



Kettle Range

CONSERVATION GROUP

February 20, 2024

Forest Supervisor Joshua White
Colville National Forest
Objection Reviewing Officer
Attn: Objections
765 South Main
Colville, Washington 99114

Submitted via email to: objections-pnw-colville@usda.gov

Re: OBJECTION – Bulldog Restoration Project Final Supplemental Environmental Assessment and draft Decision Notice

Objection Reviewing Officer:

Please accept this Objection filed on behalf of the board and membership of the Kettle Range Conservation Group.

This Objection challenges the U.S. Forest Service (FS) final Bulldog Project Supplemental Environmental Assessment (SEA) with supporting specialist reports, draft Decision Notice (DN) and Finding of No Significant Impact (FONSI), pursuant to 36 CFR Part 218, Subparts A and B.

The Bulldog Project area is approximately 43,621 acres in size and located in Ferry County, WA, vicinity of T37N/38N R34E/35E/36E. The decision would authorize the revised proposed action on a landscape "footprint" of 13,944 acres (32-percent of project area), which is a reduction of 1,165 acres from the previously approved project. The revised proposed action includes up to 5,980 acres of commercial vegetation treatments, up to 8,106 acres of non-commercial treatments, and up to 13,944 acres of surface fuels treatments, when implemented.

DN selecting Alternative 2 for the Bulldog Restoration Project (Project) and analyzed in the Environmental Assessment (EA)/SEA with a FONSI. Effects of the project were previously analyzed in an EA and specialist analysis, receiving approval in the April 28, 2022 (DN, FONSI & EA).

Kettle Range Conservation Group (KRCG) filed a timely Objection to this project on January 27, 2022. Colville National Forest (CNF) issued its Objection Statements and Responses on April 14, 2022.

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We believe the SEA, DN and FONSI were reached in error pursuant to the National Forest Management Act (NFMA), the 2019 Colville Land Management Plan (LMP), National Environmental Policy Act (NEPA), Administrative Procedure Act (APA) and Title IV of the Omnibus Public Lands Management Act of 2009.

As required by 36 C.F.R. § 218.8(d), the objector's name, address, and telephone number are listed in the signature below.

A handwritten signature in black ink, appearing to read 'TJ Coleman', with a long horizontal line extending to the right.

Timothy J Coleman
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OBJECTION to BULLDOG RESTORATION PROJECT SEA

Objector: Kettle Range Conservation Group

Submitted to:

Joshua White

Objection Reviewing Officer

Supervisor, Colville National Forest

765 South Main

Colville WA 99114

Pursuant to 36 CFR §214 and 36 CFR 218.8(d), KRCG (Kettle Rangers or Objector), seeks the reversal of the Bulldog Project SEA draft DN and FONSI signed January 4, 2024 by CNF District Ranger Marshall Moy, for the reasons described herein.

In addition to, and in further explanation of, the objections and reasoning contained below, KRCG fully incorporates the following documents into this Objection:

- All oral comments made by KRCG Executive Director Timothy Coleman during Project area field trips organized by the CNF; all comments submitted by Northeast Washington Forest Coalition prior to May 19, 2022; all oral & written comments to the CNF regarding the Bulldog Project including those filed on following dates: 1) June 26, 2018, 2) June 29, 2018, 3) August 31, 2020, 4) July 27, 2021, 5) December 6, 2021 and November 8, 2023. All comments were submitted prior to issuance of the EA and DN.
- The First Amended Complaint for Declaratory and Injunctive Relief, filed in *Kettle Range Conservation Group v. USFS, et al.*, No. 2 :21-cv-00161-RMP (ECF No. 9, filed on August 3, 2021) (attached).
- All documentation contained in Bulldog Project files and notes taken by CNF staff during Forest Service organized collaboration meetings held by the Three Rivers Ranger District, Colville National Forest.
- Objection to the Bulldog EA, draft DN and FONSI, filed by KRCG January 27, 2022
- CNF Objection Statements and Responses to KRCG's Objection filed April 14, 2022.
- All comments submitted on behalf of Objector by its legal counsel: Western Environmental Law Center (WELC).
- All documents filed by WELC regarding Canada lynx in Washington state and Northern Rocky Mountains
- All scientific research findings presented by Objector and its legal counsel.

PROJECT AREA DESCRIPTION

The Project area lies in the heart of the majestic Kettle River Range, a remote landscape that features mountain peaks rising to more than 7,000 feet, towering forests of old-growth ponderosa pine, open sagebrush meadows, and 13 countless lakes, rivers, creeks, streams, and wetlands. The Project area features spectacular hiking trails and sections of remote wilderness, including three Roadless Areas: Twins Sisters, Profanity and Thompson Ridge. The Project area and greater Kettle River Range Mountains comprise the wildest, most remote and roadless region of the CNF and northeast Washington.

In the early/mid 20th Century, SFB was primarily comprised of late and old structure forest as evidence by 1934 photos. Much of SFB survived the 1934 Dollar Mountain Fire that burned from the southern Kettle River Range north and beyond N. Fork Boulder Creek.

The Project Area is home to a wide variety of plants and animals, including many species categorized as sensitive, threatened, or endangered by either the federal government or the state of Washington. Packs of state endangered gray wolves roam through the Project area, which also includes threatened Canada lynx, endangered grizzly bear and wolverine. ESA listed whitebark pine trees cling to the mountain ridges know for severe weather & winter conditions. Old-growth and mature (late-old structure) forests provide nesting habitat for the northern goshawk, sensitive species of woodpecker and bats. Valley bottom riparian areas support sensitive species of red band, cutthroat trout. South Fork Boulder Creek (SFB) is the largest source of clean, cold water to Boulder Creek that provides habitat for threatened bull trout.

Large wildfires in the area since 2010 have significantly altered forest ecosystems in the S. Fork of Boulder Creek, its tributaries, wetlands and adjacent areas outside of the project boundary. Bulldog Project has a potential to significantly alter that natural landscape and further degrade SFB watershed heavily modified by past logging, livestock grazing, roads, legal and illegal off-highway vehicle (OHV) recreation.

BACKGROUND ON OBJECTOR

KRCG has fully engaged in CNF projects since 1976. We actively organized a wilderness campaign from 1976 to 1984 and again from 1995 to 2011 to preserve two Inventoried Roadless Areas in the Bulldog Project area as Wilderness areas.

From summer 1991 to summer 1992, KRCG worked on contract for the Audubon Society doing aerial photo, TRI Map and timber sale map interpretation. Hand drawn on 2.64" to the mile maps were results of that interpretation that when completed was shared with the CNF. On-the-ground evaluation of numerous test areas validated findings. This included the SFB. Based on that experience, the 1934 photos provide a very good historic snapshot of forest structure.

