



November 6, 2018

RE: Northeast Washington Forest Coalition Forest Plan Objection

Submitted to: objections-chief@fs.fed.us

Dear Objection Reviewing Official,

Thank you for the opportunity to provide this Objection to the Colville National Forest (CNF) Land Management Plan and Final Environmental Impact Statement (FEIS). While the Northeast Washington Forest Coalition (NEWFC) would have preferred not to formally object, we believe this is now the best path forward to resolve our issues. NEWFC looks forward to working with the Colville National Forest and other stakeholders to find resolutions that will create a Forest Plan everyone can support.

Founded in 2002, The Northeast Washington Forest Coalition strives to demonstrate the full potential of restoration forestry to enhance forest health, public safety, and community economic vitality, by designing and implementing forest restoration and fuels reduction projects that highlighting innovative approaches to forestry. We are a coalition of diverse stakeholders whose projects educate the public about the ecological and socio-economic benefits of restoration forestry and fuels reduction strategies that can be emulated in other regions of the country. Part of NEWFC continued success is the support among members for a wide range of forest issues on the CNF. The following comments are a reflection of those interests and have the full support of the NEWFC board

Recommended Wilderness Areas

The selected alternative recommends three areas for inclusion in the National Wilderness Preservation System (61,700 acres total or 6 percent of the forest). The Record of Decision (ROD) for the Colville National Forest Plan Revision fails to accurately identify all wilderness-eligible lands in the Forest and include them in the analysis and alternatives. The lands designated as recommended for wilderness area fall significantly short of the amount of lands that should be included for designation. These are lands that meet the threshold for Wilderness according to the Forest Service's own evaluation criteria.

The misrepresentation of Alternative B (which was intended to represent NEWFC's Forest Plan Blueprint) does not offer an accurate analysis of the Alternative hence the NEWFC alternative is not accurately represented in the plan despite comments, both written and verbal (during monthly meetings with the Colville National Forest), during the public comment period for the Draft Environmental Impact Statement (DEIS). Effective analysis cannot be quantified or qualified, especially between the alternatives. FEIS does not correctly analyze Alternative B. The analysis states that only

37% of the Colville National Forest is available for restoration. We suggest that this is incorrect, more passive management is indicated for an additional 38% totaling 75% of the land base.

In addition to the Recommended Wilderness Areas (RWA) in the Record of Decision, NEWFC recommends the inclusion of the Hoodoo, Profanity, Thirteenmile and Bald-Snow roadless areas, in entirety, along with the western half of Twin Sisters. Ultimately, of the 220,300 acres NEWFC recommended for wilderness (as described under Alternative B in the ROD), the selected alternative only allocates 61,700 acres, resulting in less than 6% of the Forest managed under the Wilderness/Recommended Wilderness designation. This is a 7,000-acre decrease from the DEIS, and nearly 40% less than the June 2011 Forest Service Proposed Action of 101,400 acres that was itself a compromise crafted following years of public input. By comparison, the selected alternative designates more acreage suitable for timber production than other alternatives and identifies approximately 63 percent of the forest as suitable for scheduled timber production in focused and general restoration management areas.

The Record of Decision states the following:

Public opinion regarding wilderness recommendation varies widely. The Forest received many comments about recommending wilderness throughout the planning process. Many people favor recommending additional areas for wilderness while many others do not agree with any new wilderness recommendations. The Ferry, Pend Oreille, and Stevens County commissioners do not support additional recommended wilderness in the revised land management plan.

The county commissioners do not support recommended wilderness. To be responsive to these concerns, modifications were made in the final EIS and final revised land management plan, reducing the final acres of recommended wilderness in the selected alternative from 69,000 acres to 61,700 acres.

This statement mentions no other groups nor individuals, including the large number of participants at the series of Forest Summits and the long participation of the Northeast Washington Forestry Coalition. The Colville National Forest belongs to all citizens of Washington and the United States. Ferry, Stevens and Pend Oreille county commissioners represent just a tiny fraction of these citizens. By its own admission, this statement indicates the Forest Service's analysis was skewed away from including more acreage for wilderness designation simply because of a small special interest group. Evaluation criteria regarding Forest Service responsiveness to public comments do not confer county commissioner authority over Forest Service decisions. The fact that wilderness designations are controversial is not part of the required evaluation criteria for whether a PWA qualifies to be designated as Recommended Wilderness yet it appears that that was the primary consideration.

While it is true locals tend to know the land in which they live, hike and work on a regular basis, locals are far more likely to have a personal, financial interest in what happens on that land. These sorts of conflicts of interest are an unavoidable part of life in small, rural communities and should have no bearing federal land management issues.

The ROD does not accurately identify wilderness quality lands or adequately protect existing recommended wilderness areas.

Under the Wilderness Act, 16 U.S.C. §§ 1131–1136, Congress designates “wilderness” which represents land that is “an area where the Earth and its community of life are untrammelled by man” and that most prioritize preservation. Absent Congressional direction in a specific bill, motorized and mechanized forms of transport in lands formally designated as wilderness are prohibited. 36 CFR § 219.7(c)(2)(v) requires units undergoing new plan development or plan revision to “identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation.” See *Ten Lakes Snowmobile Club v. United States Forest Serv.*, CV 15-148-M-DLC, 2017 WL 4707536, at *2 (D Mont Oct 18, 2017), *appeal dismissed*, 17-36028, 2018 WL 3045471 (9th Cir Mar 30, 2018).

NEWFC made the following comments to the DEIS, regarding Wilderness:

Alternative O is supposed to represent agreements by participants of the Colville Forest Plan Summit that took place from March 2006 to January 2007, but it does not accurately reflect consensus agreements to maintain “wilderness characteristics” of Potential Wilderness Areas.

