

Data Submitted (UTC 11): 7/5/2016 7:00:00 AM

First name: Chance

Last name: Gowan

Organization: Stevens County Cattleman&#39;s Association

Title:

Comments: Comments to LRMP from Stevens County Cattlemen's Association

Ms. Dillon:

Attached are the comments from the Stevens County Cattlemen's Association. If you have any questions or comments - please contact me at this email address - immediately.

Thank You

Chance Gowan

Amy Dillon, Forest Plan Revision Team

Colville National Forest

765 South Main

Colville, Washington, 99114

colvilleplanrevision@fs.fed.us

Attached are comments, issues, and objections to the Draft LRMP and accompanying DEIS. These comments are provided by Chance Gowan, Consulting Biologist, representing the Stevens County Cattlemen's Association (SCCA).

Ms. Dillon: In general we find this document to be very cumbersome in size and format. The DEIS is literally filled with redundancies, contradictions, biases, and misrepresentation of facts.

This document is supposed to be an unbiased and honest description of proposed management on the National Forest. It is supposed to be presented in a manner that is easily understandable to the average reader and presented without partiality or predisposition. Unfortunately, these documents (Draft LRMP & EIS) are fraught with all of these departures from expected format. We've documented many instances of each, within the text of our response.

Was it really necessary for every specialist to repeat the content of every alternative in their section of the DEIS? There are nearly 150 Tables in the DEIS, yet I would speculate that the overwhelming majority of these tables were so specific in nature, and were preceded with so little in the way of explanative precursory information that they were of little or no value to the average reader.

You will find that we have highlighted (in gray) a number of sections within the text of our response. I've identified those sections and asked that they be considered as formal FOIA requests. The information gained through these requests will be presented to the public, at a public forum, to be held later this year. Given the nature of our use, and considering that we are representing numerous individuals across 4 counties, we ask that no charges be levied for these information requests. Also, we request that the Forest provide this information within normal time constraints.

We ask that you provide all documents and documentation requested in our FOIA's and send them to Chance Gowan, 2900 N. Government Way, Ste. 127, Coeur d Alene, ID 83815.

Thank You,

Chance Gowan  
Consulting Biologist  
Stevens County Cattleman's Association  
Response to Draft Land and Resource Management Plan (LRMP) and Accompanying DEIS

July 5, 2016

We have attempted to present our comments in a fashion that was easy to follow and reference. Each comment is specific to a line and section within your document.

Those portions of our comments that are highlighted in gray have been identified as formal FOIA requests. We've presented our requests in this manner to reduce paperwork and limit confusion regarding the specifics of our request. We ask that you honor each of these as a specific FOIA request and ask that you provide all responses as one, cohesive set. If digital copies are provided, we ask that each disc provide the requested information, in chronological order and that each disc contain a comprehensive table of contents, and all necessary access data. We would appreciate not having to search through every disc in order to find the information we have requested.

We were very surprised to see that there was very little difference between things like a STANDARD and a GUIDELINES - in fact, other than semantics, there appears to be no discernable distinction between a STANDARD and a GUIDELINE. We find these revelations to be both perplexing and disconcerting.

This is especially true when you consider that our number one, primary objection to the contents of the LRMP is presented as a Guideline (GL). When we voiced our objections to this GL to Forest Leadership, we were told, "don't worry it's only a Guideline - it's not a Standard - it's really just a suggestion". Except that the definition of a GL stipulates: "The project or activity is designed exactly in accord with the guideline;"

We ask, why bother with the distinctions between a Standard, a Guideline, or an Objective - and for that matter, a Desired Condition? Was the intent to confuse the reader? Was it to lull them into believing that only a Standard was "etched in stone?"

Lastly, we were very disappointed when we realized that there are many, apparently intentional, misrepresentations of fact. It was disillusioning to see that there are many Standards and Guidelines that are very strict in their content, yet they are presented in such a manner that compliance or the desired outcome cannot be measured in any meaningful manner (read: objective and replicable). How do you propose to evaluate the compliance with a STD or GL, if the required metrics cannot be measured or identified?

Following are our comments and requests:

For review, during the evaluation of our comments, we've provided the following definitions, as described in the texts of the LRMP and DEIS:

Desired Conditions are aspirations, are not commitments or final decisions approving projects and activities, and may be achievable only over a long period of time.

Guidelines provide operational practices and procedures that are applied to project and activity decision making to help achieve desired conditions and objectives, to avoid or mitigate undesirable effects, or to meet applicable legal requirements.

A project or activity is consistent with a guideline in either of two ways:

1. The project or activity is designed exactly in accord with the guideline; or

2.A project or activity design varies from the exact words of the guideline, but it is as effective in meeting the purpose of the guideline to contribute to the maintenance or attainment of the relevant desired conditions and objectives.

"When deviation from a guideline does not meet the original intent, however, a plan amendment is required."

Objectives: These are concise projections of measurable, time-specific intended outcomes. Objectives are the means of measuring progress toward achieving or maintaining desired conditions.

Standards: Standards are constraints upon project and activity decision making... A project or activity must be consistent with all standards applicable to the type of project or activity and its location in the plan area. A project or activity is consistent with a standard when its design is in exact accord with the standard; variance from a standard is not allowed except by plan amendment.

## Draft Land and Resource Manage Plan COMMENTS

### Climate Change

Line 70: "each year, forest managers focus more on providing quiet, natural places for personal renewal, while emphasizing planning and restoration of forest ecosystems to make them more resilient to changing climates." Our question is: When did the Forest Service change it's Mission Statement ("The mission of the Forest Service is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations"? How does "focusing" on "places for personal renewal" meet that mission?

Line 74: "challenges forest managers face in providing these benefits ("... personal renewal...") include population growth and urbanization..."

Please consider requests within the texts of this document that are highlighted in LIGHT GRAY to all be a component of a formal Freedom of Information Act Request. Information gathered from this request will be made available to the public, at a forum to be held later this year. Thus, this will serve the greater good for the communities effected by the actions proposed in the Draft LRMP and the DEIS.

We request that you provide any and all documentable references (i.e., publications in published literature) or data collected within the counties that fall within the bounds of the Colville National Forest identifying urbanization and population growth within the range of the Colville NF as a management problem. This whole section is nothing but a cut and paste from another document. Couldn't you have at least done justice to the reader by providing an Introduction that is specific to the Colville NF?

Line 137: "Changing use patterns suggest the need to provide more specific infrastructure, such as facilities for large group use"

Please provide any and all documentation that indicates the need for specific infrastructure, such as facilities for large group use, as it pertains specifically to the Colville National Forest.

Line 138 -144: "... damage to riparian areas and unauthorized trail development are of particular concern"

Please provide any and all documentation that you have which numerically substantiates this statement - e.g., documented and measured impacts directly attributable to mountain bikes and off-highway vehicles.

There are lots of Standards (STDS), Guidelines (GL) , Objectives (OBJ\_ that refer to actions that may or may not occur within certain habitat types. Yet, there are no maps provided or even referenced that allow the reader to understand the magnitude of these restrictions. You should provide information that provides the reader with spatial and temporal points of reference. You had room to provide 150 tables, most of which were unintelligible. Yet you can't provide maps that outline the habitat types where all of these restrictions are to occur? This is of special interest to the members of the SCCA - especially as it may overlap grazing allotments. Please provide us with maps that depict all of these habitat types, with overlays.

For Example: FW-STD-WL-07 stipulates that shall not "reduce tree stem densities to less than 500 trees per acre in early structure subalpine fir/lodgepole pine or spruce/subalpine fir vegetationtypes through vegetation management practices..." This requirement effectively precludes livestock grazing within these areas in perpetuity! A stand of > 500 stems per acre will never mature into a healthy stand. The reader has no way of knowing if this elimination of forage base for livestock constitutes 100 acres (in total) or 500,000 acres (in total). From the perspective of the SCCA, this is a critical piece of information that has been intentionally withheld. How are we to know which areas are effected by this management direction unless a map with accompanying acreage figures - please provide that information

One must assume that there is a viable reason that the US Fish and Wildlife Service precluded the establishment of Designated Critical Habitat on the Colville. In fact, that reasons was that there simply is not enough evidence of Lynx usage, either present or historic, to justify such severe restrictions. Yet the Forest has taken it upon itself to effectively exclude livestock, timber management, and recreation within these areas, ostensibly to protect Lynx - when the federal regulatory agency charged with the preservation of this species has effectively said that not enough is known about usage or distribution of the species to designate critical habitat. How can the Forest justify exclusion of the public and permitted usage without justifying documentation?

FW-STD-WL-04 "Allow no net-increase in groomed or designated over-the-snow routes into lynx habitat at the lynx analysis unit scale." Again, there is no unit of scale provided for the reader. You have not identified (in total acres or proximity) what constitutes a "lynx analysis unit scale" anywhere in this text - except to say that "per individual lynx - this area ranges from 25 to 50 SQUARE MILES. Since you have no idea how many lynx might be on the Forest or where they might be, or even when when - that type of restriction could preclude an extremely popular recreational activity (snowmobiling) over vast ranges of the Forest. Yet the magnitude of these potential restrictions have been intentionally hidden from the reader with the use of vague and undefined language and the failure to provide definitions within the text of the Standard.

Line 250-265: It seems as though the Forest is willing to consult with anybody and everybody - even an Indian Tribe with no Treaty and no ceded rights within the boundaries of the Forest - Yet in this entire paragraph you neglect to mention consideration or any consultation with the Counties (i.e., County Commissioners) that fall within the bounds of the Colville National Forest. That failure to recognize the importance and stature of County Government was blatantly highlighted when the Stevens County Commissioners provided detailed comments prior to the release of this Draft Plan - and the Forest failed to consider those comments in the preparation of this documents.

