan are correct, since elk have historically occupied areas within northeast Washington. The following is wording from the 2014 Elk Plan.

Archeological evidence indicates that elk were once widely distributed in eastern Washington. By the late 1800's year-round subsistence and commercial hunting eliminated Rocky Mountain elk in Washington, except for possibly some remnant animals in the Blue Mountains.

The Selkirk elk herd is primarily a reintroduced elk population, with reintroductions originating from Montana in 1915 and subsequent augmentations in 1932, 1969, 1970, and 2000. The Spokane Tribe of Indians and the Confederated Tribes of the Colville Indian Reservation have also translocated elk to their respective reservations within the last 25 years. (B.J. Kieffer, Spokane Tribe of Indians, personal communication; S. Judd, Colville Confederated Tribes, personal communication). Several translocations in British Columbia have reestablished elk north of the international border. These combined efforts have contributed to a general range expansion of elk in northeastern Washington.

The elk population prior to the 1970's was primarily confined to northern Pend Oreille County. During the 1970's and 1980's elk expanded into northern Spokane and Stevens Counties.

Beginning in the 1990's significant expansion of elk numbers and distribution took place within Ferry, Lincoln, Whitman, and southern Spokane Counties. (Washington Department of Fish and Wildlife. 2014 . Selkirk Elk Herd Plan. Wildlife Program. Washington Department of Fish and Wildlife, Olympia. 59pp).

13-Request: Chapter 2 - Forest-wide direction (pg. 22) - confusion about forest-wide and what that means

Response: Current wording: Forest-wide desired conditions apply only to National Forest System lands and are measured at a forest-wide scale unless otherwise stated.

This can be clarified in final revised plan to state desired conditions apply only to Colville National Forest system lands.

14-Request: Chapter 2 - Forest-wide direction (Bottom of section, design criteria) - confusion about overlapping direction.

Response: Forest-Wide Direction - Introduction, pg. 23, MA Desired Conditions - added statement "Utilizing the most restrictive plan direction provides guidance and protection for resource-based or socially sensitive functions provided by National Forest system lands."

15-Request: Chapter 2 - Air Section Introduction (pg. 26) - protect from adverse effects of air pollution, how? What does it mean?

Response: Air introduction, pg. 26 - added the following for clarification "The U.S. Forest Service is responsible for protecting national forests and surrounding areas from the adverse effects of air pollution that are sourced from Forest Service land. This is predominantly accomplished by working with Washington State Department of Natural Resources Smoke Management to plan prescribed burning when weather conditions would prevent smoke impacts from exceeding established air quality standards."

16-Request: Chapter 2 - Air Section - How do you protect the forest from our (county) nonattainment status?

Response: Air introduction, pg. 26 - same as previous request.

17-Request: Chapter 2 - Air Section - Need to include Tri County Health in public notifications of prescribed burning. Include that as a standard practice in burn plans.

Response: This is not addressed at the Forest Plan level. This ties to project-specific operational activities, not specific to what is listed in the Forest Plan. District and forest fuels specialists are now submitting email notifications of burn plans to Matt Schanz, Environmental Coordinator - Tri County Health, mschanz@netchd.org, 509-684-2262

The following responses to soil comments/questions (#18-24) are summary of discussion held Oct. 23, 2015, between Jason Jimenez and Commissioner McCart.

18-Request: Chapter 2 - Soil Section - want to see the directions detailed or referenced for coverage of soil recovery/restoration post-fire and other issues with soil standards and productivity.

Response: This is not addressed at the Forest Plan level. These issues are dealt with through BAER, Regional, and Washington Office Direction.

19-Request: Chapter 2 - Soil Section Discussed the inclusion of water quantity evaluations and determinations of managing the landscape for water quantity

Response: the science was not clear with regards to land management and water quantity. It is very difficult, time expansive, and the models are not very good for those determinations. The Forest Plan directs for restoration of landscapes and that management makes sense moving forward.

20-Request: Chapter 2 - Soil Section - The commissioner had several description and reference issues with the soil document, due to writers being soil scientist and not being completely detailed, he said he would forward those issues to Amy.

