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Comments: Comments on Colville National Forest Plan Revision

Attached are my thoughts and comments. Thank you for the time and effort you all have put into this project. I appreciate the opportunity to comment.

Just as an FYI, I tried to submit my comments using the CARA system online and I was unable to do so. I received the following error

Respectfully,

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I 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. I appreciate the extraordinary effort by the Colville National Forest to accomplish this complicated and essential project in a timely fashion since undertaking the project in 2014.

Please accept these comments in a constructive manner. Portions of my comments are directed to policy issues that may have been set by the region (Region 6) or the Washington DC office of the Forest Service. Other comments are made regarding the specifics of literature citations and assumptions thereof in the DEIS. Further comments are made relative to the interpretation by the Colville National Forest planning team of guidance suggested by the Northeast Washington Forestry Coalition (NEWFC) as a basis for Alternative B.

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

I 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. I 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. I 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. I 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. The plan should clearly state the number of acres, miles of roads, stream miles that are in need of restoration, how many years restoration would take at the current budget, and what the consequences of that time frame would be in terms of impact to resources.

The demonization of roads with a broad brushed approach will not result in reaching stated objectives. An adequate transportation system is essential for protection, management, transportation of commodity products (restoration), and adequate recreation objectives. NEWFC (for example) has been and continues to be sensitive to the issues of excessive road construction, the cost of road maintenance, and the affects of excessive roads on wildlife, hydrology, and fisheries. I do not understand how it is possible to protect the forest adequately through fire patrol and suppression activities or to manage the forest with the targeted one-mile of road per square mile in focused watersheds, or two-miles of roads in the general restoration area. There is inadequate publication of analyses (in the DEIS) on the timeliness of response to wildfire ignition and the cost of more expensive logging methods including helicopter logging, and long-line cable logging due the lack of adequate infrastructure (roads). The proportion of lands to be categorized as structural stage six and seven as a desired future condition within the various habitat types seems to be excessive. I recognize that the historical range of variability of structural stage six and seven is quite wide (10% to 40% in late open northern rocky mountain mixed conifers and 40% to 60% in late open Douglas-fir, DFmx:LO1 are 10% to 40% single story, DFmx:LC2 late closed greater than 60% multi-story). The modeling based on an average of the historic range of variability seems arbitrary in light of the current acceleration of forest health problems and the increased rate of uncharacteristic wildfire. It would seem logical to trend towards the lower proportion of structural stages six and seven within these plant association groups since broad scale LOS may not be sustainable in the CNF region. There are questions regarding the accuracy of historic range of variability and ponderosa pine, and mixed conifer forests in Western North America ("average stand age from forest inventory plots does not describe historical fire regimes in ponderosa pine and mixed conifer forests in Western North America", Jens, Stevens, et al May 19, 2016, dx.doi.org). I suggest that this publication and "Tamm Review: Management of Mixed Severity Fire Regime Forest in Oregon, Washington, and Northern California" should be reviewed in conjunction with other data utilized during the construction of the Colville National Forest DEIS. This article can be found at Forest Ecology and Management Volume 366, 15April2016, pgs 221-250, authored by Paul F. Hessburg, et al. It is my suspicion, based on the information provided in these two publications that the opportunities for misinterpretation of data, due to the heterogeneity of the stand ages may tend to bias the management direction for the Colville National Forest during the period that this plan will be utilized. The proportion of closed canopy, multi-layered patches that are being called for in structural stage 6 in the mixed conifer portion of the forest will increase landscape vulnerability to insect outbreaks and severe wildfires. Without the necessary resources, including work force and budget, that allow the use of prescribed burning and variable density thinning over the entire landscape, the restoration of the CNF is highly unlikely to outpace the increase in uncharacteristic stand replacement wildfires.

Particularly since there is such a disparity between the historic range of variability as estimated and the current allocation of those cover classes by plant association types. To attempt to move to the presumed historic range of LOS toward the average of the HRV may result in a period where a less sustainable forest than the stated objectives of the forest plan are realized in the near future (5 to 40 years).

Note that a study accomplished by Franklin Hemstrom and VanPelt, published in December 2007, for the Washington State Department of Natural Resources determined that the appropriate terms for future forest management in Washington State lands would be historic conditions (prior to 1850); current conditions, and future sustainable conditions for future management. I question the proportions of structural stage 6 and 7 identified as desired future conditions in the Revised Forest Plan and DEIS as being obtainable or maintainable

based on the heterogeneous and dynamic (due to climate change) of the arbitrary average of the historic range of variability as determined (perhaps inaccurately) by the DEIS/Revised CNF Plan.

