

January 9, 2002

To: Tom Pawley
Three Rivers Ranger District

From: Janice Ceridwen
610 367 9789

Thank you for taking the time to answer my questions yesterday about the South Deep Management Project. Unfortunately, I have more questions now than answers. As agreed, I have sent the first list of names that did not receive the Public Comment Letter. (See Below) I will send another list when I finish compiling it.

Additionally, I need the following information from you:

What is the exact correlation between this project and the South Deep CROPS Project research initiated several years ago? Or, is this entirely new. What happens to the information that was acquired during the Collaborative Learning Planning Processes that so many attended, facilitated by WSU? Will this be taken under advisement. Who is the decision maker about this project. At what level in the Forest Service. Who is this project ultimately accountable to? Who manages the project?

Who was informed of this latest project? Please provide a data base list of the names of who received your mailing of Dec. 28, 2001. I can provide you with the additional names that need to be included in the comment process.

What are the names of universities and their contacts that you have indicated will have involvement in this project. What exactly will be their roles?

What is the status of the access road to the harvest on the backside of Roger's Mountain. Will you be reopening the public road?

Please disclose a description of the treatment methods you indicate on the map.

Most importantly, I think it is obvious that more time is needed if you truly wish to learn from those living closest to this project the implications of your proposal. Please advise me of a process for extending the time for public comment. There is not sufficient time now, since so many were left out of the initial mailing. Also, based on the thoroughness required the three week remaining deadline is hardly a sufficient time to make an informed comment based on research data.

Live close to the area encompassing this project or have land holdings near the Project Area, but DID NOT Receive your mailing Of December 28, 2001 _ Please mail immediately.

Brent and Merna Olsen
1900 - C Rocky Ck Rd
Colville, WA 99114

Signe Morefield
2135 Rocky Creek Road
Colville, WA 99114

Foster Hankins
2173 Rocky Crk Rd
Colville, WA 99114

Marcelline Hulbert
5404 46th SW
Seattle, WA 99114

Harshbarger
Rocky Creek Rd
Colville, WA 99114

William Hyde
1785 Aladdin Rd
Colville, WA 99114

Debbi Bohlin
Bill Avery
60112 State Rte 410 East
Greenwater, WA 98022

W. Judd Phillips
146 Swede Anderson Rd
Colville, WA 99114

Jeff Dawson
1316 Aladdin Road
Colville, WA 99114

John Dawson
554 Larsen Rd
Colville, WA 99114

Ken Phillips
349 Spanish Prairie Rd
Colville, WA 99114

Bud and Mary Delsman
940 Aladdin Rd
Colville, WA 99114

Art And Glenda Rutledge
1195 Aladdin Rd
Colville, WA 99114

Dick Vander Yacht
PO Box 279
Blaine, WA 98231-0279

Jan. 1, 2002

Sherri K. Schwenke
United States Department of Agriculture
255 West 11th
Kettle Falls, WA 99141

Dear Ms. Schwenke,

Ref: Your letter of Dec. 28, 2001 - File Code 1950

I own 320 acres within the boundaries of *South Deep Management Project* as described in your letter. One half of Section 27, TWP 38, R41E. There is no doubt that much of the timber in your described unit is overstocked with trees. Past logging has been hit and miss. Most of the forest land is unmanaged or mismanaged.

According to your map my property is a candidate for burning. I will not permit any burning to occur on my land. All too frequently so called "controlled burns" become uncontrolled, go wild and destroy a lot of good timber.

If you or your foresters drive or walk around my property you will find that it is one of the best managed pieces of forest land in the proposed project. In the mid 1970's, Herb Schwenke (perhaps a relative) logged the land for two years taking out damaged and diseased trees and did a lot of commercial thinning.

Since that time I have made three additional cuts spaced four or five years apart. Logger Steve Cochran, Vaughn Brothers & Ritchart Brothers did the work. Vaughn and Ritchart used mechanical harvesters taking out chip wood and hew saw material. Steve Cochran did regular commercial thinning and selective logging. More work was scheduled by Ritchart but the pulp market was flooded and we ceased the operation.

Each year members of my family and myself thin young growth for a week or two. It does not really make a dent in the overall land base but several small areas are thinned very nicely. This thinning will continue every year.

During the last chip log removal we purposefully left "wildlife thermal units" as recommended by the Washington State Department of Fish & Wildlife. Setting aside the thermal units, two thirds of my property has been thinned, logged or clear cut since I bought it. Land north and east of my property in Section 27 is a horrible mess, over stocked, untouched for years. It is interesting to note this land is not marked for a burn.

When I bought this property it was unmanaged, logged (raped) in a cut and run manner. With recommendations of the DNR I have made some drastic changes in the landscape and timber growth. Admittedly more work is needed. Depending on market conditions, I will likely make another cut in 2002 or 2003. I am a good steward of the land.

I will be on the property two or three times during May and June and would be glad to meet and show any forester how I manage the property. Your department may have good intentions but you may as well cancel any plans you have to set fires on my property. A damage suit will be filed if uncontrolled fires cross my boundaries.

I look forward to hearing from you to correct my impressions of the project if my analysis is incorrect. Please keep me advised. Thank you.

Dick Vander Yacht

Letters To The Editor

Forest Service land grab

Dear Editor,

I just became aware of another manipulation by the Forest Service to enroll private property in an agreement called Watershed Restoration and Enhancement Agreement. Sounds noble doesn't it? Watershed Restoration. However, if you knew what restoration really means to the Forest Service, you may not think it is so noble.

The term Restoration comes from junk science known as TCEEMP. Restoration consists of fire, flood, insects, and disease in other words, let Mother Nature take its course and all lands will be returned to

wilderness. This is only a policy since there has not been a Record of Decision issued for implementation. However, our environmental groups sue the Forest Service to implement this ideology.

Specifically, the Three Rivers Ranger District is proposing a project called the South Deep Management Project located approximately 15 miles northeast of Colville along the Aladdin Highway, which includes 8,560 acres of private land. One of the primary issues of this project is watershed restoration: fire, flood, insects and disease.

Has the Forest Service approached you with a Watershed Restoration and Enhancement Agreement? If you sign the agreement, you just turned over your land to

be included in a project that the extreme environmentalists will control through court cases and appeals.

Do you want to turn over management of your land to someone else? If not, I would suggest you do not sign the Watershed Restoration and Enhancement Agreement. Keep private property under the control of private landowners.
Sharon Skimate
Republic



Ces80221@aol.com
01/06/2002 10:37 PM

To: sschwenke@fs.fed.us
cc:
Subject: South Deep Mgt Project

Dear Ms. Schwenke:

I couldn't tell from your map just where on it, if at all, my property is located, but Strauss Creek Road intersects the Aladdin Road at the south end of my property and Mill Creek runs through my property. I believe Rocky Creek runs on the property north of mine. My interest is to see if there are any clear cuts planned adjacent to my property, which I hope is not the case. A clear cut was made on what I believe is National Forest at the east border of my property over 2 decades ago and has been an eyesore for probably 15 years since it was made. Any logging on my property has been thinning, which I hope will be the case on any National Forest or any other public land adjacent to my property. Please inform me if any clearcuts are planned adjacent to my property or fairly close to it, so I might have some opportunity to participate in such decision or at least understand the rationale behind it.

Thanks for the information and your consideration.

Sincerely,
Cleve Erling Armstrong

Statesman Examiner

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Printed and mailed through the Statesman-Examiner, P.O. Box 271, Colville, WA 99114(07)

5-1-02

Date: 30 Jan 2002

Fax To: Sherri Schwenke - District Ranger

Company: Three Rivers Ranger District -

Fax #: 509-738-7701

From: Joyce Hare

^{file #}
616-344-3599 ext 1102 - home fax: 616-327-0813

Number of pages including cover sheet 4

Please accept these two letters as
comments regarding the
~~South~~ South Deep Management Project

Joyce Hare

From: <Turbo49@aol.com>
To: <gjhare@kalamazoo.net>
Cc: <billbern@theofficenet.com>
Sent: Friday, January 25, 2002 12:29 PM
Subject: Proposed Fed Burning

Joyce,

Please forward the following to the appropriate agency; South Deep Management Project File Cab
1950

Along with my Sister-in-Law, Joyce Hare, my wife, Nancy Sheppard, owns land in several sections adjacent to the Colville National Forest north of Colville on the Aladdin Road. When informed of the proposal to burn land under management of the US Forest Service in areas adjacent to our land several thoughts came to mind. They include the following: Once we became aware of the Douglas Fir Bark Beetle problem, we took aggressive action to immediately remove infected trees and trees in close proximity on the advice of our Forrester, Bill Berrigan. We then planted disease resistant trees. Significant sums of money were spent to control the Bark Beetle problem and it is an ongoing project.

It seems to us that an attempt to burn infected trees at the late date is like closing the barn door after the horse got out. The Government should have taken aggressive action to control the problem but due to the cumbersome bureaucracy, the blight got out of hand. If our memory serves us correctly, the Forest Service track record of being able to control their burns is not anything to shout about. Therein lies our primary objection to any burn on land adjacent to ours. Your ability to control burns especially in the areas adjacent to our property is questionable because of a lack of roads, etc. If fire were to cross over to our property as a result of a Forest Service controlled burn, rest assured that litigation would follow.

We are sending this to ensure our objection is a matter of record.

James and Nancy Sheppard - (Mountains and Valleys, LLC)

7 Surrey Lane
McLoud OK 74851

1-405-878-8626

January 29, 2002

Sherri Schwenke, District Ranger
Three Rivers Ranger District
255 W. 11th St
Kettle Falls, Washington, 99141

Dear Ms. Schwenke,

Thank you for sending the letter of explanation and the maps regarding the proposed South Deep Management Project (file Code: 1050). My land includes areas along South Deep Creek, Rocky Creek, and Scott Creek. Therefore, it is with great interest and concern that I am responding to your call for comments and or suggestions regarding your proposed project.

Ever since my parents passed away in 1998, my sister, Nancy Sheppard, and myself as landowners in the area have attempted to practice good Forest Management on our lands. We have a Forester Consultant who has drafted the required Forest Management Plan. We have, in addition, attended many forestry educational meetings to learn all that we can in order to take care of our forestlands and improve them for sustainability as well as wildlife enhancement. We have built roads as directed by the State of Washington to have accessibility for forest management in addition to better access for fire protection. We have also attempted to control the onslaught of Douglas Fir Bark Beetle, which spread extensively in our area. New disease resistant trees have been planted to meet our commitment to be good stewards of the land.

It is with much frustration that land next to mine, which is owned by the U. S. Forest Service and the people of the United States, has not had such extensive management treatment for the Douglas Fir Bark Beetle. There are growing patches of infected and dying trees right next to my land. The infected trees are now spreading the disease onto my trees because the management plan for those stands has not addressed the circumstances in a quick fashion to eradicate the problem. If the beetle problem had been addressed two or three years ago, the problem would be much lessened or non-existent.

Much of the forestland in the Management Project area has dense growth, which needs to be addressed by commercial thinning. Many foresters, sawmills, and private landowners have spent considerable time, together with research at the University level, to address these concerns. I am glad the U. S. Forest Service is now showing some concern and action planning as well. However, it seems the Forest Service is coming in a little late particularly as it relates to the disease problems. I am very much in favor of commercial thinning in these areas as well as removing the dead and dying trees as this dramatically decreases the overall fire danger.

At this time, I am not in favor of any prescribed burns. The Forest Service does not have a good track record when it comes to controlling their "controlled burns." I would rather see the Forest Service have an aggressive tree removal and road management plan to reach their desired goals. I strongly endorse the proposed research projects for the South Deep Management Project. The currently followed "No Action" alternative is outdated, ineffective and a terrible waste of money, land, and forest resources. The U. S. Forest Service needs to listen to others beside the self-

serving and inflexible organized environmentalists, or the cut-it-all-down-for-cash timber companies and loggers. As a private landowner who works with a forester, I do feel I am also an environmentalist. I do try to take into account the needs for fresh water, wildlife habitat, and other forest management practices affecting the local area and the planet as a whole.

Thank you again for this opportunity to comment on this project.

Joyce Hare, Manager
Hare's Heirs, LLC.
6909 Towhee
Portage, MI 49024
616-327-5824

Signe Morefield
2135 Rocky Creek Road
Colville, WA 99114
(509) 684-1599

Sherri K. Schwenke
District Ranger
Three Rivers Ranger District
255 West 11th
Kettle Falls, WA 99141

Dear Ms. Schwenke:

Re: South Deep Management Project

I am responding to the letter and map which I received regarding the above project. I am a resident of Rocky Creek and have lived here for 12 years.