It is critically important to recognize that Forest Planning Summit participants wanted solutions and were willing to compromise. A majority of the NEWFC board participated in this process. The NEWFC blueprint wilderness proposals were strongly supported by most participants at the Summit. In a poll taken (Figure 1) by the Forest Service at the January 20, 2007 Collaboration Workshop on wilderness, part of the Summit process, the majority of participants indicated “strong support” of wilderness designation for 14 of the 18 PWAs (Inventoried Roadless Areas), while 16 of the areas received “strong” or “some” support for wilderness from the Collaboration participants. In general, these results are consistent with timber management and other elements of the NEWFC Blueprint that was actively debated by Summit participants. Although this was not reported in the Forest Service’s official notes of the Collaboration Summit Round-Up on March 1, 2007, it was submitted by The Wilderness Society in their comments to the Proposed Action.

The Summit results are particularly illuminating due to the experience and knowledge of the CNF the participants collectively represented. Importantly, this in-depth knowledge and the results of the inquiry is informed by the year-long shared information and collaboration. As such, these results must be interpreted as very well-informed opinions, especially when compared to the place-based workshops conducted after the Forest Summit that were much

less collaborative and specifically segregated to address just wilderness, whereas the Summit addressed diverse uses and interests.

Figure 1. Recommended Wilderness – Votes of Participants at the Colville Forest Planning Summit

	IRA Name	A	B	C	D	Total	A%	A+B%
1	Salmo Priest Adjacent	28	1	1	1	31	90%	94%
2	Hoodoo	17	6	1	3	27	63%	85%
3	Deer Creek	19	8	3	3	33	58%	82%
4	Grassy Top	19	4	3	3	29	66%	79%
5	South Huckleberry	15	6	2	4	27	56%	78%
6	Hall Mountain	17	4	3	3	27	63%	78%
7	Abercrombie Hooknose	18	4	6	2	30	60%	73%
8	Thirteenmile	19	2	5	3	29	66%	72%
9	Profanity	19	1	4	4	28	68%	71%
10	Bald Snow	18	2	4	4	28	64%	71%
11	Jackknife	14	5	2	6	27	52%	70%
12	Owl Mountain	18	2	3	6	29	62%	69%
13	Twin Sisters	18	2	4	5	29	62%	69%
14	Cougar Mountain	15	3	5	4	27	56%	67%

15	Quartzite	12	6	7	4	29	41%	62%
16	South Fork Mountain	10	6	7	4	27	37%	59%
17	Harvey Creek	1	5	13	10	29	3%	21%
18	Lost Creek	1	2	11	6	20	5%	15%

A = Strong Support as Recommended Wilderness Area
 B = Some Support as Recommended Wilderness Area
 C = Limited Support as Recommended Wilderness Area
 D = No Support as Recommended Wilderness Area

It is clear that the various interests at the Forest Summit meetings were not given equal weight in the final ROD. County commissioners - who participated late in the Summit process and said they were not interested in collaborating- were clearly the last gasp, “Just say no!” stopgap measure deployed by special interests specifically to thwart collaborative compromise. Two previous forest supervisors, Rick Brazell and Laura Jo West, that were part of the forest plan revision process-from inception through the release of the Proposed Action were the closest to the inner social workings of the public process, and both refused to back down to demands of special interest groups. This is not just a testament to their veracity, but more importantly to the thoroughness of the public process.

Management of Recommended Wilderness Areas (RWAs)

RWAs should be managed as wilderness. Pg 150 of LRMP – MA-STD-RW-02: allows mountain bikes & chainsaws in recommended wilderness. This management is inconsistent with recommended wilderness standards on other National Forests. Current levels of existing activities (such as mountain biking and use of chainsaws) will continue to occur until Congress moves to designate these areas as wilderness. The 2006 USFS Handbook provides that “[a]ny inventoried roadless area recommended for wilderness ... is not available for any use that may reduce the wilderness potential of an area. Activities currently permitted may continue, pending designation, if the activities do not compromise wilderness values of the area.” (2006 USFS Manual § 1923.03(1)).

However, the existing use of chainsaws, mountain bikes, and other mechanized vehicles is impacting the wilderness potential, including impacts on soils, wildlife, and aesthetics. Standards and guidelines are at the heart of a forest plan and serve as the basis for future decisions. Maintaining wilderness values is a responsibility the agency has under the Wilderness Act and is not discretionary. We appreciate seeing that some guidelines in the Draft Land Management Plan analyzed in the DEIS and that have been

converted to standards. There is still work to do. Guidelines should be converted to standards, and new standards and guidelines should be drafted.

The standards and guidelines for the RWAs should be written so that they serve as a link and clearly assist the agency in achieving legal mandates. In this case, the management direction for the RWAs should be clearly linked to the requirement of protecting wilderness characteristics pursuant to the Wilderness Act of 1964. The standards and guidelines should ensure that wilderness characteristics and values are retained and protected.

The FEIS violates FSH 1909.12 by failing to, "Include site specific statements of the environmental consequences that a non-wilderness designation would have on...roadless area(s)." Furthermore, the plan fails to "Discuss mitigation measures to avoid or minimize the impact or loss of wilderness characteristics." The FSH at 1909.12-92-1, 4.19(c)(5) states that a land and resource management plan must: "Describe the potential environmental consequences of a wilderness and a non-wilderness recommendation." At FSH 1909.12-92-1, 4.19(c)(5)(b) the Forest Service is required to: Discuss the impact on the roadless area of a wilderness designation and the impact of each non-wilderness prescription. Show the social and economic effects in each case. Include mitigation, if any, for loss of wilderness characteristics and the effects on plant and animal communities.