While the DEIS and other publications stress the importance of large, old wood on a "stand basis" there is no convincing data that proves that a smaller number of individual large and old trees is not an appropriate management goal. The previously referenced study for the DNR by Hemstrom, et al, states on page 6 that "old trees may persist in riparian areas or other fire refugia. A definition of old growth for this (these) forest type (s) is therefore more accurately applied to individual trees than to entire stands". With the many discussions of heterogeneity of the ages of mixed severity fire regimes, I believe additional determination or analyses of the desired objective of structural stages 6 and 7 are appropriate.

I am convinced that the non-declining even-flow methodology is not appropriate for the CNF because of the departure from the historic range of variability in nearly all plant association groups resulting in a greater percentage of closed middle-aged multi-species stands. This obviously results in increased insect and disease deprivation, as well as, a fuels build-up in dead and dying trees due to the insect and disease problems, and an increase ladder fuels due to the continuing regeneration of shade tolerant species resulting in species that maintain a high crown ratio as well as regeneration and advanced regeneration. 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.

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

I am greatly concerned that the use of cubic-volume in the stated ASQ is inappropriate. Generally, a value is not considered in the forest plan for determination of economic viability of various products being removed. For example, bio-fuels projects are most frequently at below cost production rates. Given the current and foreseeable budget constraints, it is important that relative production costs (logging costs) versus product value be minimized to maximize the "footprint" on the land in terms of controlling stocking levels and fuels reduction. I furthermore disagree with Region 6 recommendations, dated April 14, 2011 page 11 that states, for category 5a (irreversible damage) no road construction unless access absolutely requires road construction, "it is reasonable to assume harvest access through other methods, (helicopter, etc)". The past several years has demonstrated that helicopter logging is exorbitantly expensive and results in below cost production for even high value saw-timber products, and much more so for pulpwood and bio-fuels. My assertion is that during this point in time, it is not reasonable to assume harvest access through "other methods". This concept is more important as stewardship contracting allows silvicultural (and other) activities to be accomplished with retained receipts from the timber sale portion of the stewardship contract. Stewardship contracts should be designed to allow profit for the purchasers with which to fund needed silvicultural and fuel reduction projects through retained receipts. I am 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. I 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. I am supportive of the removal of a significant portion of the interim screens in the draft-revised plan. This should allow for more flexibility and address biological concerns on a more site-specific basis than the current interim screening process allows.

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 the tri-county 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 (bleeding) 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 draft plan mentions the disproportionate income and unemployment present in the tri-county area. The environmental justice consideration is stated for the Colville Tribes as being the only minority group in the tri-county area. The list of agencies/organizations consulted during the formation of the draft plan does not specifically include private forestland owners. The list does include the Department of Natural Resources but there are significant differences in state trust land management versus private land management that are reflected in the concerns expressed by state trust managers. The mandates are similar to mandates for US Forest Service managed lands and not reflective of private landowners' goals and objectives for their ownership. I submit that additional efforts should be made to assure that adequate communications take place between private landowners and the Colville National Forest systems planning team. Two suggestions for entities to include in this discussion are the Washington Farm Forestry Association representing non-industrial private forest landowners, and the Washington Forest Protection Agency representing industrial landowners. Without this effort, I feel that the discussions have discriminated against that minority class of the population of the area. The DEIS also notes the disparity in income and employment in the tri-county area versus the rest of Washington state. Environmental justice is not being served for the CNF area due to lack of adequate management under the proposed revised plan.

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.

Comments on DEIS/Forest Plan

Roads

Comments and assessments of roads impacts on various attributes include wildlife, hydrology, and fisheries are biased against roads. In the DEIS comments it is noted that 1) 2% to 9% of the roads are responsible for 90% of the damage to these resources, and 2) heavily traveled roads contribute much more damage to the various resources than lightly or non-traveled roads. These comments are incongruent with CNF proposed policy that all roads, Level 1 and greater, are affecting these various resources (equally). As stated previously, NEWFC is very

concerned about the impacts of roads and encourages the CNF to review, on a site-specific basis, those roads that are a priority for closure and/or reconstruction to avoid damage to hydrology and fisheries resources. Furthermore, I believe that Level 1 roads are more appropriate for most "wildlife" concerns than total road closure or obliteration with consideration of protection and vegetation management needs.