Response: These questions/comments are listed as request #21, 22, 23, and 24

21-Request: Chapter 2 - Soil Section Page 27, table 1: in the section addressing water absorption & storage, clarify that the indicator references 'volcanic' ash cap so there is no misunderstanding that this relates to ash resulting from prescribed fire or wildfire

Response: FW-DC-SO IL-01. Soil Productivity and Function, Table 1 pg. 27 - added "Volcanic" Ash Cap.

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22-Request: Chapter 2 - Soil Section Page 28, table 1: in the section addressing nutrient availability, clarify that the desired condition for "normal range of characteristics for the site" is based on the information found in the County soil surveys.

Response: FW-DC-SOIL-01. Soil Productivity and Function, Table 1 pg. 28 -footnote added "Soil characteristics are defined by Natural Resources Conservation Service SSUGRO (Soil Survey Geographic Database) soil data layer. 11

23-Request: Chapter 2 - Soil Section Page 29, FW-GDL-SOIL-01. Total Soil Resource Commitment - There is maximum level of 5% of the forest listed in this guideline. Where are we now?

Response: This number has not been determined yet. Should have answer by end of May.

24-Request: Chapter 2 - Soil Section (general) - per discussion with Jason Jimenez, Commissioner McCart understands that a lot of the direction in the draft plan is based on Forest Service regional standards. He would like them referenced and included in the information available to the public so they can be used in conjunction with the draft plan for providing input/ comment.

Response: A copy of the Region 6 Soil Quality Standards and Guidelines is included in the project record as an appendix to the soil report.

25-Request: Chapter 2 - Vegetation introduction, Vegetation within WUI section - there is a footnote #3 for (NWCC 2012) - is missing and needs to be added.

Response: Vegetation introduction, Vegetation within WUI/ section, pg. 31 - footnote added "National Wildfire Coordinating Group.11

26-Request: Chapter 2 - Vegetation FW-GDL-VEG-01- some confusion about the 100-ft vs 50-ft buffers, doesn't make sense.

Response: FW-GDL-VEG-01. Threatened, Endangered and Sensitive Plant Species - Disturbance in Occupied Habitat, pg. 38 - after follow-up with Forest Botanist, changed all buffers to 100-foot.

27-Request: Chapter 2 - Vegetation FW-DC-VEG-02 - wording seems off - May need to define what the characteristic role is, provide more clarity to language

Response: FW-DC-VEG-02. Insects and Diseases, pg. 32 - reworded for clarity, changed "characteristic" to "natural (endemic)" role.

28-Request: Chapter 2 - Vegetation FW-DC-VEG-03. Human Disturbance - in last sentence consider acknowledging DCs may sometimes be impaired but will mitigate.

Response: Not changed. IDT needs to discuss this since the desired condition may not be the place for this. Discussion of effects would be in the EIS. IDT will look at this between draft & final documents.

29-Request: Chapter 2 - Vegetation FW-DC-VEG-03. Human Disturbance - if fire can move us to the DCs it can play a role. Need more clarity here.

Response: Unclear exactly what the Commissioners were looking for. The referenced desired condition currently includes wild/and fire use as one of the human activities.

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#### Changes made to Revised Forest Plan Based on Comments from County Commissioners January 2016

30-Request: Chapter 2 - Vegetation FW-STD-VEG-04. Timber Production - make it clear what the components are, need to clarify and define this better for general public. What are suitable lands vs other areas.

Response: Suitability is defined in the glossary {{EIS page 765}}

31-Request: Need clarity on what regulated timber harvest is.

Response: FW-STD-VEG-04. Timber Production, pg. 37 - footnote added with definition "Regulated timber harvest means scheduled, periodic commercial harvests."

32-Request: Chapter 2 - Vegetation FW-STD-VEG-09 . Harvest Systems - need some clarity here, sounds like there is nothing on the forest that is not feasible to log

Response: Not changed. This is standard wording from regulation. Suitability is defined in the glossary (EIS page 765). How suitability is determined is in the vegetation specialist report.

33-Request: Chapter 2 - Vegetation FW-OBJ-RFP-01. Planned Sale Quantity - commissioners would like the LSY added to this

Response: The discussion related to long-term sustained yield (L TSY) is located in chapter 3 of the DEIS and in

the vegetation specialist report. L TSY assumes that lands suitable for timber production are in the desired future condition. We would not be meeting the 1982 rule for a non declining flow of timber if we harvested at the L TSY level, since the forest is not within the desired

condition yet. This objective does not prohibit the forest from offering timber volume greater than the number listed in this objective.