More precisely, the FEIS fails to consider the impacts the preferred alternative and the other alternatives would have on the natural integrity, apparent naturalness, remoteness, solitude, special features, manageability, logical boundaries, and special places or values in the Kettle River Mountains and Selkirk Mountains IRAs and other roadless areas. The effect of the alternatives on the wild character of the affected roadless areas was inadequately studied in the FEIS; therefore it does not satisfy the detailed analysis requirements set forth in 36 CFR 219.17.

The Wilderness Act contains an unambiguous affirmative obligation to protect wilderness character. The standards and guidelines for RWAs and existing Wilderness areas must be consistent with this requirement.

Requested Relief:

1. Include additional areas as Recommended Wilderness Areas (RWAs), including Hoodoo, Thirteenmile, Profanity, all of Bald-Snow, and the western half of Twin Sisters Inventoried Roadless Areas.
2. Change standards and guidelines to clearly protect RWAs so that the wilderness characteristics will not be jeopardized before Congressional designation.
3. Follow the Wilderness Inventory and Evaluation using the 2012 Planning Rule.

Special Interest (Recreation) Areas

The selected alternative would establish the Kettle Crest Recreation Area (KCRA) management area (80,300 acres). The plan states:

My decision will create the Kettle Crest Recreation Area (approximately 80,300 acres). The Forest received many comments specific to the Kettle Crest and the importance of this area for its recreational, scenic, and spiritual value. This management area will emphasize and protect outstanding recreation opportunities in a semi-primitive setting while allowing continued motorized and mechanized recreation. Some commenters expressed their interest in seeing this area as recommended wilderness (as reflected in alternatives B and R). However, due to the variety of existing recreational uses and public interest in this particular area, I believe that the Kettle Crest is best managed for a range of recreational experiences, similar to the way the area is currently managed.

The abundance of opportunities for recreation-focused management currently exists on at least 80% of the Colville National Forest. The comments by NEWFC and others requested several Special Interest Areas, but the FEIS does not recognize this or the input of a diverse section of the public. A Special Interest Area with a recreation focus (AKA Recreation Area) would support rural economic growth, provide opportunities for communities to work together and enhance recreation in a popular area of the Colville National Forest away from the Kettle Crest.

The 1982 planning rules require land management plans to identify the recreational preferences of user groups and the settings needed to provide quality recreation opportunities, and recreation opportunities on the National Forest System lands. 36 C.F.R. § 219.21(a)(2), (3). The Forest Service's land management plans fail to provide the recreation opportunity spectrum (ROS) settings necessary to provide quality recreation opportunities, and recreation opportunities on the National Forest System lands.

We strongly disagree with locating a Recreation Area (KCRA) overlying Profanity, Twin Sisters and Hoodoo PWAs in the Kettle Crest. Focused recreation in the Kettle Crest would significantly degrade its wildlife habitat and its ability to support sensitive wildlife and degrade wilderness characteristics. Here are our comments on SIAs to the DEIS:

Whereas we laud the SIA concept, believing it has the potential for a beneficial relationship between recreation and rural community economic prosperity, we strongly disagree with locating an SIA overlying Profanity, Twin Sisters and Hoodoo PWAs. All (Hoodoo PWA) or portions (Profanity and Twin Sisters PWAs) meet suitability criteria for wilderness management and are critically important to the survival of sensitive wildlife.

The CNF-led Forest Planning Summit (March 2006 to January 2007) found strong support among stakeholders for retaining the "wilderness characteristics" of Potential Wilderness Areas (PWAs). While some participants expressed a desire for that objective to be achieved – they didn't like the wilderness name. Forest Summit participants did not endorse an SIA in the Kettle Crest. During the Summit, then forest supervisor Rick Brazell proposed SIA and "Backcountry" instead of calling it wilderness. As

summarized in notes published March 2007 (“Collaborative Agreements Talking Points”), “Due to universal concern for how the [Kettle Crest] area is managed, the Forest Supervisor believes a special management area designation of less than [sic] 100,000 acres would be appropriate.” As we know, Mr. Brazell demonstrated his awareness of Summit (and public) opposition to a Kettle Crest SIA when in the Proposed Action (2011) he recommended wilderness for Bald-Snow, Profanity, and Hoodoo PWAs.

The Preferred Alternative’s emphasis on recreational uses in the proposed Kettle Crest SIA in Alternatives P & O, biases recreation above the needs of sensitive wildlife species, such as Canada lynx, wolverine, and grizzly bear. Forest Service staff have stated in public meetings, and the DEIS repeatedly references, that management objectives in the Kettle Crest SIA has a “recreation focus.”

The Kettle Crest and the Selkirk Crest are the only two wildland complexes in the entire 1.1 million acre Colville National Forest. The proposed Kettle Crest SIA “recreation focus” overlays wildlife seclusion habitats that provide breeding, rearing and migration linkages between the Rocky and Cascade Mountains. Focused recreation in the Kettle Crest would significantly degrade its habitat capabilities to sensitive wildlife.

Abundant opportunities for recreation-focused management currently exist on at least 80% of the Colville National Forest. To perpetuate healthy wild landscapes – that are unique in Region 6 USFS, and that provide essential habitat to sensitive flora & fauna--, it is essential to maintain the integrity and resiliency of The Kettle and Selkirk Crest Potential Wilderness Areas.

We ask Forest Plan drafters to take a fresh look at the potential economic benefits of locating SIAs where they abut or are near to rural communities that will benefit most from SIA infrastructure development and tourism. We offer the proposed Calispell Recreation SIA as one example.

1. Special Interest Area Recommendations

The economies of Ferry, Pend Oreille, and Stevens Counties could greatly benefit from increased access and facilities for all types of recreation on the Colville National Forest. Proposals for motorized and non-motorized loop trails, trailheads and signage move forward slowly, if at all. Special Interest Area focused on recreation would support rural economic growth, provide opportunities for communities to work together and enhance recreation in a popular area of the Colville National Forest.

