April 2, 2007

Lloyd McGee, President
Northeast Washington Forestry Coalition
565 West 5th
Colville, Washington 99114

Ms. Margaret Hartzell, Team Leader
Colville, Okanogan, and Wenatchee -
National Forests Plan Revision Team
1240 Second Avenue South
Okanogan, WA 98840

RE: Colville National Forest Plan

Dear Ms Hartzell,

The Northeast Washington Forestry Coalition appreciates the opportunity to comment and provide input to the Colville National Forest Plan revision process. As you know, our Coalition is made up of timber industry representatives, environmental group leaders, forestry consultants, private non-industrial timber owners, academic leaders and other interests. Since our group consists of a wide range of special interest groups, our general goal is to find Colville National Forest management approaches that we can all agree upon. Our specific goal concerning the Colville Forest Plan revision is to achieve a balanced approach to forest management that promotes innovative forestry, ecosystem restoration and protection of critical wildlife habitat.

Northeast Washington Forestry Coalition is a cutting-edge collaborative group formed in 2002 expressly to resolve difficult social, business and environmental issues concerning forest management including community wildfire protection, restoration and conservation of old growth forests, and wilderness preservation. For the past 14 months coalition members have developed a holistic management plan for the Colville National Forest – which we call our Blueprint – that takes an innovative approach to managing our national forest.

As you are aware, in October 2006, the Coalition presented this draft forest management strategy in a map-based format during the Forest Service-led collaborative Forest Plan Summit process. This map then became the basis for Working Group discussion and agreement during the remainder of the Summit process, which concluded in January 2007.

Management Areas & Objectives

Responsible Management Area: The goal of sustainable active management is to increase the forest's resilience to insects disease and uncharacteristic fire by providing site-specific ranges

of stocking levels, species composition and tree size, as well as provide a stable flow of forest by-products for local rural economies. These goals will be accomplished by using ecologically sensitive forestry techniques and equipment to mechanically thin overstocked stands on a sustainable schedule, using existing roads whenever possible. In situations, particularly in the WUI portion of the RMA, where new roads absolutely must be built to adequately meet the purpose and need of a project, the NEWFC Roads Policy (described below) will apply.

Restoration Area: The Colville National Forest has, in many areas, an unnatural forest structure that adversely affects the Forest's ecosystems. There is a need to enhance ecological integrity and ecosystem function in these areas by restoring natural processes and resiliency, which will protect watersheds, habitat, and ecosystems. To effectively accomplish this goal—taking into consideration various forest types and their location, ranging from warm dry forests to cold wet forests and those near WUI/RMA areas to those near proposed Wilderness areas —restoration must integrate a variety of restoration treatments, including treatments to the transportation system (road maintenance and removal), wildlife habitat and watershed restoration, restoration of dry-forest old growth, invasive species control, and fuel and fire treatments.

Wilderness Area: NEWFC supports the recommendation for wilderness of all IRAs included in the 2006 inventory with the exception of the Lost Creek IRA and Harvey Creek IRA. Proposed Wilderness areas on the attached map are restricted to inventoried roadless areas. NEWFC recommends that unroaded and lightly roaded areas, shown as Restoration Area on the attached map adjacent to and that separate IRAs should be restored to, or maintained in, their historic stand structure. Management in these areas would be the minimum necessary to restore them to a healthy, historic condition.

Guidelines

While work on enhancing and fine-tuning guidelines is still underway, NEWFC has reached agreement on a set of guidelines to be followed while implementing projects in the RMA and Restoration zones. In order to make quick comparisons between one zone and the other, we present these guidelines below in a table with columns showing guidelines for the RMA and Restoration Zone side by side.