Line 674 - Table 1: This table is full of "Desired Conditions" that are either not attainable or not reasonably measured (or both) and therefore lacks validity and serves no other purpose than to confuse the reader into believing that the Forest will have some way of attaining or measuring these parameters.

For Example I: "Root growth, both vertically and laterally, is not impeded by land management actions" Any land management action (e.g., road building, recreational facilities, hiking trails, timber harvest, mushroom collecting) will impede root growth to one degree or another.

Example II: "The soil acts as a filter and buffer to protect the quality of water, air, and other resources by immobilizing, degrading or detoxifying chemical compounds or excess nutrients.

Example III: "The soils's ability to store carbon is not reduced from current levels" - which, by this statement, seems to make the assumption that current levels are desirable and/or representative of the historic range of variability. Sadly, the rest of this document portrays the Colville in, essentially, a significantly degraded state. So, that leaves one to wonder how something as complex and fragile as carbon sequestration could remain at desirable levels throughout the Forest.

CRITICAL POINT: I take the time to make these points here, because this plan is fraught with dozens of Stds, GDL's, OBJ's, DC's that are immeasurable or cannot reasonably be monitored or numerically evaluated at a scale sufficient to calculate conditions across the Colville NF landscape. Making these statements to the public implies that the Forest will be able to attain these objectives and monitor/measure their success of attainment. If the Forest states that these objectives (whether a Standard or a Desired Condition), then the public has the right to reasonably expect that the Forest will be able to monitor and evaluate progress toward attainment. By stating objectives that cannot or will not (due to economic constraints, personnel constraints, or inability to employ effective and replicable monitoring methodology) the Forest is intentionally misrepresenting it's intentions and intentionally misleading the public.

All of these statements regarding Stds, GDL's, OBJ's, DC's need to be withdrawn from the Final Draft or modified in such a way that they depict real and tangible objectives that the public can reasonably expect to be attained or at least evaluated. Making promises or filling the collective heads of the public with expectations that cannot possibly be attained or evaluated is a condescending act of Bad Faith and represents a Fatal Flaw that is prevalent throughout this entire document. By definition you cannot stipulate a Standard that cannot reasonably be measured because the public will have no way to know if the Standard is being attained - ditto with GDL - since they are essentially the same as a Standard.

This entire section is nothing but "cut and paste" of verbiage that depicts conditions or imparts expectations that cannot be reliably measured or monitored across the landscape. We insist that it be completely re-written or wholly deleted.

Line 676 - 679; FW-DC-SOIL-02: "Surface erosion rates are within the natural range of variation for a given biophysical setting. There is no degradation of aquatic habitat and water quality from surface erosion rates resulting from permitted uses and management actions [Incomplete sentence]. Ecological and hydrologic functions are not impaired by soil compaction." This is another example of giving the public an expectation that cannot possibly be attained or measured or evaluated at a landscape level. It's deceitful and intentionally misleading expectation. More importantly, if it were to be attained it would preclude virtually all management actions and all recreational uses by the public. It's a wonderful "motherhood" statement except that it is intended to deceive - and Mothers do not deceive their children! Seriously, folks, there is no excuse for intentional deception!

Line 689-695; FW-GDL-SOIL-01: Total Soil Resource Commitment. There is no context to this statement: The

Total Soil Resource Commitment is no more than 5 percent of the forest. For it to have context, the Forest would have to divulge the status of the current Total Soil Resource Commitment. Except that I'm pretty dad-gum sure that the Forest has no idea (within + 1%) of the current Total Soil Resource Commitment. This is another example of making statements with no tangible meaning for the reader - except to imply that the Forest has the ability to accurately track and monitor these parameters.

Line 760-764: "...The historical range of variability for forest structure is the desired condition" - "Historical range of variability will be evaluated on National Forest system lands at the appropriate scale given vegetation type and natural disturbance history". This implies that you do not have definitive descriptive and measurable data to describe the historical range of variability for all forest types encountered on the Colville - but clearly states that you will [immediately?] begin these analyses so you will know if these expectations are being met? Is this true or is this just another attempt to deceive the public into believing that you know things and/or are going to ascertain facts that will enable you to measure movement toward the Desired Condition. Do you guys remember the old TV Show "Dragnet"? I suggest you follow those famous lines from that show "Just the Facts please -Just The Facts". Throughout this proposed plan the Forest has done little to provide facts, but has gone out of it's way to deceive and mislead the public. Please stick to the facts. Don't say you are going to do things that you are not or cannot and don't set attainment goals that you cannot possibly measure or monitor! THESE FAILINGS HAVE TO BE CHANGED IN THE FINAL ITERATION!

Line 782-800; FW-DC-VEG-07-09: Another example of impartation of unattainable expectations to the public. Do you REALLY expect to collect seeds and genetic material from every plant on the forest and store them someplace for "climate change provenance trails". It's a ridiculous statement. Ditto with VEG-09. The Forest already has unmanageable populations invasive species and they are growing daily. Yet, you are telling the public that "we expect" to be in a condition (presumably within the life of this plan) that will resist the establishment and spread of invasives. Do you not believe that it is important to provide the public with a realistic picture of what can be REASONABLY EXPECTED as a Desired Condition, within the life of this plan? I'm going to say it again and I'll probably say it 100 more times - THIS IS A DECEITFUL PRACTICE THAT IS INTENDED TO MISLEAD THE PUBLIC - STATE DESIRED CONDITIONS THAT HAVE A REASONABLE POSSIBILITY OF ATTAINMENT - ANYTHING SHORT OF THAT IS ESSENTIALLY A LIE!

Line 819 - 831; FW-DC-VEG-13: This directly contradicts 793-818, which constitutes a Fatal Flaw in the plan. Also, this will deleteriously effect TES spp within this management area. Which is more important? Did fire collaborate with biologists and botanists in the development of these criteria? Most of the wildland-urban interface language directly contradicts soils and veg DFC's and OBJ's.

Line 858-859; FW-OBJ-VEG-03: "Within 15 years of plan implementation, control an average of 2,000 acres per year."

Please provide us with any and all data and copies of documented methodology that the Forest intends to use - that is effective enough to meet these objectives - that will not necessitate broad scale use of herbicides or have averse effects on TES spp. This is an Objective (see below) - it is something that the public can expect to happen - not just a dream. How are you going to get there from here? You guys should have a whole separate section or category entitled "I have a dream" - because that is all most of these DC's and OBJ's are - dreams - dreams stated as reasonably attainable expectations that are designed to mislead the public! It's going to be fun watching you explain this to a Judge!

"Objectives: These are concise projections of measurable, time-specific intended outcomes. Objectives are the means of measuring progress toward achieving or maintaining desired conditions".

Line 872; FW-STD-VEG-02: Threatened, Endangered, and sensitive Plant Species - Surveys: Surveys for threatened, endangered, OR sensitive plant species shall be (WHICH, IN GOVERNMENT LINGO MEANS

ABSOLUTELY REQUIRED) conducted in suitable habitat on National Forest System lands before habitat disturbing activities to identify and protect vulnerable populations. All existing sites are identified and managed to support rare species recovery on National Forest System lands. Suitable habitat shall be managed to enhance or maintain rare species occurrences on the Forest"

This constitutes a stated requirement to conduct intensive and non-exclusive monitoring surveys across the Forest prior to allowing essentially any management action (or activity - including recreational pursuits) - that could potentially be habitat disturbing. Our concern centers on permitted cattle grazing - but the words "habitat disturbing" would necessarily include activities such as mountain biking, hiking, hunting, fishing, horseback riding, ATV use, camping, forest product gathering (e.g., firewood collection), and virtually all other activities that currently occur on the Forest! This is a statement that we are going to repeatedly announce to the public and present to the Regional Forester - as an example of unattainable and immeasurable.

I was once in court when an "Expert" from a Federal Regulatory Agency stated that there is no such thing as No Affect. He made the analogy that a person walking on a ridge could dislodge a stone, that would roll down the hill, dislodging other stones or fine material, and that would eventually wind up in a stream, which would have an adverse affect on a listed species" - That is a matter of Court Record! This STANDARD could effectively preclude ALL FOREST ACTIVITIES across the Forest - essentially forever - because it's highly unlikely that all botanical catalogues will ever be completely "caught up" with all the surveys, monitoring, and inventories this standard will precipitate!

Additionally, we ask that the Forest consider that many of these surveys, monitoring, and inventories will have to be conducted on an annual basis, in order to maintain accurate catalogues of information regarding population spread, establishment of new populations, and changes in biotic condition and trend of known populations. All of this information will need to be fully compiled for each and every activity on the Forest that could possible disturb habitat . THIS IS A "STANDARD" AND BY DEFINITION "A project or activity is consistent with a standard when its design is in exact accord with the standard; variance from a standard is not allowed except by plan amendment."

CRITICAL POINT: This is a classic example of a standard (from this DEIS/Draft LRMP) that is unattainable. It is not conceivable that these inventories, species identification, and continued monitoring and cataloging could be kept accurate and up-to-date - nor could they be completed (in a timely manner) to allow the implementation of the wide array of Forest Management activities and/or uses that occur across the Forest, on an annual basis. Because of this, we ask that this standard be DELETED FROM CONSIDERATION and INCLUSION in these texts. Affirmation of this standard will greatly impede and essentially preclude most forest current management practices and public uses.

