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Amy Dillion, Forest Plan Revision Team Colville National Forest
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Attention: Revision Team

My name is Lorna Johnson and I am pleased to be able to make comment on the Colville National Forest Plan Revision. My background gives me perspectives from different angles. I am the chair of the Ferry County Planning Commission, chair of the Historic Preservation Board, chair of the Kettle River Advisory Board, a member of the Ferry County Natural Resource Board and President of the Curlew Civics Club.

I have reviewed the three books that compile the Proposed Revised Land Management Plan for Colville National Forest. Having completed this review I have decided that the Alternative P is the most reasonable plan. All of my comments pertain to Ferry County only. Alternative P has flaws, but it also has some very good points. I shall address the positive points first.

*On page 61, line 2022 Table 11 compares the different plans with key indicators. This table shows Alternative P to have the largest number of acres suitable for timber production, and one of the highest predicted wood sale quantity. I realize that these totals are not exclusive to Ferry County.

*On page 62, table 11 continues, sections on Road densities and Recreation looks good.

*On page 63, table 11 continues, sections on Socio Economics, Wildlife and Riparian Habitat look good.

*On page 93, beginning on line 2874, the discussion is referring to Alternative P not including the Eastside Screens. I agree with the elimination of the Eastside Screens, this allows for actively managing stands and creating and maintaining structure types.

*On page 389 table 157 shows that Alternative P is the best for the recovery of Federal listed wildlife species, viability of surrogate wildlife species and sustainability of species of management interest. The Ferry County Critical Area Ordinance, which implements the policy of the county Comprehensive Plan, lists the Federal species.

*On page 522 beginning with line 18163 through 18183 support livestock grazing for the Alternatives. It states, "These activities contribute to the stability and social economic and cultural aspects of rural communities."

*On page 529 beginning on line 18387 through 18403 the discussion is about 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 on to page 530 through line 18423 discuss the benefits of grazing in concern with climate change.

I am sure that there are a number of other positive points in the Proposed Alternative P, these are the ones that stood out during my reading.

I shall proceed to the portions of the Proposed Revised Land Management Plan Colville Forest which are not

positive.

*On page 68 in chapter 3, line 2178 state, "No prime farmland, rangeland or forestland as defined by the National Resource Conservation Service has been identified in the planning area." Comment: This statement is in direct contradiction to the Ferry County Development Regulations and Comprehensive Plan which designates all grazing leases as Agricultural Lands of Long-Term Commercial Significance. The National Resource Conservation Service soil surveys report 18 prime soil types in Northern Ferry County. Suggestion: Please double check the reference of the National Resource Conservation Service since the 18 prime soils on the North half of the county do not all fall on the 17% of the land that is privately owned.

*On page 502 the table 175 shows all Alternatives authorize only 27,580 AUM for cattle and 0 allocated for sheep.

*On page 519 the paragraph beginning with lines 18043 through 18051 discuss 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 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.

*On page 526 the table 179 shows the forest capable of grazing 690,311 cattle and 881,287 sheep.

*On page 519 the paragraph beginning with line 18052 supports and defines the benefits of grazing on the Colville National Forest. The paragraph states, "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".

Comment : I realize that the AUM numbers and the number of grazing allotments are for the entire Colville Forest. The last citation expresses the importance of the grazing allotments on the Colville Forest. The other citations show that there is a capability of higher numbers of AUM's than what is proposed on all of the Alternatives. There has to be a reason why there is such a decline in the AUM numbers and why there are 16 vacant grazing leases.

Suggestion: The reason needs to be determined and the Forest Service needs to work with the cattleman to improve the grazing regulations to make them user friendly. The Forest Service Plan should reflect positive measures to process vacant allotments and make them attractive to get them filled. It is incumbent upon the Forest Service to actively manage the Public Lands to their full potential.

The Proposed Revised Land Management Plan for Colville Forest has a section concerning the Ferry County land use plan. The Ferry County Comprehensive Plan has two supporting documents, the Development Regulations Ordinance and the Critical Area Ordinance. Ferry County has a Range Law and a Right to Farm, Ranch and Practice Forestry Ordinance.

The Development Regulations Ordinance addresses the U.S. Agricultural Census, the 1934 Taylor Grazing Act, the 1976 Federal Land Policy and Management Act and the 1978 Public Rangeland Improvement Act.

The Ferry County Comprehensive Plan has a policy that states "It is Ferry County's intention that the Federal and State agencies coordinate their land use planning for intermingled state and federal lands with Ferry County's planning."

Ferry County Resolution No. 2007-07, amending Resolution No. 95-36 titled SUPPORTING COUNTY CUSTOM, CULTURE, AND HERITAGE PLAN IN DECISION MAKING ON FEDERAL LANDS IN FERRY COUNTY, STATE OF WASHINGTON outlines federal coordination with Ferry County in the decision making processes regarding management of federal lands within the county.

*On page 786 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."

Comment: This section beginning on page 786 lays out the basic goals and objectives very well, yet in other sections of the Proposed Revised Land Management Plan for Colville Forest there are statements that are not consistent with the County land use planning 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. I will continue to lay out examples below and then give my suggestion at the end of the citations.

*On page 62 Table 11 under the heading Recommended Wilderness in the column for Alternative P there is listed 68,300 acres recommended. I realize this amount of acres is not all in Ferry County. There is an area marked as Wilderness-Recommended in Ferry County on the Alternate P map and the acreage is not given.

*On page 539 beginning on line 18789 to line 18792 discussing Recommended Wilderness Areas 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."

*On page 569 beginning with line 19903 through line 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 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 : This statement is in direct conflict with the statement on page 569.

*On page 551 beginning with line 19310 through line 19312 it states, "Wilderness recommendation i 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."

Comment: The area within Ferry County that is on the Alternate P map as Wilderness-Recommended has been designated as Agricultural Land of Long-Term Commercial Significance, Forest Land of Long Term Commercial Significance and Mineral Land of Long-Term Commercial Significance. If this area remains on the Alternate P map as Wilderness-Recommended this will be in direct conflict with the Ferry County Comprehensive Plan and the supporting Ordinances.

On May 23'd, 2011 the Ferry County Commissioners signed Resolution No. 2011-25 titled Opposing "Wilderness Designations". The Resolution opposes any and all Wilderness Designations for Ferry County in order to insure equal access to the Colville National Forest for all citizens within Ferry County.

On June 6th, 2011 the Mayor and City Council of Republic, Washington signed Resolution 2011-06 titled "OPPOSING WILDERNESS DESIGNATION".

On June 8th, 2011 the Board of Ferry County Parks and Recreation District 2 signed Resolution No 2011- 01 titled Opposing "Wilderness Designation".

*On pages 776 through 778 Table A-2 shows that the Forest Revision team met with the Ferry County Commissioners at the commissioner office or in other public meetings 33 times between June 20, 2011 and September 17, 2015.

Comment:

I attended a number of the meetings listed above and I know for a fact that the Ferry County Commissioners told the U.S. Forest Service Personnel that the County opposes any designation of wilderness within Ferry County. Under the Spirit of Coordination the Proposed Revised Management Plan for Colville Forest should not show any areas of Wilderness-Recommended within the boundaries of Ferry County.

The areas being proposed for Wilderness Designation do not meet the criteria as called for in the Federal Wilderness Act of 1964 or the Washington State Wilderness Act of 1984.

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).

Suggestion:

The area on the map for Alternative P that is Wilderness-Recommended in Ferry County should be changed to either Backcountry or Backcountry Motorized. Both of these classifications allow for mechanized uses, grazing, timber harvest, mining and fire suppression. This area already has roads.

Thank you for your time,