In the early 1990's, KRCG filed four administrative appeals challenging the Gatorson Timber Sale in the SFB. Gatorson was remanded on appeal three times by Region 6 USFS. Gatorson was part of a wildland complex that historically was part of Twin Sisters

Inventoried Roadless Area (IRA) sheltering one of the largest late and old structure forests in the CNF. The 9th Circuit Court eventually halted the project. In *Smith v. U.S. Forest Service*, 33 F.3d 1072, 1078-79 (9th Cir. 1994), the court held the Forest Service violated NEPA when it did not consider the effect of a timber sale on a 5,000-acre roadless area that was partially inventoried and released for non-wilderness use.

From 2002 to 2022, KRCG actively collaborated with CNF and the timber industry in the formation of Northeast Washington Forestry Coalition (NEWFC). KRCG participated in the Bulldog Project development since its inception, attending field trips and filing detailed comments both as KRCG as a board member of NEWFC. KRCG supports NEWFC's "Strategic Vision."

Despite extensive collaborative input, written and verbal comments, the EA, SEA, DN & FONSI are not responsive to collaborative public comments, differing significantly from recommendations made by KRCG.

From spring 2017 through the fall of 2019, contracted seasonally for the CNF on restoration of whitebark pine (WBP) – a threatened ESA species. Typically work last 3-4 days a week from late June through early November. Work areas stretched from Midnight Mountain in the north to Snow Peak in the south and almost exclusively targeted cutting/removing sub alpine fir and Engelmann spruce to increase airflow and reduce the risk of pathogenic blister rust spread. The first and second years were spent almost exclusively on Copper Butte, especially on its eastern flank drained by SFB. Snowshoe hare were routinely seen in all locations and their tracks particularly noticeable when snow ground cover was present.

In the early 1990s, KRCG worked with Mark Skatrud on winter snowmobile camera survey in search of *C. lynx*. All camera stations were located next to roads and road trails adjacent and connected to Albion Hill Road (FS Rd 2030), including SFB. Most notable of this endeavor, was the abundance of snowshoe hare tracks and pictures of hare at every camera/bait location.

Historic mature and old growth (MOG) -- that encompasses Late Old Structure (LOS) -- forests once dominated the project area. Since 1976, Kettle Rangers have visited and recreated in the Project area. Logging of MOG was THE dominate "treatment" and for a hundred years in the watershed. As such current forest stands are younger in age, smaller in diameter and individuals & stands of MOG are at a historic low.

REASONS FOR OBJECTION

Since 2015, the Bulldog Project has gone through several changes and challenges. In 1994, the Copper Butte Fire burned from N. Fork Sanpoil to Midnight Mountain and in 2015, the Stickpin and Renner Fire burned most of the eastern and western headwater area in the S. Fork Boulder (SFB) Creek watershed. In 2021, the Bulldog Mountain Fire burned a significant area within northeast area of the Project area. According to Williams et al, 1995, these fires are important to maintaining native Plant Association Group (PAG) vegetation. The Project planning area and adjacent areas have had several large timber sales since 1980, including large clearcuts in sub-alpine fir / spruce forest in

the south of SFB. The majority of what is left of intact and unburned wild forests in SFB is largely located in areas slated for logging in this Project.

The Stickpin Fire burned away forest cover such that SFB is highly visible scenic viewpoints from the Pacific Northwest National Scenic Trail (PNT), particular on the east side of Mt. Leona. This Project apparently disregards the social importance of maintaining scenic integrity as evidenced by the proposal to log over 7,000 acres, bunched together in the middle ground of SFB, in full view of the recreating public.

The DN and FONSI are not in accordance with the legal requirements of the National Forest Management Act (NFMA) 16 U.S.C. 1600 *et seq.*, and its implementing regulations,, Endangered Species Act (ESA), National Environmental Policy Act (NEPA), 42 U.S.C. 4321 *et seq.* and its implementing regulations, Administrative Procedures Act (APA) 5 U.S.C. Sec. 706, the Collaborative Forest Landscape Restoration Program, (CFLRP), Omnibus Public Land Management Act of 2009 16 U.S.C. 7303(d). Sec 4003 (d) as amended, and the CNF 2019 LMP.

As a result of the SEA and DN, members of KRCG will be directly and significantly affected by significant loss of biological diversity, natural scenery, degradation of wildlife habitat and impacts to non-motorized recreation that will result from full implementation of Bulldog Project.

Objector is an organization that represents conservationists who are working to ensure restoration of S. Fk. Boulder ecosystem, threatened, endangered and sensitive (TES) species, historic mature & old growth forest in the project area and the greater Columbia Highlands bioregion. Staff, supporters, and members of KRCG frequently use the Bulldog Project area for recreation, wildlife viewing, hunting and fishing, physical and mental wellbeing. Bulldog Project will significantly reduce use activities KRCG membership enjoy.

The selected alternative, SEA, DN and FONSI will destroy and degrade old growth forests, water quality, terrestrial and aquatic species habitat, scenic views, opportunities for solitude and dispersed recreation. Proposed logging, road construction and reconstruction in the selected alternative, if implemented, combined with historic natural and human-caused environmental impacts in the SFB watershed, violate NFMA, ESA, APA and LMP. Failure to adequately assess environmental of effects of the Project, follow best available science, describe project implementation activities and fully inform the public of known, potential and predictable deleterious consequences of this project violates NEPA. Such actions as proposed will adversely impact and irreparably harm the Very High and High scenic integrity of this watershed and surrounding area.

The selected alternative does not fairly respond to public comment. It does not adequately fulfill legal requirements of the 2019 CNF LMP, NFMA, ESA, NEPA, et al.

Project documents do not fully analyze the direct, indirect, and cumulative impacts the TES species including lynx, wolves, wolverine and grizzly bear. One important deficiency in the Project is that the final EA states that the reason for the ESA-effects determination of may affect, not likely to adversely affect for lynx is that the Project will avoid potential lynx den sites. But these sites are not disclosed, nor is there any firm

commitment to avoid these areas. The failure to disclose these sites is a failure to disclose baseline conditions, and therefore a failure to take a hard look at effects.

Endangered Species

NEPA and Section 7 of the ESA require the Forest Service and FWS utilize the best available science when analyzing the effects of a proposed action – here, the Bulldog project – and consulting on the proposed action. This includes but is not limited to the latest iteration of the lynx species status assessment, latest information from WDFW relevant and latest scientific studies and papers, including King (2020), Lyons (2023), Vanbianci (2015), Vanbianci (2017), Johnston (2012), and Koehler (2008).