34-Request: Chapter 2 - Water Resources - Water quantity. Discussed a canopy density study and having a DC to meet a target (60%) for canopy density. Desire a water quantity DC in the revised plan.

Response: Kate met with Commissioner M cCart on 10/6/2015.

\*Kate will work on language to better integrate water quantity into specific forest plan components-working with the RO and IDT on this-potentially a desired condition for canopy cover for final EIS and plan.

\*Kate received spatial aquifer data from Stevens County. She will include an analysis of aquifers overlain with management areas in the hydro analysis for the FEIS.

\*M r. M cCart will continue to search for Colville-specific reference which gives a canopy cover % {{60%}} to maximize water yield.

\*M r. M cCart will look at how the Colville River Water Resource Management Board plans addresses potential limiting factors to water quantity

35-Request: Chapter 2 - Water Resources - FW-DC-WR-12 - concern that DCs are not just for fish

Response: FW-DC-W R-12. Aquatic Threatened, Endangered, and Sensitive Species, pg. 46 - added "and/or" other key life history requirements, for clarity.

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36-Request: Chapter 2 - Water Resources - FW-OBJ-WR-02. Aquatic Invasive and Non-Native Species.

This is in regards to aquatic weeds, all of which are unacceptable

Response: This needs additional work to determine if there is better way to focus the objective for treatment of aquatic invasive species. This wording does not preclude doing more than what is listed.

37-Request: Chapter 2 - Water Resources - FW-OBJ-WR-03 - concern about wording here. For clarification, consider adding trails, maybe move livestock into a different sentence, change illegal to unauthorized

Response: FW-OBJ-W R-03. General Watershed Function and Restoration, pg. 48 - added "trails" to statement and changed "illegal" to "unauthorized" off-highway vehicle use.

38-Request: Chapter 2 - Water Resources - FW-OBJ-WR-07 - discussion of 250 acres in regards to streams is confusing, add clarification since streams are linear

Response: FW-OBJ-W R-07. Key Watershed Range Infrastructure Improvements, pg. 48 - changed to "over 250 acres" for clarification.

39-Request: Chapter 2 - Wildlife - FW-DC-WL-13 - calculates the zone of influence of human activities

Response: FW-DC-W L-13. Deer and Elk Habitat-Human Activities, pg. 54 - reworded for clarity "Winter ranges for deer and elk provide a high level of habitat effectiveness by having less than 30 percent of the winter range within a zone of influence of an open road or motorized travel route. Summer ranges provide a moderate level of habitat effectiveness by having less than 50 percent of the summer range within a zone of influence of an open road or motorized trail."

40-Request: Chapter 2 - Wildlife - FW-GDL-WL-07 (pg. 57) - regarding expansion of recreation and

administrative facilities (campgrounds, trailheads) - wording needs some clarification

Response: FW-GDL-W L-07. Canada Lynx-Recreation and Administrative Facilities within Identified Lynx Habitat, pg. 58 -for clarity, added "Expansion or new construction of recreation facilities and administrative facilities ..."

41-Request: Chapter 2 - Wildlife - FW-GDL-WL-14 (pg. 58) - references DCs in Veg section, add table number here (table 5, pg. 32)

Response: FW-GDL-W L-15. Fire-Dependent Surrogate Wildlife Species, pg. 59 - added "Table 5" for reference.

42-Request: Chapter 2 - Access System - Kate - there are roughly 3 mi/mile<sup>2</sup> on average currently on the forest. (per phone call between Commissioner McCart & Amy Dillon [9/29/15]: Commissioners remember hearing a different number during meeting. Please double-check with Kate as to correct number that should be here.)

Response: Average road density across the forest is 2.5-3 miles of N FS road/square mile of N FS lands

43-Request: Chapter 2 - Access System - FW-DC-AS-01- desired conditions for the access system - wiii look at beefing up the safety aspect.

Response: Not changed. Safety is already part of Forest Service policy, so we are trying not to repeat existing direction in the plan .

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44-Request: Chapter 3 - National Scenic Trails - There may be a holdover in the revised plan from the Pacific Crest Trail when we were still combined with the Okanogan-Wenatchee. If so, we could move mineral entry to the "may authorize" section in the table.