I find your map somewhat vague as to the location of the proposed commercial harvest units in our immediate area. I refer specifically to that portion adjacent to Polley Creek. The question that comes to mind is what if any segment of that harvesting includes the stand of old growth timber on Polley Creek. Has this area been marked or ribboned so we can determine what is to be logged?

Another question that comes to mind is what method of logging is to be used in what areas. It makes it difficult to express an opinion without knowing what is to be clearcut and what is to be selectively logged. I strongly believe clearcutting should not be an option.

You show a very large prescribed burn unit in section 10 which is less than a mile due north of my ground. I have to ask how you propose to contain these fires this close to the homes located on Rocky Creek, i.e., will you clear areas around the border of this section or what? The incidence of runaway fires in recent years gives us a great deal of concern and we wonder what preventative measures you have in mind. Since your letter doesn't broach this subject we feel discretion is the better part of valor, hence, no burning.

In anticipation of your response, I remain,

Very truly yours,

Signe Morefield

cc: David Heflick
University of Washington
Washington State University
University of Idaho
U.S. Forest Service Pacific NW Research Station
Janice Ceridwan

Sherri Schwenke
District Range
255 West 11th
Kettle Falls, Washington 99141

To whom it may concern: 1/3/2002

As a concerned American Citizen, I am writing in response to the Notice of intent to prepare an environmental impact statement for the South Deep Management Project in the Colvill National Forest.

I am very concerned about potential road closures in this area. Please keep in mind that not all Americans are able to strap a 40 pound pack on their backs and hike for 10 days to enjoy the vast beauty of our great nation. Elderly and disabled Americans absolutely depend on existing roadways for outdoor recreation. Roads benefit not only these taxpayers, but sportsman and recreationalist as well. I am an off road enthusiast and avid outdoor recreationalist myself, I make use of these roads frequently.

I believe that access to public lands is a critical aspect of the multiple use policy that should govern our National Forests. And this access mandates that existing roads be preserved and only closed as an absolute last choice. And even then, only after a Roads Analysis is completed to ensure that transportation needs are determined throughout the district as a whole to prevent piece-meal decisions on road needs.

I urge your agency to consider the needs of ALL Americans as you proceed. Please do not consider ANY road closures in this area without first performing a Roads Analysis and allowing ample public comment period.

Finally, please add me to your mailing list so that I may stay informed about any potential changes to the public use of this area.

Thank you for your time,

Sincerely,

David L. Sumers
HC 01 Box 154
Kellogg, ID 83837



Sherri Schwenke
District Range
255 West 11th
Kettle Falls, Washington 99141



To whom it may concern: 1/3/2002

As a concerned citizen, I am writing in response to the Notice of Intent to prepare an environmental impact statement for the South Deep Management Project in the Colville National Forest.

I am very concerned about potential road closures in this area. Please keep in mind that not all Americans choose hiking as a way to enjoy the vast beauty of our great nation. Roads enable us to keep our forests in check as well as benefit sportsmen and recreationalists. I am an off road enthusiast and avid outdoor recreationalist myself and I make use of these roads frequently.

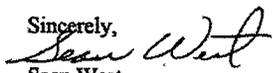
I believe that access to public lands is a critical aspect of the multiple use policy that should govern our National Forests. I also believe existing roads should be preserved and only closed as an absolute last choice, even then, only after a Roads Analysis is completed. This will ensure public needs are determined throughout the district as a whole to prevent piece-meal decisions to be made.

I urge your agency to consider the needs of ALL public land users as you proceed. Please do not consider ANY road closures in this area without first performing a Roads Analysis and allowing an ample public comment period.

Finally, please add me to your mailing list so that I may stay informed about any potential changes to the public use of this area.

Thank you for your time,

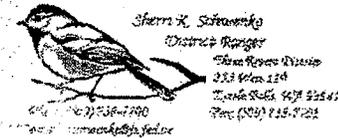
Sincerely,


Sean West
4001 Lancaster Rd
Coeur D' Alene, ID 83815

 Sherri K Schwenke
04/29/2002 02:10 PM

To: William T Pawley/R6/USDAFS@FSNOTES
cc:
Subject: No Action

To add to your project file and public comments.



----- Forwarded by Sherri K Schwenke/R6/USDAFS on 04/29/2002 02:09 PM -----

 "Daniel Henry"
<dhenry@landscounc
il.org>
04/24/2002 02:57 PM

To: <schwenke@fs.fed.us>
cc:
Subject: No Action

Dear Sheri Schwenke,

I recommend the "no action" alternative on the South Deep Project because I feel that investing in wildlife and aquifer recharge will have higher return than short term production logging. Please do not go ahead with your plans to invade this area. Please do not suppress any fires on this land, either. Educate the land owners around this area about "defensible space" around their homes so that their property is safe and then sit back and let it burn. Timber on private land would become more valuable (supply & demand) and a natural, beneficial process would be introduced. I'm aware that there would be some loss of wildlife, but I feel that the loss is part of the system on a whole. The disturbance is quite shallow in comparison to the deep effects of road building, thinning, flooding and ineffective burning.

Daniel Henry
508 S Cedar St Apt C
Spokane, WA 99204

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U.S. Forest Mismanagement

To the Editor:

An ill conceived "forest management" project is being proposed by our United St Forest Service that has the potential of destroying one of the richest habitats for wildlife State of Washington.

If you are a sledder, skier, camper, hunter, fisherman, huckleberry or mushroom gatherer probably know the **South Deep Creek Watershed, off Aladdin Road in the Colville Forest.** You'll recognize names such as Meadow Lake, Rocky Creek, Smackout, and Pass. You also know about the black bear, moose, owls, hare, cougar, lynx, bobcat, fox, squirrel and even cougar and grizzly that have adapted to this forest remnant.

Under the guise of "forest management," the area will be subject to commercial thinning harvest, clear cut AND prescribed burning. If the goal is managing for timber production course, such actions make sense. But if the goal is to provide habitat to support wildlife populations as the proposal states, these actions are totally misguided. Add this project heavy logging by Boise Cascade and private landowners in the watershed, and we've lost the last moose. I am trying hard to understand why it is in the interest of wildlife to clear cut tiny remaining old growth forest in these parts or to build miles of roads in an area that remained undisturbed by humans for over half a century. Here is an opportunity to see ecological processes at work. A forest is more than harvestable trees.

The Forest Service is required to get public comments. You can help. Please rec a NO ACTION alternative on the South Deep Project and help preserve this remain wildlife habitat. Address comments to Sheri Schwenke at Three Rivers Ranger Dist 509-738 7701 or email sschwenke@fs.fed.us

Janice Coridwen
Colville, WA
(Temporarily working in Boyertown, PA)
January 2002



STIMSON LUMBER COMPANY
Route 1, Box 1A
Priest River, ID 83856
(208) 448-1141
fax: (208) 448-1827



January 8, 2002

Sheri Schwenke
District Ranger, Three Rivers Ranger District
255 W. 11th
Kettle Falls, Wa. 99141

Re: South Deep Management Project

Stimson Lumber Company would like to express our support of the environmental analysis process for the **South Deep Management Project.** The proposed actions entailed in the letter we received on January 2nd include management practices that we believe are necessary for good stewardship and overall forest health. As a company, we believe all of the harvest methods mentioned in conjunction with sound reforestation and silvicultural methods will produce the desired results of this project. Please send me any further correspondence regarding this project.

Thank you,

Mike McKibbin, Forester
Stimson Lumber Co.
Route 1, Box 1A
Priest River ID, 83856

"purileus"
<purileus@caribaurf.com>
02/01/2002 08:25 PM
Please respond to
"purileus"

To: <wpawley@fs.fed.us>
cc:
Subject: public comment—Deep South Mgmt

February 1, 2002

Bruce Johnston
2183 Rocky Creek Rd
Colville, Washington
P O Box 1851
St George's
Grenada, West Indies
(473) 444 1432

Sheri Schwenke
District Ranger
Three Rivers Ranger District

Re: South Deep Management Project

Thank you for soliciting public comment on this project.

I am responding as a landowner whose property could be greatly affected by the proposed actions. My 80 acres, which I have owned for over 25 years, is surrounded on 3 1/2 sides by National Forest. Mine is the only private property through which Polley Creek flows. I have a domestic water right on Polley Creek. I intend to spend my retirement years enjoying my beloved land.

As you know, our area is unique in the diversity of its flora and fauna, with Rocky Mountain and Coastal species overlapping. The lands on the south side of Rocky Creek have seen little human interference over the past few decades. I know that my property was salvage logged in the 60's. While there are areas where tree growth could be referred to as being "below the minimum levels for late structure" and large sections of "shade tolerant species in the understories", the forest is healthy and alive. It may be

difficult for humans to get around in, and it may appear not to be producing top dollar value in places, but it is being "managed" by a plan with a far more successful track record than that of the USFS. In most areas the "doghair" is self thinning, leaving straight, tall, tight grained fir and larch. In the wetter areas, the spruce and white fir are getting fat. The lodgepole, the first to grow after fire, has reached maturity. Some day, if allowed, the unwanted "shade tolerant species" will again dominate the hills, as they probably did in the past, before logging. We may even see the re-emergence of the coveted white pine. A glimpse of what this could look like may be seen even today at the top of the long established Polley Trail, in the area marked on USFS maps as "Polley Cabin." The people in our area regard this location and these trees as living testimony to the glory of nature, and as a symbol of why they live where they do.

Over 25 years, I have heard probably every theory of forest management, every reason why the trees must be cut. But no matter what theory one subscribes to, each tree can only be cut once. Once it's gone, it's gone. If I had clear-cut my land then, and planted white pine, perhaps I would be a wealthy man. But orchards, parks, and "managed stands" are for people, not animals. They lack the needed diversity. I have tried small scale selective logging on my land, and have never been satisfied with the results. There is no "friendly" way of logging on those steep, soggy hills.

I am confused by the following from your "Public Notice for Comment:." These conditions exist because past wildfire regimes have resulted in dense, slow-growing, unmanaged stands. Additionally, exclusion of fire over the past 60 years have[is] allowed an ingrowth of shade-tolerant species in the understories of remnant stands." I find ambiguity here. Do you mean to burn to alleviate the results of fire?

For the protection of my water supply and the preservation of my personal paradise, I offer for comment an emphatic **NO ACTION**. For anyone who has been to Polley Cabin or looked across from the hills to the north at the verdant triangle that is the last stand of old growth white pine in the area, I say **NO ACTION**. For the vanishing wild things with few places to retreat, I say **NO ACTION**.

Bruce Johnston
Grenada, West Indies
purileus@caribaurf.com

January 31, 2002

Sheri Schwenke, District Ranger

For Nora B. Rasarc, Forest Supervisor
Colville National Forest
255 West 11th
Kettle Falls, WA 99141

RE: South Deep Management Project

Thank you for giving residents, farmers, and ranchers of the South Deep Project an opportunity to comment from our experience. I feel I speak not only for myself, but for recreationists who enjoy these forest lands: huckleberry pickers, hunters, mushroom gatherers, campers, hikers, birders, snowmobilers and ATV riders, cross country skiers, fishers and those from near and far who appreciate the South Deep Watershed because of its wild natural state.

Introduction:

My step-father purchased 70 acres in the Deep Creek Watershed in 1969. I inherited the farm after his death, ten years ago. I have been spending time in this area since the early 70's. My husband and I lived on the farm permanently as recent as last year. Over one-quarter mile of the South Fork of the Deep Creek runs through the southeast border of our farm. My family ran a strawberry and raspberry farm there for many years. We currently operate a mushroom facility and grow room for gourmet and medicinal mushrooms including shiitake and reishi. I am leasing the property to a patent attorney who uses the facility as a research site for new mushroom/fungus technologies, including toxic waste clean up and forest regeneration. The farm has two wells, one household and one irrigation, on the lower elevation of Roger's Mountain near the boundary we share with the Colville National Forest. My stepfather attempted to put a third well in, close to our common property line, but it failed to produce water.

I believe I could help you with your decision if I had the opportunity to walk this watershed with you. Having explored this area in depth, with my knowledge of ecology from a graduate degree in

Whole Systems Design, I feel I can speak to the fact that this area is very much a balanced system. I am committed to being involved in the decision making at the highest level of access citizens are appropriated in this process.

SUMMARY

The following is a brief outline of my concerns.

The project being proposed represents itself as improving wildlife habitat, when in fact the impact of human intervention, roadbuilding, burning, thinning and commercial harvest will destroy what the current habitat in this watershed. While the proposal intimates research study and alternative restorative methods, the key treatment appears to be 6,000 acres of commercial harvest and thinning. It appears to me that either the purpose is unclear, or you are misrepresenting your intentions. In earlier proposals during the 80's the Forest Service offered several models for forest management that included options such as:

Management for a specific bird populations such as owl.

Management for protection of ruminant populations.