The Endangered Species Act (ESA) prohibits federal actions that are likely to jeopardize the continued existence of an endangered or threatened species or adversely modify designated critical habitats.

Lynx

The Bulldog Vegetation Management Project: Biological Evaluation for Terrestrial Wildlife, December 9, 2021 (BE) identifies over 4000 acres in the proposed action that are within Lynx Analysis Units (LAU). According to the Biological Assessment for the Land and Resource Management Plan Revision for the Colville National Forest:

“While lynx have been occasionally detected within their historical range in Ferry, Stevens, and Pend Oreille counties, these detections are too few to represent a resident population (Lewis 2016). In a recent status review, the WDFW concluded that given the 1) range contraction observed in Washington following protection efforts (federal listing in 2000), 2) the substantial loss of habitat in the last 20 years, and 3) the ongoing and anticipated threats to lynx population persistence, the State status of the lynx in Washington should be changed from State Threatened to State Endangered (Lewis 2016).”¹

In 2016, the Washington Fish and Wildlife Commission listed the Canada lynx as state endangered² and the Canada lynx is federally protected as a threatened species under the federal ESA largely due to habitat loss. Any treatments applied in the proposed Bulldog Vegetation Management Project should prioritize habitat preservation and enhancement for the Canada lynx.

¹ MacDonald, K.; Gaines, W.; Loggers, C.; Honeycutt, K. (2017). Biological Assessment for the Colville National Forest Land and Resource Management Plan Revision. United States Department of Agriculture; Forest Service. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd594834.pdf. p145.

² *Canada lynx*. (n.d.). Washington Department of Fish & Wildlife. <https://wdfw.wa.gov/species-habitats/species/lynx-canadensis#conservation>

In the Sanpoil Project a different approach was taken. In a letter addressed to Forest Supervisor Rodney Smolden dated January 24, 2022, Republic District Ranger Travis Fletcher states: *“...failing to assess impacts to the population of lynx, and failing to reinitiate consultation based on new information of lynx to the population of lynx, and failing to reinitiate consultation based on new information of lynx release on tribal lands...I have decided it is in the best interest of the government and the public to drop treatments in the Hall Creek and West Sherman LAUs due to the potential loss of habitat caused by the Summit Trail fire and potential for the Walker and Sherman Pass projects to still be affecting suitable habitat in the LAUs. Unit 557 will be dropped from the Hall Creek LAU. Units, or portions thereof, that will drop from the West Sherman LAU include: 1, 7, 9, 10, 11, 12, 16, 17, 20, 21, 24, 25, 90, 117, 118, 121, 175, 176, 197, 198, 201, 202, 203, 204, 219, 220, 224, 531, 541, 542, 547, 550, 558, and 560. For units that fall only partly inside the LAU, treatment of those acres outside the LAU would still be authorized to proceed under the Sanpoil Decision Notice.”*

Bulldog Project LAU deserve similar respect and unit withdrawal if for no other reason than a large area of lynx habitat in and adjacent to the project area burned since 2015 and is no longer considered functional lynx habitat.

The SEA, Appendix A Table 1 @ 31 states “Portions of units with appropriate vegetation/structure types within the US LAU” 1, 2, 9, 10, 13, 15, 17, 21, 22, 36, 38, 42, 63, 67, 68, 71, 74, 76, 92, 813, 816-820, 825, 827-829, 832, 833, 839, 866, 901, 905, 907, 923-926, 928-930, 942. “Description of Criteria: Within LAUs retain a minimum of 20-percent in untreated patches and do not reduce tree stem densities to less than 500 trees per acre in early structure subalpine fir/lodgepole pine or spruce/subalpine fir vegetation types.”

Project documents further on continue a cursory descriptions of logging of lynx habitat: “Regarding lynx habitat connectivity:– Within LAU boundaries, treatment within specified units shall maintain a minimum of 30-percent canopy cover and 170 trees per acre with 20 percent of each unit being untreated in order to create travel habitat for lynx. This is expected to maintain habitat connectivity. The untreated 20- percent patches will be created on a scale per acre. Meaning .10-acre contiguous patches will be maintained for existing natural shrub cover per acre of each unit to maintain more natural shrub cover. In addition, edges of units and the patches within units will be feathered to avoid the creation of hard edges.” These include Units: 1-10, 12, 13, 15-17, 31, 33-35, 63, 800, 801, 813-16, 865, 866, 901-918, 924-926, 928-930, 945

This amount of habitat disruption threatens lynx viability. The description in Appendix A and Implementation Guide (above) lacks specificity which only furthers the sense of doom this project instills. Is KRCG to assume this is because the FS does not yet know where 20% untreated patches will be located? Stating stem densities will be less than 500 TPA also lack specificity – where will this occur, comes to mind?

Outside of LAUs, which we request be removed from Project consideration, we request proactive selection of micro sites in treated areas that offer concealing and denning cover for Canada lynx. Canada lynx have shown a hierarchical preference for den selection preferring northeasterly aspects with slope of 24° or less with abundant down timber.³

Snags and Down Wood

The current plan calls for snag leave trees to be selected/created post project. We would like to see proactive selection of trees to be left as snags as well as incorporation of smaller snag trees to be left standing onsite. We disagree inclusion of the Eastside Screens 21" retention in anyway reduces snag habitat. Larger snag trees, 12" diameter and greater are important for cavity nesting birds and mammals. Additionally, smaller diameter trees, 10" diameter and smaller, are important forage trees providing a host of insects to feed a variety of bird species. A minimum of 6-8 foraging snags and 2-3 cavity nesting snags should be left per treated acre.

In addition to leaving multiple snag trees per acre for foraging and nesting, large diameter downed timber should remain on the landscape in contact with the soil to provide complexity and cover to the landscape and offer cool, moist cover for reptiles and amphibians as well as concealment for small mammals. These decaying logs slowly release nutrients back into the forest cycle as they slowly decay and provide food and shelter for valuable insect larvae.

Large diameter legacy trees should also be left intact on the landscape to provide trunk foraging opportunities for birds. These large legacy trees, with large crowns, offer ample cone production for bird and mammal seed forage, and offer perches for predatory birds such as hawks and owls, both documented in the Project area. Large diameter legacy trees with mistletoe present should be retained to provide habitat for species that rely on mistletoe brooms for nesting like the great gray, long eared and great horned owls.