Special Interest Areas (SIAs) are managed as an integral part of the National Forest System with management emphasis placed on protecting the unique values for which each special interest area was designated. In this Forest Plan, special interest areas represent a special type of management area that overlies the forest-wide and specific management area (i.e., Backcountry, Backcountry Motorized, Scenic Byway, National Scenic Trail, Focused Restoration, and General Restoration) direction that applies to the land base within each special interest area’s boundary. In other words, each special interest area has its own distinct management direction that supports the unique values for which it was designated.

Each special interest area incorporates the management direction contained in the underlying Management Areas to support the multiple values and resources (range, timber, wildlife, fire, hydrology, etc.) available within each special interest area. The other values and resources that exist in each special interest area should be managed to a level compatible with each special interest area's unique values as well as the overall management objectives contained in the Forest Plan. If a conflict in management direction is identified between the special interest area-specific management direction and the underlying management area direction, the special interest area-specific direction would apply.

1. Proposed Calispell and Baldy Special Interest Areas

Description: The Calispell SIA (98,997 acres) is located along the east and west slopes of the Pend Oreille/Stevens County divide, running from Chewelah Peak to Lone. This SIA was identified by both motorized and non-motorized recreation interests as well as Pend Oreille and Stevens Counties, and the Northeast Washington Forest Coalition.

Elevations of this area range from 2500 feet to over 6000 feet. Motorized and non-motorized trails begin in dense conifer forest. Dispersed camping attract residents of Pend Oreille, Stevens, Spokane counties, as well as visitors from north Idaho. Approaching the altitude of 5000 feet elevation, old growth forests give way to meadows interspersed with clusters of subalpine forest. Wildflowers are abundant in the meadows throughout the summer months, and rocky outcrops offer pleasing views and topography.

Values: The southern end the Quartzite Roadless Area has numerous creeks and off-trail hikes, rising far up the southern flank of Chewelah Peak. A trail system was designed by the Forest Service some years ago but never implemented due to a lack of funds. Creating the SIA would allow implementation of this project and expand recreational opportunities in the Horseshoe Basin, which currently has a well used motorized trail around the southern end.

Just north of Quartzite roadless area is the only ski area on the Colville National Forest - 49 Degrees North Ski and Snowboard Resort. Most of the resort is on the Colville National Forest and offers some of the finest skiing in the Inland Northwest, as well as summer trails for hiking and mountain biking. Just north of the resort is the Chewelah Peak Learning Center, a year-round education center with overnight lodging and kitchen facilities. Combined, the resort and learning center attract tens of thousands of visitors each year. Enhanced loop trails, signage, and trailheads would increase opportunities and usage.

Traveling north, there are numerous motorized and non-motorized routes for hiking, cross-country skiing and ATV's on Calispell Creek and its tributaries; the North Fork Chewelah Creek, Tacoma Creek, and Ruby Creek. The entire area has important camping, hunting, and riding opportunities for a diversity of recreational interests. The adjacent Little Pend Oreille Wildlife Recreation Area has connector trails, and long riding routes extend past the popular Little Pend Oreille Lakes. Lake Leo, Frater Lake, and Browns Lake are all very popular, and Tiger Meadows is a beautiful meadow surrounded by boreal forest. Nearby communities that will benefit from the SIA designation include Chewelah, Usk, Cusick, Colville, Lone and Metaline Falls.

In addition to the recreation values, the Calispel SIA is extremely important for wildlife. The potential exists for recreationists to observe rare wide-ranging species such as black bear, gray wolf, cougar, and bobcat across an array of diverse habitats. Portions of the area provide habitat for threatened and endangered species such as northern goshawk, gray wolf and wolverine. The area is well known for providing the unique opportunity to pass through most all these elevational habitat zones, from old growth cedar forest to sub-alpine peaks, in very short travel distances.

A second proposed SIA, The Baldys SIA (38,516 acres) was identified by both motorized and non-motorized recreation interests as well as Pend Oreille County and the Northeast Washington Forest Coalition.

Bead Lake, King Lake, and Marshall Lake are all popular recreation sites and are interconnected with motorized and non-motorized travel routes. Of particular interest is the connection that provides a travel route from the community of Usk to Priest Lake, Idaho. In addition to the recreation values, The Baldys SIA is extremely important to wildlife, and again, the potential exists for recreationists to observe rare wide-ranging species such as black bear, wolf, cougar, and bobcat across an array of diverse habitats. Portions of the area provide habitat for threatened and endangered species such as northern goshawk, gray wolf, grizzly bear, and wolverine.

Both Calispel and The Baldys proposed SIAs would provide outstanding four-season motorized and non-motorized trail opportunities and relative proximity to Spokane and communities surrounding the Colville National Forest. They would provide important economic benefits to rural communities in northeast Washington, and bring new investment to the area.

2. Proposed Swan-Cougar SIA

The proposed Swan-Cougar SIA (52,000 acres) is located on national forest lands south of Republic to the Colville Reservation, east to Hall Creek Rd and FS 2053 & 2054 and west to the Ferry County line. This proposed SIA was highly acclaimed by motorized and non-motorized recreation interests in Ferry County during the Phase I & II Recreation Travel Planning and is recommended by the Northeast Washington Forestry Coalition. This SIA provides outstanding four-season motorized and non-motorized recreation opportunities close to Republic, Curlew, and Keller, providing an economic boost to the Ferry County economy. The Pacific Northwest Trail, as well as Gibraltar, Ten Mile, Thirteenmile, Swan Lake, Fish Lake trails, provides excellent non-motorized trail system that will eventually connect the Ferry County Rail Trail and Fairgrounds. The area's geology, including dramatic cliffs, faults, and views of the Kettle Crest, is amazing, supporting vibrant meadows, old-growth ponderosa pine, western larch, Douglas fir, and hardwoods, coupled with lakes, streams, and springs.