Preservation of naturally occurring ecosystems in unmodified condition for baseline research and education

Management for public use and motorized recreation

Management for developed and dispersed recreation

Management for enhancement of the visual resources

Emphasis on dispersed and non-motorized recreation in undeveloped environments

Unaltered and undisturbed wilderness (I believe this became RARE II, but only on acreage greater than 5,000 acres.)

Emphasis on timber production

The South Deep Creek project as drafted from my understanding is a plan to manage for present and future timber production only, i.e. moving unmanaged to managed stands. The project map shows the key treatment as commercial harvest, burning and thinning. I fail to see how can such a plan provides for wildlife habitat or even meet basic human recreation needs. What about the management models mentioned above? The project make reference to erosion control, harvesting systems and silviculture? Where exactly will these be used? What are the roles to be played by the university research centers? So far, the only document we have actually seen shows the same tired methods of mechanical cut, slash and burn.

The South Deep Creek project being proposes to create wildlife habit while at the same time destroying one of the prime habitats for wildlife in the State of Washington. IN ITS CURRENT STATE, this watershed is an important habitat the black bear, moose, owls, hare, cougar, lynx, bobcat, flying squirrel and even cougar and grizzly. We have pileated woodpecker, three varieties of owls, including barred, and of course, bald eagles. Under your plan the area will be subject to commercial thinning and harvest, clear cut AND prescribed burning. If the goal is managing for timber production, of course, such actions make sense. However, if the goal is to provide habitat to support wildlife populations, as the proposal states, I have information that proves these actions are totally misguided. If this project is allowed to be initiated with the heavy logging by commercial interests while ignore the heavy timber harvesting current taking place by private landowners in the watershed the current immediate wildlife population is at risk. There will be no need to manage for future wildlife populations, because they will have been driven out or decimated by your burn, thin and cut strategies. Also at risk, is over 1,000 acres of roadless area in the Roger's Mountain area which has been undisturbed by humans for over half a century, and a small precious track of the last remaining section of first growth forest in these environs. Here is an opportunity to see natural ecological processes at work.

Additionally, as a farmer, I am deeply concerned about the potential for water shortages and the drop in the water table that could result from these actions.

I feel private landowners and commercial entities have the right to harvest resources, although I choose not to cut my acreage. I am opposed to logging on U.S. Forest Lands, because it assumes that the only purpose of the U.S. Forests is to provide harvestable timber. IN ITS CURRENT NATURAL STATE, WE HAVE A VITAL BALANCED ECOLOGICAL SYSTEM. AS EVIDENCED BY ITS CAPABILITY OF PROVIDING HABITAT TO AN EXTREMELY DIVERSE WILDLIFE POPULATION.

You are proposing marring huge tracks of undisturbed land with new roads, people, and commercial logging practices.

I am requesting a NO ACTION for the South Deep Watershed, especially the Rogers mountain tracks, because of its key role in watershed for the farms in our valley and because of the substantial population of wildlife, including grizzly and lynx, owl, rabbit, it supports.

Cumulative Effect:

The impact of this Forest Service Project must be taken in context of the heavy logging currently taking place within the South Fork Watershed. In the thirty-five years we have had this property the human impact has been minimal. Now, it is difficult to find lands that are not being subject to tree harvesting. Much of the harvesting is using methods that may meet the current codes, but still have little concern for the environment as a whole, i.e., tractor logging, steep grade logging. You need only take a drive in this area to see the destructive methods applied. To expect the natural systems to absorb this level of change is playing with ecological disaster. Wildlife displaced by private logging operations has historically frequented these US forestlands for refuge. With your project in place, there will be no place for these animals away from human encounters.

Last year, Boise Cascade finished roads on Ensler Ridge. Summer 2002, the entire ridge extending two miles up the Aladdin valley will be commercially logged on the boundary of South Fork of Deep Creek. We will be losing one the finest stands of Western Larch in the county. During the fall when the needles changed to gold, motorists stop hourly to take photos of the golden hill. With Aladdin Mountain in the background, it was outstanding. You could once look

out and see vast areas untouched by human hand. We have very few view sheds left in this valley. Day by day they disappear. The US forest lands in this watershed still offer some of these viewsheds.

Four years ago, Howard Phillips, sustainable rancher and heir to over 2,500 acres in the South Fork Deep Creek passed away. While Mr. Phillips only did a small amount of selective logging, his heirs under the "management" of commercial forester, Mr. Berrigan, Colville, have put in miles of roads and engaged in non-stop cutting at a massive scale, much of it in the area above Rocky Creek. Howard Phillips brother who has another 2,500 acres has been progressively logging his track, but not at the scale of current proportions. I have a fear that his heirs may escalate this harvest.

We cannot control the tree harvesting on private land. In this past decade large track farms are being subdivided land sold at an unprecedented scale. I see that our United States Forest Service must take a leadership role in preserving some naturally occurring ecosystems in an unmodified condition. Not all of these tracks will qualify for RARE II protection because of their size. Yet, in the case of South Deep Watershed there is a vital role to be played by these forested lands as a significant corridor and for wildlife.

Water Rights

Water in Eastern Washington is always a concern. As a private landowner and farmer it is critical to my livelihood. With the South Deep Project AND the Boise Cascade 2002 log, I will have commercial logging on FOUR sides of my land. My property is dry. We have lost water in the past. I was invited to participate in a field study with WSU to plant hybrid poplars on my site. We had less than 2% survival rate. The water table is already low. The last time the Forest Service logged in the area, we lost water altogether. Given this history I was disappointed to see the heavy commercial logging proposed for the East Section 12 and the West Section 7. You have proposed heavy logging for the entire Rogers Mountain area, including Kolle, Clinton, South Fork and North Fork and Scott Creek. In fact, according to my knowledge of the map you provided the only areas near Rogers Mountain that are not affected are too steep to log. I ask what is the provision for a government entity taking away a citizen's livelihood. Whom do I turn to when my property is worthless because the water table is so low that I can no longer get water? We cannot operate our mushroom farm without a constant supply of water. This watershed, in its current state is just managing to hold the water resources needed, however with the current logging on private lands, we are already seeing some of the smaller creeks dry up during the summer. The heavy logging and irresponsible human intervention has in the past caused some creeks to be diverted underground. Is there a study to learn how the water resources will be impacted with the proposed plan?

Additionally, would it not be prudent to delay your research until we see how the water table is impacted by the Boise Ensler Ridge log next summer and the current Phillips/Berrigan harvests, the results of which may not be evident for several years?

Wildlife Habitat

As already mentioned, the proposed project, will destroy one of the most diverse wildlife habitats in the state.

In its current state this area is remote. There are vast tracks of undeveloped land with limited human contact in wildlife habitats. There simply are not that many farms and householders located in the South Deep Watershed and the roads that were built for prior logging are beginning to revert back to their natural state. This means that wildlife, having lost habitat due to human intervention, logging, subdivisions, and invasive recreation, such as snowmobiles and ATV's, must rely on this area for refuge. In particular, the area I call "tangles", woody debris of downed small diameter lodgepole, has been a wonderful refuge for hares, rodents, cats and deer. If all of these areas are destroyed there will be no place for these species to escape human intervention. How will the new road construction effect the migrations of wildlife through this area? More roads bring more people, less wildlife.

Steve Zender, State Wildlife Manager for this region, can substantiate this claim of abundant wildlife from the calls he has made to our valley. He and his staff have been brought into the area for wildlife protection on many occasions. A few years back, the DNR helped ID a 400-pound black bear we videoed because we thought might be a grizzly. (We do have grizzly markings on our property and several hunters and wildlife managers have confirmed grizzly sightings on Rogers Mountain.) I am happy to say the black bears are still here and routinely strip fruit off my trees in the fall. Hunters tell me of grizzly scat. I have seen lynx on several occasions, as have others in the Rocky Creek watershed.

Deer, black bear, grizzly bear, lynx, bobcat, hare, flying squirrel, cougar, moose are a few of the inhabitants. In fact, hunters call this stretch of the Deep Creek "Moose Hollow." Elk and other ruminates use it as a corridor to connect with Lone environs and Kettle Range area. We have at least three varieties of owl, including barred, and numerous woodpeckers, including pileated.

I have met hunters who come all the way from the coast to hunt these forestlands. The reputation for the abundant wildlife here is renown around the state, and yet the Forest Service believes there is a need to create habitat?

I reiterate how can disturbing and destroying this habitat possibly benefit the existing wildlife populations? Do we not ensure a healthy future population by showing care with our impact on the existing wildlife? What provisions are there in your plan to offer refuge during the times of violent change, burning, thinning, and harvesting?

Tree Health

What I have come to appreciate the most about this forest is the diversity of tree species. In the lower lands around the Columbia, you see mono forests of Ponderosa Pine with a bit of lodgepole. Here there is more rainfall we have Douglas Fir, Grand Fir White Pine, Engelman Spruce, Western larch, Cedar and the wonderful alpine species. The dense stands of Lodgepole are thinning themselves in quite remarkable patterns. Windfall is clearing small meadows. Trees fall and fungus begin breaking them down, we gain that precious bit of topsoil, vascular plants take root. Yes, it will take a while to let nature run her course and we have time. When is commercial logging a remedy for forest health? Current logging practices compact the earth, cut, slash, burn and scrape off the topsoil leaving a mono-forest of same aged trees on barren ground. Are we to believe that we know better than nature herself? What a wonderful opportunity we have to let this area remain and provide a model for ecosystem management.

I have NOT noted an increased susceptibility to disease in my stand of trees. In fact, while neighbors have resorted to clear-cut after every new beetle infestation is discovered, I have left my forests to manage for themselves. I would say I lose more trees from wildfall on the boundaries where trees are clearcut than I do from insects or disease. How will you compensate for creating stands of same aged trees? Will that not open our area for even more disease threats?

Some years ago, there was a concerted effort to leaving large snags and late succession trees as den homes for owls, woodpeckers, rodents, squirrels etc.. I am not seeing this practice continued, nor do I see it addressed in your plan. The map you have provided, with current logging harvests clearly leaves little habitat for eagles, owls and woodpeckers.

I also want to state that the vast view shed of uncut tracks these trees stands offer is breathtaking. Especially, as I mentioned when the Western Larch turn in the fall. With the patches you are proposing our children will not see miles of undisturbed land, for a decades. I have had difficulty reintroducing Larch on the north slopes. How do you propose to keep the same balance of tree varieties?

I am very concerned that you have failed to address the full description of the harvest methods that will be used even when it was requested. If this information is available, why was it not provided upon request?

I notice you are recommending controlled burns while at the same time failing to mention in your introductory letter the cause of most of the dense, small diameter stands in this area. Yes, there was a fire in the area about 60 years ago. However, my research shows that the fire was a direct result of overlogging and the destructive methods that promoted a huge slash backlog. This area is just now beginning to recover from bad forest management practices in the past. When will it be time to let it fully recover on its own time table?

We all know the greatest threat to any forest is man. By opening up more roads for logging, the potential for fires increases substantially.

I am especially concerned about your proposed "Prescribed Burn" in our area and the area adjacent to Rocky Creek, the most populated area in the watershed, given the forest service's record on containment.

Finally, I have to ask what provisions will be made, in this plan, to protect my stand from winds when you will be logging on three sides of my small acreage? This valley has heavy wind patterns.

Riparian Zones

I am not certain what you are specifically calling a riparian zone. In many ways its all riparian. It is my experience that it is almost impossible to not impact all the dozens of minor year around seeps and seasonal springs (many uncharted on maps) in this watershed during a logging operation. The result of this is of course, sediment buildup in the greater named springs and ultimately the Deep Creek itself. I do not know the state of all of the Deep Creek's south Fork, but I am finding that on my land the stream has developed large pools populated with fair sized wild trout and fingerlings.

What protection is offered in your proposal for streambeds? What about erosion? Much of the land being logged is steep and runoff may be difficult to control.

Again, I return to the wildlife who are depending on these streams as sources of water year around. Can we afford to see them diverted with new roads and run off patterns? I am especially concerned about Rocky Creek which has evolved some beautiful streamside vegetation with native wildflowers that feel especially wild and yet peaceful. What will happen if these areas flood out in the spring as they are wont to do.

Water is a precious commodity in the high rocky land. There is not enough in your proposal to show that these issues have been addressed.

Old Growth

Has there been full research to identify old growth pockets in the watershed. They are out there. One of them is scheduled for a commercial log according to your proposed plan. If this project is to bring forests through a state of natural evolution, why would you be destroying one of the only remaining old growth forests in this area? The area in question is Polley Creek. From what I know about the area, you have proposed a commercial log in the last significant old growth forest in the Deep Creek Watershed. What could possibly be gained from such an action, or are you even aware of the existence of this forest?