How will these surveys be completed, prior to turn-out? This is a Standard - which means it SHALL BE DONE! How will these be completed across (58 ALLOTMENTS??) by 2017. You're talking about 100's of thousands of acres! These acres will have to be -re-inventoried on an annual or bi-annual basis, because new populations could emerge at anytime - there are thousands of seed dispersal vectors on the Forest. This standard has to be stricken or the Forest is REQUIRED to notify the public that, with the implementation of this plan, grazing and most other forest uses that could "possibly" disturb habitat (intentional or not) will no longer be allowed until comprehensive surveys are completed. By definition a foot print, near a sensitive plant, would necessarily constitute disturbance - there goes opportunities for hiking or bird watching or hunting.

FOIA REQUEST: Please provide any and all information regarding the total numbers of Threatened, Endangered, or SENSITIVE plant species that are found across the Forest? For each species, please provide any and all information regarding the specific stages in their life history at which they visible, accurately identifiable, and vulnerable to any type of disturbance - certainly they are not all visible, accurately identifiable,

and potentially vulnerable to disturbance from various forest uses and management practices at the same time! Also, and specifically, at what state in their life history might they be vulnerable to impacts from livestock. Also, please provide any and all information you have regarding the locations of known populations of each and every Threatened, Endangered, or Sensitive plant species, the locations of potential habitat that has not yet been surveyed and/or inventoried, and the relative abundance of each species at each location. Surely this information should be readily "at hand" in some form of data base, for each specialist charged with managing the various life forms (e.g., botanists, biologists).

I am simply asking for copies of any and all information that you have (which would, in turn be used in the evaluation of current or proposed management activities or uses, such as livestock grazing). I am not asking that you disclose exact locations if legitimate and documentable concern exists that disclosure of exact information may jeopardize the continued viability of those populations. I AM asking for this information to be provided at the highest level of resolution possible, so this information can be discussed and reviewed at a public forum regarding the Proposed LRMP and associated DEIS - so it's important, to further the public knowledge, that this information be provided in as complete a fashion as possible and with the greatest level of resolution. What we need is any and all information that you have which would (or could) be used directly in the assessment of potential impacts from various forest uses (e.g., camping, packing, livestock grazing, ohv use, forest products utilization). As stated previously, the information provided from this FOIA will be disseminated to the public, free of charge, at a public forum, to be held later this year.

Line 884 - 886; FW-STD-VEG-03: "Prior to entering National Forest System lands, clean all vehicles and equipment that will operate outside of the road prism for actions authorized or conducted by written permit to remove invasive plant seeds and plant material"

While this STANDARD seems laudable, on the surface, upon complete consideration it is extremely problematic. How do you propose to accomplish this task? Will you set up permanent washing stations at all (most) ingress/egress sites surrounding the Forest? Will inspectors be present at all of these sites to ensure that they have all been adequately cleaned? What constitutes a vehicle (mountain bike, wheel chair, stroller, cart pulled behind a hiker, horse, mule ?) There are innumerable instances where individual(s) would have a permit to go outside the road prism and they may choose to utilize a variety of "vehicles" to accomplish those uses.

While there are a number of activities that could legally operate outside the road prism (a term you didn't bother to identify in the Glossary.) Our biggest concern is the use of OHV's, trailers, pickup trucks, or other equipment necessary to the management of a grazing allotment by permitted users. This standard would require that they thoroughly clean presumably have their vehicles inspected (that's what's done during a project - like fire camp) each and every time they enter National Forest System lands.

As a STANDARD, this is an unyielding requirement. As such, and as written, it would place an extremely expensive and time consuming burden on forest users such as livestock grazers, miners, forest product collectors. This is also a standard that cannot possibly be implemented with any level of credible documentation for the public (thus making you and ALL users subject to litigation). If you aren't able to demonstrate that you (the Forest) are not administering this standard to ensure compliance, you are subject to litigation by any interested public who does not wish to see forest uses on public lands. You CANNOT stipulate a STANDARD that you cannot possibly administer and/or assure some level of compliance. This needs to be re-written as an objective, and provision made to provide washing stations for ALL forest users who may have need to venture outside the road prism. SECONDLY, and just as importantly, why would you limit this sort of requirement to users who venture outside the road prism? Is it OK to spread noxious plants or invasives around the Forest, as long as it's within the road prism?

This is yet ANOTHER example of placement of a STANDARD that has not been thoroughly thought through, or reviewed by top level management to ensure that it is practicable, reasonable, and that the effectiveness of



implementation can be documented. This has to be removed or thoroughly re-written in a manner that incorporates the concerns that we've outlined above.

Please provide all necessary information describing exactly what will meet the requirement for "cleaning all vehicles" and provide us exact policy direction that stipulates how this standard will be monitored and enforced - where, when, and how will be vehicles be inspected? By whom? How will they be trained? How will exceptions be made for those with permitted grazing rights?

Line 936-940; FW-GDL-VEG-01: "Grazing management (including timing, intensity, duration, frequency of use, and type and class of livestock) should allow for completion of threatened, endangered, and sensitive plant species annual life cycle and development and dispersal of reproductive materials like seed and spores. Salting or water developments should not be authorized or allowed such that they reduce threatened, endangered, or sensitive plant populations."

"A project or activity is consistent with a guideline in either of two ways:

1. The project or activity is designed exactly in accord with the guideline; or
2. A project or activity design varies from the exact words of the guideline, but it is as effective in meeting the purpose of the guideline to contribute to the maintenance or attainment of the relevant desired conditions and objectives."

According to the Forest definition of a guideline, it is essentially a standard that must be adhered to - "exactly." Full and exact implementation of this GDL could have the effect of precluding or significantly reducing the ability of holders of grazing permits to exercise their rights (as defined by the Supreme Court.) As stated with Line 872; FW-STD-VEG-02: This is yet another example of a requirement (from this DEIS/Draft LRMP) that is unattainable. It is not conceivable that these inventories, species identification, and continued monitoring and cataloging could be kept accurate and up-to-date - nor could they be completed (in a timely manner - on essentially an annual basis) to allow permittees to exercise their grazing rights.

Permittees cannot be expected to have the botanical expertise necessary to identify any and all Threatened, Endangered, or Sensitive species that could occur on their allotments and determine if a "species annual life cycle and development and dispersal of reproductive materials like seed and spores" has begun or been completed, across the entirety of their allotment, at any given time and in spatial context. If the permittees cannot be expected to accomplish these tasks, then it will be necessary for the Forest to ensure that trained botanists or technicians will be available to "clear" all pastures prior to turn-on, and continually monitor during the grazing cycle, in order to ensure that various portions of the life cycles of all TES plants (that could conceivably be encountered within the allotment boundaries) may have commenced or been completed. How does the Forest propose to cover the costs for legions of trained botanists and technicians to swarm the Forest throughout most of the grazing season?

Please provide comprehensive descriptions, including strategies and prioritization schedules regarding how will these surveys be completed, prior to turn-out? How will these highly complex evaluations (e.g., determining when maturity and dispersal of a spore cycle is complete) be completed, annually? You're talking about 100's of thousands of acres across 58 allotments! These acres will have to be -re-inventoried on an annual or bi-annual basis, because new populations could emerge at anytime - there are thousands of seed dispersal vectors on the Forest.

Also, what constitutes "completion" of "dispersal of reproductive materials like seed and spores?" Once plants have "set seed" or dispersed spores is the cycle complete, will grazing be allowed, or must the permittees wait until the reproductive components have become "entrenched or settled" in the soil in an yet-to-be identified

manner?

**CRITICAL POINT:** This requirement must to be stricken from this document. The incumbent commitment of human resources is unattainable and unaffordable and the consequences to grazing permittees and economic penalties to the communities exist at an unacceptable scale.

IF the Forest chooses to critically constrain grazing and the economic lifeblood to these communities, it is **REQUIRED** to notify the public - in a clearly stated and identifiable manner - that, with the implementation of this plan, grazing will be significantly and irreparably constrained **AND**, during your economic analysis, the Forest **MUST** depict to the public the economic consequences represented by the loss of ranching and all supportive agriculture (e.g., agriculturally based commodity production) across all communities effected by this Forest Plan!

Because of the un-attainable nature of these requirements, and considering that program-wide implementation of these stipulations would likely preclude grazing or restrict the effective utilization of vested grazing rights to the point that it will no longer be economically feasible, we ask that this standard be **DELETED FROM CONSIDERATION and INCLUSION** in these texts. Affirmation of this standard will greatly impede and essentially preclude grazing across a large segment of the Forest landscape.

Line 1035: Please define "Active Restoration". This is a big statement and implies large scale, in channel and/or mechanical intervention. These types of activities are extremely expensive, inherently cost ineffective, and intrinsically prone to high incidences of failure. This needs to be disclosed to the public - in a clear, concise, and unbiased manner, so that they can reasonably understand the potential impacts of these proposed activities.

Please provide us with any and all data that encompasses "active restoration" activities that have been implemented across the Forest (excepting culvert replacement or upgrades). Please include costs per structure, on a reach-by-reach basis. Also, please include summaries of professional expertise on the Forest (e.g., specific training and certification) that will enable them (forest employees) to employ active restoration techniques (such as placement of woody structures, barbs, pool creation, and all manipulations that will occur within the active channel and adjacent riparian areas.) so that the public will have reasonable expectations that these projects will represent a reasonable use of public funding with a high expectation of success and tangible results.

Line 1050: This is the first mention of "Focal Species" and, as has become the norm in this document - the use of technical - specialist specific verbiage is spread throughout. This language is so specific to the specialty that the Forest should not expect the average reader to have tangible understanding of the meaning of these words and phrases. A NEPA document is supposed to be composed in a manner that allows the average reader to understand what is being proposed and be able to evaluate the potential consequences. When you rely on language that is outside the range of normal understanding, you intentionally inhibit understanding by the public. These problems are significantly exacerbated when the various authors refuse to take the time to include definitions of these words and phrases in the glossary! Replace these technical terms that are liberally sprinkled throughout the document or provide a parenthetical definition with each occurrence, so the reader has opportunity to understand the depth and breadth of what is being proposed.

