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July 1, 2016

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

RE: Comments on Proposed Revised Land Management Plan for the Colville National Forest and Draft Environmental Impact Statement

Submitted via email to: colvilleplanrevision@fs.fed.us

Dear Ms. Dillon:

On behalf of our more than 7,000 members, supporters and activists from throughout Washington State, Washington Wild appreciates the opportunity to provide comments on the Proposed Revised Management Plan for the Colville National Forest (CNF).

Washington Wild is a 501 (c)(3) nonprofit conservation organization that has been working to protect wild lands and waters in Washington State since 1979. We were a key participant in the development of the first forest plan for the Colville National Forest in 1988.

We have followed with interest and participated in the current forest plan revision since 2005. We appreciate the Forests' efforts early on in this process to make good on their obligation to review the existing potential wilderness areas (PWA's) and update the boundaries of these areas in advance of the forest plan revision. Washington Wild was involved in giving input into that process and feels that the resulting inventory was far superior to the existing one. It added additional potential Wilderness areas for consideration above and beyond those identified in the 2001 National Forest Roadless Area Rule.

During 2007 and 2008, WWC was an active participant of the collaborative group that was convened to give input to the Colville National Forest in the early stages of this important plan revision. I was one of only a handful of individuals that attended every meeting over a course of a year and a half. I was impressed by the significant common ground that was evident during this process across a broad group of stakeholders. There was general support for the protection of the roadless character of inventoried roadless areas, the need to engage in fuels reductions on the roaded landscape to address fire risk from dry forests stands and recognition that the forest was large enough to accommodate both additional Wilderness and restoration forestry.

In the years that followed delays, regulatory changes and key staff transitions interrupted some of that momentum. We commented on the 2011 Proposed Action for the Colville National Forests.

After reviewing the Draft Environmental Assessment (EA) we appreciate the opportunity to submit the following comments:

Recommended Wilderness

The current plan revision is historic in that it affords the first opportunity for the Forest Service in Washington State to exercise their obligation to recommend specific potential wilderness areas to Congress for consideration of a legislative wilderness designation. In the late 1980's and early 1990's no such recommendations were considered or made based on legislative language in the 1984 Wilderness Act that precluded recommendations during that initial plan development.

Washington Wild and the members and supporters we represent see the current forest plan revision for the Colville National Forest as a generational opportunity to advocate for long term protection of many of the wild places on the forest. If the duration between this revision and the original Colville Forest Plan Revision is any indication it will be 30 years before there is another opportunity to provide protections for our remaining intact forests and watershed. Since the 2010 census, Washington's population has grown at an increasing rate, topping 7 million people a year ago. According to the Washington Office of Financial Management, by 2040, the state population is predicted to approach 9 million people. Many of these people are relocating to Washington State because of the access to clean water, recreational opportunities and scenic beauty that wild places provide.

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. Each year, millions of outdoor recreationists spend \$21.6 billion on outdoor recreation in Washington. Many of the potential wilderness areas provide outstanding opportunities for wilderness recreation, including day hiking, backpacking, backcountry skiing and snowshoeing, horseback riding, and wildlife viewing; all within an easy day's drive from the greater Spokane area.

There is clearly a need for additional wilderness on the Colville National Forest. Wilderness evaluations of Colville National Forest lands showed a need for additional wilderness on the forest. Currently the Salmo Priest Wilderness is the only wilderness area in northeast Washington and North Idaho. Less than 3% of the Colville National Forest is presently designated as wilderness – the least of any national forest in Oregon and Washington. Recommending additional areas is also warranted because 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 a growing recreational and tourism economy.

The Draft Plan identifies 220,000 acres of wilderness-quality lands on the Colville National Forest. In 2011 the Proposed Alternative supported recommending more than 100,000 acres as part of this Forest Plan Revision. We commented in 2011 in support of that initial recommendation but encouraged the agency to recommend additional areas as wilderness.

The Revised Proposed Action (Alt P) in the Draft Plan inexplicably supports a 35% decrease in the amount of recommended Wilderness (68,000 acres). Not only is this a significant decrease from the significant amount of analysis that went into the 2011 Proposed Action, but it amounts to less than a third of qualifying lands with wilderness qualities on the forest.

Support for Recommended Wilderness Acreage

We support recommended wilderness for the acres identified in Alternative R in the Draft EA. These include the following potential wilderness areas identified as having wilderness quality by the Forest.

Salmo-Priest Adjacent (15,980 acres) – These wilderness quality lands are adjacent to the only designated Wilderness in the entire forest. These areas are selected to be recommended as wilderness in every action alternative.