Table 11, pg 62 Volume I DEIS, the comparison for Alternative B states there is a "cap on existing miles and no net increase in key watersheds" is over simplified at the least. To my knowledge the concept of key watersheds were not even identified or discussed with NEWFC prior to the publication of the DEIS and Forest Plan. This simplified statement is the "sideboard" for NEWFC's road policy. The past several years of collaboration between NEWFC and CNF has resulted in many exceptions for this "sideboard" and have been discussed on a project basis but NEWFC assumed to be administered on a "forest wide" basis.

The Draft Revised Forest Plan, page 25, states that roads and administrative sites are excluded from "detrimental conditions" for soils. The CNF Standards and Guides indicated that all roads are included in the "detrimental conditions" category. This is confusing and needs to be clarified in either the Soil Disturbance portion of the revised plan or the standards and guides.

Table 18 Suitable Uses for Backcountry Management Areas, pg 84-85 - Allows authorization of forest products for personal use and timber harvest as a tool, which is appropriate, but does not allow for temporary road construction that is necessary for economical timber harvest operations. The cost of non-roaded operations (helicopter logging) is three times more expansive than ground based systems. This makes helicopter logging uneconomical and decreases the "footprint" of restoration activities. These same concerns are noted for Table 19 Suitable Uses for Backcountry Motorized Management Areas, pg 85 - 86.

The result of "no scheduled" harvest in an area that "no roads" can be constructed is that "the cows will have left the barn" if, the forest service is unable to plan (schedule) projects prior to fire, or insect and disease catastrophic occurrences. This problem may be resolved with a different approach of "planned versus scheduled". The Forest Service can plan for fuel and insect damage as it can be predicted.

MA-DC-FR-05 Travel Ways, and Roads within the Focused Restoration Area, Pg 39, lines 1018-1020 - There should be a better explanation of what conditions "key watersheds" would require minimizing risks and maximizing "active restoration" to preserve watershed function and aquatic and riparian habitat relative to the high risk of fire. It also states that no more than one mile per square mile of roads is allowed within each fifth field watershed. It further states that total road density is calculated as miles of open and closed (Level 1) National Forest system road per mile of National Forest system lands. This criterion effectively precludes any ability to manage or protect the vegetation on those lands. Certainly, the constraint should not include Level 1 or decommissioned roads.

L4273 - Concerning access, identifies three concerns regarding road density. 1) Current funding is not sufficient to maintain the existing road system properly at current operational maintenance level. This maintenance could be increased as more timber harvests occurs as proposed by Alternative B by using a periodic sustained yield approach versus non-declining even flow. 2) The current road system is not aligned with current and future resource management objectives. I do not understand how this can be the case if there is a need for an accelerated restoration paradigm (more money is larger footprint). If there is a bias to the current road density due to political approaches to public land management, this statement may be true. The non-political need for a "larger footprint" is illustrated by Table 32 if the desired future condition is to return stands to or close to the historic fire return interval.

FW-STD-Veg-09 Harvest Systems - The statement that harvest systems should be selected based on their ability to meet desired conditions, and not strictly on their ability to provide the best dollar return, is incongruent. If more expensive harvest systems are used which decreases the "footprint" of desired future conditions, the greatest dollar return is important to accomplish the goals, particularly in light of the permanent authorization of stewardship contracting.

FW-STD-WR-03 - Road construction and decommissioning in key watersheds - The plan states on several instances that part of the goal of the revision is to allow more flexibility. However, this section states that there must be "no net increase" (ie, for each mile of new road construction within a Class V HOC, at least one mile of road must be decommissioned). I suggest that the Forest Service change "must" to should. Also, please clarify whether this is specific to system roads Level 2 to 5 or inclusive with Level 1.

FW-DC-WL-09 - Risk factors for all surrogate species inclusive of roads - Are these risk factors most specific to system roads and within the various system categories Level 2 to 5 roads versus level 1? This risk factor should be quantified by level of road within specific management areas.

FW-STD-WL-07 - Grizzly bear recovery area road densities - This specifies there shall not be a net increase in open or total road densities above those levels in Table 14. Total road densities do not include physically undriveable roads (ie, bermed or brushed in). Other parts of the Forest Plan include brushed in undriveable and some decommissioned roads because of lack of proof that decommissioned roads are inert. These criteria should be consistent.

FW-DC-AS-04, FW-DC-AS-05, FW-OBJ-AS-01, and FW-OBJ-AS-02 - These sections specify a de-timing and quantity of road and trail management that is not consistent with other objectives specifying complete action within 5 years of the initiation of the plan.