Plant/ Fungi Species

A few years ago a botanist catalogued over 85 species of plants in a 5 acre parcel of our land. He was actually looking for species with edible and medicinal uses, of which almost 70% could be included in this category. Among the species that are most rare, we have several varieties of Moonwort, White Trillium, and Wild Orchid in the South Deep Watershed. (The orchids are found primarily in the area that I call the tangles.) The area you will be destroying in your plan.) However, I wonder how many of these rare beauties will survive in a massive commercial logging endeavor. First, there is the issue of roads. I thought the Forest Service was working with the Weed Control Board to stop evasive non-native, noxious plants like St. John's Wort? These species as well as other noxious weeds such as knapweed are already making their way up the first quarter mile of most logging roads in this watershed. More will follow with your plan.

This is a prime area for wild berry and mushroom gathering as well. People come from as far way as Spokane pick huckleberries around Aladdin Mt, Smackout and Meadow Lake. With all the past logging, believe me, there is plenty of open ground for the huckleberry to thrive.

Did you know this area has more fungus species than almost anywhere else on earth? I have catalogues dozens of varieties on a short walk in the woods and fields in the South Deep Watershed. For example, we have several varieties of boletes, including one that only grows under Western Larch, all manner of gilled mushrooms, both black and the elusive morechella esculenta. Not to mention the wonderful puff balls, and polypores in exquisite colors. Some say abundant mushroom and fungi growth in an area signals a live ecosystem. The area is a secret mushroom patch for many tourists who come up to pick morels by the basketful in the spring. Mycologists tell me the current commercial harvest practices destroy most of the fungi that have a symbiotic relationship with the small tree root hairs. I don't see how this project as proposed can avoid destroying millions of colonies of fungi in the area.

Conclusion

Again, I must return to defining the goal of this project? If the purpose and intention is harvest timber, it most likely does an adequate job. If the purpose is to create habitat for wildlife it fails for the reasons mentioned above.

The current proposal appears to be an opportunistic smokescreen to gain access to convenient timber near the mills. I oppose this plan because economically it just does not serve the Forest Service to use their resources for only timber production. Economically, landowners, farmers and ranchers could be hurt by water shortages. Recreationists would no longer find the area appealing. Environmentally, it has devastating effects for a valuable living ecosystem and ultimately the wildlife and all organisms who call these forestlands home.

Please abandon this project. NO ACTION is the right action.

Thank you for listening.

Respectfully submitted,

Janice Ceridwen
1785 Aladdin Rd
Colville, WA 99114

Currently we live and work in Pennsylvania

PO Box 782
Boyetown, PA 19512

610367 9789



NORTHWEST ENVIRONMENTAL DEFENSE CENTER

10015 S.W. Terwilliger Blvd., Portland, Oregon 97219
Phone: (503) 768-6673 Fax: (503) 768-6671
www.nedc.org



Paul Olson
Northwest Environmental Defense Center
10015 SW Terwilliger Boulevard
Portland, OR 97219

Sherri Schwenke, District Ranger
255 West 11th
Kettle Falls, WA 99141

Thank you for the opportunity to comment on the South Deep Creek Management Project. Northwest Environmental Defense Center (NEDC) is committed to preserving the ecological integrity of the Pacific Northwest's forests. Our members regularly utilize National Forests and other public lands for a variety of purposes and have a strong interest in improving forest ecosystems. NEDC has the following concerns about the proposed project.

I. Purpose and Need

When proposing vegetation management projects, planners should include a purpose and need for projects that focus on rehabilitating the forest ecosystem. The EIS should state activities that will help to rehabilitate the area that has already been damaged from past logging and road construction, and a central purpose of any new project should be rehabilitative so that the forest ecosystem recovers from past timber harvests and road construction as well as present prescriptions. An appropriate response to this purpose and need would be a restoration-only action alternative or no action. How will a prescribed burn and road construction improve wildlife habitat and contribute to watershed restoration?

II. Logging

The project proposes vegetation management using commercial and precommercial thinning on 6,100 acres. What methods will the forest service use in the selected area? NEDC is concerned about the effects of tractor logging. To what extent does the Forest Service plan on using these tools? What percentage of the thinning will this be? Some of the proposed area includes steep slopes. Will cable logging be performed? How many MMBf will be harvested? What peer-reviewed scientific evidence does the USFS have that indicates the necessity of the project?

Private land adjacent to the proposed area has already been subjected to timber harvest. What is the amount of harvest allowed per decade in this watershed? Considering the effect of timber harvest on adjacent private land, how much forest habitat will remain in its natural state? What other timber harvests, public or private, are additionally planned or currently ongoing in the area adjacent to the planned project?

The Colville contains extensive old growth and late successional forest, and old growth forest is reported in the project area. What types of forests will the proposed thinning affect? Will it affect old-growth or late successional forests, and if so, what percentage of the remaining old growth in the area? What harvest prescriptions will be imposed on commercial thinning operations? Will the present diversity of arboreal species be altered?

Coarse woody debris and large diameter snags are important to the forest ecosystem, particularly many animal species. How much coarse woody debris will be removed in the project? Has the Forest Service surveyed for animal species in these areas? Finally, if surveys for old growth and coarse woody debris have been done, are they thorough, credible scientific surveys?

III. Prescribed Burn:

The plan indicates approximately 6,500 acres of prescribed burning. What standards has the Forest Service used to determine that burning this large area is necessary? What alternatives to burning has the Forest Service contemplated?

What specific areas within the South Deep Creek Watershed are targeted for prescribed burning? How were they chosen? What safeguards is the Forest Service taking to limit the damage of wildlife after burning? Are there factors that would delay or impede progress on the burn?

Prescribed burning can have dramatic effects on the soil, often reducing soil productivity. What specific plans does the Forest Service have to mitigate damage to the soil? What is the prescribed effectiveness of mitigation plans? How much will mitigation cost? What dangers could result from the burn?

Prescribed burns are often a significant source of air pollution. What will be done to reduce public complaints about the smoke caused? How will the visual impact of smoke and burning be minimized? Where will the smoke go—will it affect any limited air sheds downwind? What will the particulate level be from the burn, and how will that level affect humans, plants, and animals?

Will the burn include areas of dense woody debris on the ground? Wildlife depends on the woody debris. What will the impact be on wildlife that depends on these areas, such as rodents, and predator species that depend on them? What actions have planners contemplated to prevent damage to wildlife that may be negatively impacted by

the burning? How will the burning be done to safeguard the survival of seed trees? Finally, will there be high intensity fire in primary streamside zones?

III. Roads and Roadless Areas

The project proposes construction of approximately 19 miles of new roads. NEDC does not advocate intrusion into roadless areas, even if the project area does not include any wilderness, RARE II, or other inventoried roadless land. Road construction includes not only obvious plant and animal mortality but also changes in animal behavior and alterations in the physical and chemical environment of an area. What is the current road density of the planning area? What is the required road density per applicable laws? What will the road density be post-project? Will this density include all roads, including closed roads? Does it include spur roads, or just main road in its calculation?

The plan does not mention plans for future closure or decommissioning of planned roads. Road removal and permanent decommissioning are an important component of forest restoration. Does the Forest Service plan for road construction to be permanent? If not, are funds allocated for road removal?

The presence of permanent roads may also increase usage of the area. Will this increase usage of the area by motorized vehicles? Have the effects of increased vehicle traffic in the area been contemplated? Will this increase interaction between humans and wildlife, consequently fragmenting wildlife habitat into narrower corridors? How will the impact of increased vehicle and offroad vehicle use on rare flora be mitigated?

New road construction also affects the quality of riparian areas. Will roads cross streams? If so, how many, and where?

IV. Watersheds and Riparian Areas

Aquatic areas are fragile and disturbances such as extensive creek crossings, sedimentation, and habitat disturbances are likely to adversely impact them. What is the structure of the streams in watershed? How much of riparian area is in an open condition? What is the bank stability? What actions are planned to limit damage to the quality of the watershed, riparian zones, and other streams within the planning area? Are roadless areas in key watersheds protected from new road construction? NEDC is concerned that road building and vegetation management will contribute sediment to the watershed and riparian zones, all of which eventually flow in streams in the area. Does area have highly erosive soils? Does soil end up in streams? Is area subject to flooding? Has it flooded recently? What data does the Forest Service have on turbidity and sediment? Will project increase peak flow of streams in project area? Will project result in increases in sediment as a result of road building and thinning—will this be consistent with the Clean Water Act, which prohibits and change in either high quality or

degraded waterways? Will thinning take place in Rain On Snow (ROS) areas? What is the potential for water shortages if there is a drop in the water table? Have recent studies been done to evaluate the condition of riparian systems in consideration of extensive recent private timber harvests on lands adjacent to the project area?

What specific measures is the Forest Service planning to accomplish wetlands management? Have all wetlands been located and mapped? If so, who did the locating and mapping? Are there any Water Quality Limited (WQL) streams in the area and what actions will be taken to reduce the impact of vegetation management measures in the area? Are streams a source of municipal drinking water? What is the date of the last surveys of water quality in the planning area? Have seeps and springs been identified and mapped? What mitigation actions are planned to reduce the impacts upon the aquatic environment, such as buffers or other site specific mitigation measures?

Do wild resident and sensitive species fish such as redband and westslope cutthroat trout found in the region require the South Deep Creek watershed for habitat? Has the Forest Service surveyed for populations in stream? If so, has a biologist done the survey?

V. Wildlife

In its current condition, the area is a prime habitat for wildlife, including many species of conservation concern with state or federal status as endangered, threatened, sensitive or candidate species, such as the lynx or grizzly. Wolves have persisted in the region even as they have disappeared elsewhere in the continental United States. Will the plan allow sufficient habitat retention for these species? What population surveys were conducted? Who did the surveys? The larger ranging species require large unfragmented wilderness corridors. Will the project fragment the forest to the extent of denying them necessary habitat? The area serves as winter habitat for moose, deer and elk. Does planning area provide optimal and thermal cover for deer and elk in accordance with Land and Resource Management Plan standards? Does planning area include biological winter range for deer and elk? Have population surveys been done during the winter to ascertain populations of moose, deer, and elk? If so, who did these surveys?

Will wildlife need for this area in its current natural state be increased by commercial logging on private land in the areas bordering the project area? Has the Forest Service designated Management Indicator Species (MIS)? Is the project in a Critical Habitat Unit (CHU)?

The areas of coarse woody debris provide valuable habitat for smaller rodent species which are ecologically significant in the food chain for all other species. Will the project affect the habitat of these species?

VII. Noxious Weeds

Six new species of grapeferns and moonworts have been discovered in the region in the last twenty years, and other rare flora thrive in the South Deep Creek watershed. Has the Forest Service surveyed for species of threatened, endangered, or sensitive (TES) plants subject to takeover by noxious weeds in areas subject to burn, road construction or thinning? If so, have these surveys included biologists with credible experience in identifying wild flora? What noxious weeds exist in planning area? Are they encroaching on surrounding area? Does forest service have a plan for addressing spread and control of noxious weeds? What measures in the planned project will mitigate the impact of the spread of noxious weeds? Will herbicides and pesticides be used as part of this project? If so, how will these treatments be applied? What would be the impacts of such treatments on water quality, fish, and "non-target" plants, humans, and nearby wildlife?

IX. Economics

Will the proposed project reduce tourism as a result of thinning and burning? How much income do local communities generate from recreational use of the land, and how much do they expect to gain from the project? Will potential future losses outweigh any possible economic short term gains from jobs created by the project? What other economic activities in the region will be affected--will the project affect the water supply of farmers and ranchers in the area who use wells for household use and irrigation? South Deep Creek watershed farmers complain of water shortages subsequent to extensive commercial timber harvest on adjacent private lands. Are funds allocated to mitigate possible economic losses potentially resulting from further drops in the water table?

What are the predicted expenses for the planning of a safe prescribed burning, the harvest itself, and cost of road building? Are there funds allocated for mitigation actions such as road decommissioning? Are funds tied to revenues from the commercial thinning proposed in the project so that falling timber prices could affect funds for mitigation? How will the Forest Service plan to complete the project if there is a shortfall?

X. Cumulative Effects

Has the Forest Service analyzed private lands adjoining the project area in considering cumulative effects? How will the present action be affected by past, present, and future timber harvests in adjacent lands? What direct and indirect effects will the proposed action have?

XI. Conclusion

NEDC urges the Forest Service to abandon the proposed project because the economic and environmental costs of road building, prescribed burns, and commercial thinning will deplete valuable habitat for human, plant, and animal residents of the South Deep Creek watershed.

