



July 5<sup>th</sup>, 2016

Colville National Forest  
Attention: Amy Dillon, Forest Plan Revision Team  
765 South Main  
Coeville, WA 99114

Re: Colville National Forest Plan Revision

Submitted via email to: [colvilleplanrevision@fs.fed.us](mailto:colvilleplanrevision@fs.fed.us)

Dear Ms. Dillion:

The Wilderness Society is pleased to submit these comments in response to the Colville National Forest (CNF) Proposed Revised Land and Resource Management Plan (Forest Plan). The Wilderness Society works to protect wilderness and inspire Americans to care for wild places. Toward this end, The Wilderness Society works in partnership with local communities, businesses, agencies, conservation organizations, recreationists and local citizens to find solutions for the preservation and stewardship of national public lands. Representing more than 500,000 members and supporters nationwide, including more than 20,000 in Washington state, The Wilderness Society has been involved in land management issues throughout Washington state since 1981.

The Colville National Forest is a diverse landscape of forests, meadows, mountain peaks, and river valleys. The water from the Colville flows into the Columbia River. This forest is a local, regional, and national treasure for Americans in terms of offering quality experiences and contributing to the community, economic, and landscape health by providing plentiful, clean water for agriculture, fish and people; healthy habitat for wildlife ranging from the elusive wolverine, lynx, wolf, and grizzly to moose, elk and caribou; and renowned recreational opportunities include hunting, fishing, hiking, backpacking, pack and saddle stock use, mountain biking, off-road vehicle riding, snowmobiling, and backcountry skiing.

We submit these comments in the spirit of maintaining these incredible values for current and future generations.

**1. Late-successional and old forest habitat conditions**

*a. Old Growth Protections and Standards*

Although the Proposed Revised Forest Plan has a clear and practical standard for retaining large snags, it offers no explicit protections for large and old trees and only aspirations for restoring large tree habitat

across the landscape (e.g. FW-DC-VEG-06 Biological Legacies. Plan Revision, p. 32). The goal of improving ecological resilience through restoring forest structures to historic ranges of variability cannot be achieved without clear and practical standards for retaining and recruiting large and old trees, and restoring landscape spatial patterns. The proposed dynamic landscape approach has ambiguous guidelines regarding large and old trees that must be clarified and strengthened in order to achieve resilient conditions, and meet wildlife viability and other direction.

We strongly recommend diameter standards for the following reasons:

1. Diameter standards (with specified exceptions) are crystal clear, and operational.
2. Diameter standards ensure effective large and old tree and snag retention, and provide spatial variability in tree and snag distribution (heterogeneity, such as clumping and variable spacing).
3. Diameter standards facilitate monitoring and accountability.
4. Large trees and snags are scarce in the region, and effective protection is crucial for meeting ecological objectives.
5. Large trees and snags have inordinate ecological and economic value. Diameter standards mitigate the economic incentive to remove the largest, most ecologically valuable trees and snags from the site.
6. Diameter standards (allowing for specified exceptions) will not impair attainment of forest management objectives and will ensure ecological resilience goals will be achieved.

We request that the selected Alternative be modified to include a Forest Wide Standard for Large and Old Tree Wildlife Habitat:

*FW-STD-WL-13. Large and Old Tree Habitat:*

Large and old trees are currently below the desired conditions. Trees older than 150 year of age of all species shall be retained unless they pose a safety hazard. Old trees are identified using visual ratings such as the Van Pelt guide (Van Pelt 2008). Trees greater than 21" dbh of priority species shall be retained based on vegetation type (Table below), unless they pose a safety hazard or unusual operational conflict, or for ecological reasons that are documented, justified, and assessed at the project level. In areas lacking 21" diameter trees, generally retain the upper 25 % of the site's diameter distribution of priority species

**2. Roadless Values**

- a. Clearly state that all roadless areas and Potential Wilderness Areas will be managed for wilderness and roadless character*

The Proposed Action must clearly state that the roadless areas, both inventoried and non-inventoried, and PWA's on the CNF will be managed for their wilderness and roadless character. During a prior collaborative process that took place between 2007-2008, of which The Wilderness Society participated, the diverse array of stakeholders found common ground on a number of issues. A consensus was reached on the need to protect, with specific management direction, the wilderness and roadless character of the inventoried roadless areas. Some roadless areas or Potential Wilderness Areas (PWAs) receive protection by the 2001 Roadless Rule. However, other roadless areas inventoried as part of this planning process do not. We request that the selected Alternative provide clear direction in the form of

desired conditions and standards that ensure all roadless areas maintain their wilderness and roadless character.

