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c/o Ferry County Planning Department PO Box 305

Republic, WA 99166

June 27, 2016

Amy Dillion,Forest Plan Revision Team Colville National Forest

Colville Supervisors Office 765 South Main

Colville, WA 99114 Dear Ms. Dillion:

The Ferry County Planning Commission would like to thank you for the opportunity to comment on the Draft Forest Plan Revision. The Planning Commission's comments are as follows:

Planning Commission comments in Reference to P Alternative for the Forest Plan Revision as this is the Plan that is closest to being acceptable.

The Forest Plan Draft (FPO) has a section concerning the Ferry County land use plan on page 786 beginning at line 26453 and to begin with there is a correction that needs to be made on line 26471 where it states, "There are eight incorporated communities in the county...". The correction is that "There is only one incorporated city and 7 unincorporated towns in the county ...".

The section on page 786 of the FPO, beginning with line 26454 through 26455 states, "The county land use plan describes local government goals and objectives for land management and provides opportunities for coordination between the Forest Service and the county."

This section concerning the Ferry County Comprehensive Plan does lay out the basic goals and objectives very well, yet in other sections of the FPO there are statements that are not consistent with the County Plan and draw conflict with the spirit of coordination as provided for in the County documents and the Federal Laws that require the U.S. Forest Service to coordinate with the County.

We shall address the issues of Long-Term Commercial Significance as related to Agriculture, Forest and Minerals within Ferry County as addressed in not only our Comprehensive Plan but also in the supporting Development Regulations Ordinance.

The Ferry County Development Regulations address Resource Lands and the designation of Agriculture, Forest and Mineral Lands of Long-Term Commercial Significance. We will begin with the discussion on Agriculture, followed by Forest and Minerals.

#### AGRICULTURE:

\*A Whereas statement on page 3 of the Ferry County Development Regulations Ordinance pertains to Colville National Forest grazing leases. The chart on page 18 lists National Grazing

Allotments within Ferry County as 459,545 acres. These acres have been designated as Ferry County Agricultural Lands of Long-Term Commercial Significance.

\*Two Whereas statements on page 3 of the Ferry County Development Regulation Ordinance refer to the U.S. Agricultural Census, the 1934 Taylor Grazing Act, the 1976 Federal Land Policy and Management Act, the 1978 Public Rangeland Improvement Act, Ferry County's Range Law and Right to Farm, Ranch and Practice Forestry Ordinance, of which the FPO only includes a few.

The following FPO citations are problematic:

\*On page 68 of the FPO in Chapter 3. Affected Environment and Environmental Consequences under the title Prime Farmland, Rangeland and Forestland on line 2178 it states, "No prime farmland, rangeland or forestland as defined by the National Resource Conservation Service has been identified in the planning area."

Comment addressing the above citation:

This statement is in direct contradiction to the Ferry County Plan which designates all the grazing leases as Agriculture Lands of Long-Term Commercial Significance. The National Resource Conservation Service soil surveys report 18 prime soil types in Northern Ferry County and 49 prime soil types on the Colville Reservation located within Ferry County.

\*On page 502 of the FPO Table 175 shows all alternatives authorize only 27,580 AUM for cattle and 0 allocated for sheep. Then, on page 526 the table 179 shows the forest capable of grazing 690,311 cattle and 881,287 sheep. (It is realized that these numbers reflect the entire Colville Forest and not just the Forest Service lands managed within Ferry County.)

\*On page 519 of the FPO the paragraph beginning with lines 18043 through 18051 discusses the history of grazing on the Colville National Forest and how the change in the 1950's to diminishing numbers of sheep and cattle being grazed on the forest and that "today almost all the permitted grazing is for cattle with only one sheep allotment (currently vacant) remaining."

\*On page 520 of the FPO the paragraph beginning with line 18085 discusses the decline from a 1988 average of 35,000 AUM per year to a current average of 29,500 AUM per year. Of the 58 grazing allotments 42 currently have permitted use and 16 are in vacant status . {{It is realized that these numbers reflect the entire Colville Forest and not just lands managed in Ferry County.)

Comment addressing the three above citations:

Ferry County is concerned that the reduction of AUM will be a detriment to the local cattle industry. We would like to see the AUMs increased to the 1988 levels.

The number of grazing allotments for Ferry County need to be maintained for the economic survival of the cattle industry. All 28 of these grazing allotments have been designated by Ferry County as Agricultural Land of Long-Term Commercial Significance.