Line 1055 - 1058: This section directly contradicts 1026 - 1031! Also, this implies that "partners" with significant influence will be given preferential treatment for their "pet" projects and interests. This is contrary to the common good for the public in general. It provides a venue for the Forest to give deference to select groups in an unequal and bias manner. Unless there is a clearly stipulated and rigidly followed set of criteria that allows the Forest to consider **ALL** recommendations from **ALL** "partners" - in an equal and unbiased manner, the Forest should immediately curtail these discriminatory practices!

Line 1084 - 1086, including Figure 6: This "table" is useless. The reader cannot differentiate the difference between the "rating" parameters. The language imparted in association with this Table demonstrates pre-existing bias. Impairment does not equal Non-function - as presented therein.

Please provide us with any and all information that explains (from the perspective of the "Watershed condition framework ratings" what constitutes a threshold? How is that measured in a replicable and standardized manner? Please provide data that demonstrates the need and magnitude of scale for which a threshold must be exceeded - before a designation or action is triggered. Please provide copies of the methodology that is used to evaluate these criteria at the sub-basin level. Lastly please provide copies of the decision framework, including the distribution specialist participation - to ensure an interdisciplinary approach has been and is being used in these analysis - across each sub-watershed.

Line 1186; FW-OBJ-WR-02: This language means nothing, as written. Please provide the reader with a few examples - name a few sites - explain the conditions - what will be proposed - and how this will potentially affect public access and enjoyment! This is of critical importance to the public sector that actively enjoys and utilizes their National Forests

Line 1205 - 1215 FW-OBJ-WR-05: This could effect/limit/curtail all management activities, including grazing and recreation. You've identified ½ of all the watersheds on the Forest as "key watersheds" that are a "priority for restoration." That does not reflect any sort of meaningful prioritization! We strongly suggest that you actually prioritize - i.e., "this is our first priority, this is our 2nd priority..." and implement restoration needs as appropriate. When you identify ½ of the Forest as a priority, you've identified NOTHING. But, you give the Aquatics Program license to implement anything that strikes their fancy - because it's a priority area! This type of language demonstrates to the public that the Forest really does not have any idea where the most important issues lay and what should be done to address them. You're essentially calling everything a priority and not identifying any decision framework or process for selecting actions to address the highest priorities! It's ridiculous and disrespectful of the public interest!

Line 1257, FW-STD-WR-03: This is an unattainable standard. "There shall be no net increase...at any time in the mileage of National Forest System roads..." This states that if a road is being built - a commensurate mileage of existing road must SIMULTANEOUSLY be decommissioned. This is especially ridiculous since fully ½ of the watersheds across the Forest are considered "priority" watersheds. The maintenance and development of a useful transportation system provides access for the public to their public lands. The needs of the public need to be considered before removing access.

Also, grazing permittees rely on these roads for accessing their permits and exercising their vested rights on the Forest. The roads are used for trailing livestock from pasture to pasture. If key trailing routes are closed, then the permittees may be left with no choice but to drive stock through more sensitive areas - creating problems that they actively wish to avoid. It is critically important to the permittees to protect and maintain the health & vigor of these lands and waterways. Their needs need to be carefully considered prior to closing any road on the Forest!

Line 1350, Table 9: The MacGillivray's warbler is identified as a management indicator and focal species for evaluating the effects of grazing "understory effects". If this is truly a viable indicator of grazing effects, then please provide us with any and all data that displays all past monitoring for MacGillivray's warbler. Please provide us with any and all data regarding the current base population, population trend and distribution across the Forest? Please provide us with clear descriptions of all methodologies that are utilized to monitor this species across the Forest. How often does monitoring occur (i.e., at what intervals), how are locations selected (i.e., is this statistically randomized sampling or targeted), if it is targeted how and why are the targets selected. If it's random, please provide us with all statistical monitoring and population modeling data that has been collected.

Lastly, please provide us with a comprehensive depiction as to how these data will be utilized and a complete description as to how livestock may impact which life cycles of the warbler. Most importantly, please provide us with all available insight as to how these data will be utilized to affect grazing management across the Forest.

Line 1393; FW-DC-WL-09: ALL livestock livestock use is regulated. There is a difference between authorization and regulation.

The author of this section should receive training in technical writing, sentence structure, and the proper use of the abbreviations i.e., & e.g., in the context of a parenthetical phrase. This entire section is so poorly written it's hard to follow.

Line 1442 - 1446 & Table 13; FW-STD-WL-01: "protect all known active nest sites below from human disturbance caused by management activities during the following periods to reduce the risk of nest abandonment or decline in productivity"

(We ask that you please review the above "sentence" structure and consider our previous comment regarding the need for training - it's not unreasonable for the public to expect resource professionals to be able to write in a manner that is grammatically correct and structurally articulate.)

What does this mean? How would this be applied if one of these species was located within the boundary of an active allotment? Would it preclude the permittees from managing their livestock?

This is a STANDARD, which means that the direction must be followed exactly! Please provide us with any and all data that will be referenced and utilized to decide what constitutes "human disturbance" as it pertains to these species. Please provide us with copies of the framework(s) that will be followed in determining midigatory actions to be followed in an instance where a permittee is tending to their cattle while potentially in proximity to one of these nest sites. We're looking for documented forest policy direction, FSH direction, or clear direction taken from refereed literature - not speculation on the part of a specialist. It's important that we know exactly what this means and what the potential actions may be should these circumstances develop.

Line 1458; FS-STD-WL-04: This STANDARD appears to be unnecessarily restrictive to forest recreational users, especially OHV (snowmobile) users. It appears that the author determined that ski areas, mineral exploration, and logging will have no significant affect on lynx, but OHV use will have significant affects.

Please provide us with copies of all refereed literature that was utilized to make this determination. Specifically, we are looking for peer reviewed literature that concludes that concentrated and repetitive disturbance from commercial activities (such as mining and logging, and intensive use and snowmobile operation at ski areas) have no affect on lynx, but incidental recreational operation of an OHV, while simply passing through an area, will have an adverse affect.

Please remember these are public lands. It's not OK to preclude incidental public use of these lands based on a whim or a perceived potential affect. OHV use is a viable use of the resource, and study after study has demonstrated that proper use of over-the-snow OHV's (snowmobiles) will precipitate no measurable effects as a ground disturbing activity. If the author is trying to restrict incidental public travel through these areas, based on disturbance factors, we request that the Forest provide any and all documentation (especially that which has been subjected to peer review prior to publishing) with conclusive evidence that disturbance from sustained commercial activity has no affect on lynx, while minor disturbance from occasional recreational use will result in adverse affects. If you don't have strong documentation to defend this huge restriction of recreational activities, you'd better be prepared to remove this from the final draft.

We have observed numerous instances, throughout the texts of these documents, where STANDARDS, or otherwise significant restrictions, have been placed on public or commercial use of public lands, with little or no scientific documentation to back these demands. Restrictions of public use on National Forest Lands should be

minimized wherever possible. When restrictions are necessary, they should be to the least extent practicable and be backed by sound, well documented scientific research. These are not National Parks. They are public lands that are managed under a multiple use doctrine. We ask that you keep this fact in the forefront of your collective minds while developing this LRMP, and before implementing restrictions to public access and use!

Line 1468; FW-STD-WL-06: This STANDARD pertains to all lynx habitat. "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 through vegetation management practices..." This STANDARD will effectively preclude livestock, in perpetuity, across all "identified" lynx habitat. This will have a significant long term negative effect on those permittees who hold grazing permits that overlap into "identified" lynx habitat. The effects of these restrictions will result in severe economic impacts to individual ranchers and the economic stability of the communities as a whole.

We're very concerned that the Colville NF has chosen to implement strict vegetation management strategies, which will certainly result in the development of "explosive" fuels for wildfires and cause severe economic hardship for individual permittees and the community as a whole. These severe and costly restrictions are even more perplexing when one considers that the USFW, the agency charged with the protection and management of listed species in the United States, determined that lynx presence and usage of these Forest lands, was so minimal and incidental that there was no warranted cause for them to identify Critical Habitat. Yet it seems that the Forest is intent on going above and beyond the protections deemed necessary by the regulatory agency, when it comes to precluding use of these public lands - often for no good (read: scientifically documented) reason.

There is a reason that few lynx are found on the Colville NF. The Forest lies on the extreme southern end of their historic range (Pers. Comm., USFWS) and it's likely that there have never been significant numbers of lynx in this area. That is one of the reasons that the Service chose not to designate critical habitat. We ask that you provide us with any and all scientific documentation and peer reviewed literature that was used to develop these severe and costly restrictions. Please provide us with maps (with grazing allotment boundary overlays) that depict all "identified" lynx habitat on the Colville National Forest. In addition, please provide us with total acreage figures, for each lynx habitat area across the Forest, that will be subjected to this STANDARD. As stated previously, the information provided from this FOIA will be disseminated to the public, free of charge, at a public forum, to be held later this year.

This STANDARD will have significant impacts for permittees, timber management, wildfire control and containment, community economic stability, and recreational opportunities. We ask that this standard be deleted or re-written in a manner that is consistent with the best management of this forest and the public interest. We are not asking you to take actions that will further imperil a listed species. We are, however, asking that you absolutely justify the implementation of severe restrictions, which will cause significant hardship across a broad spectrum of forest users and surrounding communities. These whimsical restrictions may have some benefit (to listed species) and they may not. It's particularly upsetting when you force the public to forfeit use and sacrifice economic stability and well being, to provide marginal habitat, on "fringe range" for a species with an historically minimal presence!

