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First name: Paul

Last name: Ruprecht

Organization: Western Watersheds Project

Title: Staff Attorney

Comments: Please accept the attached comments on behalf of WWP. Thank you.

July 5, 2016

Portland Office

126 NE Alberta St., Suite 208

Portland, OR 97211-2665

tel: (208) 421-4637

fax: (208) 475-4702

email: paul@westernwatersheds.org web site: www.westernwatersheds.org

Working to protect and restore Western Watersheds and Wildlife

BY EMAIL AND ONLINE SUBMISSION

Amy Dillon, Forest Environmental Coordinator and Plan Revision Team Leader

Debbie Kelly, Public Affairs Lead Colville National Forest

Plan Revision Team 765 South Main Street Colville, WA 99114

colvilleplanrevision@fs.fed.us <http://www.fs.usda.gov/project/?project=45826>

Re: Colville Forest Plan Revision, Comments on DEIS and Draft Forest Plan

Dear Colville Forest Planners:

Thank you for the opportunity to comment on the Forest's Draft Land and Resources Management Plan revision and Draft EIS. Please accept the following comments on behalf of Western Watersheds Project (WWP). Since the comment period extends until July 5, 2016, these comments are timely.

WWP works to protect and conserve the public lands, wildlife, and natural resources of the American West through education, public policy initiatives, and litigation. WWP and its staff and members use and enjoy the public lands in Washington-including those within the Colville National Forest-and its wildlife, cultural, and natural resources for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes.

Please add WWP to the mailing/contact list for this Plan Revision, as we wish to receive all future notices of planning documents and environmental analyses.

No Grazing Alternative

It is well established that the Forest must consider a no-grazing alternative, as well as reduced grazing alternatives. The DEIS fails to do so because it specifies that under each alternative all allotments will continue to be available to grazing under the Revised Plan.

Grazing Permit Retirement

The DEIS should include alternatives that would provide for non-use (vacancy) of grazing allotments during the life of the Forest Plan when a permittee decides to voluntarily relinquish the associated grazing privileges or

permit. The Plan should then adopt appropriate language enabling that to occur.

In a hypothetical case, a third party may provide compensation for permittee's decision to waive a grazing permit back to the Forest Service provided the Forest Service agrees not to offer the permit to another party, instead allowing the allotment where the permittee held preference to be rested. The permittee's choice whether to relinquish grazing privileges is entirely voluntary.

Grazing permit retirement is increasingly provided for in forest plans, BLM RMPs, monument plans, and other programmatic management plans across the West. It is widely regarded as a "win-win" both for conservationists and native species and for livestock operators. The Colville Forest Plan should allow this opportunity through its plan revision process.

Bighorn Sheep and Disease Transmission

We strongly urge you to retain FW-STD-WL-12 in the final Forest Plan.

The Forest should also act quickly to analyze the risk of contact to bighorn sheep from domestic sheep that are authorized anywhere on the Colville National Forest. Because of the natural inclination of bighorn sheep to foray large distances, domestic sheep may pose an unacceptable risk to bighorn populations even if they are authorized outside of bighorn sheep source habitats or in areas not directly adjacent to source habitat.

In the Final EIS, please provide mapping at a scale and quality that clearly shows 1) bighorn core herd home ranges; 2) potential bighorn sheep habitat; 3) all domestic sheep grazing allotments, pastures, and driveways on the Colville National Forest; and 4) mapping showing the risk of contact between bighorn sheep and domestic sheep authorized on the Forest.

The Forest Plan should also specify that affected domestic sheep AUMs or Head Months would be cancelled outright instead of being converted to permitted/authorized use for other classes of livestock, or in other areas.

If the authorized use for sheep is converted to cattle or other classes of livestock, it should not be a 1:1 conversion of AUMs, and must take into consideration that domestic sheep use the landscape differently than cattle: they utilize steeper areas; are less dependent on riparian areas; make use of browse more than cattle; and are far more mobile than cattle. Thus, any conversion of use to cattle from sheep must be at a fraction of the AUMs authorized for sheep in order to prevent new impacts on riparian areas and other resources.