1. Special Interest Area Advisory Group

The SIA Advisory Group could consist of county commissioners and representatives from local ranching, motorized recreation, non-motorized recreation, environmental, business and forest industry.' and other

interested parties. The Advisory Group will work closely with the Colville National Forest to find funding and implement the plan.

We believe these widely supported SIAs were not adequately addressed in the ROD.

Requested Relief:

1. Remove the Kettle Crest Recreation Area from the ROD due to our comments about the suitability of much of this area for Wilderness.
2. Include the following Recreation Areas (formally SIAs)
 - a. Calispell
 - b. Baldy
 - c. Swan-Cougar

Timber Volume

The proposed and possible management actions should specify commercial harvest on more acres over the next 35 years.

In Table B-1 "initiate active management activities on 6 to 12 thousand acres per year..." (LMP p 175) should clearly communicate that the intent is to treat acres that have commercial value. Timber harvest, scheduled production should be consistent and predictable, acres treated that moves structure toward desired vegetative conditions should at least produce 80 million board feet per year.

The FEIS does not comply with the purpose and need statement: "change compliance with all federal mandates including the Multiple-Use Sustained-Yield Act (MUSYA)." The FEIS does not actually change the pace and scale adequately to accomplish restoration within a meaningful timeframe. Nor does the FEIS comply with the MUSYA. The FEIS states that there are 486,000 acres of the CNF in fire regime condition class 3, at 12,000 acres/year of treatment (mechanical, prescribed fire, etc.) it would take 40.5 years to restore the current acreage to fire regime condition class 1. The FEIS states that there are 890,000 acres of fire regime condition classes 2 and 3, at 20,000 acres/year of treatment it would take 44.5 years to restore the current acreage to fire regime condition class 1. Note that during the 40 years, additional acreage will progress to fire regime classes 2 and 3. This lack of accounting of continual transition toward adverse condition does not comply with the mandate referenced in the Purpose and Need.

Section 4 a) Multiple-Use Sustained-Yield Act¹ calls for, "Making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments to conform to changing needs and conditions."

¹ *US Forest Service*, www.fs.fed.us/emc/nfma/includes/musya60.pdf.

Section 4 d) "Sustained yield of the several products and services means the achievement of a high level annual or periodic output of the various renewable resources of the national forests without impairment to the productivity of the land."

The methodology the FEIS continues to use is an inappropriate interpretation of the term "Sustained Yield" as clearly stated in the preceding quotes from the act. Alternative B used a "cutting budget" approach to the reconstruction efforts by utilizing an "unconstrained" approach on 37% of the CNF. The FEIS does not recognize uncharacteristic fire and fuels as a "significant issue" in the purpose and need. This unfortunate omission must be corrected in the FEIS. There are adequate discussions to change the rate of restoration (FEIS p. 5) due to adverse impacts from insects, disease and wildfire on soil and water (FEIS pgs. 317, 428). Wildfire is a natural event within the CNF, but uncharacteristic wildfire is not conducive to managing "the national forests without impairment to the productivity of the land" (Sec. 4 d) MUSYA.

The FEIS modeled timber volume is based on starting from the Desired Future Condition (DFC) of the forest. The calculation should be based on the volume/acreage (restoration) that should be removed/treated to reach the DFC as early as practicable. This would give the public a clearer "picture" of what is necessary to accomplish the goals of the forest plan over the next 15 years.

Requested Relief

1. Change the analysis to specify the number of acres in need of treatment annually to accomplish the DFC within 35 years.
2. Change Table B-1 (LMP p 175) to "Initiate commercial and non-commercial management activities on at least 18 to 25 thousand acres per year....."

Socio-economic

The FEIS socio-economic impact review on the local economy is inadequate. The FEIS missed several economic analysis considerations²:

- 60% overstatement of total regional employment
- The use of "Retained Receipts" under stewardship contracting
- The extreme difference in county economies overlooked
- Spatial redistribution and Stevens Co. concentration of effects
- Role of Spokane dominance in both retail sales and commuter income
- Missed poverty and diminished working age class demographics in Ferry Co.
- Timber utilization that overlooks log imports (esp. in cedar, biomass, & pulpwood)
- Miscategorization of large employers particularly in the medical sector
- Wood sector production relationships not the same as the national average

² Forest Econ Inc., Moscow, Idaho. Four Reports prepared for Colville National Forest Collaborative Working Group, May 12, 2016

- Labor intensive aspects of forestry, particularly in restoration
- The missed dominance of Ferry County Indian tribal employment
- Role of retirement and second home sectors
- Recreational Visitor Day attribution problems (esp. Recreation Visitor use locus)

The FEIS review does not reflect the use of "Retained Receipts" under stewardship contracts on the CNF (Daniels et al. 2018³). "Retained Receipts" enable the CNF to accelerate the restoration efforts, including project analysis under NEPA. Furthermore, there have been studies on the impact of various recreation activities on local economies (Headwaters Economics 2009⁴). Neither of these is referenced in the FEIS.

- The use of US Labor Department data and other generalized data is not adequate to analyze the impact of the forest plan to local economies.
- The analysis of the tri-county (Ferry, Stevens, and Pend Oreille counties) does not recognize the economic impact of the CNF management activities on the larger regional area inclusive of the general Spokane area.

Requested Relief:

1. Withdraw the ROD and complete a more detailed socio-economic analysis, inclusive of the use of cited studies and others as available. (FEIS p 616)
2. Census data is described as being out of date and not adequate for the FEIS. There should be an amendment to use more recent Census Data and other studies previously mentioned.
3. Include a map or description of the socioeconomic impact zone.

