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Organization: Stevens County Commissioners
Title: Chairman
Comments: November 6, 2018

Chris French

Objection Review Officer

1400 Independence Avenue SW EMC-LEAP, Mailstop 1104

Washington D.C. 20250

Letter of Objection regarding Forest Plan selection and Record of Decision, Colville National Forest Objector
Stevens County Commissioners

Lead Representative Commissioner Steve Parker

On behalf of the more than 44,000 people residing in Stevens County the following objections are submitted, based on our comments to the Forest Plan dated July 5, 2016 - 28 months prior. Our specific objections are based on concerns for the economic impacts to Stevens County, the forest products industry, the Colville National Forest (CNF), the cattle industry and the customs and culture of our tri [shy] county region.

Objections

Our first objection is the CNF road density Standards for Focused Restoration and Desired Condition for General Restoration areas. The potential for misapplication of the intent will exist for the duration of the plan. Further the numbers set a precedent for the next plan revision process. We suggest a rewording of MA-DC -FR-05 and MA-STD-FR-01 (p.107) of the Land Management Plan to reflect the stated management emphasis of landscape level ecological function (p106) and drop all references to an arbitrary statistic. The statement regarding General Restoration M A-DC-GR- OS can appear contradictory when read and confusion could spawn litigation.

Second and similar is our objection to Riparian Management Area stubble height. The 4 and 6 inch metric listed at MA-GDL- RMA -11. The science used for calculation is not site specific and is not peer-reviewed. Therefore we believe this is not the best available science and could adversely affect grazing practices if applied.

We are objecting to the water quantity section of the plan. Water quantity has not been adequately addressed

and more policies are , needed. Stevens County would benefit economically if the Colville

[bull] watershed had advanced flows from tributaries on the CNF that would maintain current uses and allow for new water rights to be made available.

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Stevens County objects to the inclusion of Recommended Wilderness in the Land Management Plan. We find no place in law that authorizes continued wilderness designation for USFS. Any expansion of wilderness will negatively impact many forest users and will not contribute to healthy ecosystem function, will not protect forest stands from insect and disease and will have the potential to contribute to catastrophic wildfire. Certain areas have been removed from RWA after ground truthing by citizens and later by FS staff. More needs to be done and the areas removed from Recommended Wilderness should be designated as General or Focused Restoration, not as Back Country. But, please, inform us by what act of Congress do you rely upon for continued recommendation of wilderness areas to National Forest systems? What law?

Finally, we wish to thank the Forest Service for presenting all of us with this opportunity and especially to our local staff at CNF, they have truly been attentive, responsive and open to all of us. The overall plan is good and we want to be supportive to the greatest degree possible. The Colville National Forest is a great contributor to our customs, culture and economic viability. Stevens County takes seriously the obligation to provide comprehensively for our next generation.

Sincerely,

BOARD OF COUNTY COMMISSIONERS OF STEVENS COUNTY, WASHINGTON

Commissioner Steve Parker