Guideline	Responsible Management Area	Restoration Area
Preliminary Assessments	The level, range, and scope of assessments required will be determined by existing law, regulations and official agency guidance in place at the time the assessments are conducted.	The level, range, and scope of assessments required will be determined by existing law, regulations and official agency guidance in place at the time the assessments are conducted. Short-term adverse impacts to biological legacies, soils, water quality, wildlife and botanical resources, weeds, and impacts from roads that are determined in a risk assessment to be unavoidable in accomplishing the overall restoration objective shall be mitigated. Under conditions where adverse impacts outweigh the potential benefits of active restoration activities, such activities will not take place.
Monitoring	The assessment and corresponding actions are then followed by improved programmatic and effectiveness monitoring that measures progress towards improving a degraded system so that it is more resilient to disturbance. Effectiveness monitoring will provide a means to assess progress and make a determination regarding the need for subsequent/additional treatments in order to continue progress toward the desired future condition.	The assessment and corresponding actions are then followed by improved programmatic and effectiveness monitoring that measures progress towards restoring a degraded system. Effectiveness monitoring will provide a means to assess progress and make a determination regarding the need for subsequent/additional treatments in order to continue progress toward the desired future condition.
Adaptive Management	Adaptive management is key to successfully managing biological systems. Adaptive management, based on monitoring results, will serve as a reality-check for the above assessments and will enhance the ability to achieve the goal stated above.	Adaptive management is key to successfully managing biological systems. Adaptive management, based on monitoring results, will serve as a reality-check for the above assessments and will enhance the ability to achieve the goal stated above.

Priorities	In the interest of getting necessary work done, most active stewardship effort can be focused on already roaded, grazed, and/or logged portions of the landscape.	In the interest of getting necessary work done, restoration effort should be focused initially on already roaded, grazed, and/or logged portions of the landscape.
Economics	In addition to sawlogs, other materials generated from active stewardship projects (by-products) may be made available to the forest products industry.	If materials generated from implementation of site-specific restoration prescriptions are not to be left on site, they may be made available to the forest products industry. In planning restoration projects where there will be a significant number of units in which the costs of services exceeds the value of such by-products, project planners should strive to include enough units in which the value of by-products will exceed implementation costs that the project will, at minimum, break even economically. However, in doing so, the restoration objective of the project must not be compromised.
Variations in Prescriptions	Prescriptions to accomplish active stewardship objectives will vary, depending upon site-specific conditions, including but not limited to, plant association groups, historic fire regime, social and cultural objectives. (Note: The inclusion of "plant association group" shall not be construed to imply that we are managing for a seral climax condition across the entire forest.)	Prescriptions to accomplish restoration objectives will vary, depending upon site-specific conditions, including but not limited to, plant association groups and historic fire regime. (Note: the inclusion of "plant association group" shall not be construed to imply that we are managing for a seral climax condition across the entire forest.)
Water Quality and Quantity	Active stewardship includes protecting and/or restoring streams and riparian habitat, fish passage, stream temperature, sediment load, addressing erosion problems at road-stream crossings, and protecting the land's capacity to absorb, store, and filter water, including protection of water table levels.	Restoration includes restoring streams and riparian habitat, fish passage, stream temperature, sediment load, addressing erosion problems at road stream crossings, and restoring the land's capacity to absorb, store, and filter water, including restoration of water table levels.
Weeds	Minimize noxious weeds by conducting integrated weed management.	Minimize noxious weeds by conducting integrated weed management.

Grazing	[*Committee members all agreed that development of language this item should be postponed until we've consulted with grazing interests.*]	[*Committee members all agreed that development of language this item should be postponed until we've consulted with grazing interests.*]
Soils	Protect, manage, and rehabilitate soils where necessary to optimize soil productivity.	Restore soils, in accordance with site-specific prescriptions.
Wildlife Habitat	[*Committee members all agreed that language for this item will developed in tandem with language for the same item in the Restoration Principles, allowing us to assess (with assistance from independent biologist) the extent to which Restoration and Wilderness zones allow for habitat protection.*]	[*committee members all agreed that language for this item will be developed in tandem with language for the same item in the restoration principles, allowing us to assess (with assistance from qualified biologists) the extent to which RMA and Wilderness zones allow for habitat protection.*]
Roads	[*Language regarding roads will be tiered to a NEWFC board-approved roads policy. This policy is currently under development by NEWFC Project Committee.*]	[*Language regarding roads will be tiered to a NEWFC board-approved roads policy. This policy is currently under development by NEWFC Project Committee.*]
Species and Structure	Restoration of structure (including reduction of fuels), ecosystem function, and species diversity is a key objective of all projects.	Restoration of structure, ecosystem function, and species diversity are key objectives of all restoration projects.