Abercrombie-Hooknose (37,650 acres) – Abercrombie-Hooknose Roadless Area contains two mountains so tall that even past continental ice sheets could not cover their peaks. The taller of the two, Abercrombie Mountain, is the second highest mountain in eastern Washington at 7,308 feet. With views of the Cascades, the Columbia River valley, and Idaho's Selkirk Mountains, it is no surprise that hikers, equestrians, and hunters looking to get away from motorized vehicles are drawn here. Perhaps most beautiful is the explosion of subalpine wildflowers and blooming beargrass typical of early July. Wolverine, pine marten, deer, elk, moose, pileated woodpeckers, and goshawks also dwell in this area. Even the grizzly bear, whose habitat has been chipped away and fragmented by past development, is sometimes sighted and tracked here. The terrestrial species are supplemented by healthy fish populations and other aquatic species, particularly the threatened bull trout, which occupy the mountain watersheds below.

Profanity (37,700 acres) & Bald Snow (18,810 acres) – The acknowledgment of the remoteness, solitude, natural beauty, ecological diversity, and primitive character of the Kettle Crest that would come along with wilderness recommendations for these areas would add value to these two wilderness trail resources. The Pacific Northwest Trail, which passes through these PWAs, will become even more significant as long-distance treks with recommended wilderness status and eventual wilderness designation. Also, having hikes that accessed wilderness off of Sherman Pass would open up the opportunity for many people traveling the scenic byway who may not otherwise visit a wilderness area, to be exposed to the National Wilderness Preservation System, and to have a relatively easily accessible wilderness experience.

Cougar Mountain (6,210 acres) and Thirteenmile (10,890 acres) – Highlight by the Thirteenmile Trail providing a unique low-elevation, early season, Ponderosa pine dominated hiking environment, these areas provide 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 Mountain 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 could also continue if these areas were recommended for wilderness.

Grassy Top (2,200 acres) & Hall Mountain (7,890 acres) – These connected blocks of wildland are above Sullivan Lake and adjacent to the Salmo Priest Wilderness Area. 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.

Harvey Creek (5,720 acres) – Also known as the Bunchgrass Meadows and the Molybdenite Mtn area, this is a 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.

Hoodoo (11,060 acres) – Hoodoo Roadless Area is one of the most frequented non-motorized recreation destinations in the Colville National Forest. Hikers travel the secluded, wilderness setting up through Hoodoo Canyon to discover hidden mountain lakes and sweeping views of granite cliffs. Hunting, hiking, and rock climbing are popular wilderness activities in this area. The developed recreation site at Trout Lake offers fishing and camping opportunities greatly enhanced by an adjacent wilderness area. Hoodoo's cottonwood, aspen, and shrub-steppe is a rare vegetation type in the state and provides crucial habitat for Canada lynx, wolverines, and nesting golden eagles. The series of remote lakes and ponds provides secluded habitat for frogs and other aquatic animals.

Quartzite (5,340 acres) – The Quartzite PWA next 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 environmental/nature study values.

Twin Sisters (14,610 acres) – Twin Sisters PWA in the Kettle Crest 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. The PWA rating used in the wilderness evaluation weighed the value for recreation, botany, habitat connectivity, source habitat, vegetation representation, fisheries and focal species. Twin Sisters was rated the same as Hoodoo and close to Bald Snow, but may not be considered wilderness quality because of two jeep trails. The use of the jeep trails is limited, and the trails are located in some of the best unaltered and roadless landscapes on the forest (DEIS, p. 565). Since these trails are rarely used and most off-road highway vehicle (OHV) on the Colville National Forest occurs on the nearly 700 miles of designated roads (DEIS, p. 565), if better trails for jeeps can be located elsewhere, a wilderness recommendation for Twin Sisters would help protect lynx and other wildlife habitat and landscape connectivity for rare carnivores.

Owl Mountain (11,060 acres), Jackknife (8,940 acres) & South Huckleberry (9,680 acres) – These PWAs that contain areas with motorized trails also provide important wildlife habitat and connectivity and other values. We request that the portions of those PWAs that is currently designated as “Semi-primitive, Motorized Recreation” should be designated as “Backcountry Motorized” with the remaining portion of Owl Mountain, Jackknife, and South Huckleberry PWAs designated as “Backcountry” in the selected Alternative to protect lynx and wolverine habitat and habitat connections that facilitate adaptation to climate change. For these and other purposes, existing wilderness qualities within

potential wilderness areas should be maintained whether or not they are recommended for wilderness designation.

Support for Management of Recommended Wilderness

We recognize that the Colville National Forest has never actually had the opportunity to manage a recommended wilderness area. It is also our understanding that no national forest in Washington State or in Region 6 has had the opportunity to manage a recommended wilderness area either. Regulations require the agency to manage recommended wilderness to retain the wilderness quality of the area. However, there is some discretion to the individual forest about what that means with respect to non-conforming uses.