*Thanks for the opportunity to comment,
Paul C. Olson*



DEPARTMENT OF THE AIR FORCE
AIR EDUCATION AND TRAINING COMMAND



28 March 2002

MEMORANDUM FOR THREE RIVERS RANGER DISTRICT
ATTN Sherri Schwenke
255 W 11th Street
Kettle Falls, WA 99141

FROM: 336 TRG/CD
811 Los Angeles Ave Ste 104
Fairchild AFB WA 99011-8648

SUBJECT: File code 1950 dated 28 Dec 01 South Deep Management Project

File code (1950) South Deep Management Project has no effect with scheduled training at this time. Request any further action and actual dates be routed through us for de-confliction with future training.

[Signature]
MARVIN S. PUGMERE, Lt Col, USAF
Deputy Commander



Dear Ms. Schwenke,

We have lived in this area for forty years. I am retired from the Colville National Forest Service where I was a T.S.I. crew supervisor. I have seen a lot of forest policies tried. Some worked and others didn't. We can learn from past experience. I am managing my own five hundred acre timber stand successfully.

In reading this plan, it seems to me that part of the equation is missing. Multi purpose use benefits everyone. Cattle grazing, for instance, has proven to be very effective in keeping the brush down which helps prevent wild fires.

In this area we have good forest regeneration. Commercial harvest, seed tree cut and select cut have always been effective tools in managing the forest. In some areas where there is disease, small clear cuts may be needed. Most of these areas are roaded and those roads are important to service the forest and for quick response to fires. More roads in some areas may be appropriate on a case by case basis.

We are concerned about the volume of prescribed burn areas. The brush comes right back from the roots, marketable trees are damaged and most young healthy trees would be killed by the fire. What good could be accomplished by such a policy? Commercial thinning with a shear, for instance, would retard brush growth while utilizing excess timber and do less damage to the forest in the process. These areas would need to be limited with attention to wildlife corridors. Potential for erosion and water shed protection would also need to be addressed. There are probably areas where prescribed burns would be appropriate but not on this scale.

We would be very interested in keeping up with your progress in formulating this forest plan. Please let us know about any public meetings on the subject.

Sincerely,

Art and Joan Arrington
Art Arrington
Joan Arrington
2289 Aladdin Rd.
Colville, Wa. 99114
509-732-4223

Dick Vander Yacht
PO Box 279
Blaine, WA 98231-0279

Jan. 1, 2002



Sherri K. Schwenke
United States Department of Agriculture
255 West 11th
Kettle Falls, WA 99141

Dear Ms. Schwenke,

Ref: Your letter of Dec. 28, 2001 - File Code 1950

I own 320 acres within the boundaries of *South Deep Management Project* as described in your letter. One half of Section 27, TWP 38, R41E. There is no doubt that much of the timber in your described unit is overstocked with trees. Past logging has been hit and miss. Most of the forest land is unmanaged or mismanaged.

According to your map my property is a candidate for burning. I will not permit any burning to occur on my land. All too frequently so called "controlled burns" become uncontrolled, go wild and destroy a lot of good timber.

If you or your foresters drive or walk around my property you will find that it is one of the best managed pieces of forest land in the proposed project. In the mid 1970's, Herb Schwenke (perhaps a relative) logged the land for two years taking out damaged and diseased trees and did a lot of commercial thinning.

Since that time I have made three additional cuts spaced four or five years apart. Logger Steve Cochran, Vaaghen Brothers & Ritchart Brothers did the work. Vaaghen and Ritchart used mechanical harvesters taking out chip wood and hew saw material. Steve Cochran did regular commercial thinning and selective logging. More work was scheduled by Ritchart but the pulp market was flooded and we ceased the operation.

Each year members of my family and myself thin young growth for a week or two. It does not really make a dent in the overall land base but several small areas are thinned very nicely. This thinning will continue every year.

During the last chip log removal we purposefully left "wildlife thermal units" as recommended by the Washington State Department of Fish & Wildlife. Setting aside the thermal units, two thirds of my property has been thinned, logged or clear cut since I bought it. Land north and east of my property in Section 27 is a horrible mess, over stocked, untouched for years. It is interesting to note this land is not marked for a burn.

When I bought this property it was unmanaged, logged (raped) in a cut and run manner. With recommendations of the DNR I have made some drastic changes in the landscape and timber growth. Admittedly more work is needed. Depending on market conditions, I will likely make another cut in 2002 or 2003. I am a good steward of the land.

I will be on the property two or three times during May and June and would be glad to meet and show any forester how I manage the property. Your department may have good intentions but you may as well cancel any plans you have to set fires on my property. A damage suit will be filed if uncontrolled fires cross my boundaries.

Look forward to hearing from you to correct my impressions of the project if my analysis is incorrect. Please keep me advised. Thank you.

Dick Vander Yacht

Dick Vander Yacht

STATE REPRESENTATIVE
7th DISTRICT
BOB SUMP

State of
Washington
House of
Representatives



NATURAL RESOURCES
RANKING MINORITY MEMBER
AGRICULTURE & ECOLOGY

January 24, 2002

Sherri Schwenke – District Ranger
Three Rivers Ranger District
255 W. 11th Street
Kettle Falls, Washington 99141

Re: South Deep Management Project

Dear Sherri:

Thank you for the opportunity to comment on the above mentioned proposed project.

The stated purpose for the proposed treatments is to improve overall landscape vegetative conditions within the South Deep watershed, which includes approximately 8,560 acres of private land.

National Fire Plan (1995) and Ecosystem Management Ecosystem Management Project standards and guidelines are being implemented through the use of directives, manuals, handbooks and other documents that were developed by the Interior Columbia Basin Ecosystem Management Project Team. (Interior Columbia Basin 12/12/2000 Press Release)

There were 33 sites in the state of Washington listed in the Federal Register (Vol. 66, No 1507/Friday, August 17, 2001/Notices) that targeted hazardous fuels reduction treatments ongoing or planned for implementation in fiscal year 2001. (National Fire Plan)

Projected Acres of Prescribed Fire for Total Project Area Annual Average First Decade (Table 4-41/Page 156/chapter 4/ICBEMP Supplemental Draft EIS) for the preferred Alternative S2 is 1,456,400 acres per year for 10 years. According to the Table 3-38 Page 3-183 of the Forest Service Roadless Area Conservation DEIS Volume 1, each million board feet of timber produces \$57,677.45 to the economy.

The record of decision that was issued for ICBEMP, amended 62 individual land use plans on the 32 Forest Service and Bureau of Land Management administrative units. (ICBEMP Supplemental Draft EIS/Chapter 1/Page 3) Private lands have been affected by The Multispecies Framework, the All H Papers, the Washington State Salmon Recovery Plan, development of habitat conservation plans, the Washington State Forest & Fish Report, the proposed Shorelines Management Guidelines, all of which are being directed by National Marine Fisheries Service. (Page 133 & 140/Chapter 4/ICBEMP Supplemental Draft EIS)

Throughout the years, we have petitioned the ICBEMP team as to our concerns of economic stability, custom and cultures of our peoples, and the threat to our heritage.

The ICBEMP team has contended the directives, objectives and standards for land management on 145 million acres of federal and private land is not a "rule" and is not subject to regulatory analysis requirements. They have continually denied compliance with requirements of National Environmental Protection Act (NEPA), National Forest Policy Act (NFMA), Federal Land Planning Management Act (FLPMA) Regulatory Flexibility Act, Small Business Regulatory Enforcement and Fairness Act.

However, Ecosystem Management and National Fire Plan standards and guidelines are now being implemented at the local level – Colville National Forest and surrounding private lands; and are therefore subject to regulatory analysis requirements.

We request that you review the proposed South Deep Management Project to identify inconsistencies between the proposed project and officially approved or adopted resource related plans, policies, or programs of state and local governments.

We request NEPA analysis of the cumulative impacts and connected actions of *all* proposed decisions affecting private, county, tribal, state and federal lands in/around Colville National Forest in context with other similar decisions issued by all federal and state agencies which effect our economy, custom, culture and heritage of our counties, our state and our Nation.

Sincerely,

Bob

Bob Sump
State Representative

9520043505 13

Postnet barcode



Mr. Martin Schneider
1805 E 15th Ave
Spokane, WA 99203



Stephen H. Schwabe, District Ranger
Three Rivers Range District
255 W. 11th St.
Kathleen Feder, COA 94141



D-51501

JAN 3 - 2002

Mr Schwabe -
Re: South Deer
Management Project.

After 25 years of
ownership of property
with a cabin off at
Rocky Creek, I have
not seen any positive
result of logging.

Roads destroyed, forests
alterred for decades,
Slash piles, ~~and~~ mud are
just some of the negative
effects I have perceived.

I also see the U.S.
Forest Service skirting
legally protected areas
to build roads and remove

trees. I always want
to believe that the
intentions are positive
and preventative, but
always areas are
compromised and
commercial interests
seem to prevail to
the loss for the home
owner. It is so
frustrating for the individual
home owner to get
the big picture, so please
tell me, how is my
increase going to be
affected? I am north
of Rocky Creek. Your
letter is vague at best.

Sincerely,

Martin Schneider

Ferry County Natural Resource Board

350 East Delaware

P.O. Box 115

Republic, WA 99166

Sherri Schwenke – District Ranger
Three Rivers Ranger District
255 W. 11th Street
Kettle Falls, Washington 99141

January 28, 2001



Re: South Deep Management Project

Thank you for the opportunity to comment on the above mentioned project.

Issues of concern.

Air Quality

With the implementation of prescribed burning in all Ranger Districts of the Colville National Forest, what is the cumulative effect on air quality when all projects are combined?

Private Land Ownership

Have all landowners in the 38,300 acre area been made aware of the proposed project. This analysis includes 8,560 acres of private land. The possibility of prescribed fire escaping onto private land ownership is great. As we have seen from the fires in Ferry County 2001, these fires are only monitored and not extinguished thereby creating destruction of private property.

Regulatory Analysis Requirements

Identify inconsistencies between the proposed project and *officially approved* or adopted resource related plans, policies, or programs of federal, state and local governments such as The National Forest Policy Act, Federal Land Planning Management Act, The Colville Land and Resource Management Plan and Stevens County Comprehensive Plan.

NEPA Analysis of the *cumulative impacts and connected actions* of all proposed projects affecting private, county, tribal, state and federal lands in/around Colville National Forest in context with other similar decisions issued by all federal and

state agencies which effect the economy, custom, culture and heritage of our counties, our state and our Nation. (The National Fire Plan identified 33 sites in the state of Washington that targeted hazardous fuels reduction treatments ongoing or planned for implementation in fiscal year 2001.)
Wildlife

What is the projected effect to plants and animals that *do not* depend on Old Growth Forest? Evaluate cumulative effects of management activities for all.

Page 4.42 Land and Resource Management Plan – Colville National Forest.

(7) No actions that are likely to jeopardize the continued existence of any plant or animal species or adversely modifies the essential habitat of such species or cause the need for listing any species threatened or endangered, will be authorized, funded, or carried out by the Colville National Forest...

Sustainable Timber Harvest

What is the projected *long-term economic impact* to the communities in and around the Colville National Forest after moving the majority of the land into Old Growth Habitat with noncommercial thinning, prescribed fire and heavily reduced timber harvest?

Thank you, and we feel these are issues that need to be addressed.

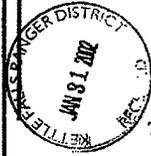
Sincerely,

Sharon Shumate
Chairman
Ferry County Natural Resource Board

Cc: Representative Bob Sump
Senator Bob Morton
Stevens County Commissioners



DENNIS A. SNOOK, Danville-District 1
 JAMES M. HALL, Republic-District 2
 MIKE L. BLANKENSHIP, Boyds-District 3



FERRY COUNTY
BOARD OF COMMISSIONERS
 and BOARD OF EQUALIZATION

350 EAST DELAWARE #5
 REPUBLIC, WASHINGTON 99166
 TELEPHONE (509) 775-5229 • FAX (509) 775-5230
 e-mail: ferry@coopext.cahc.wsu.edu
 Lynne Baldwin
 Clerk of the Board

January 23, 2002

Sherri Schwenke – District Ranger
 Three Rivers Ranger District
 255 W. 11th Street
 Kettle Falls, Washington 99141

Re: South Deep Management Project

Thank you for the opportunity to comment on the above mentioned proposed project.

The stated purpose for the proposed treatments is to improve overall landscape vegetative conditions within the South Deep watershed, which includes approximately 8,560 acres of private land.