Post-Disturbance Restoration

The FEIS gives inadequate recognition to the collaborative approval of post-disturbance restoration: Much time and effort spent by Eastern Washington collaboratives in the formulation of a framework to approve of post-disturbance projects involving the removal of commercial products. The FEIS notes a great likelihood that these events will increase in volume and frequency necessitating an unambiguous statement that such activities will take place. We agree that there is a generic statement in the FEIS which gives legitimacy to post-disturbance restoration projects on page 207, Appendix E. Due to the historical controversy including appeals (now objections) and litigation, we feel there should be a statement to emphasize that this will be analyzed on all appropriate projects as per collaborative agreements.

Requested Relief:

³ The Economic Contribution of Stewardship Contracting: Two Case Studies from the Mount Hood National Forest. Jean M Daniels, Max Nielsen-Pincus, Michael Paruszkiewicz, Nathan Poage *Journal of Forestry*, Volume 116, Issue 3, 4 May 2018, Pages 245–256

⁴ Headwaters Economic Report produced for the Northeast Washington Forestry Coalition. 2/7/2009

1. Withdraw the ROD and include a statement emphasizing the agreements on post-restoration activities that will be analyzed on a project basis.

Wildlife

We object on three critically important points regarding sensitive, threatened and endangered species: 1) designation of the central Kettle River Mountains as a Recreation Area and in opposition to the Proposed Action recommendation of wilderness; 2) failure to designate Recommended Wilderness for areas that provide critical habitat for Canada lynx and other threatened and endangered species; and 3) reducing protections for late-successional and old forest habitat conditions.

1. TES Species will be harmed by a focus on motorized and mechanized recreation over wilderness and solitude

The Draft ROD, p 8, states that the Kettle Crest has been identified as an important area for the recovery of Canada lynx in Washington. The terrestrial portion of the Biological Assessment found the implementation of the revised land management plan *may affect and is likely to adversely affect* woodland caribou, Canada lynx, grizzly bear, yellow-billed cuckoo, the candidate species whitebark pine, and the wolverine, currently proposed for ESA listing. Map 8 in the FEIS map packet clearly shows that the majority of lynx habitat in the CNF is in the Kettle River Mountains. Yet, Preferred Alternative P promotes over 80,000 acres to high-use recreation including mountain bike and motorized recreation increasing human impacts in this critically important habitat for Canada lynx and grizzly bear.

In the Draft ROD the following statement elucidates a connection between wilderness and critical habitat for sensitive wildlife:

The Salmo-Priest Adjacent recommended wilderness area ... also provides valuable habitat for wildlife species that benefit from quiet, unroaded environments, such as grizzly bear, caribou, and lynx. Providing the Abercrombie-Hooknose and Bald Snow recommended wilderness areas will ensure that forest users who seek a wilderness-like experience can find that opportunity on both the east and west zones of the Forest.

Land management decisions must consider the entire landscape and recognize the abundance and scarcity of the land. Wild areas are spatially scarce whereas developed areas are abundant. A recreation focused management area overlying scarce wildlife security areas is inappropriate. The abundance of opportunities for recreation-focused management exists on at least 80% of the Colville National Forest. To perpetuate healthy wild landscapes, which are unique in Region 6 USFS, and provide essential habitat to sensitive flora & fauna is essential to maintain the integrity and resiliency of the Kettle and the Selkirk Mountains.

2. Kettle Crest Recreation Area Designation

The Kettle River Range and Selkirk Range are the only two wildland complexes in the entire 1.1 million acre Colville National Forest. The proposed Kettle Crest Recreation Area (KRCA) would overlies wildlife seclusion habitats that provide critical breeding, rearing and migration linkages between the Rocky and Cascade Mountain Ranges. Emphasizing recreational use, including mechanized and motorized recreation, in the central Kettle Mountains would effectively reduce habitat viability creating a bottleneck constriction to wildlife movement sensitive to human disturbance, also impacting wildlife movement to and from areas south of Sherman Pass, including the proposed Bald-Snow RW, further reducing the B-S contribution to wildlife security.

Alternative P state objective is *to design and construct at least one motorized loop trail in the Twin Sisters IRA* (LMP p 134, MA-OBJ-KCRA-02). This will further reduce habitat suitability throughout the year for lynx, grizzly bear, wolverine, elk and other species of concern. In addition, the KCRA would:

...Move or reconstruct the over-snow vehicle sno-park located on the Albian Hill Road (Forest Road 2030) to accommodate at least twice the existing capacity.

Clearly, the KCRA's underlying objective is to increase human use of the central Kettle River Mountains during all seasons regardless of the negative impacts to wildlife already stressed by 240,000 acres of forest restoration treatments per planning cycle, periodic wildfire, 4,000 miles of roads and a changing climate.

Recommended Wilderness and standards that prohibit mechanized use within Recommended Wilderness is the correct choice providing the highest level of protection to threatened, endangered and sensitive plant, fish, and wildlife species.

3. Late-successional and Old Forest Habitat Condition Protections

The proposed forest plan fails to protect large and old trees.

The ROD, #3 p 29 states:

The selected alternative provides for greater assurance of maintenance of large trees across the landscape over time. This improves the health of our forests and watersheds, enhances wildlife habitat, and reduces undesirable and unintended consequences.

However, the Eastside Screens were specifically created to stop the loss of large diameter trees and forest communities that were being decimated by similar but well-intention standards. The *21" Rule* as it came to be known is a clear and unequivocal metric. The final Alternative P leaves significant exceptions to cutting old/large trees. Snags and large logs and biological processes that create them are considered emblematic of unhealthy forests.

Late-successional and old forest habitats are generally below their historic range of variability (FEIS p 93). Forest research has yielded a wealth of information on the availability of large trees and snags, the

role they play in ecosystems, and how they were arranged in stands across the landscape of northeastern Washington. Forest spatial patterns and landscape ecology have been transformed by timber harvest, fire suppression, road construction, and domestic grazing, resulting in substantive changes to disturbance regimes, and wildlife habitat availability and distribution (Hessburg et al. 1999⁵, Hessburg and Agee 2003⁶).

