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Title: Clerk of the Board
Comments: Forest Plan Revision Comment Letter

Attached is the Forest Plan Revision Comment Letter from the Ferry County Board of Commissioners, hard copies will follow in the mail.

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FERRY COUNTY

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July 5, 2016

Colville Forest Plan Revision Team 765 South Main St.
Colville, WA 99114

Re: Forest Plan Revision

Amanda Rowton, Clerk of the Board
con1n1issioners@co.fen

The Ferry County Board of County Commissioners (BOCC) submit the following comments to the Colville National Forest Service (CNF) for the draft Forest Plan Revision (FPR).

The BOCC has participated in the current planning process from the beginning in 2003. Throughout this process our constituents and the BOCC have been very clear and consistent regarding local needs. The thirteen year long process has not changed the resolve of the BOCC nor has the citizens of Ferry County. The FPR and map alternative presented with approximately 50,000 acres of wilderness recommendation is a disappointment to the BOCC. Wilderness recommendation for the sole purpose of appeasement of the professional environmentalists is not science based forest management. The wilderness recommendation is not responsible management and certainly not beneficial to local area.

Wilderness has a place in forest management however that said, Wilderness is only of value if in fact it actually has quality characteristics as originally defined in the Wilderness Act of 1964. The CNF has experienced numerous reviews for wilderness existence and each time the lands within Ferry County did not qualify. Federal Wilderness Act of 1964 and subsequent reviews; 1972 Roadless Area Review & Evaluation (RARE #1), 1979 Roadless Area Review & Evaluation (RARE #2) and the 1984 Washington State Wilderness Act did not identify any wilderness in Ferry County.

- * The forest plan revisions alternatives fail to meet Ferry County's economic needs
- * Fails to meet local management needs
- * Reduces recreational opportunities
- *Increased trail maintenance costs
- *Increases grazing costs

- *Limits access for fire fighters and emergency responders
- *Eliminates forest health management strategies
- *Prevents habitat enhancement for wild life and endangered species

The BOCC has questioned the Inventoried Roadless Review (IRA) process from 1990's to the present time. Members of the current BOCC participated in a Colville National Forest public meeting at the college in Colville, Washington August of 2005. The CNF presented information at that time indicating several changes within the Ferry County portion of the CNF IRAs. The CNF changes were to recommend dropping two IRAs (failed to meet criteria) and adjusting the boundaries of others (to meet criteria) for a net loss of acres. This presentation was given after the CNF's review of the IRAs. The Ferry County

BOCC never had an opportunity to participate in any renewed analysis of the IRAs.

The addition of Potential Wilderness Areas (PWA) added to the plan after 2005 IRA reviews, apply policy in a very broad scope. Many of the PWA additions have been proven to contain roads, key trails and even some with logging evidence. The BOCC and our citizens believe there have been decisions made regarding IRAs and PWAs that were made as conciliatory actions. Once again the BOCC believes those actions are not scientific nor in the best interest of the local region. The application of the policy or guidelines defining these PWAs fail to consider local Economics, Customs, Culture and Heritage and would be in conflict with Public Law 96-354 "Regulatory Flexibility Act" and the intent of the act. The BOCC asks that the new PWAs be removed from the plan and be managed for the local area benefit. Access to the PWAs has been part of the Custom, Culture and Heritage of Ferry County aiding in the livelihood of many citizens.

Regarding the possible Wilderness Designation on approximately 50,000 acres of the CNF within Ferry County. Ferry County citizens that have for many decades (maybe a Century) used the area in question. Users have reported to the BOCC a number of reasons the Kettle Crest does not qualify as a candidate for wilderness designation. First it has all the evidence of man's presence from the start to end of the constructed and reconstructed trail. Repairs to the trail have been completed with chain saws, trail reconstruction with excavators and other common management tools. There is a warming hut (cabin) so in demand you need reservations to use it. There is nothing wrong with anything we have listed but a trail this well constructed removes any notion this is wilderness. The CNF acknowledges the lack of Wilderness quality in their own review of the PWAs and IRAs. The CNF acknowledges the loss of opportunities that Wilderness designation will bring with PWAs and IRAs review statements; "The Profanity and nearby Bald Snow PWAs provide one of the best opportunities for wilderness-oriented recreation on the Colville National Forest, but at the expense of displacing other well-established and emerging uses", "however, use of this area has been gaining in popularity by mountain bikers with much of the use original British Columbia. These users would be displaced with Wilderness designation" these comments taken from the CNF assessment of the Profanity PWA document.