National Fire Plan (1995) and Ecosystem Management Ecosystem Management Project standards and guidelines are being implemented through the use of directives, manuals, handbooks and other documents that were developed by the Interior Columbia Basin Ecosystem Management Project Team. (Interior Columbia Basin 12/12/2000 Press Release)

There were 33 sites in the state of Washington listed in the Federal Register (Vol. 66, No 1507/Friday, August 17, 2001/Notices) that targeted hazardous fuels reduction treatments ongoing or planned for implementation in fiscal year 2001. (National Fire Plan)

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The record of decision that was issued for ICBEMP, amended 62 individual land use plans on the 32 Forest Service and Bureau of Land Management administrative units. (ICBEMP Supplemental Draft EIS/Chapter 1/Page 3) Private lands have been affected by The Multispecies Framework, the All H Papers, the Washington State Salmon Recovery Plan, development of habitat conservation plans; the Washington State Forest & Fish Report, the proposed Shorelines Management Guidelines, all of which are being directed by National Marine Fisheries Service, (Page 133 & 140/Chapter 4/ICBEMP Supplemental Draft EIS)

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However, Ecosystem Management and National Fire Plan standards and guidelines are now being implemented at the local level – Colville National Forest and surrounding private lands; and are therefore subject to regulatory analysis requirements.

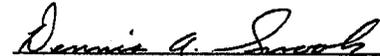
We request that you review the proposed South Deep Management Project to identify inconsistencies between the proposed project and officially approved or adopted resource related plans, policies, or programs of state and local governments.

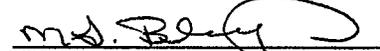
We request NEPA analysis of the cumulative impacts and connected actions of *all* proposed decisions affecting private, county, tribal, state and federal lands in/around Colville National Forest in context with other similar decisions issued by all federal and state agencies which effect our economy, custom, culture and heritage of our counties, our state and our Nation.

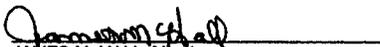
Thank you for your consideration of these requests.

Sincerely,

FERRY COUNTY BOARD OF COMMISSIONERS


 DENNIS A. SNOOK, Chairman


 MIKE L. BLANKENSHIP, Vice Chairman


 JAMES M. HALL, Member

January 16, 2002



United States Department of Agriculture
Forest Service - Three Rivers Ranger District
Sherri K. Schwenke, District Ranger
255 West 11th
Kettle Falls, WA 99141

Dear Ms. Schwenke,

This letter is in response to the environmental analysis of the South Deep Management Project:

My family owns a farm that will be directly affected by the proposed project. Although at present I do not live there, I lived on the farm for a number of years and often return there when I get the chance.

My concerns are as follows:

Water quality is of great concern since our well could be adversely affected. By even thinning the trees and removing the low, dense, slow growing vegetation, the water table and thus watershed could be affected. Even the creek on the south side of the property goes underground on occasion in the dry summers. I cannot imagine what would happen if the trees and vegetation were compromised.

In addition, in the summer, this can be a particularly dry area and without the vegetation to hold some of the moisture in the soil, we could have a more arid soil, which eventually will not even be able to support the trees. As the water table drops or changes course due to the absence of the trees and vegetation the land becomes useless. There are examples of abandoned farms throughout the Aladdin corridor and surrounding area in which this has occurred. Even one of my neighbors, (an old-timer-he was 80+ and his father had the land before him!) talked about this. In addition, with all the water run-off there would be fewer nutrients in the soil due to the erosion and the precious nutrients being leached out of the soil.

In response to the "Forest Stand Density" portion of the plan:

I have seen places where they "thinned" the trees. A prime example is further towards Colville. I know the landowner thinned out his trees at one time some years ago and it still looks very barren. The trees themselves have remained spindly and the area has never filled in.

Additionally, I am concerned about the wildlife and their habitat. Currently the area supports a diverse wildlife population including Black Bear, Grizzlies, White Tail Deer, Mule Deer, Moose, Cougar, Bobcats and Owls, to name a few. If their environment is

altered in any way, especially by the removal of trees, adding new roads and leaving just islands of vegetation without connecting forests and vegetation, we could lose their presence in these areas altogether since they rely on this habitat. In addition, by adding roads, it opens up the area to potential fires as hunters, off road vehicles, and campers are able to drive on and use the area without taking responsibility for protecting the land. We are all aware of some of the irresponsible people who abuse these areas.

In conclusion, I would just like to say I am recommending "NO ACTION BE TAKEN" I would like you to know that I majored in Forestry in college and while I understand the concepts and importance of forest management, it appears to make no sense to go in and disturb an area that is already supporting a healthy environment.

I appreciate your time and consideration on this. If you wish to speak to me directly, please feel free to call. (360)663-7757

Sincerely,

Deborah A. Bohlin

Deborah A. Bohlin
60112-Chinook Pass Highway (State Route 410 East)
Greenwater, WA 98022-8083



Phone 509-325-2200 Fax 509-325-2201 Email tlc@landsCouncil.org Website www.landsCouncil.org
517 South Doleton Street
Spokane, WA 99202

Jan 28, 2002

Sherri Schwenke
Three Rivers District
255 West 11th
Kettle Falls, WA 99141

Dear District Ranger Schwenke,

The Lands Council, Forest Conservation Council, Sierra Club and National Forest Protection Alliance have reviewed the scoping notice for the proposed South Deep Management Project on the Three Rivers District of the Colville National Forest. We appreciate the opportunity to review this project and provide scoping comments. We hope that our comments can be considered in the preparation of the draft EIS.

More detailed scoping comments on the issues that we believe are significant and should be evaluated in the draft EIS are enclosed.

Silviculture and Historical Conditions

The purpose stated in the scoping notice is to improve landscape vegetative conditions, move stands toward late structure, and make stands less susceptible to catastrophic wildfire. But, will more logging actually accomplish this? We know reducing canopy cover dries out soils, creates conditions amenable to non-native plants and changes watershed function. In addition, an important question in response to this "objective" is what are historical levels, recognizing that a diversity of species composition was present across the landscape and that no one point in time should be used as a basis? We know that historically no logging took place and late structure/old-growth development occurred because fire and insects selectively "thinned" stands, leaving the most resilient trees. We know this process took hundreds of years, and varied depending on site conditions. It is important to establish the dominant processes that historically shaped the composition of tree species in this area. Some of the processes in this area are fire regime and return interval, annual precipitation, slope, aspect, elevation, and geographic location. While it is certain that the Forest should reduce the negative impacts of past management, such as the road system and grazing, it is less clear why more logging will actually achieve improved landscape conditions. Our suggestion is that having a commercial timber sale is the last activity this area needs and should have only one alternative. Other options to truly restore this area



should be examined in a range of alternatives that balance an investment in resources with restoration outcomes.

The crux of determining what, if any, restoration needs to occur in the South Deep watershed depends on a frame of reference. Past fire history, logging, fire suppression, grazing and human development have certainly altered the landscape but whether a silvicultural response is appropriate should be analyzed carefully. Last year we reviewed a fire history of part of this area, and found the assumptions used in the model and conclusions to be highly questionable. We would like to see all peer reviewed, as well as anecdotal evidence that the District has on the fire history, species composition, and successional processes of the project area.

Once a historical range has been accurately established we would like to see a discussion of the options for restoration, and documentation that the proposed restoration efforts are likely to succeed. All of the commenting parties are striving to end the timber sale program, and would therefore like to see several non-commercial logging alternatives fully analyzed.

As for the Plan mandate to provide logs to the surrounding communities. One alternative that addresses this outcome could be provided, but providing the majority of alternatives for the single purpose of providing logs to the mill is simply catering to a single use, and ignoring a range of alternatives that the forest and public deserve to see analyzed. We should note that less than 3% of the nations wood fiber consumption comes from National Forests, and that polls show about two-thirds of Americans do not want their National Forests logged. This information should be part of the socioeconomic analysis that is used to support the no-commercial logging alternative. We would also like to mention that last summer, Duane Vaagen (private conversation) said that Vaagen Brothers only operated 2 days in 2000 on federal timber.

Water Quality

BMPs

The achievement of water quality standards for non-point source activities occurs through the implementation of BMPs, which are designed to achieve water quality standards. Water quality standards criteria are the measures by which BMP effectiveness is judged. While BMPs are believed to protect water quality, they must be monitored to determine that this is the case, if they are not effective, then the BMPs must be revised. Therefore, mere application of BMPs is not adequate to satisfy the Clean Water Act. The draft EIS should discuss any monitoring results that indicate the effectiveness of BMPs to protect designated uses and maintain state water quality standards.

Affected Environment

The draft EIS should provide a documented, scientific description of the existing physical and chemical characteristics of streams, lakes, and any other bodies of water in the planning area. The identification of affected watersheds on the alternative maps will help the reviewer understand their relationship with project activities. The discussion must reveal what data are available and the condition (quality, quantity, gaps in the data base) of the information. The collection of baseline water quality data at the project level is key to the comparison of projected impacts and actual impacts. Physical characteristics

should include stream class designations. Stream classification methodology and stream protective strategies should be outlined in detail. The data from any sampling efforts should be displayed in tabular form or summarized as part of the "affected environment" discussion. It is important that the draft EIS also describe the relationship of these water quality characteristics to the biota found in affected streams.

Environmental Consequences

The draft EIS should also provide a quantitative basis to judge whether water quality parameters such as temperature, turbidity, sediment accumulation, and stream morphology will be kept at levels that will protect designated uses and meet state water quality standards. The draft EIS needs to thoroughly describe and evaluate the relationship between the primary designated use in area streams, fisheries spawning and rearing habitat, and sediment yield. The information provided in the draft EIS should include the extent to which fish habitat will be impaired by timber harvest and road construction activities including effects on stream structure and supply of large organic material. All models to estimate sedimentation should be clearly identified; we would also like to know if the models are the most up to date and accurate.

The draft EIS should consider several important water quality/fishery questions. Will non-point source pollution reach levels, which will cause significant degradation of fish habitat by any of the action alternatives? Will state Water Quality Standards be met? Will winter, summer, spawning, and riparian habitats be impaired? As a designated management agency for water quality management by the state, has it been determined by analysis using water quality and fish habitat specialists, that the reductions in habitat capability are not serious? Will these streams still fully support the designated uses of cold-water fish habitat?

The draft EIS should evaluate restoration opportunities, both biophysical and economic. Issues such as road obliteration, culvert removal or replacement, and maintaining tree cover to minimize flooding should all be examined in the South Deep watershed.

Wetlands

The draft EIS should provide a description of any existing wetlands in the planning area and methods to maintain both wetland acreage and functions. Information on the location, acreage, type, and ecological role of wetlands should be provided. Wetland functions (e.g., fisheries and wildlife habitat, food chain support, flood water conveyance and storage, sediment control, water quality improvements) to be lost or impaired by timber harvest and road construction activities should be addressed in detail. Non-point source derived alterations to water quality should also be addressed. The draft EIS should also provide a description of anticipated hydrologic alterations (e.g., changes in hydroperiod, hydrodynamics) that may affect wetland functions. In accordance with the Clean Water Act (CWA), the draft EIS should provide detailed strategies and methods to protect wetlands in the planning area (e.g., buffers, corridors). Wetland mitigation strategies should be included in the overall site mitigation plan. BMPs and monitoring procedures should be developed that specifically address wetland protection.

Antidegradation

We believe that the proposed project could degrade water quality so that recreational activities and fisheries will not be fully maintained - therefore violating the federal antidegradation policy. An Antidegradation analysis, as specified in the Antidegradation Policy [40 CFR 131.12] should be included in the draft EIS. This policy was developed to achieve the goals of the Clean Water Act (CWA), which are to restore and maintain the chemical, physical and biological integrity of the nation's spirit and intent of the CWA.

The Antidegradation Policy describes three tiers of protection. Briefly:

Tier 1:

No activity is allowable which would partially or completely eliminate any existing beneficial use of a water body, whether or not that use is designated in a state's water quality standards. If an activity will cause partial or complete elimination of a beneficial use, it must be avoided or adequate mitigation/preventive measures must be taken to ensure that the existing uses and the water quality to protect those uses will be maintained.

Tier 2:

Where the quality of the waters exceed 'fishable/swimmable' levels (high quality waters), that quality shall be maintained and protected unless the following are completed:

- 1) a finding that such degradation is necessary to accommodate important economic or social development in the area in which the waters are located.
- 2) full satisfaction of all intergovernmental coordination and public participation provisions,
- 3) assurance that the highest statutory and regulatory requirements and best management practices for pollutant controls are achieved.

Please note that this provision is intended to provide relief only in extraordinary circumstances where the economic and social need for the activity clearly outweighs the benefit of maintaining water quality above that required for "fishable/swimmable" water, when both cannot be achieved. The burden of demonstration on the party proposing such activity is very high. In any case, the activity shall not preclude the maintenance of a "fishable/swimming" level of water quality protection.

Tier 3:

Where "high quality waters" constitute outstanding National resources, that water shall be maintained and protected. As with the other tiers, the state determines the 'tier' of the water body. If necessary, EPA will provide guidance on determining water quality status.