As a result, the Draft Plan has two different management options that are applied to different alternatives with respect to recommended wilderness management. One, which is applied to Alternatives B and R, would effectively manage recommended wilderness areas the same as if they were designated by Congress. For example existing and new mechanized uses like mountain bike trails would be prohibited.

Another management option is applied to revised proposed alternative (P) which would retain the existing wilderness quality of the area until a decision on designation is made by Congress. That language reads as follows:

Forest plan components would direct that the wilderness character and potential for each area recommended is to remain intact until congressional action is or the area is released from consideration through a future plan amendment or revision. Existing mechanized uses would be allowed to continue, but no new motorized or mechanized recreation opportunities would be allowed. (Pg 50 of the Draft EA)

Over the past 15 years, Washington Wild has played a leadership role in several wilderness proposals that have either been designated by Congress or are currently pending in Congress. We have worked hard to build trust and identify common ground solutions with respect to local and national mountain bike advocates as part of those proposals. Both the Wild Sky Wilderness (designated in 2008), the Alpine Lakes Additions (designated in 2014) and the Wild Olympics legislation (pending in Congress) have earned the endorsements of statewide and national mountain bike advocates. We were successful in this result by excluding some trails from proposed wilderness and negotiating others based on years of dialogue and negotiation. A legislative process allows considerably more opportunity to craft such a proposal than a forest plan revision.

From our interaction with the mountain bike community, we understand that there are several high value mountain bike trails that are included within potential wilderness areas that we feel merit recommended wilderness status. These include the Abercrombie, Barnaby Butte, Jungle Hill, Kettle Crest South, Silver Creek Trails and others.

While we think the recommended wilderness acreage in Alternative P is far too low, we support the application of recommended wilderness management as described in Alternative P (and restated above) that would retain the existing wilderness character until Congress acts on a designation. This would allow the option to allow existing mechanized use in these areas until a Congressional action.

Recommended wilderness management is an opportunity for national forests to preserve the existing wilderness qualities of a landscape during the often lengthy process involved in Congressional action. We do not see recommended wilderness management as a surrogate for wilderness designation.

Concerns about Kettle Range Special Interest Area

In the Revised Proposed Action (Alt P) a Kettle Range Special Interest Area (SIA) is included as an alternative to recommended wilderness for several qualified potential wilderness areas including Profanity, Bald-Snow, Twin Sisters, Hoodoo, and Thirteenmile. We do not support these areas be included within the special interest area because the specific protections and management laid out in the Draft EA for this area are insufficient to protect the values of these areas. The SIA concept may have merit in some landscapes where recreation activities align with other management objectives.

Support For Non-Motorized Recreation

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

The plan appropriately distinguishes between non-motorized and motorized recreation due to the difference in resource impacts, potential for user conflicts and level of use.

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 Forest's 2009 National Visitor Use Monitoring (NVUM) report states that "viewing natural features," "hiking/walking" and "relaxing" are the top three recreational activities on the forest.¹

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. More surprisingly, while Preferred Alternative (Alt. P) increases the number of backcountry acres managed for summer motorized recreation trail opportunities, it does not increase the amount of acres for non-motorized summer recreation trail opportunities even though non-motorized recreation are the leading recreational activities on the Forest.

The Recreation Report goes on to state that: "Alternative P would increase the number of backcountry acres managed for summer motorized recreation trail opportunities from 13,571 acres in the No Action

¹ U.S. Forest Service. 2009 Visitor Use Report, Colville NF, National Visitor Use Monitoring Data Collect FY 2009.

Alternative to 54,577 acres. This equates to a 400% increase in backcountry motorized (BCM) management area acres. “

Furthermore, the Recreation Report seems to suggest that the experience hikers can have on a motorized trail 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)...”

The above statement does not take into account the experiential value of the non-motorized recreation trail opportunity in that hikers prefer having a non-motorized experience when they head out for a hike. In fact, many studies have been done that document the effects of motorized use on other recreationists, both direct and indirect.

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

Our concerns are not helped by the fact that the plan utilizes two backcountry designations. One of which is labeled “backcountry motorized” and the other labeled “backcountry” (rather than backcountry non-motorized). Earlier requests during the collaborative meetings and the 2011 proposed action to institute a “backcountry non-motorized” designation have not been responded to.

Manage For Roadless Character in New Plan Revision

The Proposed Action and subsequent plan should clearly state that the roadless areas on the Colville National Forest will be managed for their roadless character.

During the collaborative process on the Colville Forest Plan revision (2007-2008) one of a number of common ground points where a diverse group of local stakeholders were able to find consensus around was the need to protect the roadless character of inventoried and uninventoried roadless areas with specific management direction.