We recommend that the selected Alternative in the final Forest Plan state the following:

“All roadless areas and Potential Wilderness Areas, whether allocated as recommended wilderness or some other land management allocation, will be managed so as to protect their roadless state. This includes no new road building, no commercial timber harvest, and maintaining, protecting and restoring them as key ecosystem elements of the Forest.”

### **3. Recommended Wilderness**

A required element of forest planning is the evaluation of roadless lands to identify areas that qualify and should be recommended for wilderness designation. These lands include some of the most pristine, wild, and natural places beyond those already designated as Wilderness in the National Forest System.

The revision of the CNF Forest Plan is a significant in that it is the first National Forest unit in the Pacific Northwest to recommend to congress specific Potential Wilderness Areas (PWAs) for inclusion into the National Wilderness Preservation System. Currently, the CNF has only one designated wilderness area, the Salmo Priest Wilderness in the northeastern portion of the forest. The Wilderness Society believes the current Forest Plan revision process is a significant opportunity to advocate for the protection of specific areas where wilderness characteristics and other special values are present and deserved of the protection wilderness designation offers.

In the context of the state’s designated wilderness acreage, the CNF is vastly underrepresented. Since the enactment of the Wilderness Act in 1964, Congress has designated over 4.4 million acres of wilderness in Washington state, including 2.7 million acres managed by the U.S. Forest Service. Of the 2.7 million acres of national forest wilderness, only 41,307 acres is currently designated on the CNF, representing just over 1.5% of the overall designated wilderness on national forests in Washington state. Only 3% of the CNF is designated as wilderness, the least of any National Forest in Washington state or Oregon.

The draft plan correctly identifies 220,000 acres of wilderness quality lands on the CNF. The 2011 Proposed Alternative supported recommending over 110,000 acres as part of the Forest Plan revision. We commented in 2011 in support of the recommendation, but encouraged the CNF to recommend additional acreage in the final Forest Plan. The revised Forest Plan (Alt. P) in the Draft Plan reduces the recommended acreage to roughly 68,000 acres, a decrease of 35% from the 2011 recommendation. Not only is this decrease disappointing and without strong rationale, it represents less than 1/3 of the wilderness quality lands that were identified on the CNF and misses a substantial amount of quality and qualifying lands for wildlife and recreation.

- a. We support the Wilderness Recommendations included in Alternative P for the Bald Snow PWA, Abercrombie Hooknose PWA, and the Salmo Priest Adjacent*

Though we are disappointed in the reduction of recommended wilderness in preferred Alternative P, the three PWAs that were included provide outstanding opportunities for wilderness recreation, including day hiking, backpacking, backcountry skiing and snowshoeing, horseback riding, and wildlife viewing, within an easy day’s drive from the greater Spokane area. There is a growing need for

additional wilderness areas to meet the increasing need and demand for wilderness recreation in the Inland Northwest, especially for day trips, and additional recommended wilderness areas will help meet that need. All of these lands provide significant wilderness character and a wild, scenic backdrop for the area's many scenic driving routes and communities that promote the region's rustic, remote, backcountry as part of their growing recreational and tourism economy.

- **Abercrombie-Hooknose:** This PWA includes Abercrombie Mountain, the second highest mountain in eastern WA and is a prime destination for hikers, hunters and equestrians seeking solitude and world-class views of the Cascades, Selkirk Mountains and the Columbia River Valley. A wide array of wildlife can be found in this area and the subalpine environment is renowned for wildflowers and other botanical species.
- **Salmo Priest Adjacent:** The areas in question represent wilderness quality lands that can enlarge the only currently designated wilderness area in Northeastern WA. The areas in question are recommended for wilderness designation in every action alternative in the Draft EA.
- **Bald Snow:** The acknowledgement of the remoteness, solitude, natural beauty, ecological diversity and primitive character of the Bald-Snow area would come along with a wilderness recommendation for this PWA. The Kettle Crest Trail, which runs for nearly 45-miles through the Bald-Snow PWA, as well as the Pacific Northwest Trail, which also passes through will become even more significant as long-distance treks with recommended wilderness status.

b. *We urge the CNF to re-evaluate and consider the following Potential Wilderness Areas for wilderness recommendations.*