We ask that you keep these facts in the forefront of your collective minds while developing this LRMP, and before implementing restrictions to public access and use of OUR public lands!

Line 1947 - 1948; LIVESTOCK GRAZING: "Plan components apply to both commercial and recreational grazing unless specifically stated otherwise."

The SCCA vehemently disagrees with this statement. Recreational grazing should have higher (more restrictive) standards than commercial. Permittee's rely on the availability of forage and are held to strict standards when it

comes to things like riparian conditions. Recreational users should not be allowed to utilize forage to the point that standards are met or exceeded. This would preclude planned and needed use by permittees who have paid for and depend upon the availability of these forage resources. Secondly, and often more importantly, recreational users tend to concentrate livestock (usually riding and pack stock) adjacent to open water ways. They are regularly tied or penned up in such a way as to provide open access to water. These activities can severely degrade riparian components and the cattlemen will pay the price for such degradation. The members of SCCA are diligent in their efforts to manage their livestock in a manner that is productive for them while managing use so that it falls within expected parameters (e.g., residual stubble height, stream bank impacts). If recreational users are allowed to utilize these resources up to threshold limits, there will be nothing available for those with vested and permitted grazing rights on the Forest. They should have a documented priority of use!

#### RIPARIAN MANAGEMENT AREAS (RMA)

This marks the beginning of a section that the SCCA has found to be fraught with prejudice, unsubstantiated statements, misleading comments, and requirements or restrictions that cannot possibly be attained or effectively monitored.

The author of this section begins by stating "Livestock grazing has been the most important factor leading to bank damage, conversion of riparian vegetation species to upland species or non-native species, and sedimentation." Not only is this statement untrue and grammatically disgraceful, it displays extreme prejudice against livestock grazing. For the author to make such a contemptuous proclamation of fact, without backing their words with credible literature citations, is reprehensible.

FOR RF

PLEASE provide any and all documentation, as found in refereed (published and peer reviewed) literature that specifically - that means word for word - documents the conclusion stipulated above! This is important, and we expect explicit attention to be paid to this request. We also require documentation that any literature provided was in your possession - prior to publishing this draft. You cannot make condescending and damaging assertions and then run to find something - anything that may justify the making of that statement. That's not how science works. You cannot demean an activity and assign blame, if you do not FIRST have the research in-hand to document the statement!

The public has the right to expect these documents to be constructed and presented in a manner that is without partiality. Indeed, we have the right to expect all NEPA documents to be presented in a fashion that is truthful and forthcoming in content! That gravity of these expectations are intensified when considering an LRMP that will guide and stipulate all management practices for more than a decade!

We ask that the deciding official (Jim Pena) to take quick, decisive, and punitive actions regarding these contraventions of public trust. A large cross section of society is rapidly losing faith in the Forest's ability or desire to manage these lands in a manner that is reflective of its Mission Statement! We believe that it's compulsory for regional leadership to demonstrate that this sort of prejudice shall not be condoned and that transgressions of this magnitude will not be tolerated! If Mr. Pena decides to take no action regarding these intentional improprieties, then we insist that he provide written explanation as to why he has chosen to condone these intentional efforts to mislead the public.

Line 2675 - 2680; RIPARIAN MANAGEMENT AREAS: Constructed ponds and reservoirs are wholly man made structures that are intended for a consumptive use! Most of these reservoirs were constructed specifically for livestock use, and livestock has used all of them, regularly, since their creation. They were built by cattlemen specifically for use by their livestock, and they have been maintained for decades to ensure that resource is available, when needed. The fact that riparian vegetation is present in association with these structures is testament to the fact that the cattlemen have managed their integrity in an environmentally conscious manner - since their establishment. Wildlife, aquatic species, and plant life (submergent, emergent, and riparian) have all

benefited from the presence and continued maintenance of these structures. There is no reason to expect that the continuing use of these structures (by livestock) will change or diminish the integrity of these creations in the future.

There is absolutely no justification to restrict livestock access to these structures, at this juncture. They were built for an explicit purpose and have been maintained with integrity and care! If it were not for the foresight, hard work, and dedication of the cattlemen, most of these structures would not even exist. We insist that this restriction be fully removed and open access be restored to those who created them!

Line 2735; MA-OBJ-RMA-01 "... at 50 dispersed and developed recreation sites..." How was this number established or selected? Was it simply pulled out of thin air? We are concerned because there is a thinly veiled objective, within this management segment, to limit, reduce, or eliminate recreational opportunities adjacent to waterways, of every kind, shape, and form. The phrase "...restore riparian processes and balance need for occupancy and access to water..." Provides insight into the hidden desire to preclude public access, use and enjoyment of water across the Forest. With the establishment of this objective, there is a clear intention to, at a minimum, restrict the public from 4-5 established recreational sites PER YEAR, across the Forest! The SCCA advocate truth and open disclosure from the Forest. If the intention is to restrict (read: close) 4-5 established recreational sites, per year, for the life of the plan, then just come out and say it in plain English, so the reader can understand the true intent! And, if the intent is to kick the public off of public lands, at sites they have come to love over the years, the Forest should also recognize that, by in large, these sites (especially the dispersed rec. sites) are used primarily by local members of the community!

We request that you provide any and all objective (i.e., numeric and statistically evaluated) data that has been utilized to identify the sites slated for closure - or restricted access. Please provide all objective monitoring data, comparative reference data (with compatible analysis features), and site condition and trend data that is (or will be) utilized to evaluate these sites. Then, please provide us with a structured, chronological, prioritized (hierarchical) list of recreation sites that have been identified for closure or restriction. If those data, surveys, and prioritized lists do not exist, then how do you justify the establishment of 50 sites as a desired objective? How do you know that there aren't just a few dispersed recreation sites that are even in need of some sort of attention? Please provide us with any and all data, meeting notes, field notes, selection criteria, and, as mentioned objective or subjective data that identifies the need for the establishment of this Management Objective. As stated previously, the information provided from this FOIA will be disseminated to the public, free of charge, at a public forum, to be held later this year.

If all of the aforementioned justifications do not exist, then you must delete and omit this MA-OBJ from this document, for lack of identifiable reason and public accountability!

Line 2745 - 2754; MA-STD-RMA-01: The existence of this STANDARD is testament to the fact that the author does not have a sound working knowledge of Properly Functioning Condition, how it is developed, and what it means - OR, IS MOST LIKELY evidence that the author is intentionally deceiving the public and Forest Leadership. For reasons that I'll outline below, WE DEMAND THAT THIS STANDARD BE DELETED AND WHOLLY REMOVED FROM THIS Draft LRMP - for reasons outlined below!

A STANDARD, by definition is something that is measurable. For data to be measureable, it must be collected in a completely objective (meaning numeric and lacking in subjective or bias speculation.) Objective data, which is the foundation of science, is collected using standardized, objective methodology that, when collected properly, can be accurately replicated by trained personnel! It is a unit of measure.

Properly Functioning Condition Assessment (PFC), as described in footnote 8, at the bottom of page 99, is a process developed by the BLM to qualitatively assess riparian conditions. It's an imprecise method of estimating current conditions regarding riparian communities and channel condition. That is why it's called an assessment

and not an analysis!

To properly conduct a PFC assessment, it must be done in an interdisciplinary team (IDT) environment. A PFC assessment is of little value, if the assessment is conducted by personnel who may, intrinsically, share the same biases. A good PFC assessment is conducted while utilizing as broad a cross section of personnel as is practicable. The principle value of a PFC assessment is to stimulate conversation and understanding between specialists (or personnel) of differing backgrounds and dispositions (pers. comm, Pritchard.)

A PFC assessment cannot be replicated. Few measurements are taken during a PFC assessment, and there is no requirement to do so. People with different backgrounds will have different perspectives and opinions. That is the true value of PFC, to help all participants to see resource conditions and values through "each others eyes" - in other words, to learn and gain perspective.

With those facts about PFC understood, it is clear that a riparian management STANDARD cannot possibly be based upon a PFC assessment. I've personally been involved in dozens (possibly hundreds) of PFC assessments in my lifetime, and I've taught the methodology to many groups. There are really only three outcomes that may come from a PFC assessment. The assessed stream segment may be judged as:

\*Functioning or Fully Functioning - meaning everything is just about as good as it can get. The conditions are reflective of reference conditions one would expect to find in the total absence of man. Outside of wilderness areas that have been in true wilderness for many decades, it's rare (but certainly not unknown) to judge a stream as Fully Functioning.

\*Functioning At Risk - meaning that the system is functioning and providing for most resource values and conditions in a reasonable manner. The overwhelming percentage of PFC assessments result in this conclusion. Things are working pretty good, but there is room for some improvement.

\*Not Functioning - meaning the system is almost wholly lacking in desirable riparian vegetation, and the channel form is unstable and function is far outside what is needed to provide quality habitat for aquatic biota. Streams that are judged to be Not Functioning are very rare. I've seen very few in the past 25 years!

Most PFC assessments land somewhere along the gradient within the classification "Functioning At Risk". Some streams tend to be closer to fully functioning condition and some tend to be closer to non-functioning. Typically, when an IDT completes their assessment, they almost always wind up being graded as "Functioning At Risk". The true value of the assessment is the conversation between participants that leads them to their end point. And, to that end, PFC assessment is a very valuable tool.

However, a PFC assessment is not a tool upon which a STANDARD can be based! The assessments cannot be replicated because the personnel always varies and the site location is not monumented (established as a permanent point along a pre-determined length of stream that can be located over and over through the years.)

