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First name: Don

Last name: Parks

Organization:

Title:

Comments: Comments on the Coalville NF Forest Plan Update of 2016

Forest Planning Team,

Please find the comments from Donald and Linda Parks on the preferred alternative of the CNF forest plan update, as attached below.

DP

4July2016

Donald and Linda Parks

3127 181st Ave NE

Redmond, WA 98052

Colville National Forest Plan Revision Team

765 South Main St.

Colville, WA 99114

Subject: Forest Plan Revision Comments

Dear Plan Revision Team,

As users of the Colville National Forest (CNF) we submit the following comments in the hope that you will improve the plan by reducing its focus on resource extraction and motorized recreation.

We have visited this NF several times and value its existence as a lightly managed landscape rather than a first cousin to an industrial forest land.

The Preferred Alternative.

Wilderness

The Colville NF includes the least designated Wilderness when compared to all Washington's other NF's. This planning process should redress this glaring shortcoming.

We have walked along the quiet trails along the Kettle Crest in Thirteenmile and Bald Snow. These are lands of high wilderness quality and should be so designated. Please recommend Wilderness for Thirteenmile, Bald Snow, Profanity Peak, and Twin Sisters, Hoodoo, that is the entire Kettle Crest.

The presentation of the Preferred Alternative is confusing and possibly misleading. The "2016 Preferred Alternative Map" dated 24Sep2016 depicts 4 separate recommended Wilderness units. However, the DEIS Summary on page viii Table 2 states that the "Proposed Action" includes 101,390 acres. The two statements are not compatible. Why this confusion factor? Is Alternative "P" actually the "2016 Preferred Alternative?" We would strongly support a "Preferred Alternative" that included 101,390 acres were that the actual preferred alternative. However, we do support the recommended wilderness proposed by CNW.

Abercrombie Hooknose must be recommended as wilderness, as it apparently is in the 'Preferred Alternative.'

Also please expand the Salmo Priest Wilderness to the maximum extent with a recommended wilderness allocation (Salmo Priest Adjacent). Protect Quartzite by recommending this area for wilderness.

Unroaded and Roadless Lands.

The Forest plan final direction must maximize the area of NF lands that are undeveloped by the definition based upon the 2001 Roadless Area Conservation Rule (182,000 acres) and the re-inventory that was prepared in 2006. The DEIS appears to show the roadless inventory has been expanded from 182,000 to 254,000 acres. THE DEIS should clearly state this fact.

The direction of the Roadless Conservation Area Rule must be strictly adhered followed. We expect that the Land Management Plan will provide clear direction for those land management allocation definitions so that they are in full conformance with the Roadless Rule (see DEIS lines 13 & 14 "...provide direction on desired conditions and allowable activities and uses..."). Such direction apparently applies to "Backcountry and Backcountry Motorized."

Timber

Limit timber cutting increases. We know that the actual cut volume from the CNF in recent years (FY2011-2015) was 39 million board feet (mmbf). The cutting level has remained at about this level for nearly two decades. The "Preferred Alternative" would increase this volume by more than 50% to 62 mmbf/year. Such an increase is simply not acceptable. And there may not be sufficient budget to approach such a volume. Please reduce this in the FEIS.

The data shown in the DEIS line 17124 (Table 162) appears to be selective for the years chosen in that it shows a greater output of wood fiber than has been the case in more representative periods of the applicable past. This data also is expressed in terms of CCF units that are not readily translatable to mmbf, the more common unit used for log outputs.

Identify and protect all old forests. Old growth found in any location (inside or outside roadless lands) must be protected and not cut for any reason.

Wildlife

The preferred alternative needs to insure that populations of focal species not only remain viable but also flourish. Please see that your plans address Canada lynx, great gray owls, and pine marten. Profanity roadless area is the core habitat area for pine marten and other small forest carnivore, so give this place the maximum protection.

Wildlife connectivity is best addressed by ensuring that core habitats of sufficient size are protected and situated relative to one another to allow movement. Maximize the protection of unroaded lands and limit the size of the road system.

Access

The forest plan must not be used as an excuse to expand motorized use on trails. Instead, motorized use should be limited and reduced to ensure that this forest plan is in full conformance with Executive Orders 11644 of Feb. 8, 1972 and Executive Order 11989 - Off-Road Vehicles on Public Lands May 24, 1977. Please ensure that ORV use is not causing adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources on any particular areas or trails on the CNF. If any such harm is being caused we expect you to immediately close such areas or trails to the type of off-road vehicle causing such effects.

Ensure the OSV use is in conformance with the new OSV Rule by limiting user conflict and adverse impacts to wildlife.

The "Preferred Alternative" is apparently retaining a sufficient number of roads open so as to provide access to 73-75% of the CNF. The original road system was sized to provide access to a timber cut level that was substantially greater than either the current levels of cutting or for the planned increased from this forest planning exercise. You have too many roads and you need to plan to decommission as well as close many road segments. This can be done without impacting needed access for either administrative uses or recreation.

Minerals

Limit mineral entry by not allowing exploration and production in areas where unacceptable damage to wildlife habitat and water quality may occur. Do not allow entry into any roadless or unroaded lands.

Summary

Please adjust this forest plan preferred alternative to reduce its over emphasis on resource extraction and non-sustainable recreation.

Donald Parks

Linda Parks