- **Profanity:** Similar to the Bald Snow PWA to the south, the acknowledgement of the remoteness, solitude, natural beauty, ecological diversity and primitive character would come along with a wilderness recommendation for this wilderness trail resource. Coupled with a wilderness recommendation for the Bald Snow PWA, the access to remote wilderness experiences from Sherman Pass would be greatly enhanced by a wilderness recommendation for the Profanity PWA.
- **Hoodoo:** Hoodoo Mountain is one of the most frequently visited non-motorized destinations on the CNF. Hunting, hiking and rock climbing are popular wilderness activities in this area. Hoodoo's cottonwood, aspen and shrub steppe is a rare vegetation type in the state and provides high quality habitat for Canada lynx, wolverine and nesting golden eagles.
- **Harvey Creek:** This area is also known as the Bunchgrass Meadows and the Molybdenite Mtn. area. This mountainous wild area south of the Sullivan Lake area provides excellent solitude and off-trail hiking and hunting, and has some of the most diverse wildlife habitat of any potential wilderness area in the region, including the ecologically rich bunchgrass meadows, and hidden old growth groves. Recommended wilderness for this area would help ensure that the upper reaches of the LeClerc Creek watershed, and important stream for bull trout, westslope cutthroat, and red band trout, are protected. It is also important, connected habitat for caribou, grizzly bear, lynx, wolverine, wolves, and other wildlife.
- **Twin Sisters:** The Twin Sisters area forms the wilderness scenery backdrop to the east of the Kettle Crest Trail in the Jungle Hill/Wapaloosie area and enhances the scenic wilderness values along the Kettle Crest.

- **Quartzite:** This IRS adjacent to 49 Degrees North Ski Area should be recommended for wilderness. This would be the closest wilderness area to Spokane. Recommended wilderness would help ensure that this unlogged wild area and its large cedar trees and adjacent private wetland preserve would be protected for their scenic and biological values.
- **Grassy and Hall Mountain:** These connected blocks of wildland above Sullivan Lake and adjacent to the Salmo Priest Wilderness Area should be recommended for wilderness. The Noisy Creek Trail and Grass Top Trail system provide excellent solitude through rugged terrain that is directly adjacent to the existing Salmo Priest Wilderness, and connected to the existing wilderness trail system, making multi-day wilderness treks throughout these areas possible. There is also a growing need for wilderness day hiking opportunities, and the Noisy Creek Trail (#588) provides easy access from several campgrounds along Sullivan Lake for those interested in shorter, more accessible wilderness hikes. These areas are also part of designated habitat for grizzly bears and caribou and provide connectivity for those and other species; wilderness protection would provide added habitat security. Wilderness recommendation and eventual designation would also protect the scenic backdrop of and water quality for Sullivan Lake.
- **Cougar Mountain and Thirteen-mile:** The 13-mile trail, which runs through both PWAs, provides a unique low-elevation, early season, Ponderosa pine dominated hiking environment that provides an extremely remote, wild experience with exceptional opportunities for solitude. There is a need for more wilderness experiences in the Okanogan Highlands eco-region like the opportunities provided by the Thirteenmile area. This trail is one of the first trails on the Colville NF to be snow-free each spring, and is an increasingly popular spring and fall day-hiking destination for people from the greater Spokane area. Because of its connectivity to the Bald Snow area and the Kettle Crest Trail via a network of hiking trails, this area provides a unique opportunity for multi-day treks from Sherman Pass. The Thirteenmile and Cougar PWAs are also important habitat and habitat connectivity for rare carnivores, including lynx, wolverine, and wolves. Prescribed fire and efforts to protect the area's old growth Ponderosa pine, an acknowledged Forest Service concern, could also continue if these areas were recommended for wilderness.

Finally, we recognize and respect that Colville Confederated Tribes have concerns about Thirteenmile and Cougar Mountain, and that the 2011 proposed action noted that Thirteenmile warranted wilderness recommendation if not for these concerns. The Wilderness Society commits to continued engagement with the tribes and CNF to find common ground to enable permanent protection of the values present in these PWAs.

*c. Manage High Need Potential Wilderness Areas not recommended for Wilderness to protect their Wilderness Values*

Additionally, for Potential Wilderness Areas that are not recommended for wilderness, we request that the management allocations be crafted to maintain and protect their wilderness values for current and future generations.

*d. Existing Wilderness Management*

The final Forest Plan must be clear with regards to any changes to management of existing wilderness. We did not find anything in the Proposed Revised Forest Plan to suggest such changes.