Ferry County welcomes the opportunity to increase the AUM to the potential of these 28 grazing allotments and the flexibility with the FPO to make it economically feasible to do so.

\*On page 519 of the FPO the entire paragraph beginning on line 18052 supports and defines the benefits of grazing on the Colville National Forest. Included are "an important use to the local ranching and local communities" and "helps to maintain social customs and traditions of ranching and agriculture, and provides social and economic contributions at a local, regional, and national level".

\*On page 522 of the FPD beginning with lines 18163 through 18183 support Livestock grazing for the Alternatives. A highlight of "These activities contribute to the stability and social economic and cultural aspects of rural communities."

\*On page 529 of the FPD beginning with lines 18387 through 18403 discuss the benefits of grazing in different management levels and greenhouse gas reduction and carbon sequestration. On lines 18385

through 18386 it is stated that large wildfires are expected to increase over the life of the plan, resulting in an increase of forage. Continuing with lines 18411 and onto page 530 through line 18423 discuss the benefits of grazing in concern with climate change. Comment addressing the above three citations:

We appreciate that the FPD recognizes the importance of grazing. These citations support our desire to maintain the 28 grazing allotments in Ferry County.

\*On page 569 of the FPD lines 19903 through 19904 states, "Any potential wilderness area recommended to Congress is managed to preserve those wilderness characteristics that made it a candidate for wilderness until Congress chooses to take action."

\*On page 595 of the FPD beginning on line 20939 it states, "Non-conforming wilderness uses would be allowed to continue in recommended wilderness until the areas are designated as wilderness by Congress."

Comment addressing the above two citations:

This statement on page 595 is in direct conflict with the statement on page 569. An area that has non-conforming wilderness obviously should not be recommended for potential Wilderness designation.

\*On page 539 of the FPD discussing Recommended Wilderness Areas on line 18789 to line 18792 it states, "alternatives with a high percentage of allotment acres in recommended wilderness would have the highest effect to permit holder's use of mechanized equipment in these areas. This would result in the permit holder having to spend more time and labor to manage the allotment."

Comment addressing the above citation:

The diminishing AUMs are not due to the lack of interest in grazing but due to the financial burden imposed by the FPD regulations. Allotment acreage in Wilderness designation would increase the regulations and add to the burden already imposed.

Comment addressing all the above Agriculture citations:

With all of this above noted, the Planning Commission would like to comment that the area on the Forest Plan Revision P Alternate which is shown as Wilderness-Recommended is designated as Agricultural Lands of Long-Term Commercial Significance due to the fact that it is part of the National Grazing Allotments. By maintaining this area in the status as Wilderness-Recommended the Forest Plan Revision is not compliant with Ferry County Planning policy or ordinance.

Recommendation:

The Planning Commission has two recommendations, the first is that this area be changed to Backcountry as an extension of the adjoining Backcountry designation. The second recommendation is the potential for a Backcountry Motorized designation since the Hall Creek Road divides these two areas and other roads exist. Both Backcountry and Backcountry Motorized are multi-use and allow for grazing.

FOREST:

\*A Whereas on page 3 of the Ferry County Development Regulations state, "All state and federally managed forest lands or lands under current use taxation programs...are designated as Forest Lands of Long-Term Commercial Significance in Ferry County, and are protected in Section 8 of this document."

On page 787 of the FPD the draft refers to the Ferry County Comprehensive Plan section 7.4.29 Natural Resource goal which states, "Maintain and enhance natural resource-based industries in the county and provide for the stewardship and productive use of agricultural, forest and mineral resource lands of long-term commercial

significance."

Comment:

Beginning with page 93 of the FPD Alternative P, the Planning Commission is in agreement with the management strategy for the forests in relation to timber harvest and the replacement of the Eastside Screens by a series of desired conditions which removes the restriction of cutting trees greater than 21 inches in diameter. However, the land that is Wilderness-Recommended is also designated as Forest Lands of Long-Term Commercial Significance by the county plan. By maintaining this area in the status of Wilderness-Recommended the Forest Plan Revision is not compliant with the Ferry County Planning policy or ordinance.

Recommendation:

The Planning Commission suggests that the two recommendations above concerning changing the Wilderness-Recommended area to either Backcountry or Backcountry Motorized as stated.

MINERALS:

\*On page 32 of the Ferry County Development Regulations Ordinance set the goals which read, "To conserve mineral lands for productive economic use by identifying and designating mineral resource lands of long-term commercial significance and to minimize loss of paleontological information.

