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The Lands Council
25 West Main #222
Spokane, Washington 99201



December 21, 2011

Laura Jo West, Supervisor
Colville National Forest
765 South Main Street – Federal Building
Colville, Washington 99114

Dear Supervisor West,

We have deep concerns over the South End Project Decision. Our groups diligently participated in Forest Service recreational travel planning from 2004 to present, consistently supporting a legal trail system while expressing concerns about expansion of illegal user-built trails and trespass on Level I (closed) roads. Our chief concern about the South End Project Decision is that it worsens systemic problems regarding illegal trail and Level I road use that are having serious impacts to people and the environment.

The South End Project proposal carries with it nothing to foster confidence that the Forest Service and All-terrain vehicle (ATV) users can be accountable for the problems this project is sure to create. We point out that the agency:

- a. Has failed to stop illegal ORV use in past, even where promised;
- b. Has failed to restore many areas damaged by ATV's in past (see attachment);
- c. Lacks funding to prevent further illegal use spawned by South End,;
- d. Lacks funding to restore damage caused by previous ATV abuse within the project planning area.
- e. Lacks funding even to implement \$750K in the infrastructure envisioned in the South End proposal.



Pictures taken in South End Project Planning Area – D. Heflick June/July 2011

**"The FS does not have the money or resources to enforce the existing MVUM,
least of all this increased use.**

The FS does not have a pot of money to implement this proposal."

EA at page 14

Cumulatively, both legal and illegal routes are having significant impacts to the Colville National Forest (CNF) including disruption of wildlife, spread of noxious weeds, noise and air pollution and increased risk of wildfire.

The Forest Service lacks law enforcement capacity to police the existing CNF ATV route system and is clearly incapable of policing an expanded trail system that also includes hundreds of miles of illegal user-built trails.

South End Project expands the ATV motorized trail system within the CNF well-beyond the capacity of the Forest Service to contain it to acceptable use. Since 2005, the Forest Service has expanded ATV access to over 650 miles of trails and Level II roads. During that same period, Ferry, Stevens and Pend Oreille County have opened additional hundreds of miles of county roads to off-highway vehicle access.

We don't have a problem with ATV's driving on roads. But many ATV users are not satisfied with road travel, and have used their increased road privileges to access and abuse an ever increasing amount of backcountry.

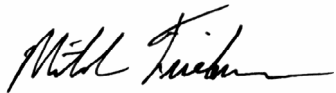
Even with the expanded legal network of trails, illegal user-built trails and trespass on closed roads has increased exponentially throughout the CNF and onto state and private lands. In some watersheds within the CNF, 100% of Level I (closed) roads have been breached by ATV users. The South End Project takes us headlong in the wrong direction by simply opening more roads (170 miles) but not much more trail. This is an outright invitation and recipe for users to create their own illegal and destructive trails.

Since the South End Project legalizes some trails that were illegally built by ATV users, it rewards bad behavior and as such incentivizes additional illegal trail construction elsewhere across the CNF. In addition, the Forest Service assigns self-policing power to ATV groups and individuals, some who likely built the illegal trail system that the South End Project would retroactively sanction. We have abundant evidence that self-policing is insufficient.

Another concern is that opening more roads to ATV use in effect will be an invitation for illegal trail blazing and use, which is already rampant and damaging. For example, our study of the administratively closed portion of the South Fork Boulder Creek watershed of the CNF revealed 17 miles of closed roads regularly violated by ATV's, and numerous user-created routes running through the riparian area to the creek.

The dangerous course of action authorized by the Decision leaves us no option but to appeal this project. However, our preference is to not appeal, but we cannot stand aside unless the Forest Service can demonstrate convincingly that our concerns are addressed at the project and forest-wide level. For instance, can your agency guarantee funding to implement this project fully, including mitigation and enforcement? What measures will you employ to stop and repair illegal trails and trespass issues across the Forest? Another product that might help address our concerns is a signed commitment by the CNF and leading motor clubs to closure of the entire South End area the moment that abuse crosses an agreed upon threshold.

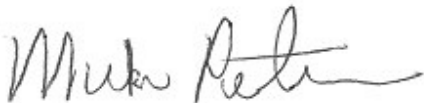
Sincerely,



Mitch Friedman
Executive Director
Conservation Northwest



Timothy J. Coleman
Executive Director
Kettle Range Conservation Group



Michael P. Petersen
Executive Director
The Lands Council

cc: U.S. Senator Maria Cantwell
Congresswoman Cathy McMorris Rodgers
Senator Bob Morton
Rep. Joel Kretz
Rep. Shelly Short
Stevens County Commissioners