Late-successional forests provide disproportionately high ecological value as wildlife habitat, carbon storage, and resilience to natural disturbance. Scientists have described large and old trees as the ecological backbone of dry and mesic forests (Franklin and Johnson 2012⁷, Hessburg et al. 2015⁸, Stine et al. 2014⁹). Old trees have distinct qualities related to crown structure, bark thickness and color, heartwood content, and decadence which take a century or more to develop. Large old trees are the primary source of large snags and down wood, which support a broad diversity of species across forest types. In fire-prone forests, large old ponderosa pine, western larch, Douglas-fir and other fire-adapted species are most likely to survive fire events, and serve an important role in post-fire recovery ecological processes.

Numerous species of wildlife use old-growth forests and large diameter trees, snags and down logs. Additionally, numerous species are closely associated with late-successional, old growth forests in contiguous roadless areas, such as Pileated Woodpecker, Black-backed Woodpecker, White-headed Woodpecker, Pygmy Nuthatch, Three-toed woodpecker, Lewis' Woodpecker, Williamson's Sapsucker, and other cavity excavators. The Preferred Alternative reduces protections for big trees. The Eastside Screens 21-inch diameter at breast height (dbh) limit would be replaced by structural stage and wildlife habitat management. Indeed, the revised plan eliminates the Eastside Screens' connectivity corridor land use allocation and does not replace it with anything similar, and fails to explain why the Forest

⁵ Hessburg, P.F., Smith, B.G., Kreiter, S.D., et al., 1999. Historical and current forest and range landscapes in the interior Columbia River Basin and portions of the Klamath and Great Basins. Part I. Linking vegetation patterns and landscape vulnerability to potential insect and pathogen disturbances. USDA, Forest Service, Pacific Northwest Research Station, General Technical Report PNW-458, 357 pp

⁶ Hessburg, P. F, and J.K. Agee. 2003. An environmental narrative of Inland Northwest United States forests, 1800-2000. *Forest Ecology and Management*. 178 (1-2): 23-59.

⁷ Franklin, J. F., and K. N. Johnson. 2012. A restoration framework for federal forests in the Pacific Northwest. *Journal of Forestry* 110:429–439.

⁸ Hessburg, P. F., D. J. Churchill, A. J. Larson, R. D. Haugo, C. Miller, T. A. Spies, M. P. North, N. A. Povak, R. T. Belote, P. H. Singleton, W. L. Gaines, R. E. Keane, G. H. Aplet, S. L. Stephens, P. Morgan, P. A. Bisson, B. E. Rieman, R. B. Salter, and G. H. Reeves. 2015. Restoring fire-prone landscapes: seven core principles. *Landscape Ecology* 30:1805–1835.

⁹ Stine, P., P. F. Hessburg, T. A. Spies, M. G. Kramer, C. J. Fettig, A. J. Hansen, J. F. Lehmkuhl, K. L. O'Hara, K. Polivka, P. H. Singleton, S. Charnley, and A. Merschel. 2014. The ecology and management of moist mixed-conifer forests in eastern Oregon and Washington: a synthesis of the relevant biophysical science and implications for future land management. USDA Forest Service. Pacific Northwest Research Station. General Technical Report PNW-GTR-897:254.

Service has departed from its prior policy that wildlife connectivity requires specific management direction.

Eastside screens 21-inch diameter limit with a guideline that allows harvest of large trees under certain scenarios; P12, ROD.

There will no longer be a prohibition on harvest of trees greater than 21 inches in diameter, as mandated by the Eastside Screens, which amended the 1988 land management plan. Instead, the revised land management plan contains a guideline for large tree management and specifies a number of scenarios where large trees (defined as greater than 20" in diameter) may be harvested. These scenarios include moving stands toward their desired conditions for structural stages, to control or limit insects and disease, for fuels reduction, and for safety reasons. I believe that this guideline will protect large trees and emphasize late structure across the landscape while allowing adequate management flexibility to respond to emerging resource issues. P13, ROD

In 1993, Congress convened the Eastside Forests Scientific Society Panel to examine the health of old-growth forests east of the Cascade crest in Oregon and Washington. In "A Report to the Congress and President of the United States," the Panel concluded that "all remaining LS/OG [late-successional/old-growth] blocks and fragments are ecologically significant." The Panel recommended that the federal government halt logging of all Eastside old growth forests and all individual trees older than 150 years or larger than 20 inches in diameter as an interim measure in order to "protect [] the resources remaining on the Eastside until, and only until, a long-term strategy of protection and restoration can be developed." The Panel found that "[f]urther reduction in LS/OG is likely to jeopardize many components of the biological diversity of eastside forests and increase numbers of threatened, endangered, and extinct species, ..." The Panel further found that "[p]rotecting ponderosa pines must be a high priority independent of the size of the patch where the trees are located." *Western Land Exchange Proj. v. Dombeck*, 47 F. Supp.2d 1196, 1198 (D. Or. 1999).

In 1994, the Eastside Forests Scientific Society Panel published a number of recommendations for the management of Oregon's and Washington's eastside forests in their report to Congress (Henjum et al. 1994¹⁰). These recommendations were amazingly prescient and are still valid today—if anything, there is now even more scientific justification for the recommendations they made 24 years ago.

The Panel's recommendations included the following:

- Protect old-growth stands, including patches of 5,000 acres or more, and small, isolated patches as well.

¹⁰ Henjum, M.G., Karr, J.R., Bottom, D.L., Perry, D.A., Bednarz, J.C., Wright, S.G., Beckwitt, S.A., and Beckwitt, 1994. Interim Protection for Late Successional Forests, Fisheries, and Watersheds: National Forests East of The Cascade Crest, Oregon and Washington. The Wildlife Soc., Bethesda, Md.