\*Ferry County has designated the entire county as Mineral Lands of Long-Term Commercial Significance, excepting the City of Republic.

On page 551 of the FPD the title is Effects Common to All Action Alternatives which is part of the Section on Minerals and Geological Resources beginning on page 545.

\*The first paragraph suggests that vegetation management would not adversely or positively affect minerals to any degree.

\*The second paragraph shows that protection of wildlife and compliance with the Endangered Species Act is required of mineral operations.

\*The third paragraph discusses motorized access and how Backcountry Non-Motorized and Wilderness-Recommended would have the highest effect on access for saleable minerals.

\*The fourth paragraph is a continuation on the access issue. It lays out that for locatable and leasable minerals lower road densities or lack of motorized trails can increase time and cost during prospecting and exploration activities. This paragraph states, "Motorized access on existing roads and trails or proposed road/trail reconstruction/construction could still be approved in non-motorized areas for leasable operations, so long as the management area does not have a No Surface Occupancy or Controlled Surface Use suitability determination, and for all locatable operations on lands open to mineral entry.

\*The fifth paragraph is titled Recommended Wilderness and the first two sentences state, "Wilderness recommendation alone removes lands from consideration for leasing and saleable mineral materials use. Mining claims and active locatable operations in recommended wilderness would not be affected until the area is designated as wilderness by Congress.

On page 552 of the FPO under the title of Indirect Effects of Action Alternatives, sub title Motorized Recreation Trails on line 19317 it states, "For saleable minerals, a non-motorized designation essentially eliminates the opportunity to exploit mineral materials." Then on line 19324 the draft states, "For locatable and leasable minerals, an increase in non-motorized management area acreage can limit motorized access on existing, open forest system roads and trails for initial prospecting and exploration activities that may not otherwise require Forest Service regulatory approvals." Then it quotes the sentence that is underlined above in the fourth paragraph on page 551.

On page 552 of the FPO under the subtitle Road Density beginning on line 19333 the paragraph reads, "The major influence of other resource management direction on minerals is their effect on access. For saleable minerals, a lower road density can adversely affects opportunity to exploit mineral materials due to less open

roads on the landscape. Alternatives R and P have the lowest road densities and would limit access the most." The second paragraph begins on line 19337 and states, "For locatable and leasable minerals, lower road densities or road decommissioning to achieve lower road density standards can decrease existing motorized access on open forest system roads during initial prospecting and exploration activities that may not otherwise require Forest Service regulatory approvals. However, alternative means of reasonable access are possible and use of existing but closed roads and road reconstruction/construction can be proposed and approved for mineral operations in accordance with applicable regulations. "

Comment :

The Planning Commission has designated the entire county as Mineral Lands of Long Term Commercial Significance. Due to the fact that Wilderness Recommendation "removes lands from consideration from leasing and saleable mineral materials use", this Wilderness-Recommended area is not compliant with the Ferry County Planning policy or ordinance.

Recommendation:

The Planning Commission again refers to the two recommendations above concerning changing the Wilderness-Recommended area to either Backcountry or Motorized Backcountry. The paragraph above that refer to the FPO suggest that even Backcountry non-motorized can be accessed by alternative means.

Any recommendations for wilderness are in direct contradiction to multi-use of the forest (public land) reducing it to special interests and is detrimental to restoring, let alone maintaining a healthy forest. Also, any recommended wilderness would contradict Ferry County's designation of lands of long-term significance in Forest, Mineral and Agriculture (grazing).

The following comments address the FPO in respect to the Ferry County Critical Areas Ordinance:

The Planning Commission has analyzed the sections of the FPO that relate to critical area and wildlife. The Ferry County Critical Area Ordinance implements the policy of the Comprehensive Plan. The Critical

Area Ordinance lists species and habitats to be protected. Due to the fact that Ferry County is made up of so much public land Section 7.4.15 reflects the approach of relying on the management of these lands by the responsible agency.

The Planning Commission is pleased to see that Table 157 on page 389 of the FPD shows that Alternative P is the best for the recovery of federally listed wildlife species, viability of surrogate wildlife species and sustainability of species of management interest.

Washington State Fish and Wildlife has designated the lynx habitat in the Kettle Range and the Planning Commission is pleased to see that the FPD lays out plans to address the issue.

The above comments and recommendations are unanimously submitted by the Ferry County Planning Commission.