Federal Consistency with Provisions of § 319 of the Clean Water Act

Section 319 includes water quality assessments and a Nonpoint Source (NPS) management program. The assessment identifies water that cannot reasonably be expected to attain or maintain applicable water quality standards or goals without control of nonpoint sources. The NPS program identifies BMPs and programs to achieve implementation.

The Federal consistency provisions of Section 319 represent an opportunity for State and Federal agencies to more closely coordinate their activities and cooperate in achieving water quality goals. If the

state determines that a Federal project is not consistent with the provisions of the NPS program, the Federal agency must make efforts to accommodate the State's concerns. Executive Order 12372 provides guidelines for using the State intergovernmental review process for conducting Section 319 Federal consistency reviews.

The NEPA process must integrate Section 319. Existing water quality conditions in NEPA documents need to reflect the state's water quality assessment. Direct or indirect nonpoint source water quality effects need to be reduced through design and through mitigation measures to insure that the project is consistent with the state's NPS program.

Soils and Watershed Sensitivity

The soils in the planning area should be described and related to landform stability or watershed sensitivity. Erosion hazard descriptions should be tied to geology, landforms, and specific locations in the planning area. The draft EIS should describe whether mass soil failure is a major problem, the type of geologic material that is present, and whether erosion is a concern in the planning area. Areas of potentially high soil erosion and mass soil failure risk should be shown on a map of the area that indicates the location of roads and harvest units relative to the soil erosion potential.

Soil productivity and any detrimental soil conditions should be described on a unit-by-unit basis, both the existing condition, and how the alternatives will alter the existing condition. We would like to see a table showing the current and proposed levels of compaction on a unit-by-unit basis. If levels exceed the 15% by unit (without roads) in the Colville LRMP, mitigation measures to reduce the percentage to Plan standards should be discussed and planned for the draft EIS. The methodology of the soil surveys should be discussed and compliance with Forest Service Handbook standards ensured.

Biodiversity

Biodiversity is the variety of life. It includes the number of different species, the abundance of each species, and the distribution of species. It includes species diversity, gene pool diversity, and ecosystem diversity. The concept of biodiversity also includes the processes of interaction among species. Biodiversity can be evaluated on several scales including site specific (alpha), environmental gradient (beta) and landscape (gamma).

To maintain genetic diversity, upland and stream corridors should be retained in the planning area. The draft EIS should provide information on the location and length of habitat corridors. Since biodiversity tends to be greatest in the late successional stages of ecosystem development, the Affected Environment and Environmental Consequences sections of the draft EIS need to discuss what effect timber harvest could have on the preservation of gene pools and species diversity.

Threatened and Endangered (T and E) Species

We request that the draft EIS include the Biological Assessment or a summary of it as well as the Fish and Wildlife Service (FWS)/National Marine Fisheries Service (NMFS) Biological Opinion/concurrence with the findings in the Biological Assessment. It is likely that grizzly, lynx, caribou, wolverine, bull trout and wolf reside in the South Deep project area or have in the recent

past. The Lynx Conservation Areas Strategy should be adhered to and impacts of past management as well as proposed actions should be included in the analysis.

NEPA requires full disclosure on all issues and public involvement in all aspects of the decision. The Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA encourage the integration of NEPA requirements with other environmental review and consultation requirements (1502.25), and

The Endangered Species Act (ESA) consultation process can result in the identification of mandatory reasonable and prudent alternatives for a jeopardy opinion and reasonable and prudent measures for an adverse modification opinion.

We believe that a final EIS or Decision should not be completed prior to the completion of Section 7 consultation. The effect of the timber sales on the T or E species in or near the planning area is relevant to the decision at hand: whether to cut, where to cut, when to cut and under what conditions to cut timber. Both the Biological Assessment and the EIS must evaluate the potential impacts of the proposed action on T and E species and the EIS must fully disclose the impacts. Integration of the analysis of reasonable and prudent alternatives/mitigation measures required by the Endangered Species Act (ESA) and the analysis of feasible alternatives/mitigation is required by NEPA.

If the consultation process is treated as a parallel process it is conceivable that reasonable and prudent alternatives/mitigation measures to avoid a jeopardy/adverse modification opinion, which have not been evaluated in this final EIS, could be developed during the ESA consultation process. If the Section 7 consultation process is completed after the EIS process for this sale is completed, then a supplement to the final EIS could be warranted.

Access

The draft EIS should indicate which roads built for this timber sale will be removed from the Forest Development Road System and which roads will remain in the system. For those roads remaining on the system, mitigation measures to protect water quality and fish habitat should include provisions for inspection and maintenance. The draft EIS should describe the frequency of maintenance activities for these roads and whether adequate funding is available for road maintenance. What are the road densities in the South Deep project area and what roads are needed for access for recreation and private lands?

Mitigation

A comprehensive discussion of proposed mitigation for direct, indirect and cumulative impacts is required by the Council on Environmental Quality (CEQ) regulations for implementing the Procedural Provisions of NEPA. The CEQ regulations indicate that an EIS should include the means to mitigate adverse environmental effects (40 CFR 1508.7) as well as disclose the effectiveness of the mitigation measures to minimize adverse effects. Numerous judicial reviews of NEPA cases have supported this need for identifying mitigation measures and discussing their effectiveness.

Site-specific details on the effectiveness of mitigation are appropriate for a site-specific timber sale. The EIS should provide a quantitative (if possible) or qualitative description of mitigation effectiveness. Prior timber sales in the Idaho Panhandle National Forests could be used as a basis for these discussions.

Monitoring

The cultural, soil, watershed analysis and wildlife surveys should be completed before the draft EIS is released. The draft EIS should include a discussion of monitoring for each resource category, that has been determined to be significant through the scoping process, including fisheries and water quality. A properly designed monitoring plan will demonstrate how well the preferred alternative resolves the issues and concerns identified during scoping. A comprehensive monitoring plan will measure the effectiveness of the mitigation measures to control or minimize potential adverse effects. The EIS should include a discussion of how the three basic types of monitoring (implementation, effectiveness and validation monitoring) are being used in this project.

The monitoring plan should include types of surveys, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups. A helpful document has recently been completed for developing water quality monitoring plans: Monitoring Guidelines to Evaluate Effects of Forestry Activities on Streams in the Pacific Northwest and Alaska, EPA/910/9-91-001, May 1991

The draft EIS should describe the feedback mechanism which uses the monitoring results to adjust standards and guidelines, best management practices, standard operating procedures, intensity of monitoring, and timber sale administration when adverse effects are first detected. Providing such a process for adjustment will ensure that mitigation will improve in the future and that unforeseen adverse effects are recognized and minimized.

Cumulative Effects

Cumulative impacts are defined as "...the impact on the environment which results from the incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." (40 CFR 1508.7) At a minimum, the cumulative scenario should include all past, present, and reasonably foreseeable future timber sales in the area and their effects on water quality of major drainages and wildlife habitat especially for those species that move/migrate through more than one timber sale area, and other projects that could affect the resources in the project area - including private lands. The cumulative impacts analysis should include evaluation of direct and indirect effects on all resource categories.

Timber Sale Economics

In the interest of the full public disclosure intent of NEPA and with the national controversy regarding below-cost timber sales, it is important that the EIS consider timber sale economics as a potential management concern for analysis. When methodologies to compute the benefit/cost ratios and the value of the species of timber- are used, the EIS should provide clear descriptions of the key assumptions about timber value pricing, the products being valued, discount rates, length of rotation etc. How are road costs, maintenance, sale preparation, and IDT costs used in the analysis? If non-market values are not measured, a discussion of their relative value to the measurable benefits and costs should be made.

How will the mandate to provide a maximum return to the public be attained? For example if two thirds of the American public doesn't want their forest logged, but no value is placed on this, how can the Decision Maker make a logical choice? For this reason we ask that a range on non-commercial alternatives, with varying costs and benefits, be provided in the analysis.

Post sale Activities

The draft EIS should provide site-specific activities planned under the Knutson-Vandenberg Act (KV) improvements. Since such projects have positive and adverse effects to some resources, they should be described in some detail. Locations within the project area should be shown and expected KV funds that are generated should be described.

We ask that all unroaded areas be identified, as well as impacts of this project on the potential wilderness values of the Abercrombie Hooknose area.

Livestock grazing

The draft EIS should consider the cumulative effects of the effects of this project on livestock grazing. Through this project, a considerable amount of additional "range" will be created through logging and road building. This greatly facilitates the use of this area by domestic livestock and thereby increases the potential for the spread of noxious weeds, increases the likelihood of livestock access to water bodies which can negatively effect water quality and stream bank stability, and increases the risk of fire.

In addition, the draft EIS should discuss and disclose the interrelationships between domestic livestock grazing and forest health concerns. The Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin (PNW-GTR-382) notes:

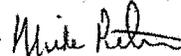
The primary causative factors behind fire regime changes are effective fire prevention and suppression strategies, selection and regeneration cutting, domestic livestock grazing, and the introduction of exotic plants.

Noxious Weeds

The DEIS should consider the direct, indirect, and cumulative effects of this project on existing noxious weed populations, the introduction of new noxious weed species, and the spread of noxious weeds. Furthermore, the DEIS should disclose the effects of increased noxious weeds on wildlife habitat, fire hazard, restoration efforts, sensitive plant species, and soils.

Thank you for the opportunity to respond.

Sincerely,



Mike Petersen, for the Commentors

See also Attachment 1

Reducing Fire Risks to Save Fish – A Question of Identifying Risk

A Position Paper by the Western Montana Level I Bull Trout Team

In the past year, much attention has been focused on forest management as it relates to reducing the risks of large-scale, intense wildfires. This heightened emphasis is largely a result of the 2000 fire season, during which parts of the west experienced larger than normal forest fires. There is mounting public concern that fires in our national forests are out of control. The Forest Service and the Bureau of Land Management have responded to this concern with the National Fire Plan, which addresses this threat and proposes a path to reduce the risk of catastrophic wildfires in our forests. At a more regional scale, the Northern Region of the Forest Service is in the process of developing a "Cohesive Strategy" to implement the National Fire Plan.

The Western Montana Level I Bull Trout Team recently met with one of the Cohesive Strategy Team members to discuss the concept of reducing fire risks and its role in native fish species recovery. There has been much discussion regarding this issue. One theory expressed by many people is, because fires can result in increased erosion, they are a threat to fish habitat, and therefore reducing the occurrence or intensity of forest fires will result in improved conditions and reduced risks to fish. It is this subject that we feel we need to comment on, because much of the post fire planning is at least partially dependent on it, and we feel that our collective discussion regarding this issue could prove useful in NEPA projects related to the fires. It is also our desire to work closely with the Cohesive Strategy team in developing a strategy that accomplishes both the social and ecological goals of the plan.

First, we want to re-emphasize the importance of wildfire, including large-scale, intense wildfire, in creating and maintaining stream systems and stream habitat. In western Montana, the two primary natural disturbance mechanisms responsible for initiating stream dynamics that ultimately increase habitat complexity and diversity are fires and floods. In the short-term, fires trigger other processes, such as erosion and woody debris recruitment, which are critical in the formation of young, biologically rich stream systems. Over longer time periods, fires recycle nutrients, regulate forest development and biomass, and maintain biological pathways (Keane, et al. 1999). The effect of fire on these processes is ultimately transferred to stream channels. Fires, and the ecological processes associated with them, are thus an integral part of maintaining our native fish populations.

From this point, we often catapult into a discussion of whether or not the recent fire activity observed in the west is outside the range of variability. The question here is "if fires burned hotter or over larger areas than in the past, do they necessarily have more negative impacts on fish, and therefore would reducing them be better for fish?" To answer this question, we must first identify the timeframe of reference. In this case, since we are concerned with native fish species viability, the timeframe would aptly be several thousand years because species such as bull trout and cutthroat trout have been in western Montana for at least this long. There have been countless periods where wildfires have been much more severe and widespread than we are currently experiencing, and these fish have survived. At a regional scale, at least two periods just within the last century were significantly worse than the fires we are observing now. Clearly, the fires we have recently experienced, by themselves, do not pose the risk to fisheries that has been inferred in some circles.

That said, however, it is imperative to recognize that most existing aquatic conditions are drastically different than they were when past periods of intense fire activity occurred, and the impacts to fish may be different as well. There are four major differences between current and past conditions that play directly into this discussion – fragmentation, habitat degradation, exotic species, and fire suppression. While there are other factors that relate to fires potential effect on fish, these four are generally the most predominant in the area, and will therefore be focused on in the following paragraphs.

Many native fish habitats are currently fragmented to varying degrees by dams, road culverts, stream dewatering, or temperature barriers. Historically, fish were able to avoid localized fire effects by moving to unburned areas. If local extirpations did occur, these areas were quickly refounded by nearby populations in the open stream network. Presently, many populations are functionally isolated, and when natural disturbances occur the effects are therefore much greater than they would have been historically.