- Cut no tree over 150 years or with a dbh of 20 inches or greater--with no distinction between live or dead trees.
- Reduce roads within old growth patches to less than 1 mile per square mile
- Prohibit logging of dominant or co-dominant Ponderosa pine from any forest
- Establish science panels similar to the one proposed in this legislation.
- Develop a comprehensive monitoring program.
- Salvage cuts should be severely limited.

Between 1993 and 1995, the Forest Service developed interim measures to preserve late-successional/old-growth forests pending completion of the Columbia Basin EISs¹¹, this was part of the larger Interior Columbia Basin Ecosystem Management Project (ICBEMP). The first of these measures, was the Revised Interim Standards for Timber Sales on Eastside Forests (Regional Forester Amendment #2), commonly referred to as the Eastside Screens, which consists of a series of procedures for screening proposed timber sales. *Prairie Wood Prods. v. Glickman*, 971 F. Supp. 457, 461 (D. Or. 1997). The Eastside Screens was originally announced in a memorandum issued by the Regional Forester on August 18, 1993. On May 20, 1995, the Forest Service issued a final EA and FONSI. The Regional Forester amended the affected forest plans but did not amend the regional guide. *Id.* The screens were designed to ***maintain*** habitat options for species that were considered to be associated with eastside old growth forests. The intent of the screens was to retain key habitat features and management options until a larger-scale analysis and EIS could be completed and provide new direction. They were not designed to *restore* habitat for species that were no longer viable due to past logging activities.

The Eastside Screens incorporated just a portion of the Science Panel recommendations, and actually weakened many provisions, such as: raising the dbh limit to 21 inches or greater, limiting the application to live trees only. Outside of late old structure, the Screens directed forests to be managed to maintain or enhance old growth components. Although not as widely protective of old growth stands as the Eastside Scientific Society Panel recommendations, the Screens did incorporate measures that allowed for connectivity between old growth patches and protection of goshawk habitat.

The Eastside Screens were intended to be in place until the completion of the ICBEMP. Although volumes of data had been collected for the ICBEMP, the project was never officially completed and so the Screens remain in place several years after their anticipated expiration. The science generated by the ICBEMP process further supported the approach taken by the Screens.

This forest plan gets rid of the protections of the Eastside Screens, and the Screens had previously weakened the original recommendations to Congress by the Eastside Forests Scientific Society Panel; they were only designed to maintain what little old growth habitat we have left, not to restore this forest component which is essential to a healthy and thriving eastern Washington. There is absolutely

¹¹ 62 Fed.Reg. 2176 (Jan. 15, 1997)

no scientific support for this approach. The lack of an accurate baseline of our old growth stands along with inadequate monitoring of the plans' impacts on old growth exacerbates the issue.

The importance of old growth in northeast Washington cannot be overstated. It has been reduced to dangerously low levels due to past logging activity. As a result, old-growth dependent species have become unviable. For example, researchers have found that old growth forests and historic ecosystem processes (including wildfire) are integral to the survival of migratory birds in the Pacific Northwest. The past and continuing logging-oriented management of the forests of Oregon and Washington, which provide nesting and fledgling habitat for numerous migratory birds, has resulted in severe ongoing population declines in forest canopy-dependent migratory and native birds (Sharp 1996¹²). American marten and goshawk are just a few of the other species that rely on our legacy forests.

We ask that detailed standards and guidelines be developed that protect old growth habitat to "insure" wildlife viability and to protect wildlife diversity as required by the National Forest Management Act (NFMA). 16 U.S.C. § 1604. The plans fail to do so and thus the plans approach to old growth is a violation of NFMA's viability requirement and NEPA's requirement to follow best available science.

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 to achieve resilient conditions, and meet wildlife viability and other direction.

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

Requested Relief

- Modify the Land Management Plan to include a Forest Wide Standard for protections of large and old trees rather than a Desired Condition
- Modify this new Standard, based on FW-GDL-VEG-03 (LMP p 42):
 - Clarify that even in emergency situations efforts will emphasize retention of large trees
 - Modify insect & disease infestation exemptions for removing large trees to be based on a deviation from the Historical Range of Variable for insect & disease levels.
 - Modify exemptions for removing large trees based on forest structure desired conditions (see FW-DC-VEG-03. Forest Structure) to include a landscape and stand scale pattern component.
 - Suggested changes underlined below:
FW-STD-VEG-10. Large Tree Management

¹² Sharp, B.E. 1996. Avian population trends in the Pacific Northwest. Bird Populations. 3: 26-45.

Management activities should retain and generally emphasize recruitment of individual large trees (larger than 20 inches diameter at breast height) across the landscape. Exceptions where individual large trees may be removed or destroyed include the following:

- Trees need to be removed for public health or safety (such as but not limited to, danger/hazard trees along roads or in developed or administrative sites).*
- Trees need to be removed to facilitate management of emergency situations such as wildfire response. Every effort should be made to preemptively establish fire breaks & retain existing large trees to prevent their emergent removal.*

The following exemptions apply only to situations where removal of smaller trees alone cannot achieve the stated desired conditions:

- Trees need to be removed to meet, promote, or maintain desired conditions and spatial pattern for structural stages (see FW-DC-VEG-03. Forest Structure) and species composition.*
- Trees need to be removed to control or limit the spread of insect infestation or disease outside the historical/future range of variability.*
- Trees need to be removed where strategically critical to reinforce, facilitate, or improve the effectiveness of fuel reduction in wildland-urban interfaces.*
- Trees need to be removed to promote special plant habitats (such as, but not limited to, aspen, cottonwood, whitebark pine).*

We appreciate the opportunity to submit this objection and look forward to accomplishing a resolution.

Sincerely,



Russ Vaagen
Board President
Northeast Washington Forest Coalition