If a specialist wanted to develop a true riparian standard, it could be based upon PIBO Standards in a Designated Monitoring Area (DMA) or utilize Multiple Indicator Monitoring (MIM) protocol (Cowley and Burton, 2011) in DMA's. These methodologies are objective. The sampling methods are based on established criteria that must be followed exactly! The parameters are measured. The methods and results are replicable (within accepted statistical confidence intervals). And, when these data are collected at the same (established and monumented) monitoring site over a period of years, a trend for conditions can be recognized.

Of the two true riparian monitoring methodologies, the MIM protocol is probably most applicable at the Forest Level. PIBO sites are typically only "read" at about 5 year intervals because they are very labor intensive. MIM protocol is less labor intensive and thus, can be replicated annually and trends in vegetative or channel condition may become apparent over a shorter period of time.

However, there is a dark and deeply disturbing issue surrounding this STANDARD, and that disturbing issue is



the reason I've taken such effort to describe all of this: If a Forest employee intentionally wanted to negatively skew public perception of conditions on the Forest, or if that employee wanted to paint a negative picture for upper Forest Level Management (who lacked specific expertise in these areas) so that conditions appeared to be worse than they truly were, then it would behoove that employee to choose PFC as the evaluation methodology and stipulate that conditions must be properly functioning! An expert in their field would know all of this, and would have selected appropriate methodology to evaluate conditions and trends of streams and their attendant riparian communities. An employee who intentionally wanted to deceive the public and promote an anti-grazing agenda would choose PFC and stipulate that conditions must be Properly Functioning - which they almost never would be.

Sadly, I must conclude that the author of this section intentionally selected inappropriate methodology and stipulated an end-point condition that they knew would almost never be depicted, while utilizing the methodology they had specified! The FACT that there was an intentional effort to mislead the public and Forest Leadership - CONSTITUTES AN INARGUABLY FATAL FLAW IN THIS DOCUMENT! FOR THAT REASON ALONE, WE DEMAND THAT THIS DOCUMENT BE WITHDRAWN AND RE-ISSUED WITH A PURE and HONEST GOOD FAITH INTENT! AS IT IS, BAD FAITH HAS BEEN DEMONSTRATED AND NO CORRECTION CAN CHANGE THAT!

Had the author not stipulated the methodology - one could attempt make the argument that they were inferring something different - however, that is not the case here!

Line 2778 - 2782; MA-STD-RMA-09: This Standard will essentially make it impossible for permittees or Forest Range Staff to develop new (or maintain old) watering facilities in authorized grazing allotments OR in developed recreation sites that are aimed at livestock use (e.g., back country horsemen, pack trips, guide and outfitter businesses). On one hand, the author has been vociferous in their desire to keep livestock out of streams, lakes, and wetlands. One of the most effective ways to accomplish that goal is by developing "off-site" watering sites - through the placement and development of troughs that draw water from a stream, run it through an open-ended trough (via pipes) and allow the water to return to the stream. This provides water for wildlife and domestic livestock and minimizes the time that large animals must spend in streams and riparian areas.

Unfortunately, with the establishment Aquatic Restoration Strategy, it is now required that off-site watering facilities (i.e., troughs) be located at least 300 lineal feet from a stream or river. To do this, on a gravity feed system (i.e., without pumps) it would require hundreds and hundreds of feet of pipe (in most instances). Which such a long run, gravity flow through pipe tends to be ineffective, and flows are often lost or too small to meet demands. Also, long runs of pipe are very expensive to install and maintain. Therefore, the language in this STANDARD MUST BE CHANGED TO PROVIDE EXCEPTION FOR WATER DEVELOPMENTS. FAILURE TO DO THIS WILL SEVERLY CONSTRAIN THE ABILITY TO EFFECTIVELY MANAGE LIVESTOCK AND WILL COMPELL PERMITTED AND RECREATIONAL LIVESTOCK TO ACCESS WATER DIRECTLY FROM STREAMS, RIVERS, OR LAKES - WHICH IS COMPLETELY CONTRARY TO THE INTENT OF THE ARS.

LINE 2783; MA-STD-RMA-10: In order to meet this standard, it will be necessary to contradict RMA STD 09. The effect of RMA STD 09 will be that it renders it nearly impossible for managers and/or grazing permittees to develop off-site watering sites for livestock (e.g., troughs). Therefore, livestock will have no alternative to watering directly in streams/rivers. A PROVISION MUST BE MADE TO ALLOW THE DEVELOPMENT AND MAINTENANCE OF OFF-SITE WATERING DEVELOPMENTS WITHIN THE RMA.

Line 2788; MA-STD-RMA-11: This standard must be completely stricken from these documents. It stipulates an expectation that cannot possibly be met! "Prohibit livestock access to federally listed threatened or endangered fish redds". On the surface, this seems like a perfectly reasonable expectation except for one fatal flaw. Nobody can accurately tell the difference between a brook trout red and bull trout redd (or any other redd that has been made by a similarly sized salmonid). Bull trout and brook trout spawn at the same time of the year and are often of approximately the same size. A redd looks like a redd. The only way to tell if the redd was created by a listed

fish is to actually observe the fish while it is nesting OR to dig up the redd, take out the eggs, and examine them in a laboratory setting - which would destroy the redd and defeat the purpose completely! THIS IS A STANDARD THAT CANNOT POSSIBLY BE MET BECAUSE NOBODY CAN DIFFERENTIATE BETWEEN THE SPECIES THAT CREATED THE REDD - IT IS THEREFORE A FATAL FLAW AND IT MUST BE STRICKEN FROM THESE DOCUMENTS .

My Understanding is that - if Protocol is followed, the discovery of a Fatal Flaw requires that the document be withdrawn and re-issued. That is necessary because all of the readers who commented on the document did so with a false understanding of facts and expectations. Therefore we INSIST that this document be withdrawn and re-issued, once these critical corrections have been made!

The issues here are the same as those that we pointed out regarding the use of PFC as methodology to validate a STANDARD. That is: An expert in this field would have absolutely known that it would be impossible to accurately identify

Trap for the cattlemen and other Forest users - "well, if you can't tell the difference then we have to err on the side of conservancy and therefore livestock are precluded from anyplace where there may be a red.

This standard also ignores research that has demonstrated that once a "egg in a redd" has "water hardened" it is very resilient and more like a rubber ball - thus much less susceptible to damage from external forces (e.g., something or somebody stepping on a redd.)

Lastly, where does this end. This debate was had almost two decades ago. At that time professionals agreed that the likelihood of a hoofed animal stepping on a redd was minimal. They also recognized that shortly (a few hours) after egg deposition and fertilization the eggs became physically resilient (i.e., water hardening) . And, lastly, they realized that if cattle were excluded, why wouldn't you logically exclude fishermen, miners, hikers, bird watchers, or other recreationists who might step on a redd? Resident fish are small and make small redds - a person stepping on one is just as likely to cause damage as a cow or an elk or a bicycle tire. So this whole issue was dropped.

Now, here it is, thrown in our face again - Only this time with a VERY BIASED and UNDERHANDED spin. That spin is this: There are very, very few bulltrout (probably none) across the range of the Colville National Forest. There are, however lots and lots of brook trout! Brook trout and bull trout are both CHAR - they are not TROUT!

As Char, they share a very similar life history (except that brook trout are much more prolific reproducers.) The author(s) of this segment knew full well that you could not discern between the redds from these two fish. They knew there were many more brook trout. If you can't tell which fish made the redd - then you are forced to err on the side of conservancy and restrict cattle, people, bicycles, dogs - everything from any area that may have a redd that may have been created by a bull trout. Except that nobody has documented a bull trout on the Forest for more than 20 years - so nobody knows where they might be found, so one would expect that the Forest would have to assume they could be anywhere! Thus, we have an immeasurable standard, with implications that could preclude recreational access to large sections of the Forest, for even the most modest of recreational pursuits

CRITICAL POINT: So, here we are, again! The same author(s) are prescribing intentionally deceitful restrictions, in an attempt to push a private (anti-grazing) agenda by developing a STANDARD that cannot possibly be met. Furthermore, the implementation of this STANDARD will likely prohibit any conceivable impact (e.g., a hiker fording a stream) throughout an expanse that far exceeds an area where a true expert in their field would reasonably expect to find a bull trout! The "experts" who developed these standards knew full well that they were fatally flawed. Yet, they have endeavored to ram them down the collective throats of the public and Upper Forest Management - in an underhanded effort to forward their own private agenda. Trust me, I do NOT make such accusations lightly - In fact, I've never made such an accusation in my professional career, or in the review of any

other NEPA document or LRMP. This is a unique instance and I fully believe that it was done with malice and forethought! Repercussions are in order. Forest/Regional Leadership should not allow employees to intentionally deceive and/or craft STANDARDS that are wholly unattainable, simply to promote their own agenda. We expect that the Forest AND the Region will take appropriate disciplinary actions. It would go a long way toward helping restore public trust!

Line 2852; MA-GDL-RMA-09: Streambank alteration was "never intended to be utilized as a stand-alone restriction on grazing use" (Personal communication, Tim Burton, Principle Author MIM Protocol.) This is but one parameter that is used within (and as a part of) a suite of evaluation and monitoring techniques. The stipulation of streambank alteration as a restriction that "must be in exact accord with the GDL" is completely inappropriate. It is contrary to published literature. And, most importantly, this monitoring parameter is contingent upon a variety of characteristics that are peculiar to the characteristics of different channel types and riparian communities (For Example: a B2 channel with alder as the dominant riparian vegetation; > 25% bank alteration would not be potentially indicative of a problematic situation. Alternatively, 25% bank alteration adjacent to an E4 channel with Nebraska sedge as a dominant hydrophytic herbaceous species, would indicate that close examination of utilization patterns was warranted.) Clary and Burton were very clear in their description of the proper use and application of these monitoring techniques. The author has inappropriately chosen to misinterpret and misapply that direction. We ask that this GDL be stricken from the Draft LRMP.

