Date submitted (Pacific Standard Time): 11/6/2018 12:00:00 AM
First name: Maurice
Last name: Williamson
Organization: Williamson Consulting
Title:
Official Representative/Member Indicator:
Address1: 270 S. Main St.
Address2:
City: Colville
State: WA
Province/Region:
Zip/Postal Code: 99114
Country: United States
Email: general@williamsonconsulting.net
Phone: 509-684-8550
Comments:
November 6, 2018

Chris French

Objection Reviewing Officer 1400 Independence Avenue SW EMC-LEAP, Mailstop 1104

Washington, DC 20250.

Re: Objection regarding the Revised Colville Forest Plan

Pursuant to 36 C.F.R. Part 218, I file this objection to the proposed decision for Revised Colville Forest Plan and Record of Decision. The responsible official is Region 6 Forester. The project occurs on the Colville National Forest.

Objector
Maurice Williamson Williamson Consulting 270 S Main St

Colville WA 99114

(509)684-8550

Thank you for the opportunity to provide objections to the Colville National Forest (CNF) Land Management Plan and Final Environmental Impact Statement (FEIS).

My Concerns are as follows:

The proposed and possible management actions should specify commercial harvest on more acres over the next 35 years.

In Table B-1 "initiate active management activities on 6 to 12 thousand acres per year..." should clearly communicate that the intent is to treat acres that have commercial value. Timber harvest, scheduled production should be consistent and predictable, acres treated that moves structure toward desired vegetative conditions should at least produce 80 million board feet per year.

The FEIS does not comply with the purpose and need statement: "change compliance with all federal mandates including the Multiple-Use Sustained-Yield Act (MUSYA)." The FEIS does not actually change the pace and scale adequately to accomplish restoration within a meaningful timeframe. Nor does the FEIS comply with the MUSYA. The FEIS states that there

are 486,000 acres of the CNF in fire regime condition class 3, at 12,000 acres/year of treatment (mechanical, prescribed fire, etc.) it would take 40.5 years to restore the current acreage to fire regime condition class I. The FEIS states that there are 890,000 acres of fire regime condition classes 2 and 3, at 20,000 acres/year of treatment it would take 44.5 years to restore the current acreage to fire regime condition class I. Note that during the 40 years, additional acreage will progress to fire regime classes 2 and 3. This lack of accounting of continual transition toward adverse condition does not comply with the mandate referenced in the Purpose and Need.

Section 4 a) Multiple-Use Sustained-Yield Act calls for, "Making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments to confonn to changing needs and conditions" Section 4 d) " Sustained yield of the several products and services means the achievement of a high level annual or periodic output of the various renewable resources of the national forests without impainnent to the productivity of the land".

The methodology the FEIS continues to use is an inappropriate interpretation of the tenn "Sustained Yield" as clearly stated in the preceding quotes from the act. Alternative B used a "cutting budget" approach to the reconstruction efforts by utilizing an "unconstrained" approach on 37% of the CNF.

The FEIS does not recognize uncharacteristic fire and fuels as a "significant issue" in the purpose and need. This disastrous omission must be corrected in the FEIS. There are adequate discussions to change the rate of restoration (FEIS p. 5) due to adverse impacts from insects, disease and wildfire on soil and water (FEIS pgs. 317, 428). Wildfire is a natural event within the CNF, but uncharacteristic wildfire is not conducive to managing "the national forests without impainnent to the productivity of the land" (Sec. 4 d) MUSYA.

The FEIS calculation of (volume of timber modeled) budgeted amount is based on starting from the DFC of the forest. The calculation should be based on the volume/acreage (restoration) that should be removed/treated to reach the DFC as early as practicable. This would give the public a clearer "picture " of what is necessary to accomplish the goals of the forest plan over the next 15 years.

Inadequate/outdated infonnation is used in the economic assessment: FEIS p. 608 (JKA 2010 for BLM) "data only good for 15 years",

Requested Relief

Change the analysis to specify the number of acres in need of treatment annually to accomplish the DFC within 35 years.

Change Table B-1 to "Initiate commercial and non-commercial management activities on at least 18 to 25 thousand acres per year........................ "

Socio-economic

The socio-economic impact review of the plan revision on the local economy is inadequate. It does not reflect the use of "Retained Receipts" under stewardship contracts on the CNF (McK.etta study). "Retained Receipts" enable the CNF to accelerate the restoration efforts, including project analysis under NEPA. Furthennore, there have been studies on the impact of various recreation activities on local economies (cite Headwaters ... ). Neither of these are referenced in the FEIS.

[bull]    The use of US Labor Department data and other generalized data is not adequate to analyze the impact of the forest plan to local economies.

[bull]    The analysis of the tri-county (Ferry, Stevens, and Pend Oreille counties) does not recognize the economic impact of the CNF management activities on the larger regional area inclusive of the general Spokane area.

Requested Relief: Complete a more detailed analysis, inclusive of the use of cited studies and others as available. FEIS pg. 616 Census data is described as being out of date and not adequate for the FEIS. There should be an amendment to use more recent Census Data and other studies previously mentioned.

Could find no map or description of the socioeconomic impact zone.

Post-Disturbance Restoration

The FEIS gives inadequate recognition to the collaborative approval of post-disturbance restoration: Much time and effort spent by Eastern Washington collaboratives in the formulation of a framework to approve of post-disturbance projects involving the removal of commercial products. The FEIS notes a great likelihood that these events will increase in volume and frequency necessitating an unambiguous statement that such activities will take place. We agree that there is a generic statement in the FEIS which gives legitimacy to post[shy] disturbance restoration projects on page 207, Appendix E. Due to the historical controversy including appeals (now objections) and litigation, we feel there should be a statement to emphasize that this will be analyzed on all appropriate projects as per collaborative agreements.

Requested Relief: There should be a clear statement emphasizing the activities are legitimized and will be analyzed on a project basis.

Request for Resolution Meeting

Pursuant to 36 C.F.R. [sect] 218.11, I request a meeting with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, I respectfully

requests that the resolution meeting be held as soon as possible with all objectors present.  I believe that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. [sect] 218.11 gives the

Reviewing Officer considerable discretion as to the fonn ofresolution meetings. With that in mind, I request to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. I look forward to our initial resolution meeting. Please contact me at the address and phone number shown above, to arrange a date for the resolution meeting.