Habitat conditions are another factor that has changed significantly. In general, fish habitat quality is much less diverse and complex than historic, and native fish populations are therefore less fit and less resilient to watershed disturbances. Roads, more than any other factor, are responsible for the majority of stream habitat degradation on National Forest Lands in this area (USDA 1997). Historically, roads were not present in watersheds and did not affect hydrologic or erosional patterns. Now, however, extensive road networks in many of our watersheds contribute chronic sediment inputs to stream systems, and these effects are exacerbated when fires remove the vegetation that filters road runoff.

Exotic species have a similar effect as habitat degradation, in that they suppress or eliminate native populations in certain areas, thereby reducing the resiliency of these populations and their ability to recover from natural disturbance events.

Finally, our efforts to suppress fires can have significant effects on native fish populations. Fire lines, water drafting, and fuel spills can have significant short and long-term impacts on stream systems, especially the smaller streams where much of the activity usually takes place. Dozer lines can have similar impacts as roads designed below standards. Historically, none of these impacts occurred when fires burned across the landscape.

Note that in each of the four cases described above, the real risk to fisheries is not the direct effects of fire itself, but rather the existing condition of our watersheds, fish communities, and stream networks, and the impacts we impart as a result of fighting fires. Therefore, attempting to reduce fire risk as a way to reduce risks to native fish populations is really subverting the issue. If we are sincere about wanting to reduce risks to fisheries associated with future fires, we ought to be removing barriers, reducing road densities, reducing exotic fish populations, and re-assessing how we fight fires. At the same time, we should recognize the vital role that fires play in stream systems, and attempt to get to a point where we can let fire play a more natural role in these ecosystems.

In addition to not addressing the true risks to aquatic systems, most proposals to reduce fire risk involve fuel reduction treatments that can, themselves, result in significant risks to fisheries. Salvage of burned trees is often proposed to reduce future fuel loading. While salvage can be accomplished with minimal impacts in some areas, many burned areas are already extremely sensitive to ground disturbance due to the loss of vegetation. Further disturbance can result in increased erosion, compacted soils, and a loss of nutrients from these areas (USDA 2000, Beschta et al. 1995). Large-scale thinning or construction of fuel breaks in non-burned forests may have

fewer direct impacts than salvage, if it occurs from existing roads and outside of riparian areas, but it still won't reduce risks to aquatics, because it's not addressing the source of the problem. Finally, constructing new roads may directly contradict objectives aimed at improving watershed or native fish conditions.

Although mechanical fuel removal and salvage is more likely than wildfire to adversely affect fishes and their habitat, the Team understands that in some areas (such as urban interface zones), mechanical fuel management may be the most practical option. In these cases, we recommend that fishery and fuels specialists work closely together to achieve project goals while minimizing impacts to fishes.

Based on this, we believe, in most cases, proposed projects that involve large-scale thinning, construction of large fuel breaks, or salvage logging as tools to reduce fuel loadings with the intent of reducing negative effects to watersheds and the aquatic ecosystem are largely unsubstantiated. Post-fire activities such as these that increase the probability of chronic sediment inputs to aquatic systems pose far greater threats to both salmonid and amphibian populations and aquatic ecosystem integrity than do fires and other natural events that may be associated with undesired forest stand condition (Frissell and Bayles 1996). There are undoubtedly exceptions to this position. Examples might include direct urban interface environments where natural fire processes are clearly not an option and road systems cannot be removed, or areas where native fish populations are nearly extinct and isolated to an extremely small watershed and reconnection to other populations is not an option. Another exception might be where funds generated from thinning would be directly used to obliterate roads or remove barriers. In general, however, fish populations will respond better to projects directed at reducing the immediate risks - barriers, roads, exotic species, and suppression - than to projects aimed at reducing fire intensity or scale.

Rob Brassfield,
Bitterroot NF

Jim Brammer,
Beaverhead-Deerlodge NF

John Carlson,
Kootenai NF

Jo Christensen,
Missoula Field Office, BLM

Steve Phillips,
Flathead NF

Brian Riggers,
Lolo NF

Len Walch,
Helena NF

Kate Walker,
USFWS

Literature Cited

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Sherri Schwenke
District Range
255 West 11th
Kettle Falls, Washington 99141

To whom it may concern: 1/3/2002

As a concerned American Citizen, I am writing in response to the Notice of intent to prepare an environmental impact statement for the South Deep Management Project in the Colville National Forest.

I am very concerned about potential road closures in this area. Please keep in mind that not all Americans are able to strap a 40 pound pack on their backs and hike for 10 days to enjoy the vast beauty of our great nation. Elderly and disabled Americans absolutely depend on existing roadways for outdoor recreation. Roads benefit not only these taxpayers, but sportsman and recreationalist as well. I am an off road enthusiast and avid outdoor recreationalist myself, I make use of these roads frequently.

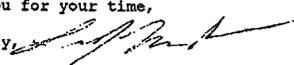
I believe that access to public lands is a critical aspect of the multiple use policy that should govern our National Forests. And this access mandates that existing roads be preserved and only closed as an absolute last choice. And even then, only after a Roads Analysis is completed to ensure that transportation needs are determined throughout the district as a whole to prevent piece-meal decisions on road needs.

I urge your agency to consider the needs of ALL Americans as you proceed. Please do not consider ANY road closures in this area without first performing a Roads Analysis and allowing ample public comment period.

Finally, please add me to your mailing list so that I may stay informed about any potential changes to the public use of this area.

Thank you for your time,

Sincerely,


William Madonna, Jr
516 Sunrise Dr
Coeur d'Alene, ID 83815



Kettle Range
CONSERVATION GROUP

January 28, 2002

Tom Pawley
Three Rivers District, C.N.F.
255 West 11th
Kettle Falls WA 99141

RE: South Deep Ecosystem Management

Dear Mr. Pawley,

Please accept these comments on behalf of the board and over 800 member families of the Kettle Range Conservation Group.

Looking at the scoping document, it is clear this is a large-scale project. We assume that it will include several million board feet of timber harvest. Because the proposed project area is so large, and the proposed actions numerous and varied, we would expect that there will be a commensurate level of analysis, including but not limited to the following areas:

- ♦ **Sediment.** Will comprehensive sediment modeling be performed as part of the analysis?
- ♦ **Endangered species.** It appears that the project area overlaps lynx analysis units and habitat areas. What analysis will be done in this regard? What other sensitive, threatened or endangered species habitat is within the proposed project area?
- ♦ **Soil.** What level of soil analysis will be conducted? What are the current conditions in the watershed in terms of erosion, compaction
- ♦ **Wildlife.** The proposed project area is prime habitat for a number of species, such as black bear, moose, owls, cougar, lynx, bobcat, cougars, pileated woodpeckers, etc. What species-specific analysis will be provided?
- ♦ **Roads.** KRCCG is opposed to the construction of new roads under all but the rarest of circumstances. What analysis will be conducted regarding the effectiveness of road closures in the area and the impact of both legal and illegal ORV use? Is new road construction part of the proposal.
- ♦ **Cumulative effects.** How much logging has occurred in the project area in the past? How much is planned for the future? What degree of logging has occurred on adjacent lands in the past? What level of logging is planned on private and state land within and adjacent to the proposed project site? What are the cumulative effects of these past, present and future harvests and to what degree do they combine with other activities in the area including recreation in this popular Highway 20 corridor?



- ◆ **Fire.** What percentage of the prescribed burning will take place within the wildlands-urban interface? Will the WUI receive priority treatment as outlined in the National Fire Plan? What analysis has been done to indicate that the proposed benefits of reduced fire risk from stand density through mechanical thinning is not offset by the increased fire risk imposed by increased road densities, exposure of the forest floor to the drying effects of summer weather, and greater access to thinned stands by ORV's and other human activities?
- ◆ **Old growth.** Are there stands of existing old-growth within the proposed project area? What monitoring has been conducted to support the belief that commercial logging promotes the development of natural old growth habitat? What scientific support is there for the USFS's understanding of HRV in regards to stand structure? What criteria does the USFS use in defining old-growth habitat other than tree size? How will this logging lead to a net increase in old growth habitat, rather than merely increasing the rate of growth for the leave trees? How does the intensive level of thinning typically proposed in projects such as this one resemble the natural process that led to the development of old growth in the absence of the "benefits" of logging?
- ◆ **Logging.** Why are clearcuts proposed for this project? How will these "improve the overall landscape and vegetative conditions." What evidence is there to support such restoration effects of clearcutting? On how many acres is clearcutting being proposed?
- ◆ **Roadless Areas.** KRCG is adamantly opposed to logging, road building, or any other development activities within roadless areas. Pacific Biodiversity Institute maps indicate that there are numerous roadless areas within the project boundaries. What activities are planned within these areas?
- ◆ **Economic analysis.** KRCG asks that ALL costs and benefits to taxpayers be included in determining PNV of the alternatives. The USFS routinely omits externalized costs of timber sales, thus inflating the PNV of logging alternatives. We ask that these externalized costs be included.
- ◆ **Water.** Residents in the proposed project area have indicated that past logging operations in the watershed have led to changes in well water levels, including one resident who states that some wells went dry following past timber harvests. Has the USFS investigated these claims? What measures would be taken in the proposed action to protect property owners from such consequences?
- ◆ **Forest health.** The scoping documents make no mention of insect infestations in the area. What is the current assessment in this regard? Is treatment of insect infestations part of the purpose and need for this project?

In addition, we ask that a restoration-only alternative be included in the EIS and that this alternative be given serious analysis.

We also ask that the timber-harvest alternatives offer a full range of options, including not only a variance in the total number of acres that will be logged, but also a range of

the intensity of the commercial logging itself. We would like to see a timber-harvest alternative, for example, that sets the threshold for "thinning" at 12" or 14" dbh, rather than the typical 21" maximum.

Thank you for the opportunity to comment on this proposal.

Sincerely,


David Henick

Director, Forests and Rivers Program.

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Don & Kristen Super • Proprietors

P.O. Box 1016
Tonasket, WA 98855
January 8, 2002



Sherril Schwenske
District Manager
Colville National Forest
255 West 11th
Kettle Falls, WA 99141

Dear Sherril
As President of Washington Outfitters and Guide
Association I would like to request any
information available concerning the
South Deep Management Project on the
Colville National Forest.
Thank you for your kind assistance.

Sincerely
Don Super

(509) 486-4699 • P.O. Box 1016 • Tonasket, Washington 98855

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P.01

Three Rivers Rangers District
Attn: Sherril Schwenske
Tom Pawley
255 W. 11th St.
Kettle Falls, WA 99141

January 11, 2002

RE: South Deep Management Project

Dear Tom:

This letter is a follow up to our phone conversation of earlier this morning.

On your map of the Deep South Management Project in section 16, it shows that about one third of the north end of section 16 is to be commercially harvested.

There is a small spring that runs down through that section as into Rocky Creek. My self and two other homes use that spring as our water supply and have since late 1879.

Should you log in that area of section 16 there is the danger that the spring would be disrupted endangering our water supply.

In our conversation you mentioned that you would have a hydrologist come out and check the area and would probably prescribe the immediate area of any logging.

Please keep me posted and let me know when your hydrologist would like to visit the area.

Regards

Foster Hopkins
Foster Hopkins
2173 Rocky Crk. Rd.
Colville, WA 99114
PH: 825-0535
Fax 824-5182

CALLED REGARDING THIS ISSUE ON 1-11-02.
Tom Pawley

Alan E. Dragoo
14728 E. 48th Lane
Vernode, WA 98037
509-893-1209
ADragoo@aol.com

January 30, 2002

Sherri Schwenke
District Ranger
255 West 11th
Kettle Falls, WA 99141

Dear Sir or Madam:

I am writing regarding the notice of intent to prepare an environmental impact statement in conjunction with the South Deep Management Project, as published in the Federal Register on January 2, 2002.

As an avid off highway vehicle user, I would request that the needs and desires of motorized recreationists be seriously considered in the planning of this project. My particular interest is in the use of 4WD vehicles (e.g. Jeeps®, trucks, and SUVs), but I believe the needs of motorcycle, ATV, and snowmobile users should also be considered.

I know that road maintenance costs often enter into the decision to close roads and trails. I would like to point out that 4WD users usually prefer trails impassible to ordinary automobiles. These trails should receive only maintenance necessary to minimize environmental impact, such as diverting runoff to reduce erosion and stream siltation.

Being relatively new to four wheeling in this area, I am not very familiar with the project area. Therefore, I do not know for certain whether it contains any roads or trails of interest to motorized recreationists. However, I would appreciate the opportunity to comment on the desirability of any roads that may be considered for closure under this or any other projects in your district.

Sincerely,



Alan E. Dragoo