Response: Per Becky Blanchard (RO PNT PM F)}, the PNT corridor has not been withdrawn from mineral entry. When the plan is signed the corridor should be shown as "May" be Suitable for mineral leasable, locatable, and surface occupancy. This means that in the FEIS/final plan, the trail corridor will show the three mineral suitability rows as "may authorize".

45-Request: Chapter 3 - Backcountry & Backcountry Motorized - The backcountry feeling is semi primitive - so may be able to highlight the DC in terms of what one can expect, maybe the signing piece

Response: Amy missed getting this clarification into the version that went out for public comment.

Additional wording will be added to the final revised plan.

46-Request: Chapter 3 - Backcountry & Backcountry Motorized - beef up the backcountry motorized DC, even though the rest is in there, just need to drill down through the plan to find all the places

Response: Amy missed getting this clarification into the version that went out for public comment.

Additional wording will be added to the final revised plan.

47-Request: Chapter 3 - Backcountry & Backcountry Motorized - Will try to make this clearer in the plan, do a better job of distinguishing between BC & BCM so it is less confusing.

Response: Amy missed getting this clarification into the version that went out for public comment.

Additional wording will be added to the final revised plan.

48-Request: Chapter 3 - Riparian Management Area - MA-DC-RMA-01- update wording from natural to functional. A riparian ecosystem that is functional.

Response: MA-DC-RMA-01. Composition, pg. 94 - changed wording to "Riparian management areas consist of native flora and fauna in a functional system and a distribution of physical, chemical, and biological conditions appropriate to natural disturbance regimes affecting the area."

49-Request: Chapter 3 - Riparian Management Area - MA-STD-RMA-01 - in footnote 6 - consider water quantity in this issue, maybe not here but ties to properly functioning condition

Response: This is now footnote 8. Water quantity addressed in response to request #21, 22, 23, and 24.

SO-Request: Chapter 3 - Riparian Management Area - MA-STD-RMA-09 - need to allow for point crossings for watering facilities to harmonize those, seems to be in conflict with this standard

Response: Not changed. Plan revision team could not find a way to reword this standard to include specific wording for point crossings and still maintain original intent. Rewording of these standards beyond their original intent needs to be coordinated with the Regional Office.

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SI-Request: Chapter 3 - Riparian Management Area - Wildland Fire - Pg. 97 RMA standards - consider adding fire access and future suppression needs for human health and safety

Response: MA-STO-RMA-12 and MA-STO-RMA-13, pg. 96 - Not changed. Plan revision team could not find a way to reword this standard to include specific wording for point crossings and still maintain original intent. Rewording of these standards beyond their original intent needs to be coordinated with the Regional Office.

S2-Request: Chapter 3 - Riparian Management Area - MA-GDL-RMA-09. Permitted Grazing Management - Greenline Vegetation Areas The commissioners would feel better if there was no stubble height number in the plan

Response: MA-GDL-RMA-09. Permitted Grazing Management - Greenline Vegetation Areas, pg. 98 - not fully addressed at this time since this is based on region1orest discussions. We expect to update grazing plan components between draft and final based on coordination with FS regional office. However, footnote #10 was added to explain the site-specific analysis tied to this guideline.

S3-Request: Chapter 3 - Riparian Management Area - MA-GDL-RMA-19 - confusion as to when water bar/sediment control work on fire lines would occur -during or after a fire? Need to add clarifying language

Response: MA-GDL-RMA-19. Wild/and Fire and Fuels Management - Fire Line Construction, pg. 100 - added "Water bars on fire lines..."for clarification.

S4-Request: Chapter 3 - Riparian Management Area - MA-GDL-RMA-20 - add 'non-emergency' for wildfire (related to state hydraulic project approval).

Response: Not changed. This change was missed before publishing the draft revised plan. Will be reworded for final revised plan.

SS-Request: Chapter 3 - Recommended Wilderness - Would there be any options to protect the watershed if there was a massive insect infestation, whether it was roadless or wilderness? Would any management activity occur?

Response: Direction related to this concern/question is located in the Forest Service Manual. Any treatment in wilderness would need to be designed to preserve the wilderness character and would be approved at the RO/WO level. The use of pheromones (like verbenone for mtn. pine beetle) is one potential option.