The Kettle Crest is truly a back country experience yet the sound from state highway and the lights visible from the communities east and west of the trail, remove that sensation of solitude. Profanity PWA/IRA does not meet the original criteria of 1964 Wilderness Act and to recommend it for wilderness is not required by law, even current policies do not require Wilderness designation.

The BOCC is cognizant of special areas within our County that do not meet the criteria for wilderness designation but need a management designations to protect current back country conditions from changing. The BOCC believes a Special Interest Area with recreational emphasis would be the best management tool for the Kettle Crest.

The fact that there were numerous different maps (alternatives) with significant differences would indicate the proposed forest plan is not based on science or specific law. The FPR clearly is not based on science, the testimony of the Ferry County citizens, or the input of the local governments in which the CNF resides.

The BOCC agrees with input by the local user groups as a need for more access, more recreation and more commercial timber harvest at the many community meetings for FPR. The testimony has never wavered from 2003 through 2016 more access as the leader, more recreational opportunities and more jobs from timber production. A former CNF Supervisor, Rick Brazel conducted an exercise call "Proof of Concept" a process to

prioritize fund expenditures. The needs that topped the proof of concept list were access, recreation and timber harvest. The FPR clearly provides for the opposite direction, recommending fewer roads and limited timber harvest. The plan places more emphasis on restoration without addressing long term timber production. The BOCC's concern here is the failure of the CN F to recognize the negative economic impact this action would have on the local economy.

Wilderness designation would eliminate mountain bikes from a trail purported as a premiere mountain bike experience, reducing economic activities in Ferry County. Wilderness Designation reduces the recreational opportunities and blocks many effective management tools from being utilized in those areas. Revenues for forest management is insufficient to properly manage the CN F currently, so why would creating areas that require more effort and funding be desirable? Wilderness designation is the exact opposite direction the BOCC expects the FPR to take our County in the future.

The FPR is a document that does not meet the needs of forest health, riparian recharge, endangered species, and wildlife habitat, much less the Customs, Culture and Heritage of Ferry County. The FPR reads as if it were created to validate and continue the current management of the CNF as we all know to be less than acceptable. Harvest goals within the FPR are far below the forest growth rates and do not compensate for the failed harvest goals (back log of harvest) of the 1988 plan. The DBH of 21" is not suited for site specific management of the Colville National Forest. The 21" DBH has prevented forest restoration. This size limitation should be removed and local management should be allowed to determine the needs for forest management. Some of these needs are:

- *1988 Harvest levels were not achieved

- *For forest health, at least 80 million board feet annual harvest

- *Over inventory has resulted in

- Water quantity reductions

- Loss of wildlife habitat

- *Increased pest and disease

- Loss of economics

Grazing is a part of our Agricultural Lands of Long Term Commercial Significance in the Ferry County

Comprehensive Plan. Grazing allotments are essential to the stability of the local ranches. Management of the Grazing Allotments should include the economic viability in addition to environmental concerns.

Road Density recommendations should be all inclusive and formulated through the travel management plan with consideration for local needs:

- *Recreational needs

- Motorized

- Non-motorized

- Hunting and fishing

- Camping

- *Harvest needs

- Berry pickers

- Wood cutting

- Logging

- *Emergency response

- Law enforcement

- Fire response

- Search and rescue

The Ferry County Board of Commissioners would like to see the following changes to the Forest Plan Revisions:

- *Forest health improvement oPest control

- Disease control

- *Increased harvest

- Public wood cutting

- Preplan for fire/wind salvage oCommercial logging

- *No new wilderness

*Removal of all PWAs

*Protect critical infrastructure as outlined in the Ferry County Fire Protection Plan

*Inventoried Roadless Area (IRA) review revisited

*No loss of grazing opportunities

*Local Economic strategy addressed

*Water quantity and quality increased

*More recreation access

*Kettle Crest Trail area designated as a Special Interest Area for recreation

The Colville National forest covers over 500,000 acres and has a significant impact on the county. The Ferry County Board of Commissioners asks that you take our comments into consideration for the economic, health, safety and welfare of the Ferry County residents.

Very Respectfully,

CC: Rodney Smolden, James Pena, Mike Herrin & Josh White