Forest treatment projects produce enormous amounts of residual biomass which is often piled and burned. A portion of this residual biomass should be retained and designated as habitat piles. These piles should be intentionally structured with larger diameter stems on the bottom to provide interior open spaces and smaller stems on top to provide cover. Habitat piles provide enormous value for small mammals, reptiles and birds. Habitat piles can be intentionally located outside of the drip line of conifers to

³ Squires, J. R., Decesare, N. J., Kolbe, J. A., & Ruggiero, L. F. (2008). Hierarchical den selection of Canada lynx in western Montana. *Journal of Wildlife Management*, 72(7), 1497.
<https://doi.org/10.2193/2007-396>

mitigate wildfire risk. Habitat piles should be constructed intentionally, designated and marked so they are not removed as slash piles.

Landscape Assessment

The 2019 CNF Forest Plan states that “FW-DC-WL-03. Habitat Conditions for all Surrogate Species: Habitat conditions (amount, distribution, and connectivity of habitat) are consistent with the historical range of variability (per FW-DC-WL-03) and contribute to the viability of surrogate species and associated species” (LMP p. 59). However, the EA and specialist reports do not contain any analysis of the landscape pattern when addressing wildlife viability, a key consideration. Wildlife viability cannot be determined without in part assessing where wildlife can move through suitable habitat in a mosaic roads, old and new logging units and burned area landscape.

Additionally, a spatially explicit landscape evaluation conducted to aid the forestry treatments includes an assessment of specific wildlife habitat, including northern goshawk, white-headed woodpecker, and American marten. However, these results are not part of the wildlife specialist reports..

Roads / Livestock Grazing

Reconstructing old roads has ecological impacts to ecosystems similar to new road construction. Reconstruction, restoration and construction of roadways in the Project area will have significant impacts on TES species and elk. This road system, added to the existing road system, will permit over snow motorized use during winter, a time of year when wildlife are at its highest level of stress.

Commercial logging, road construction and livestock grazing will impact sensitive wildlife seclusion and reduce landscape permeability to migrating TES species.

Roadside treatments 300’ to 500’ from roads edge, logging, road construction, over-snow motorized recreation and livestock grazing will impact sensitive wildlife seclusion and reduce landscape permeability to migrating TES species. This Project will further increase habitat fragmentation and the viability of wildlife diversity. Wilcove et al (1986) found that habitat fragmentation is a principal threat to most wildlife species in the temperate zone. This Project degrades the viability of wildlife diversity.

Silvicultural treatments will degrade snowshoe hare and red squirrel habitat, impacting lynx habitat suitability and in violation of the Forest Plan (STD WL 06; GDL WL 06)

Specific Reasons for Objection

1. Project documents, SEA/DN/Response to Comment et al, are not responsive to public comment, do not answer nor adequately address issues and questions raised by KRCG, its legal counsel or NEWFC presented in comment letters.

2. The Project does not fulfill its Purpose & Need, will not trend towards landscape resiliency, does not logically use or follow the landscape evaluation, and violates the LMP, ESA, NEPA, NFMA.
3. The SEA and supporting documents do not reasonably analyze nor respond in a meaningful way to the comment submitted by KRCG: “EA and supporting documents do not analyze the relationship of human-caused wildfire ignitions to roads” the relationship of human-caused wildfire ignitions to roads.
4. Project documents do not map where dry Douglas fir – defined as 1/3 of the Project area – nor where Northern Rocky Mountain Mixed Conifer (NRMMC) are located. How is the public supposed to know where these are located?
5. Project files do not make available to the public site-specific details re Plant Association Group that allow the public to understand their validation, nor does this help the public further understand why present watershed conditions are “inappropriate” regarding Historic Range of Variability (HRV).
6. Forest Service seems unwilling to acknowledge and discuss limitations of its own interpretation of HRV nor inherent weakness in its LiDAR interpretation and Plant Association Groups (PAGs). By FS own acknowledgement, PAGs provided by contractors are “potential” – and whether much more accurate or not are not forthcoming in project document. How is the public to know the private contractor the CNF hired did a better job than Williams et al, 1995? LeFevre test plot in the Kettle Range did not show dry PAGs.
7. Forest Service argues historic 1934 photos don’t “... *scientifically show that the predominant HRV for forest structure was mature, dense stands of mixed conifer in the Bulldog project area. There are no peer-reviewed scientific articles that rely on these photos for estimates of HRV density or HRV structure class because these photos do not include a large enough scale nor the camera perspective needed to derive HRV estimates.*” (Bulldog Supplemental EA – Response to Comment)

KRCG et al, asserted historic photos taken from mountain top fire lookouts on behalf of the FS and from various angles encompassing 360 degrees, do not support FS supposition that SFB watershed was 38-78% late-open structure. FS claims such photos were an “oblique” angle as compared to its aerial and satellite photos taken from high altitude were better. However, those photos also frame landscapes at oblique angles. Vertical plain photo analysis is every bit as cursory as ground-based analysis, depending on cloudiness, angle of sunlight, slope angel, etc. The fact is that aerial / vertical analysis and LiDAR are nevertheless coarse scale analysis.

FS claims HRV late-open structure was 10-40% canopy closure. Where are historical photographs of SFB that prove their point? Who knows? The sub-basin watershed scale and quality of 1934 photos provide a good deal of visual information that refutes FS late-open structure claim. Photos from mountain tops also allow 90 degree view of forest where an opposing slope is at a right angle to the camera and such allows a side view of forest canopy rather than a top down vertical view that can skew age of trees. Fast growing conifers on ideal sites grow canopy much faster and fuller than trees whose crowns are touching.

As the saying goes, 'a picture is worth a thousand words.' Most of the SFB watershed was not "open" structure as alleged by FS HRV, despite contradictory evidence captured on film in the 1934 photos. The DN and supporting documents do not address this apparent discrepancy, and in fact assert KRCG's submission is faulty compared to its own.

This is status quo response from the U.S. Forest Service. Everything FS does is appropriate. What the public wants is unscientific. FS arbitrarily argues their more recent aircraft and satellite photography essentially negates photographs it sanctioned taken from the headwaters of a watershed.

Read between the lines: historic photographic evidence belies CNF HRV restoration objectives. In other words, it disproves FS claims regarding HRV structure that of course is the grit in the cog of timber production that is the foundation of LMP HRV desired conditions (Table 5, p 35, LMP)

Consider in 1934 SFB was still wilderness. The 1934 photos were taken at the same timeframe as the FS's establishment of their aggressive wildfire suppression policy of putting out reported forest fires reported out by 10 AM the next day.

Hessburg, Churchill et al, use historic photos to demonstrate their theories. It's their research postulation, evidence and findings that are peer-reviewed. Their research, based largely air and satellite remote sensing and computer modeling. Old long distant black & white photos displayed in their research documents and public presentations (seen multiple times by KRCG) demonstrate coarse-scale theoretical, hierarchical and transitional forest conditions of their HRV research. Forest structure in SFB pictured at a subwatershed level in circa 1934 SFB photos provide graphic, fine scale view.