Grazing in Research Natural Areas

WWP supports your proposed decision not to allow new or additional grazing within RNAs. However, we urge you to also eliminate current grazing in these special areas. RNAs comprise only 5,904 acres (.5% of the Colville National Forest), but are disproportionately important for protection of biodiversity and other public values. Such small but important areas could be removed from areas available to livestock without discernible effect to grazing overall. The Forest Service should require this.

Capability and Suitability

Please include the mapping and underlying data from this exercise, and include the results in Tables 2, 6, and 11 in the FEIS. Currently livestock grazing is permitted on much of the Colville National Forest, but the Range Suitability Determination shows that only 363,000 acres (33% of the forest) are suitable for cattle grazing. Cows are the main class of livestock authorized. Does the Forest Service authorize grazing on land that it has found unsuitable for grazing? Do the results of the analysis dictate that any areas currently authorized for livestock use be made unavailable to livestock grazing under the Revised Plan?

Climate Change and Grazing

Except for one paper, the Range Specialist Report cites only studies that find grazing increases carbon sequestration and reduces greenhouse gases. In fact, there is an ever-growing body of literature¹ suggesting the opposite, which the Forest must consider. In the Final EIS, please provide more complete analysis of the effects of livestock grazing on climate change.

1 See e.g. Beschta, R. L., Donahue, D. L., Dellasala, D.A., Rhodes, J. J., Karr, J. R., O'Brien, M. H., Fleischner, T. L., & Deacon-Williams, C. (2012) Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates. Environmental Management.

Dong Wang, Gao-Lin Wu, Yuan-Jun Zhu, Zhi-Hua Shi. 2014. Grazing exclusion effects on above- and below-ground C and N pools of typical grassland on the Loess Plateau (China). *Catena* 123 (2014). http://lab.yangling.cn/UploadFile/ea_201482785433.pdf.

Lei Deng, Zhinan Zhang, Zhouping Shangguan 2014. Long-term fencing effects on plant diversity and soil properties in China. *Soil & Tillage Research* 137 (2014) 7-15.

Wu Xing, Li Zongshan, Fu Bojie, Lu Fei, Wang Dongbo, Liu Huifeng, Liu Guohua 2014. Effect of Grazing Exclusion on Soil Carbon and Nitrogen Storage in Semi-arid Grassland in Inner Mongolia, China. *Chin. Geogra. Sci. Bol* 24 No. 4 pp. 479 -87.

Xing Wu, Zongshan Li, Bojie Fu, Wangming Zhou, Huifeng Liu, Guohua Liu. 2014. Restoration of ecosystem carbon and nitrogen storage and microbial biomass after grazing exclusion in semi-arid grasslands of Inner Mongolia. *Ecological Engineering*, Volume 73, Pages 395-403.

Aquatic and Riparian Resources

According to the Draft Plan, the majority of watersheds on the Forest are functioning at risk or non-functional. Grazing is a widespread cause of degradation of the watersheds and persistence of degraded conditions, as well as a threat to native fish and other species. Since the Plan Revision intends to replace INFISH, the aquatic strategy that the Forest implements in its place should be at least as protective of riparian resources and species as INFISH.

Measurable Use Standards

Draft Plan Guideline MA-GDL-RMA-09 should be retained, but modified in several ways. First, it should be included as a standard rather than a guideline. This includes modifying the permissive language so that it is mandatory (change "should" to "shall"). Second, the footnote allowing the numeric values of use levels to be made less protective based on site-specific conditions should be removed.

*The 6"-8" stubble height currently contemplated is appropriate and should not be subject to modification.

*However, the use standard for streambank alteration is too high, and should be changed to a lower value that is supported in the scientific literature. For example, the INFISH RMO for bank stability (which has an inverse relationship to bank alteration) is 80% percent. Thus, a 25% bank alteration standard would be less protective than the current bull trout objective. A breadth of other available literature shows that 25% bank alteration is

above or at the upper extreme of appropriate levels for fish-bearing streams.² At a minimum, the Forest should adopt the 20% bank alteration standard in the proposed action alternative.