#### **4. Balanced Recreation Opportunities**

The Wilderness Society places a high value on high quality and balanced recreational opportunities on our National Forest lands. The number one way that the public interfaces with the CNF is through recreational activities. Future support for our Nation's special places is largely reliant on a citizenry that is actively engaged in experiencing these lands. Americans, and others, can enjoy the wild parts of our national landscape in myriad ways while at the same time ensuring their protection. Roads have long offered plentiful opportunities to explore cherished places. Hiking, biking, and pack trails lead to favorite picnic spots, fishing holes, hunting grounds, climbing areas, and camp sites. And at the wild heart of our nation, wilderness offers some of the most remote and profound of primitive recreational experiences. Opportunities for these kinds of adventures have been a cherished American birthright since before the founding of the republic, and are among the most compelling reasons we work to protect the public lands.

##### *a. Support for Non-Motorized Recreation*

The Forests Recreation Report states that "demand for access to the Colville National Forest for recreation purposed has increased steadily over the past 26 years since the last forest plan was developed." We appreciate the CNF's recognition of this increase in demand and feel it is important that the forest address this issue within its Forest Plan revision.

The plan appropriately distinguishes between non-motorized and motorized recreation due to the difference in resource impacts, potential for user conflicts and level of overall use. It is critical that the FPR provide for the quality of the recreational experiences. The 1982 National Forest Management Plan regulations require that forest plans must identify "the recreational preferences of user groups and the settings needed to provide quality recreation opportunities" (§219.21(a)(2)).

According to the 2013 Washington State Statewide Comprehensive Outdoor Recreation Plan, non-motorized recreation statewide is very popular:

- 51% of Washington residents participate in "Hiking – Trails"
- 24.4% of Washington residents participate in "Bicycle Riding – Trails"
- 2.7% of Washington residents participate in "Off-roading-Motorcycle – Trails"
- 5.2% of Washington residents participate in "Off-roading – ATV/Dune Buggy – Trails"
- 3.9% of Washington Residents participate in "Horseback riding – Trails"

Additionally, the Colville National Forests 2009 National Visitor Use Monitoring Report states that "Viewing natural features," "hiking/walking" and "relaxing" are the top three recreational activities on the forest.<sup>1</sup>

Yet, the Draft Plan's Recreation Report does not suggest a change in the number of trail miles available for non-motorized recreation trail opportunities. In fact, while Preferred Alternative (Alt. P) increases the number of backcountry acres managed for summer motorized recreation trail opportunities, it does

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<sup>1</sup> U.S. Forest Service. 2009 Visitor Use Report, Colville NF, National Visitor Use Monitoring Data Collect VY 2009.

not increase the amount of acres for non-motorized summer recreation opportunities even though non-motorized recreation are the leading recreation activities on the CNF.

The Recreation Report goes on to state that: "Alternative P would increase the number of backcountry acres managed for summer motorized recreation opportunities from 13,571 acres in the No Action Alternative to 54,5777 acres. This equates to a 400% increase in backcountry motorized (BCM) management area acres."

Furthermore, the Recreation Report seems to suggest that experience hikers can have on a motorized trails system is equivalent to one that they may find on a non-motorized trail system by stating: "Non-motorized recreation trail opportunities would be allowed on nearly 100% of the Forest's land base (excluding RNAs)."

We question the plan's focus on the need to increase summer motorized recreation on the forest at the such a dramatic rate while the percentage of motorized use on the forest is much less then the non-motorized activities. This is especially relevant given that hiking and biking are increasing in popularity while motorized creation s decreasing at a statewide level.<sup>2</sup>

b. Concerns about Kettle Crest Special Interest Area

In the Revised Proposed Action (Alt. P) a Kettle Crest Special Interest Area (SIA) is included as an alternative to recommended wilderness for the Profanity and Hoodoo PWAs. Though we appreciate the attempt to balance the recreation opportunities present in these PWAs with the need to protect wildlife and other unique values of the Kettle Crest, The Wilderness Society believes the SIA detailed in the draft EA is insufficient to protect the values present in these areas and that a designation that delivers a more lasting protection is warranted.

Again, we thank the CNF for this opportunity to comment on the Colville National Forest Proposed Revised Land and Resource Management Plan and look forward to continuing to work with you as the process moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Greuel".

Benjamin Greuel  
Washington State Director  
The Wilderness Society

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<sup>2</sup> According to 2013 Washington State Statewide Comprehensive Outdoor Recreation Plan. Pgs. 74-75