FS LMP and project documents assert that in the CNF 38-78% of the dry Douglas fir PAG was late-open structure. The 1934 photos, taken high atop nearby mountain lookouts, clearly show late-open structure was not the dominant structural composition of SFB. Quite likely the 1934 photos actually show Northern Rocky Mountain Mixed Conifer (NRMMC) was predominate forest

structure and which the LMP (p 35) lists 18-30% was mid-closed and 44-60% was late-closed as HRV.

- Response to Comment #3

PNW GTR 458 publication used as supporting evidence that CNF science is better than 1934 historic photos taken from mountain top perspective of SFB – does not contain a single photograph, not of SFB or any watershed. It does explain the basis for its findings:

“Forest and rangeland vegetation composition and structure were remotely sensed from resource aerial photographs taken from 1932 to 1965 (historical), and from 1981 to 1993 (current).” (Summary GTR 458) During this timeframe, logging and road construction in the SFB was full-on forest stand conversion. A logging project in the mid-1980s clearcut about 80 acres of sub alpine fir, spruce, western larch and Douglas fir in the lower SFB.

Contrary to SEA/DN and LMP, GTR 458 shows the Kettle River Range is primarily comprised of cold and moist mesic forest (p236, GTR 458) typical of NRMMC.

Whereas, KRCG agrees there is a significant dry forest portion of the SFB, it is primarily on the south and southeast aspect of the main massive of Bulldog Mountain and Thompson Ridge. All other aspects are NRMMC PAGs.

8. Implementation Guide @ 1 states “Harvest is allowed in late moderate and late closed.” Dry Douglas fir and in late closed Northern Rocky Mountain Mixed Conifer and even in subalpine fir/spruce/lodgepole. “A minimum of 10-percent canopy cover. Priority to ponderosa pine, western larch, hardwoods. A minimum of 4-8 trees per acre of the largest trees regardless of species.” This is insufficient to “restore” historic forest conditions.

This is Exhibit A why this project is NOT remotely going to restore HRV in a 20-30 year timeframe. Retention of just 4-8 TPA is a near to a clearcut or shelterwood prescription. By definition, dry Douglas fir not too surprisingly includes Douglas fir. The prescription is not about restoring HRV, it is about producing timber volume of a species that local mills covet.

Tree retention is insufficient to provide for wildlife including lack of winter snow-intercept, lack of shade that will include drying of forest soils and shift in mesic PAGs.

9. Response to Comment #2 and #3 argue both against and in support of KRCG et al claim that SFB contains boreal forest: “The Kettle Range contains ideal habitat for C. lynx. This includes boreal forest landscapes with sufficient snowshoe hare densities and winter snow conditions. (KRCG comment to Bulldog SEA) CNF *Response to Comment: “The 2013 Lynx Conservation and Assessment Strategy (LCAS) describes “true boreal forests” in the western U.S. as occurring above*

4,600 feet elevation (Agee 2000).... Western boreal forest that includes subalpine forests similar to [northern] boreal forests." Most of the SFB is 4,600' and above. Although FS response is technically correct, it nevertheless misses a key element in the 2013 LCAS and Agee 2000 – sub alpine fir / Engelmann spruce / lodgepole pine and associated PAGs represent similar seasonal variations as do northern et al, boreal forest conditions: long, cold winters, deep fluffy snow, abundant prey species snowshoe hare and red squirrel. E. spruce is related to boreal species (*Picea mariana*), white spruce (*Picea glauca*); balsam fir (*Abies balsamea*) is related to sub-alpine fir (*Abies lasiocarpa*). The fact is there are different boreal forest zones beyond southern or northern zone.

This is a description from a British Columbia "Naturally Wood" website:
"Subalpine fir, also known as balsam or balsam fir, grows throughout most of the BC Interior from mid to high elevations, as well as near sea level on the north coast. **It is most common in humid, continental boreal climates** with a short growing season, grows less frequently in cool temperate climates, and is rare in warmer, drier climates. It occasionally occurs in pure stands but **is usually mixed with other species, principally Engelmann spruce and white spruce**. Its high shade tolerance makes it a desirable component in mixed-species stands." (emphasis added)
<https://www.naturallywood.com/species/subalpine-fir/>

This describes conditions found in SFB.

10. **Response to Comment** states Objector is incorrect but FS does not provide evidence supporting its challenge:

"The Bulldog project area is comprised of about one-third dry forest (see table 2 in the vegetation report)." (Response to Comment #2, p 3)

Table 2 in the Vegetation Report does not show 1/3 of the SFB is dry forest.

11. Project documents do not provide map or data re historic changes to SFB as the result of timber sale removal of late-old structure and other management practices that fundamentally shifted some PAGs. What baseline was used to assess changes and the way forward? Past management is downplayed while Project logging is touted as the way forward to restoration of HRV.
12. Road construction – "3.4 miles of temporary roads, 5.6 miles of temporary roads opened using existing road templates" (Biological Evaluation p 25) - even if temporarily open for as long as a decade or more - reconstruction, restoration and construction of roadways in the Project area will have significant impacts to lynx and other TES species, elk, and aquatic species. Sedimentation caused by

roads and the impact of temporary roads associated with this Project are not assessed. Project documents do not provide location information re temporary road construction. LMP FW-GDL-VEG-01 requires ESA-occupied habitat have a minimum 100-foot buffer.

SFB watershed has a high concentration of roads in riparian areas putting it functionally at risk for habitat connectivity. Logging units proposed along S. Fk. Boulder Creek will degrade riparian areas. Units in the lower area of this creek target cool and wet forest species such as western red cedar. Units in the upper watershed target cool/cold spruce-fir and NMMRC.

13. Project snag retention does not meet LMP desired amounts. “Retain all snags that are 20+ inches DBH except those that would be felled within new road or equipment corridors, log landings, or for worker safety.” (Bulldog Biological Evaluation @ 14) This violates the LMP FW-DC-VEG-04 Snag and Coarse Woody Debris and FW-DC-VEG-05 Biological Legacies

This equates to the best location of new / temporary road and skid trails (equipment corridors) is where the mills will get the most volume for its work. Skid trails are determined by the logger who is working for the mill/purchaser.

14. Logging units in and adjacent to Inventoried Roadless Areas (IRAs) and the deleterious effects that they will have on solitude, recreation, and scenic integrity to wilderness qualities in the IRAs.
15. IRA boundaries are inaccurate and arbitrary.
16. Soils analysis is inaccurate. Issue raised repeatedly was not addressed Response to Comment or other Project documents.