Adequate replacement for INFISH STD GM-1 needed

Under current management according to INFISH, Standard GM-1 provides for modification of grazing practices that retard or prevent attainment of RMOs or negatively affect native fish.

There appears to be no equivalent analyzed in the DEIS. The FEIS should include such a standard, which the Plan should ultimately adopt to ensure that grazing is reduced when it leads to stagnation of poor conditions and lack of recovery.

Impacts to spawning salmonids

Draft Plan Standard MA-STD-RMA-11, which would prohibit livestock access to federally listed threatened or endangered fish redds, should be extended to apply to all reaches of stream where native fish species are known or expected to spawn during spawning periods, but also through the time of incubation and emergence. Spawning fish are at risk of harassment from wading livestock while they are staging and actively spawning. However, incubating eggs and

² See Bridger-Teton National Forest Streambank Alteration whitepaper (describing ranges within 10-20% for fish-bearing streams depending on channel type) (attached).

emergent juveniles still within substrate gravels are also vulnerable to trampling. ³ For bull trout, this likely means excluding livestock from August to April or later. For interior redband and cutthroat trout, spawning occurs in the spring and the season of use restrictions should be implemented accordingly.

The mode of excluding livestock is also important. Temporary and even permanent fencing is often ineffective at preventing livestock from accessing these sensitive areas, and has many negative consequences to wildlife, as well as inhibiting recreation. Consequently, livestock should be excluded through season of use restrictions at the pasture level to prevent impacts to redds. This is also critical because, apart from direct impacts to redds from trampling, incubating salmonid eggs are at risk from sedimentation caused by grazing in accessible upstream reaches and uplands.⁴

Wildlife/predator killing

The DEIS and Draft Plan do not appear to address wildlife killing by Wildlife Services on National Forest lands. This is a very important issue for a forest that provides actual or potential habitat for each of these species: grizzly bear, gray wolf, Canada lynx, Wolverine, American Marten, and fisher, which can be incidentally taken through various means even if not directly targeted. What are potential indirect and cumulative effects to these and other species from wildlife killing by Wildlife Services and how, when, and where does the Forest authorize these actions?

Old Forest Structure

WWP recommends designation of large areas of the Forest for emphasis on old growth- dependent species and old forest structure. Of the alternatives considered, this is best represented by Alternative R, which implements a large-scale reserve approach for this type of forest habitat (51%). This alternative also represents a passive management approach, which recognizes that manipulation by humans is not required for properly functioning

ecosystems.

Wilderness

WWP supports adoption of-at a minimum-the wilderness recommendations under Alternative B. This alternative is the best of those analyzed in the DEIS because it recommends the greatest percentage of the forest for wilderness designation, while designating the lowest percentage of the forest as "backcountry" areas, in which mechanized recreation is allowed.

Alternative B is preferable to Alternative R with respect to wilderness because it designates less backcountry, which is a watered-down designation that does not provide either the

3 See Thurow, R. F. *The Camas Creek Watershed: Its Native Fish Populations, Aquatic Habitats, Landscape Processes, Scientific Values, Human Activities, and Limiting Factors and Threats*, pp. 23-29 (attached).

4 See Doumitt, Theresa and Laye, Doug, *Assessing the Effects of Grazing on Bull Trout and Their Habitat* p. 19 (attached) (noting that "effective [grazing] management of salmonid habitat begins at the ridgeline (watershed boundary) and not at the streambank").

environmental preservation or primitive recreational experience of actual wilderness. For similar reasons, WWP supports recommendation for actual wilderness designation of the Kettle Crest instead of creation of the Special Interest Area.

There is no shortage of areas allowing mechanized and motorized travel on public lands in the West, but wilderness areas comprise only a small percentage of public lands and are increasingly in demand by the public. Even under the most restrictive alternative, 73% of the Colville National Forest would still allow roads. The Forest Plan should recommend at least 220,330 acres (20%) of the Forest as suitable for wilderness, as contemplated in Alternative B.

Thank you for considering these comments. Please contact me if you have any questions. Sincerely,
s/Paul Ruprecht Staff Attorney

Western Watersheds Project Copy: Travis Bruner, WWP