Line 5318: Please provide copies of any and all stream survey and riparian inventories or monitoring (e.g., MIM, PIBO, Hanken - Reeves, R-6 stream survey protocol) that has been conducted on the Forest since 1989 - until present - copies of all raw AND summarized data, including field notes, would be appreciated. This is needed for us to discuss these standards and restrictions with the public, at an open forum that will be held later this year. We are interested in these data because the author(s) state that they have "inventoried" greater than 95% of the fish-bearing streams. However, inventory and monitoring methodologies have evolved in a remarkable fashion in the past 25 years. We are particularly interested in discovering how the Forest aquatic experts have utilized these markedly differing protocols and methods in to conduct the comparative analysis that they infer to have completed.

Line 5329-32: These expected values are contingent upon slope, gradient, bedload, valley form, forest composition, riparian vegetation, and other biological and geophysical factors. The author has failed to make this distinction to the reader. And, instead has lead the reader to believe that one should reasonably expect to find these habitat conditions evenly distributed across all types of forest streams. Every biologist or hydrologist with even the most minimal training knows that the opposite is true - expected habitat components vary widely, depending on a litany of biological processes and geophysical conditions.

This is another example of inappropriate and likely intentional misapplication of a standard in an attempt to misrepresent actual conditions. Many and probably most (which is why we require copies of the stream survey/riparian monitoring data conducted throughout the Forest - so we will have quantitative data) of the stream reaches on the Colville are greater than 3% in gradient. The statements found in this section are intentionally misleading in that they developed to assess predictive conditions on what we refer to as "C" channels. One of the components that defines a "C" channel is gradient. The expected number of "pools per mile" , "large pools", and amount large woody debris is only reasonable with certain channel types and in the presence of certain vegetative components. The author should know (as they have just told us they have 25+ years of data at their fingertips) what percentage of inventoried streams contain reaches representing which channel types (most typically A, B, C, and E). The expected number of pools per mile, the expected amount of large woody debris, will vary, depending upon the channel classification. I find it inexcusable that the author(s) have chosen to misrepresent these criteria.

Lines 5336 - 5338: "Watersheds with active livestock grazing and heavy dispersed recreation use are more likely to have some reaches with excessive bank disturbance resulting in reduced stream bank cover and widening

stream channels due to localized bank erosion and sediment deposits"

This is yet another example of the author's predisposition to present livestock grazing (and, to a lesser extent, recreation) in as negative a manner as possible, whenever possible. This is a sweeping statement that paints a very negative picture to the public. I request that you provide copies of any and all documented data (that is published in peer reviewed, refereed literature) that were utilized to formulate this conclusive statement! In this case, I don't expect a simple literature citation. This is a wholly damning statement, regarding two of the most important uses of the Colville National Forest (Recreation and livestock grazing). We need to see the exact (journal) statements and quantitative data that the authors accessed in order to draw these conclusions.

If the authors are unable to provide copies of the kind we have requested - the exact research that they utilized in order to present these conclusions to the public - then we insist that all references in this section be deleted. It is not OK, for the authors to go out and do research in hopes that they will find something to substantiate their claims. It's imperative that they have these data currently available and in their files. It's not OK to impart personal biases and then, if questioned, run out and see what you can find to substantiate what has already been stated as fact!

As you'll see by the end of this review of the aquatic and riparian components of the LRMP and DEIS, there are numerous instances where misinformation, biases, and simple untruths have been presented to the public - as unrequited fact! The ability of the public to review these NEPA documents is wholly contingent upon the notion that all of the information being presented is accurate and true and most importantly, has been presented in an unbiased form.

If it is determined that any of the information presented in these documents has been, in any substantive way, misrepresented, embellished, or in any way falsified or presented with a personal "spin", then the Forest must withdraw this document, in its entirety! Published corrections or supplements will not suffice. It's important that this information be read and understood in the context of the whole document. In my review of this document, I've come to believe that there are some, who had significant roles in the development of these documents, who endeavored to mislead the public and/or present information as fact, when it was actually reflective of their own biases!

The public cannot review these documents, understand what is being proposed, and document reasonable feedback if any of their assumptions or beliefs are based upon false information that has been presented by the Forest!

Line 5503-04: I was not aware that counties had and maintained "county fish and game agencies". Clearly the author has information that none of the rest of us have been privy to. Please provide us with any and all information regarding historic and current management by "county fish and game agencies"

Pages 162-261, Fisheries: NEPA documents are supposed to be presented in a manner that they can be read and understood by the average citizen. I think at one time it was stipulated (intra-agency direction) that the documents should be presented at about 9th grade reading level. But, irrespective of that, they are supposed to be presented in a manner that the average reader can understand. These documents in general, and the Fisheries/Riparian sections in specific, have been written in a manner that utilizes language (and specific words) that would appear foreign to the average American. It's as though the author(s) of this section made extra effort to utilize latin or other words that constitute "professionally specific" language (ask the average reader on the street to define piscivorous - how about anthropogenic?) Please explain what "The scores for the habitat portion of the AEC were obtained by multiplying the score for each attribute by its weight and summing the scores for each subwatershed. The properly functioning, functioning at risk, and not properly functioning scores were then converted to a+1 to -1 scale and combined with the MIS/Focal Species Status to obtain the AEC score for a subwatershed." Would mean to the average reader! I can tell you it would mean NOTHING!

No wonder this section and several of the others are ridiculously long! They are full of repetition, redundancies, and excessively wordy language that adds nothing to the understanding for the average reader. It's simply a means for the authors to stroke their own ego's and add a lot of words to make it look like they really put out a lot of work. In the end, this excessive use of big words and long sentences that nobody understands only precipitates one result - it makes the documents so large and unwieldy that the average reader will be intimidated and not bother to try to understand and comment! Which, I assume, is the intended purpose!

These sections are fraught with words that the average reader could not reasonably be expected to know or understand - but the author(s) went ahead and used them, so they must be critical to the understanding of what they are saying, right? Except that, the writer did not even bother to provide explanations of these words in the Glossary. In fact, the author(s) of this section rarely took the time to document (in-text literature citations) in the "literature cited" section of the documents.

I don't know if the authors chose to use words that the average reader could not understand because they wanted to sound knowledgeable or authoritative or if it was simply an attempt to use foreign words in an attempt to confuse the public or hide the true meaning of phrases and sentences. Either way, it's inappropriate and we strongly recommend that the authors of these sections be sent to training that is specific to NEPA writing. That would be in the best interest of the public and since this IS public land...

Line 5571-5572: Regarding the statement: "Bull trout were once widely distributed in four of the five subbasins that overlay the Forest", in my review of this document I did not find reference that stipulated that bull trout were "once widely distributed." I found where it said that they were likely distributed, but that is a far cry from documentation of "wide distribution" which suggests abundance. Most literature indicates that bull trout (at least in the non-anadromous form) were likely never very abundant - due to their highly restrictive habitat requirements. To facilitate our discussions at an upcoming public forum, please provide the exact citation that you quoted herein. The citation provided in the literature cited section (of this document) is vague and does not provide the specific information required for a literature citation (as described in the Council for Biology Editors Style Manual.)

If that exact citation is not available, then explanations are in order.

5733-34; Fisheries: "There are numerous aquatic insects for which we have no inventory or population information - due to the lack of information these species cannot be discussed" Really? I find it hard to believe that any fisheries/aquatics program would not have collected any inventories, presence absence surveys, or documented other incidental information regarding aquatic insects/invertebrates.

Conducting surveys or inventories of invertebrates is a basic component of nearly every stream habitat survey. A critical component to understanding population dynamics is understanding their forage base. The author of this section boasted that they had thorough and complete information for 95% of the streams because they had been conducting stream surveys for > 25 years - but now you tell us that you have no information regarding aquatic invertebrates. Aren't they an important component to aquatic biology? Were you not able to glean any of that information for any of the state fish and wildlife biologists? Have you checked with universities for data they may have. It's inconceivable to me that you purport to manage a comprehensive aquatic/riparian program, yet you have no data regarding aquatic insects or invertebrates?

Please provide me with any and all information the Forest has regarding the presence, absence, abundance, and distribution of any species of aquatic invertebrate found on the Forest!

6146-6147; Fisheries: "The habitat scores are considered not properly functioning in 10 of the 15 subwatersheds occupied by interior redband" This is important! Yet, the author's have chosen not to provide any sort of

explanation as to why these subwatersheds were scored as "not properly functioning." Was it because habitat parameter criteria were inappropriately assigned to all streams (e.g., pools per mile, large pools, when channel gradient was > 4%) - who knows, the authors tell us that 2/3rds of the subwatersheds are not functioning, but don't deem it necessary to even provide even the slightest insight as to what caused them to receive such a terrible score. This could easily be interpreted to be an overt attempt to represent something as being in a much worse condition. In all of the language in this section, all the redundancies, the authors tell us that 2/3rds of the subwatersheds are in terrible condition - but aren't going to tell us why - aren't even going to give us a hint. If find this to be disturbing!

Line 2855-2857; MA-GDL-RMA-09: Permitted Grazing Management - Greenline Vegetation Areas "Within greenline vegetation areas adjacent to all watercourses, measured in designated monitoring areas":

- 1) Streambank alteration should not exceed 25 %
- 2) Utilization of available mean annual vegetative production on woody vegetation should not exceed 40 percent
- 3) Residual stubble height of at least 6 to 8 inches should be maintained and no more than 40 percent of mean annual vegetative production on deep-rooted herbaceous vegetation should be utilized as determined by plant community type.

