Bryce Dillon

Brett Konzek

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Comments for the Colville National Forest Plan- Fish and Watershed Systems.

How will the use of “focal species” ensure the survival of species of fish that will not be listed under the assessment? The listed species that are considered to be at risk include the Bull Trout, Westslope Cutthroat, Redband/ Rainbow, Kokanee, and Pygmy Whitefish, yet what mitigation will be established for other fish and aquatic species that reside in the watershed of the National Colville Forest? I believe that all species of fish in a watershed system should be put into consideration because they are vital to the development and growth of that ecosystem. (EIS,Table seen on pg 175)

The management plan inquires that the Bull trout is threatened by historical and current land uses, which include the construction of dams, the degradation by timber harvests, and livestock grazing. The introduction of non-native species has also made a huge impact on the bull trout’s population through competition, predation and hybridization. Since the bull trout is a keystone, indicator species, how will the new plan set about a way to ensure the survival and growth of the bull trout? There is no recommendation addressing dam construction or removal. (EIS, pg 171)

In the Full Draft EIS used for the Proposed Revised land Management for Colville National Forest it states "Alternative P would accelerate improvement in watershed condition faster than the no-action alternative, the proposed action, and alternative B. Measurable objectives in the expanded key watershed network would accelerate restoration and preservation of hydrologic function" (EIS, pg. 332).  However, there is no mention of how and why alternative P would improve watershed conditions better than the other alternatives, or what the so called "measurable objectives" are.

The most likely fish management plan would involve the use of the ARCS (or a modified version),which focuses on aquatic and riparian management and would, in theory, increase the pace and scale of aquatic restoration. I am in support of using the ARCS model, however none of the alternatives identify the "desired conditions" of the ARCS model. Without setting the "desired conditions" of the ARCS model, there is a possibility that management practices would be based on the greatest societal and economic benefits rather than the greatest ecological benefits.  This could potentially lead to a less effective management of watershed, aquatic, and riparian resources than under the INFISH management. Therefore, I ask that the Forest Service explicitly state some of the "desired conditions" that would be laid out in the ARCS model to better understand what direction the Forest Service is taking on fish management.

  Similarly to the previous comments above, the results of “Alternative P” I find are much more efficient than the results of Alternative R,B, and O. Alternative P most aggressively addresses several problems within the boundaries of the Colville National Forest and I believe that  through providing recovery plans for threatened species, implementing components to prevent and control aquatic invasive species, and controlling amounts livestock grazing, Alternative P addresses all of the major problems that threaten the Colville Forest and proposes effective methods to combat them. While the other plans are still effective, I believe that P will prove to be most effective in combatting the current problems within the region.