There is a history of mass soil movement in the SFB. Surveys have identified many soils in the Project area as subject to moderate to very severe erosion potential, including sandy loams, glacial tills and ash (including MKE, SdC, TtD and TtF documented in *Soil Survey of North Ferry Area, Washington* (USDA SCS & USFS 1979).

Most if not all soils on slopes >15-25% are an erosion risk, potentially adding significant sediment to streams, burying fish redds, filling in pools and threatening sensitive and threatened species. Historically, periods of high precipitation have resulted in gullying and landslide events including a flood event that washed out SFB road.

Gatorson Timber Sale (1990) made this assessment of SFB soils: “Three soil associations in the planning area: Torboy-Wapal-Gahee glacial outwash plains; Nevine-pepoon-Oxerine glacial till plains and uplands; and Togo-Manley-Scar uplands and mountains. Soils within these series for the most part include loams,

silt loams, and sandy loams. All have moderate to very severe erosion potential as well as medium to rapid runoff, except for some loams on less than 15 percent slopes. Ozerine, Togo, and Torboy soils have the highest erosion potentials.” (Gatorson EA, App. D)

Bulldog NEPA has not adequately investigated the erosion risk nor Project area or downstream risks to aquatic ecosystems associated with road maintenance & construction, temp roads, logging systems and forest removal.

17. Lynx Analysis Unit (LAU) boundaries do not accurately reflect PAGs associated with spruce / fir / NRMCC nor occupied snowshoe hare habitat. Forest Service effectively measured changes to the LAUs (given the changes made to them in the Kettle Range).

FWS outlined four recovery objectives for lynx in these six core areas, including the Kettle Range: (1) retain adequate habitat of sufficient quality to support long-term persistence of lynx populations in identified “core” areas; (2) ensure sufficient habitat is available to accommodate long-term persistence of movement between each core area and adjacent populations in Canada or secondary areas; (3) ensure that habitat in secondary areas remains available for lynx occupancy; and (4) ensure that all threats are addressed so that lynx will persist in the contiguous United States “for at least the next 100 years.”

FWS also outlined seven specific actions (several with multiple parts) needed to achieve the four recovery objectives in the six “core areas,” including the Kettle Range. These actions include: (1) establishing management commitments in all core areas; (2) maintaining baseline inventories of lynx habitat in each core area; (3) monitoring lynx use in core areas; (4) identifying habitat to facilitate movement between core areas; (5) ensuring that habitat in all secondary areas remain available for lynx; (6) identifying population and habitat limiting factors for lynx; and (7) developing a post-delisting monitoring plan for lynx.

None of this is happening on the Colville National Forest or within the Kettle Range. The objectives are not being met and the actions are not being implemented and, as a result, lynx numbers and the lynx’s range in Washington and within the Kettle Range “core area” have and continue to decline.

18. Many harvest units (8, 9, 12, 13, 15, 16, 17, 18, 19, etc.) south of and adjacent to SFB, US Creek and other tributaries are suitable lynx habitat (spruce/fir/mesic forest), abundant snowshoe hare and red squirrel prey species mostly outside of LAU.

19. Large areas of LAU will be affected by proposed management activities that violate NEPA, LMP (FW-DC-VEG-10 and NFMA: “...immediately post treatment and

then 20-40 years post treatment. The CNF at this time has not monitored projects post treatment to determine success of treatments and the timing related to when habitat may become suitable again for lynx. This is purely an estimate based upon literature.” (Bulldog Project Biological Evaluation, p 25)

20. LAU boundaries in the project area and Colville National Forest were changed in 2020 without any NEPA-required public participation, consideration of alternatives, or consideration of direct, indirect, or cumulative effects to lynx, lynx habitat, connectivity, management of lynx, or lynx recovery in the region. The FS and FWS also never consulted on this change as required by Section 7 of the ESA. The removal of LAUs and changing of LAU boundaries conflicts with the best available science on habitat needs for lynx and conditions on-the-ground.
21. The Project does not follow its own Purpose and Need, specifically to maintain and improve aquatic habitats or to “restore” Historic Range of Variability (HRV).
22. SEA Vegetation Report Table 4 and 5 misrepresent LMP Table 5 (Chapter II Forestwide Direction, p 35) Desired HRV conditions.
23. SEA and Vegetation Report misinterprets LMP Table 5 to unfairly target Douglas fir >20.9” allegedly to restore HRV that it concludes threatens restoration of ponderosa pine.

“Ponderosa pine, western larch, and hardwoods would be prioritized for retention in Dry DF LOS treatments. Douglas fir, western larch, western white pine, and hardwoods would be prioritized for retention in NRMCC and AF/LP LOS treatments.” (Response to Public Comment)
24. Project analysis fails to provide adequate habitat needs of northern goshawk, a LMP Focal Species and MIS, fails to apply relevant science regarding its home and forage range. Bulldog Project proposes to protect goshawk nest sites (March 1 to August 31) 30 acres (12.1 ha) and 420 acres (170 ha) in post-fledgling forage area (only if birds are present and within seasonal restrictions BE @ 16 and LMP FW-GDL-WL-19). However, goshawk home range mean size for males is 3606 ha (~8,900 acres and 1619 ha (~4,000 acres) for females (Blakely 2020). The LMP lists goshawk home range of 6,000 acres, however, there is no limitation on logging in home range. The EA and FONSI do not protect goshawk home range – logging near nest site is deferred not prohibited. LMP dominant tree >15” dbh is not discussed. Goshawk often return to nest near or at prior nest site / post-fledgling forage area. Logging near *known* nest/forage sites and reduction in home range, particularly by larger regeneration units allowed by the LMP, could reduce or eliminate future use of formerly occupied goshawk habitat.
25. The Kettle Range contains ideal habitat and is a stronghold for lynx and an important area for lynx conservation and recovery (as revealed by on-going