While we did not have any direct involvement with the Provincial Advisory Committee (PAC) associated with the Wenatchee-Okanogan National Forest it is our understanding from those that did that a similar consensus was reached on the need to manage roadless areas by an equally diverse group of stakeholders.

To be clear, while the discussion during these collaborative efforts early on in the planning process centered around the re-inventoried “roadless areas” for the Forest. It is useful to note that the Draft Plan and the agency as a whole refers to these areas as “potential wilderness areas.” Regardless of the terminology, the consensus and need for specific management direction for these areas is the same.

At issue is the fact that some of these roadless areas or potential wilderness areas enjoy protection under the 2001 Roadless Rule. However, others inventoried as part of this planning process do not. As the Forest Service invests in identifying and managing a sustainable road system to address the

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

significant impacts of an oversized and unmaintainable road system, ensuring that that problem is not made worse by adding more roads in the few areas that don't have them is essential.

It is our understanding that both the "backcountry motorized" and backcountry" designations used in the Draft Plan would prohibit new or temporary road construction except in the case of an emergency. This is comforting but we would ask that the following additional actions be taken to ensure that the roadless character of these areas is preserved by the plan:

1. Add language to both the Backcountry Motorized and Backcountry land use designations that "these areas would be managed to protect the roadless character of these unroaded landscapes." In addition to already prohibiting new and temporary road construction this language will capture the interest in protecting the roadless character.
2. Ensure that all potential wilderness areas (either applicable under the 2001 Roadless Rule or as inventoried as potential wilderness areas as part of the current plan revision are included entirely within either the Backcountry Motorized or Backcountry land use designations.

Review of Eligible Wild and Scenic Rivers

We were disappointed to read that the Colville National Forest essentially declined to review additional rivers on the Forest for an eligibility determination for designation under the Wild and Scenic Rivers Act. The argument that there have been no relevant changes since the last forest plan almost 30 years ago is neither a compelling reason to not review additional rivers for eligibility nor is it accurate.

The Okanogan-Wenatchee National Forest did review and find several rivers as eligible as part of their Proposed Action (2011). We believe additional rivers should be found eligible for designation and that the same review should be conducted in the Colville National Forest Plan. The same rationale that led to the agency reviewing additional river segments for changed circumstances (e.g., federal fisheries listings, land ownership changes, etc.) equally apply to the Colville National Forest. Such a review is perhaps even more important for the Colville, given that only two rivers (Kettle River and South Salmo River) were found eligible in the first forest planning effort.

For example, we believe that Sullivan Creek merits consideration of the following outstanding remarkable values and should be found eligible by the forest:

Sullivan Creek

Sullivan Creek is one example of a river on the Colville National Forest that should be further analyzed due to its outstandingly remarkable recreation, fisheries, and other values. Sullivan Creek flows through a scenic river canyon in the Colville National Forest.

Sullivan Creek has a long and rich history of human development, including the construction of the soon-to-be-removed Millpond Dam. The recent settlement agreement to remove an old hydropower dam on this river will further enhance the regionally and nationally significant values as outlined below.

1. Recreation - Sullivan Creek offers paddlers an opportunity to float meandering Class II upper reaches, and a spectacular and remote Class V lower Canyon. It offers one of the few creek boating opportunities on the Colville National Forest and is known to attract paddlers from throughout the region.

2. Scenery - Sullivan Creek offers views of a clear blue stream tumbling over falls and rapids in its lower slate canyons, and as it meanders through moist forest in its upper reaches.
3. Fisheries - Abundant clear and cold water support bull trout and other native fish like west slope cutthroat trout. Sullivan Creek is listed as critical habitat for Bull Trout and provides the best salmonid spawning and rearing habitat of any tributary of the Boundary reservoir. This habitat makes Sullivan Creek very important for bull trout and other native species.
4. Wildlife - Sullivan Creek is home to numerous nationally and regionally rare wildlife species including lynx.

Continued Protection For Late Successional and Old-Growth Forest Habitat

Although the Revised 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 dynamic landscape approach has ambiguous guidelines regarding large and old trees that must be clarified in order to maintain the social license necessary for this approach to work.

We strongly recommend diameter guidelines for the following reasons:

1. Diameter guidelines (with specified exceptions) are crystal clear, and operational.
2. Diameter guidelines 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 guidelines 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 guidelines mitigate the economic incentive to remove the largest, most ecologically valuable trees and snags from the site.
6. Diameter guidelines (with 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, and 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

Thank you for the opportunity to comment on and participate in this important process for our organization and the individuals that we represent. We hope that our input to this process over the past decade will help develop a strong and effective forest plan that will serve current and future generations of users well.

Sincerely,

Tom Uniack
Executive Director