



Kalispel Tribe of Indians  
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July 5, 2016

Rodney Smolden, Forest Supervisor  
Colville National Forest  
Forest Plan Revision  
765 South Main St.  
Colville, WA 99114

Sent by email to: [colvilleplanrevision@fs.fed.us](mailto:colvilleplanrevision@fs.fed.us)

**RE: Forest Plan Revision Comments of the Kalispel Tribe**

Dear Mr. Smolden:

Thank you for the opportunity to comment on the Draft Revised Land and Resource Management Plan (draft forest plan) for the Colville National Forest (CNF) and its accompanying Draft Environmental Impact Statement (DEIS). The Kalispel Tribe appreciates the time and effort you and your staff have dedicated to updating the 1988 forest plan.

The purpose of these comments is not to endorse a particular alternative or recommend a particular approach for balancing multiple uses throughout the CNF, but to focus your attention on a single place in the CNF that means a great deal to the Tribe. This place is the LeClerc Watershed—an area that we described in our comments on the LeClerc Grazing Allotment DEIS as “the Tribe’s most cherished cultural landscape in the CNF.” In lieu of reiterating our reasons for this description, we hereby incorporate those comments by reference and submit that they demonstrate that grazing is not a suitable use in the LeClerc Watershed.

This is not an indictment of grazing in the CNF as a whole, but of grazing in the one place on your forest where it conflicts with such compelling interests, where cattle drift has proven to be such an uncontrollable problem, and where outside funding already exists to fully restore riparian habitat and native fish populations if cattle are removed. In this particular watershed, fencing is not a reasonable option to protect ESA-listed bull trout and their critical habitat (not to mention westslope cutthroat trout, a Forest Service Region 6 sensitive species, and their habitat). This is true because the amount of fencing required to keep cattle out of native trout streams would be so extensive as to be cost prohibitive; harmful to the Tribe’s cultural use of the Watershed; and harmful to the ESA-listed mountain caribou, grizzly bear, and Canada lynx known to use the Watershed.

Further grazing in the LeClerc Watershed would also harm the federal interest in protecting the utilization and purposes of the Kalispel Indian Reservation. As explained in the Tribe's comments on the LeClerc Allotment DEIS, this interest stems from section 4(e) of the Federal Power Act based on a condition prescribed by the Secretary of the Interior in response to the inundation of a portion of the Reservation by the Box Canyon Hydroelectric Project. This 4(e) condition, establishment of the Trout Habitat Restoration Program (THRP), requires the Licensee to restore 164 miles of stream habitat in seven priority watersheds. LeClerc has the largest amount of potential native fish habitat of these watersheds and is therefore the lynchpin of the effort. Because grazing has proven to be incompatible with this effort, it not only jeopardizes the restoration of the LeClerc Watershed and success of the THRP but also undermines the uses and purposes of the Reservation that the THRP is designed to protect.

If the LeClerc Watershed is determined to be unsuitable for grazing, the Tribe intends to make it our highest near-term priority for conservation under the THRP. This includes meeting all of the restoration objectives for the Watershed listed under Table 114 of the DEIS (though we would remove range infrastructure improvements instead of enlarging them), as well as any additional habitat restoration measures the Technical Committee agrees are necessary to restore the Watershed. In other words, LeClerc is the one watershed where the CNF can most clearly reverse its ubiquitous problem of watersheds not properly functioning or functioning at risk.

Please contact Deane Osterman, Executive Director of the Kalispel Natural Resources Department if you have any questions about this letter. I'd also urge you to have your staff contact Ken Merrill, the Tribe's Water Resources Program Manager, to discuss the DEIS's use of the wrong water temperature standard for waters of the Colville National Forest, as well as Jason Olson, the Tribe's Fisheries Conservation Program Manager, to discuss problems with the DEIS's fisheries data and analysis. We can supplement the record with this information if necessary.

I appreciate your thoughtful consideration of these comments.

Regards,

A handwritten signature in blue ink that reads "Glen Nenema". The signature is written in a cursive, flowing style.

Glen Nenema  
Chairman, Kalispel Tribe of Indians