FW-STD-WL-03 - Canada Lynx - Rate of change within identified lynx habitat - The unsuitable condition over 15% of the habitat can persist for only 10 years given that roads and trails are considered the primary detrimental cause of hydraulic erosion and sediment issues. The 15- year time frame for correcting only a portion of those deficiencies is excessive and not consistent with other remedial activities of the forest.

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 Washington Department of Fish and Wildlife has completed (but not generally reported on) lynx presence surveys throughout Northeast Washington and as far as I have been told there is very minor evidence that any lynx are present on the Kettle Crest or other areas throughout Stevens and Pend Oreille counties. My understanding is that the lynx analysis units were established resulting from threatening lawsuits similar to those in Montana and Idaho that were upheld. Because the lynx were once considered a game animal and trapped in Northeast Washington during the 1970s and 1980s it is unconvincing to allow lynx habitat to interfere with "restoration" activities such as pre-commercial thinning in significant areas of the forest when they were not afforded this protection during the open trapping period. There is no data to justify continuation of Lynx assumptions.

Pg 23, Chapter 2 - Management Area Desired Conditions, states "for management direction overlaps and depending on site specific conditions and the activity or use, the most restrictive (vegetation management) plan direction applies." This does not follow the goal of decreasing uncharacteristic disturbance. Also mentioned is the reduction of habitat for federally listed terrestrial and aquatic species. Due to management activities, the intensity and burn severity that can result in accelerated erosion, loss or impairment of soil productivity, potential to increase peak flows, reduced water quality, and decreased aquatic habitat function has been shown to drastically affect habitats. How can a universal statement be made that allows the "most restrictive" plan directive to apply when overall much more damage and less sustainability occurs with "single species" or "single purpose" management directions?

Air

Pg 25 - Air - "The US Forest Service is responsible for protecting the National Forest from the adverse effects of air pollution". Does this mean that the Forest Service should not use prescribed fire, to avoid air pollution episodes? Does this mean that the Environmental Protection Agency's authority is usurped on National Forest lands? I do not understand how given the reliance on appropriated funds, FW-DC-Veg-13 "fuel treatments in wild land urban interfaces standard" can be reached when each acre may have to be revisited every 20 years, as per the projected retreatment timing.

FW-OBJ-Veg-01 Restoration - The targeted activity of 6,000 to 12,000 acres per year for the next 15 years would amount to 90,000 to 180,000 of the total 1.1 million acres of the Colville National Forest. How can decision makers be expected to understand the need for more rapid restoration when this metric is not quantified describing the probable acreage that needs to be treated in the next 15 years?

FW-STD-Veg-09 Harvest Systems - The statement that harvest systems should be selected based on their ability to meet desired conditions, and not strictly on their ability to provide the best dollar return, is incongruent. If more expensive harvest systems are used which decreases the "footprint" of desired future conditions, the greatest dollar return is important to accomplish the goals, particularly in light of the permanent authorization of stewardship contracting.

Misinterpretations of Alternative B Relative to the Proposed

I have been told that the "sideboards" for Alternative B were presented to the CNF Planning Team are 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 Derrick 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. For "active" management, no volumes were discussed in NEWFC's restoration areas, but we did/and have recognized that activities need to take place in those areas. My thoughts were that each acre could not fully satisfy all of the desirous attributes for the CNF. NEWFC's guidelines for the restoration management area were very similar to the preferred alternative's focused watershed restoration guidance. I feel that there are opportunities through collaboration to merge the most desirable parts of Alternative B with Alternative P. Since I have not asked Mr. Churchill to project the ASQ to be removed from the "restoration" area I 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. My 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.

Summary

I laud the efforts by the Colville National Forest and revision team in completing the revision in a timely fashion. I feel that there could be significant improvement made in the acceptance by the local community with collaboration with groups such as NEWFC and the recently organized group convened by Ferry County Commissioner Mike Blankenship. An extension of the comment period to enable the individuals within this group to become more familiar with each other and willing collaborate is essential.

My criticism of the revised draft plan and EIS should be clear from my comments relative to Forest Service policy and the use of bias assumption and data that should be subjected to the "scientific method" and should be more site specific in order to be effective for the economic and environmental management of the Colville National Forest. It is important that the socio-economic portion of the DEIS to be fortified to be reflective of the impacts to the tri-county area and the ability of a less resilient communities (tri-county area) to prosper in light of the lack of consideration for environmental justice as demonstrated in the DEIS.

Respectfully submitted,

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