

Data Submitted (UTC 11): 7/3/2016 11:53:55 PM

First name: Mire

Last name: Levy

Organization:

Title:

Comments: Colville National Forest Plan Revision Comment

Colville Forest Management Plan Revision team,

10 years ago July, I made my first ever visit to the Colville National Forest to check out the claims made about the area by some of my mountain biking friends who visited the area a year before. They told me the trails in the area provided some of the best backcountry riding experience in all of the state of Washington with tremendous views of a very unique landscape. It turned out that my friends were not exaggerating and I fell in love with the Kettle Crest during that first visit.

Ever since that year, I have made a pilgrimage to the Kettle Crest almost every summer to campout for 4~5 days with other like-minded mountain bikers, riding and working on trails, and generally enjoy the camaraderie afforded by such gathering. The annual campout at Jungle Hill Campground had brought many mountain biking enthusiasts from afar, including Seattle, Spokane, Boise, Coeur d'Alene, Bellingham and Vancouver, BC, all attracted by the superb natural beauty and primitive backcountry experience the area offered. During my annual trips to the Kettle Crest, I have come to know the nearby towns of Republic and Kettle Falls as well from frequenting the area restaurants, gas stations and other shops for necessities during our stays.

Also over the years, I have ridden practically all the trails open to bicycle use, from Deer Creek to the north to Thirteen Mile to the south and everything in between. One trail others have visited but I had not had the chance to is Abercrombie Mountain. My friends from Vancouver, BC, who have ridden Abercrombie and Silver Creek trails were so enchanted by the area that they had made separate treks in the past to help local equestrian volunteers maintain the trail. Hearing such stories, I am very much looking forward to visiting these two trails this year during our annual gathering and experiencing this area for the first time.

As you can imagine, I was very dismayed when the 2011 Proposed Action was originally published and much of the Kettle Crest and Abercrombie/Silver Creek areas were proposed to be designated as Recommended Wilderness. The 2011 Proposed Action appeared to be very skewed and ill conceived with limited input from the general public, so it was no surprise that the Proposed Action created much controversy following its release.

Reading the newly proposed Revised Land Management Plan, it seems to reflect a greater degree of understanding of the existing historical uses and respective stakeholders' concerns, as well as better use of modern and best available science. I have participated in public land planning processes in the past and know first hand how much work has to be put into in drafting a comprehensive EIS. I would like to personally thank you for your team's time and efforts in drafting this EIS and providing various alternatives for stakeholders to consider.

Of all the alternatives presented in the draft EIS, it appears that the Preferred Alternative (alternative P) is most effective in achieving a balanced approach to addressing all of the identified significant issues. In particular, I am very pleased to see that alternative P attempts to address the public's concerns voiced against the 2011 Proposed Action that a drastic increase in Recommended Wilderness area would reduce recreational visitors to the area and could have an adverse impact on the local economy, and includes an innovative solution in the proposed Special Interest Area designation. SIA aims to achieve the same goal of better managing the forest resources without sacrificing backcountry recreational interests, and I am very appreciative to your team's initiative to introduce this new designation in this area.

However, alternative P still takes the broad-brush approach of applying wilderness designation in two key management areas - Bald/Burnaby/White corridor in the south end of the Kettle Crest and Abercrombie Mountain in the South Selkirk Mountains - when the best available science referred to in the DEIS does not seem to warrant such approach. The newest available science referred to in the DEIS identified a few common threats to achieving better protection for the federally listed threatened and endangered species such as Woodland Caribou and Canada Lynx in the aforementioned management areas. These threats were namely (1) human disturbance by snowmobiles in the critical winter habitats, (2) roads bisecting the habitats that disrupt habitat connectivity, and (3) high speed vehicular use of the said roads contributing to wildlife mortality from collisions.

While designating these areas as wilderness could certainly address these identified threats, it will adversely impact the mountain biking access to the areas historically open to its use even though mountain biking was never identified as having any adverse impact on the significant issues that the Plan is trying to address. My recommendation is for your team to make some adjustments to alternative P by adopting a more targeted approach to management area designation in order to minimize unintended adverse consequences to user groups not identified as contributing to the significant issues. Specifically:

1. Designate Bald/Burnaby/White corridor as Special Interest Area in keeping with the remainder of the Kettle Crest recreational corridor. By designating this area as an SIA, it would maintain historical mountain bike access to the contiguous Kettle Crest trail and preserves the needed connection to Thirteen Mile area from Snow Cabin and north. It should also aid the Forest Service in providing more consistent management approach for the entire Kettle Crest corridor under one management designation.
2. Split the South Selkirk Mountains area proposed to be designated as Recommended Wilderness mostly along the existing ranger district boundary line, and designate east half in the Sullivan Lake Ranger District as Recommended Wilderness and west half in the Three Rivers Ranger District as Backcountry MA or another SIA. This will allow historical use of the Abercrombie Mountain and Silver Creek trails by mountain bikes while restricting the winter motorized access to protect the critical winter habitat for Woodland Caribou and Canada Lynx.

Above two changes should also make more sense from the Forest Service's administrative and budgetary standpoints. By concentrating the new Recommended Wilderness to an area within the Sullivan Lake Ranger

District which already houses the Salmo-Priest Wilderness, these changes will eliminate the need to house specialized personnel with wilderness management expertise in the Three Rivers and Republic Ranger Districts where none currently exists.

Working every year on different trails in the Colville NF alongside with Forest Service rangers and local volunteers, I have learned first hand that the area is in acute need of monetary and labor resources to just maintain what is there currently, probably more so than many of the other Region 6 National Forests due to its remote location and limited local population. Funding saved by not having to install wilderness management personnel in two of the tree ranger districts can be reallocated to implement other much needed changes proposed in the DEIS.

Overall, alternative P contains good proposals for managing the forest back to the historical range of variation, restoring riparian health and limiting future adverse impacts on wildlife as well as aquatic quality by applying the best available science. If above recommended changes can be incorporated into alternative P, then it will have my full support. I look forward to visiting the beautiful Colville National Forest and volunteering to maintain many of its trails for many years to come.

Sincerely,

Mire Levy

6731 Crest View Ave SE

Snoqualmie, WA 98065

mire1113@gmail.com <<mailto:mire1113@gmail.com>>