Draft NEWFC Interim Road Policy for NEWFC Supported CNF Projects

The Northeast Washington Forestry Coalition (NEWFC) is committed to preventing and significantly reducing harmful impacts of roads,[1] including reducing overall road density on the Colville National Forest.

NEWFC recognizes that there may be site-specific circumstances in which road construction and/or reconstruction[2] may be appropriate. Whenever NEWFC determines that road construction activities are necessary to meet the Purpose and Need of a project, NEWFC support for the project shall be conditioned on the following: for each foot of road

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[2] This includes all roads within the Colville National Forest, classified, unclassified, and temporary.

[2] For the purposes of this document, the following activities constitute road construction/reconstruction:

- Construction of a new segment of road where there is currently no road template
- Construction of a new segment of road over an existing unclassified-road template
- Construction of a temporary road
- Road reconstruction over any existing road template, classified or not

[2] and entered into the obliteration target.

construction/reconstruction implemented in the project, one foot of existing road shall be removed from the road atlas and ripped or re-contoured[3] to the extent necessary to allow the affected landscape to recover from the adverse ecological impacts to soils, hydrology and wildlife. These roads will also be considered for possible conversion to trails.

During the period in which the interim roads policy is in effect, the amount of road miles to be obliterated or converted into trails in exchange for 1 mile of road reconstruction will as follows:

1 mile of light reconstruction = .2 miles of obliteration/trail conversion
1 mile of medium reconstruction = .4 miles of obliteration/trail conversion
1 mile of heavy reconstruction = .6 miles of obliteration/trail conversion

A forest-wide list of roads to be obliterated as described above shall be collaboratively developed, prioritized, and maintained by NEWFC. This list of roads will also be coordinated with the NEWFC Recreation Committee to prioritize roads the committee has identified as possible roads-to-trails conversions to enhance the existing recreational trails system on the forest. Roads will be obliterated or converted into trails in the assigned order of priority unless otherwise agreed to by NEWFC.

Boundaries

NEWFC has agreed upon boundaries for the Responsible Management Area, the Restoration Area, and areas that NEWFC supports for Wilderness Recommendations under the CNF forest planning process. Please see the attached map for the boundaries of these three zones.

Below is a brief description of each of these three zones:

Responsible Management Area: The starting point for developing the RMA was to determine polygons of land that were located between roads within a half mile of each other. In ArcView, all system roads were buffered out ¼ mile. Areas where the buffers overlapped (or nearly overlapped) were considered, with rare exception, as the "no brainer" areas that would serve as the starting point for the RMA. Other considerations were then used to expand or contract the area, including adding of all WUI areas (1.5 miles from occupied structures) not overlapping proposed wilderness boundaries, exclusion of INFISH buffers and habitat management units, inclusion of areas immediately adjacent to or surrounded by polygons of "already roaded" areas, etc.

Proposed Wilderness Area: In terms of reflecting NEWFC agreement on areas of the CNF to be proposed for Wilderness in the context of comments on this administrative process, the proposed Wilderness area on the attached map is restricted to inventoried roadless areas. NEWFC supports the recommendation for wilderness of all IRAs included in the 2006 inventory with the exception of the Lost Creek IRA and Harvey Creek IRA.

Restoration Area: Since road density is the key driver is differentiating one area from the other, the Restoration area emerged as the lightly roaded area that lies—on the road-density

scale—between the heavily roaded RMA and the unroaded IRAs. In other words, in general, the Restoration area is the portion of the forest remaining after the RMA and the IRAs were developed.

Conclusion

We appreciate the opportunity to work cooperatively with the Colville National Forest to implement the Blueprint. We will provide additional specific silvicultural and restoration objectives in the near future and in a timely manner prior to release of your draft Forest Plan Option. Please feel free to contact me any time if there are any questions concerning our proposal.

Sincerely,

Lloyd McGee
President

Enclosure: Map – proposal for management of Colville National Forest