For an IRA, the same process we used during the fires this summer could be used to request permission to implement treatment in an IRA to help protect a watershed. We wouldn't have to worry about wilderness character, but we do have the no new roads and no commercial timber removal components of the 2001 Roadless Rule. Again, an RO/WO decision.



For recommended wilderness (that does not overlay an IRA) the decision can be made at the Forest/ RO level. The forest plan would require us to protect the wilderness characteristics of the recommended wilderness, so the management options would be limited to those that might be acceptable in designated wilderness. There would also be the option to amend the forest plan and change the recommended wilderness boundary prior to it being designated as wilderness by Congress. This would allow other management options in the portions of the recommended wilderness that was not in an IRA.

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56-Request: Plan Appendices - Draft Plan Appendix B - Table on pages 4 and 5 - salvage is not checked, need to add explanation of why table is there

Response: Table B-2 - Modelled Vegetation Treatments by Management Area and Vegetation Type, pg. 5 - added explanation before the table "shows what treatments were proposed and included by management area for modelling vegetation changes related to the revised land management plan."

57-Request: Plan Appendices - Draft Plan Appendix B - Request to add local government coordination to Appendix B.

Response: Appendix B Social and Economic Systems, pg. 9 - added bullet "Coordinate management plans and activities with state, local, and Tribal governments. "

58-Request: Plan Appendices - Draft Plan Appendix B - Hydrologic function - ground water in that category, hard to quantify.

Response: Appendix B Aquatic and Riparian Ecosystems, pg. 6 - added "ground and surface" hydrologic function.

59-Request: Plan Appendices - Appendix E Scenic Integrity Objectives - the map is small and needs explanation.

Response: Appendix D Scenic Integrity Objectives, pg. 1-3 - narrative added, and table 0-1 Scenic Integrity Objective Definitions added.

60-Request: Other - Special Interest Area (SIA): change the recommended wilderness on the Kettle Crest in Alternative P to a special interest area.

Response: Revised Forest Plan and DEIS Alternative P - now include the 82,800 acre Kettle Crest Recreation Special Interest Area.

61-Request: Other - Wilderness Recommended: the commissioners would like more detail/clarification on how designation as wilderness could affect management of cattle allotments

Response: Direction related to permitted grazing in designated wilderness is located in the 1964 Wilderness Act and Congressional nationwide guidelines and specific statements of legislative policy. There are a couple of areas where there could be a change in the current management of cattle allotments. The first is that access for minor salt placement, fence repairs or checking on fence lines or other range improvements would likely change from motorized (if that is how they are currently done) to non-motorized. Second, while maintenance of range improvements is permissible, motorized equipment for maintenance activities would only be allowed where practical alternatives do not exist. This statement could affect the use of chainsaws to clear fences since the only examples given in the Guidelines are for backhoes, trucks and specialized equipment. Finally, new improvements would be limited to those needed for resource protection and not to accommodate increased numbers of stock.

62-Request: Other - Emergency Situations are outside the realm of the plan. Add a simple disclaimer in the plan to address that, address up front

Response: Not changed. Any wording added related to emergency situations needs to be consistent with regional and national direction.

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63-Request: Other - Anywhere "managing human activities" is mentioned in the plan is a red flag for Commissioner McCart. Consider rewording the locations where this terminology shows up.

Response: Chapter 2, Forestwide direction, Wildlife Habitats, Surrogate species, pg. 51 - removed "primarily managing human activities"; FW-DC-WL-13. Deer and Elk Habitat-Human Activities, pg. 54 - removed "human activities" from narrative.

64-Request: Other - Commissioner Blankenship discussed the 2006 Ferry County Travel Management Plan given to the FS and would like to see it recognized in the new plan.

Response: Documents were received by Eric McQuay and are included in the project record.

65-Request: Other - Send the glossary to Polly Coleman (Stevens County Clerk of the Board) for distribution.

Response: Terms discussed during meetings with County Commissioners in September were added to the Glossary. Amy Dillon emailed the Glossary to Polly Coleman on 9/12/2015 for distribution to the commissioners.

66-Request: Other - Amy will send the CER to all commissioners

Response: Amy Dillon emailed the Draft Analysis of the Management Situation document to the three county commissioners on 10/8/2015.