- reintroduction efforts in the Kettle Range). The Forest Service disagrees. Boreal / mesic forest composition along mountain ridgelines, north and east solar aspects sheltered from warming/melting snow effects, riparian/bog/wetlands, create excellent habitat for prey species and snow conditions ideal for lynx. Snowshoe hare can be found from high mountain ridges to valley bottom.
26. Environmental habitat conditions ideal for lynx also provide essential cool/cold conditions essential to the survival of moose.
27. In their Response to Public Comment, the CNF argues “There is no boreal forest in the Kettle Range” is unsubstantiated nor does the Forest Service explain why the presence of spruce / fir forests that characterize boreal forest widely occupy the Kettle Crest and its east and north aspects down to valley floor. Where recent wildfire and clearcut logging (circa 1980’s) is predominately lodgepole pine and where wildfire has created early seral forest conditions, lodgepole pine may be dominant or co-dominate species – that has been shown to transition of spruce/fir over time. Even though occasional individual Douglas fir and even ponderosa pine may be found at higher elevations in the Kettle River Range these do not indicate a dry forest condition and are likely planted by humans or Clark’s nutcracker.
28. FS has not provided forestry prescription information requested by KRCG. Project documents are not forthcoming how commercial logging will be specifically defined ie. what instruction will inform the logger? This lack of specific logging/fuel treatment, road construction/reconstruction do not allow for effective collaboration or fully informed comment or objection. Issues associated with deficient public information include providing inadequate Response to Comment verbal and written comments.
29. The Project does not improve recreational opportunities to better align with desired public uses, does not maintain scenic integrity and in fact degrades scenic integrity by clearcutting forests and their use by over-snow recreation vehicles, skid trail & road construction scars and other disturbances that will degrade national scenic and recreation designated trails.
30. The Project does not effectively analyze wildlife viability as required in the new Forest Plan, and it is thus unknown whether the Project is maintaining wildlife viability. In approving the Project, the FS also failed to ensure compliance with various lynx standards included in the Colville Forest Plan as detailed in item (6) in our October 27, 2023 comments (submitted by WELC on behalf of KRCG).
31. The direct, indirect, and cumulative impact of livestock grazing is not reasonably analyzed and impacts to TES species are not addressed, threatening species

habitat viability. The FS also never takes the requisite hard look at how the Project, in combination with livestock grazing, other logging/vegetative projects, motorized access (including over-snow motorized recreation), recreational uses and developments, climate change, wildfires, insect outbreaks and related tree mortality, incidental take and mortality, and the loss of protective measures due to forest plan and LAU changes, may cumulatively effect lynx, lynx habitat, connectivity and movement in the region, or recovery (including on-going reintroduction efforts).

32. The Environmental Assessment is woefully inadequate in taking a hard look at past, present and reasonably foreseeable environmental impacts, showing the need for a more thorough Environmental Impact Statement. The Bulldog project requires an EIS for the reasons stated in our comments as it will result in significant effects to listed species, cumulative effects, involves highly controversial and uncertain effects, and will occur in an ecologically critical area.
33. The EA / BE / Response to Comment have not addressed the environmental impact of over-snow motorized recreation and comments raised by KRCG. Twin Sisters, Profanity and Thompson Ridge Inventoried Roadless Areas are some of the most remote on the CNF and have outstanding wilderness characteristics. The verifiable IRA boundary begins at the roads' edge, not 300 to 500 feet from each side of Albion Hill Road. The Project will affect Profanity and Twin Sisters IRA, reduce scenic integrity, increase the footprint of winter over-snow motorized use and otherwise degrade, solitude and pristine quality of these areas and its suitability for Canada lynx and other ESA species.

The Forest Service supports year-round motorized use of Albion Hill and Bulldog-Cabin Road, including groomed winter over-snow and motorized use of Albion Hill Road, Bulldog Cabin, Indian Creek and South Fork Boulder roads that extends upwards of 6,000' elevation and bifurcating US LAU. Authorized over-snow motorized recreation also leads to motorized trespass via the Old Stage Trail and Stickpin Trail. All of these contribute to degradation of lynx habitat. Project document largely ignore the complexity of this issue its impacts and that have been raised by KRCG.

Forest Service sanctions over-snow motorized winter recreation via Twin Sisters and King/Mac Mountain trails and via Indian Creek Road east of the Kettle Crest and through to where it connects to Long Alec Creek Road west of the Kettle Crest. The cumulative impact of this and its impact to Canada lynx was not analyzed in NEPA documents.

SUGGESTED RESOLUTION REMEDIES

1. Landscape Resiliency and Restoring Fire

Requested Resolution Options

- Modify objectives, and associated actions within the Project area to include landscape-level objectives such as mean patch size, patch density, connectivity, and fragmentation as described in NEWFC's Strategic Vision.
- Modify Project actions to limit regeneration openings to <3 acres.
- Increase patch-size of thin from below. Retain a minimum of the largest 40 trees per acres and connecting nearby patches.

2. Remove all proposed logging in and adjacent to Inventoried Roadless Areas. Wildlife movement & seclusion, recreation and scenic Integrity are degraded, IRA boundaries are arbitrarily drawn

Requested Resolution Options

- Drop commercial logging units along Albion Hill Road from southern Project boundary north to FS RD 6114
- Retain roadside cover suitable for lynx migration & forage in the upper Mick Creek tributary of SFB.
- Provide additional Project NEPA analysis and develop strategies to eliminate impacts of off-road motorized trespass.
- Provide vegetation screening and through-traffic seasonal (fall) closure of Albion Hill Road from Rd 2030-920 to Old Stage Campground to reduce poaching potential, provide seclusion and security for wildlife movement
- Retain vegetation screening for wildlife security & habitat effectiveness, especially during fall, winter and early spring.

3. Commercial logging units in cedar, spruce/fir and along SFB, US Creek and other tributaries that will degrade C. lynx habitat, increases stream warming negatively impacting bull trout, red band and cutthroat trout and reducing potential instream large woody material

Requested Resolution Options

- Drop all units along upper SFB and US Creek. These are NRMMC providing excellent prey species habitat and horizontal cover, denning and hiding cover benefitting lynx.
- Drop all red cedar units. Decline in red cedar across R-6 requires a higher level of retention, avoid risk of sun scald, retain higher level of shading to protect against heat and drought stress.
- Drop all units or portions of units within the Riparian Influence Zone.

4. Scenic Integrity Objectives are Not Met

Requested Resolution Options

- Retain more trees, average of 40 of the largest trees per acre and design prescriptions that are not visually disrupting to natural appearing scenic integrity
- Restrict regeneration openings to <3 acres
- Expand SIO to natural watershed break points, particularly ridgelines
- “Feather” treatments in High SIO to include middle ground vistas that are not arbitrarily assigned lower Moderate SIO to a limited distance metric

5. Wildlife Viability Depends on Wildlife Habitat Effectiveness

Requested Resolution Options

- Remove all commercial logging units in Lynx Analysis Units and associated lynx forage areas.
- Consult with USFWS on Biological Opinion for impacts to endangered and threatened species.
- Conduct a wildlife viability analysis in concurrent with the 2019 LMP
- Size regeneration treatments of 1 acre and in rare circumstances no larger than 3 not connected to steep slopes, along roadways and in riparian influence zones.

6. EA and Draft DN not responsive to public input and request for information

Requested Resolution Options

- Provide specific unit by unit regeneration and tree retention data
- Do not log trees >20” dbh regardless of species

7. Project Related Grazing Impacts Not Analyzed

The U.S. Forest Service is tasked with responsibly managing public lands livestock grazing so as not to impair the diversity and viability of native wildlife inhabiting our national forests. As the federal land manager, this responsibility means the Forest Service must carefully evaluate whether federal forest lands are suitable for domestic livestock grazing and explore methods for reducing conflicts between wild animal populations and the cattle it authorizes to graze the Project area landscape. Drought and grazing alter plant community composition and habitat structure, and reduce regeneration of trees and shrubs which in turn alters the bird and small mammal communities.⁴

⁴ Vose, J. M. (2016). Effects of drought on forests and rangelands in the United States: A comprehensive science synthesis.

The EA does not address the impacts of Project activities on recolonizing gray wolf and grizzly bear related to grazing even though this Project will affect species habitat. Nor does the EA in any way attempt to address potential future impacts, assess range management issues directly connected to this Project that could only be addressed through application of silvicultural prescriptions to create pasture, transitory range and allow for such range improvements to livestock management, ie. Bunching & herding, sight distance and aquatic resource conservation.

Requested Resolution Options

- Identify specific locations where additional grazing acres will be located
- Analyze grazing impacts past, present and future and provide evidence to support meeting the needs for TES habitat.

8. Wildfire

Requested Resolution Options

- Please modify fuel treatments to broadcast burn treatment units post-harvest
- Provide a map showing all areas burned in the Project area since 1988.

9. Need for an EIS

NEPA requires the Forest Service to prepare an EIS when it proposes a major federal action that *may* significantly affect the quality of the environment. 42 U.S.C. § 4332(2)(C); *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir. 1998) (“[A] ‘plaintiff need not show that significant effects will in fact occur....’ It is enough for the plaintiff to raise ‘substantial questions whether a project may have a significant effect’ on the environment.”) (citation omitted). Importantly, “the [Ninth] Circuit has established a relatively low threshold for preparation of an EIS.” *Natural Res. Def. Council v. Duvall*, 777 F. Supp. 1533, 1537 (E.D. Cal. 1991). If a plaintiff raises substantial questions regarding whether a project *may* have a significant effect on the environment, “a decision not to prepare an EIS is unreasonable.” *Blue Mountains Biodiversity Project*, 161 F.3d at 1211 (citing *Save the Yaak Comm. v. Block*, 840 F.2d 714, 717 (9th Cir. 1988)).

This Project reaches beyond the threshold of a finding of NO significant environmental impact. It’s connected actions encompassing a wide geographic area seriously challenges a conclusion that a less rigorous examination of environmental consequences in an environmental assessment framework meets necessary legal requirements. The Bulldog Project area is contiguous to the nearly complete Sherman Pass Project, Trout Lake CE, Walker, Orient, Sanpoil and Kettle Face -- which added to the soon to come Dollar Mountain Project of similar size as Bulldog -- is a HUGE land area that without a doubt cumulative has significant impacts,

especially to wide-ranging terrestrial species and watersheds. The forecasted timber cut (40 million board feet in the 5-year plan dated 7/26/2019) is likely to increase given the size of this logging Project has also increased (4,000 ac estimated in 5 year plan compared to 7,000 acres in the EA). A Finding of No Significant Impact in this one of the wildest most pristine area of the Colville National Forest, is fundamentally untenable. Taken together, past, present and future logging and road building Project will have dire environmental impacts on fish & wildlife, wilderness recreation and scenic integrity. As such this Project must be more thoroughly examined in an Environmental Impact Statement.

In determining whether a proposed action may “significantly” impact the environment such that an EIS is required, both the context and intensity of the action must be considered. 40 C.F.R. § 1508.27. In evaluating intensity, the Forest Service must consider numerous “significance” factors. 40 C.F.R. §§ 1508.27(b)(1)-(b)(10). If the Forest Service’s action may be environmentally significant according to any one of the criteria, it must prepare an EIS. *Blue Mountains Biodiversity Project*, 161 F.3d at 1212; *Ctr. for Biological Diversity v. Nat’l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1220 (9th Cir. 2008) (“an action may be ‘significant’ if one of these factors is met”); *Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846, 865 (9th Cir. 2005) (“We have held that one of these factors may be sufficient to require preparation of an EIS”); *Nat’l Parks & Conservation Ass’n*, 241 F.3d at 731. Even if no significance factor standing alone requires the preparation of an EIS, consideration of the significance factors cumulatively can require the preparation of an EIS. *Anderson v. Evans*, 371 F.3d 475, 494 (9th Cir. 2004) (requiring EIS based on consideration of multiple NEPA significance factors); *Cascadia Wildlands v. U.S. Forest Serv.*, 937 F. Supp. 2d 1271, 1283 (D. Or. 2013) (“[W]hen considered individually, none of these significance factors might require an EIS. However, when considered collectively, they do.”).

Virtually all of the concerns / issues raised in this Objection (and KRCG’s previous comments) could be addressed in an Environmental Impact Statement.

Requested Resolution Options

- Provide a supplemental information documentation as identified above stated reasons for this action.
- Withdraw the EA and draft DN and redo Project NEPA analysis, issuing an Environmental Impact Statement
- Redo soils analysis that is divergent from *Soil Survey of North Ferry Area, Washington* (USDA SCS & USFS 1979)

- Fully analyze impacts to the watershed of livestock grazing, over-snow winter recreation
- Fully analyze the direct, indirect, and cumulative impacts to TES, including lynx, wolverine, gray wolves, and grizzly bears. Fully analyze how changes to LAU boundaries affect lynx and lynx habitat. Apply the best available science on lynx. Take steps to recover lynx in the Kettle Range and Colville National Forest (and follow the steps laid out in the recovery outline and support reintroduction efforts). Ensure any and all aspects of the project comply with forest plan standards for lynx.
- Reassess and field verify to determine accurate Plant Association Groups.
- Fully review Canada lynx habitat reflected in a range of viable alternatives.

Conclusion

KRCG appreciates your consideration of the information and concerns in this Objection. KRCG the opportunity to collaborate on the Bulldog Project. Pursuant to 36 C.F.R. § 218.11. We respectfully request the reviewing officer allow adequate time for Objector to prepare thoroughly for any resolution meeting and that only objectors and officially registered interested parties be invited to participate in the meetings.

If you have any questions, please do not hesitate to contact us.

Sincerely,



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Kettle Range Conservation Group


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