This is the MOST IMPORTANT issue for the SCCA and grazing permit holders, across the range of the Colville National Forest! We have brought up the issues with this GDL over and over with Forest Leadership and were once promised "don't worry, I've taken care of it." When, in fact, all that occurred was that a footnote was added with vague language that, in the end, did nothing to significantly alter the impact of this GDL!

For Review, LETS DEFINE A GUIDELINE: A project or activity is consistent with a guideline in either of two ways:

1. The project or activity is designed exactly in accord with the guideline; or
2. A project or activity design varies from the exact words of the guideline, but it is as effective in meeting the purpose of the guideline to contribute to the maintenance or attainment of the relevant desired conditions and objectives.

"When deviation from a guideline does not meet the original intent, however, a plan amendment is required."

Our point here is, in the context of these documents, a guideline is essentially a standard where activities must be exactly in accord with a guideline. We make this point because when we have pointed this out to Forest staff and Leadership, the response has essentially been "what is the big deal, it's just a guideline, nothing says it has to be followed". Unfortunately, when one reads the definition of a guideline, directly from the text of this document, it in fact says that it must be followed exactly!

We are deeply concerned with this proposed standard for a number of reasons:

\*These recommendations, along with a number of other recommendations found throughout the aquatic and riparian sections of this document follow direction outlined in Goss et al 2013. In the DEIS and Draft LRMP (Goss) is often referenced and sometimes cited as "best available science." Indeed, it is cited as an "unpublished report". The fact of the matter is that this report was submitted for publication in a prestigious scientific journal and it was rejected. IT was not rejected due to style technicalities or other nuances that could easily be fixed. It was rejected because the science was (is) flawed. It's highly disturbing to see the Forest base so much of it's aquatic and riparian management direction on an unpublished report that did not pass peer

review. This is a report that prescribes highly restrictive grazing standards, which remain unsubstantiated. Highly regarded and well published (and tested) literature is available (e.g., Multiple Indicator Monitoring, Cowley & Burton, 2011) and those methodologies are considered the "standards of the industry" and truly are "best available science."

\*With the implementation of this guideline, it will not be possible to graze an allotment, in a productive manner, and still meet this GDL. This GDL prescribes numerical limits for a specific habitat attribute, which in this case, is residual stubble height of herbaceous vegetation. The limits that are placed on this attribute do not take habitat variabilities into account; it is simply stated as a "one-size-fits-all" restriction without consideration for physiographic or biologic influences that would affect the appropriateness of this attribute.

\*According to the University of Idaho Stubble Height Report, published by the Wildlife and Range Experiment Station, residual stubble height is not an appropriate indicator of riparian health. Rather, "it should be used as a prompt to investigate and assess the resource condition..." Sadly, the author attempts to utilize a single, short-term indicator, as an end-all threshold value that if met, will end grazing on that allotment or pasture, without regard for a myriad of other influencing factors.

\*This GDL restrictive attribute fails to consider growth potential for individual sites. The growth potential for a plant can be greatly influenced by elevation, mean daily temperatures, annual or seasonal moisture regimes, soil type, competition from surrounding vegetation, channel gradient, stream flow characteristics (e.g., was the riparian area flooded for an inordinate period {{as in 2016}} and plant growth retarded as a result?), aspect (daily exposure to sun), shading, available soil nutrients and a litany of other factors.

\*The author has chosen to follow the recommendations found in Goss et al (peer rejected research), and monitor residual stubble height of essentially any herbaceous plant. However, nearly all scientifically respected literature stipulates that key riparian (hydrophytic) species should be utilized for monitoring residual stubble height. When one does not target monitoring on key riparian species, it is likely that the monitoring transect could fall on a herbaceous species that may not have growth characteristics to produce 6"-8" of (herbaceous) height, in the complete absence of grazing.

\*The author does not recommend or even require "trend" monitoring to determine if resource objectives being met. However, the Idaho Stubble Height Report is clear on this: "Emphasis should be placed on long-term monitoring of trend to determine whether resource management objectives are being met or not." Stubble height is not an indicator of riparian condition or trend. It can be "useful in providing information for interpreting the cause of unsatisfactory trend.."

\*The author has demanded, as a STANDARD, that highly restrictive use restrictions (6'-8") be implemented across the Forest. Yet, talk about 4" starting point

\*Regarding the use of the Goss Stubble Height, The National Riparian Service Team stated: The authors' conclusions and recommendations for stubble height standard can be questioned because the relation between conventional measurements and the modified Goss stubble height method have not been tested and evaluated." How can the Colville NF utilize and recommend a stubble height that will, without question, severely restrict grazing opportunities, when that agencies own "preeminent riparian grazing expert - The National Riparian Service Team - states that the use and implementation of this standard is not warranted "and should be questioned?"

There are many other, highly justified, and scientifically documented reasons for the Forest Service to completely withdraw MA-GDL-RMA-09 from the text of this document (and other LRMP's throughout the Region.) But, the fact of the matter is simply this: If one reviews the scientifically respected and accepted literature, and follows the recommendations of the of the Agencies own preeminent expert on riparian grazing (The National Riparian

Service Team) it is easy to conclude that this highly restrictive attribute is without justification, as a blanket requirement.

Therefore, we insist that this RMA-GDL be dropped from the text of the Colville Draft LRMP and strongly recommend that it be removed from all Draft LRMPs, across the region!

Line 2853-2854; MA-GDL-RMA-09: KEY ISSUE FOR COVER LETTER This monitoring attribute is essentially impossible to measure. There is very little available literature that describes methodologies to measure annual mean utilization of woody vegetation. What there is has been highly debated and the results are the subject of significant scrutiny. The principle problem is that all methodologies rely upon some degree of subjective judgment. Subjectivity cannot be replicated and therefore, it cannot be relied upon when multiple observers, with highly variable skills, are attempting to collect these data, on an annual basis.

We do not argue that overutilization of woody shrubs, especially in riparian communities, can have deleterious impacts on riparian health. For a variety of reasons, condition and trend of important woody shrubs (e.g., geyer willow {{Salix geyeriana}}) can be important indicators of overall riparian health. However, the accurate, replicable, and objective annual measurement of utilization (for woody riparian shrubs) is extremely problematic.

To our knowledge, there exists no reliable, accurate, and easily replicable methodology that will allow an educationally stratified group of observers to collect these data, on an annual basis, with reasonable expectations of accuracy. That is a long-winded way of saying that measuring annual utilization of willow is extremely difficult, very time consuming, highly contingent upon the skill and training of the observer, and must be distinct with regard to species and site potential.

It is unreasonable of the Forest to put forth a GDL with the implicit expectation that these parameters will be accurately measured, on an annual basis, across all monitoring sites, across all allotments. This sort of data collection demands multiple replications, at each site, and the assignment of site specific statistical confidence intervals. The Forest does not have adequate staffing, with proper training to collect these data in an objective manner AND the ability to implement Quality Assurance/Quality Control (QAQC) o

Since this GDL constraint has the unreserved potential to directly affect grazing permittees ability to reasonably access and utilize their vested grazing rights, it is imperative that this parameter be properly paired with individual site conditions and concurrent growth potentials for each local. We do not have time, nor is this the proper venue for a lecture regarding the inherent problems associated with trying to measure percent utilization of woody shrubs. Suffice to say that it is NOT an exact science.

Researchers have been able to employ various methods to evaluate the annual utilization of woody shrubs. However, they have only been able to attain those results after months in the field, where all of their efforts were focused on collecting data under very closely regulated parameters and while using specific and tightly regulated methodology. There has not been a single published study that documented the success or failure (read: statistically confident result intervals) associated with training technicians to collect and report these data with precision. It is simply too complicated and there are too many pitfalls

We realize that this is not a research project and you are not endeavoring to collect data for peer review. However, the Forest Service needs to recognize that the economic future of generational family farms, AND the communities that rely on ranching and agriculture as their economic base, will rest on the ability of various individuals, with greatly diverse levels of skill and knowledge, to collect these data.

Measuring woody shrub utilization seems simple, but it is complicated stuff. I have been involved with this type of research, a professional level, for more than 30 years. I can tell you, without qualification, that researchers who have spent months doing nothing but evaluating willow utilization have difficulty in replicating their results



when they return to the same sites. How can the Forest impose a highly restrictive parameter upon permittees, when it is that they

Woody utilization, in and of itself, is most valuable as an indicator of trend. Overuse of a single plant or association of plants, at an isolated site (e.g., DMA) has little impact on long-term riparian health. There are methods that will allow the Forest to monitor woody shrub utilization AND trend that are simple, very time effective, extremely reliable, and essentially immune to observer predisposition. The use of properly placed photo-points is an excellent example of a methodology that will document use, condition, and trend. It's simple, quick, and completely replicable.

We insist that the Forest REMOVE this GDL from the Draft LRMP and replace it with one that is reliable, not reliant upon observer skill and expertise, and which will reliably depict condition and trend of this important parameter.

**IMPORTANT POINT:** The inclusion of this GDL (as an RMA GDL) is reflective of the same cavalier and unrealistic attitude that has been prevalent throughout this entire section. We have highlighted numerous instances (in this section) where STDS, GDLS, or OBJs were immeasurable, or based on faulty science (e.g., 6-8" stubble height), or stipulated inappropriate methodology (e.g., utilization of PFC for measuring a STD.) WE insist that the entire RMA section be re-written by an author that possesses documented expertise, is without biases, and understands the nuances of cause and effect associated with the imposition of restrictions, their relative importance to riparian health, and the assignment of appropriate evaluational methodologies.

Line 3154; Wilderness - Congressionally Designated: We don't know if it was intentional or not, but this section seems to have been intentionally introduced in a manner that was designed to blend into the end of the previous section regarding Wild and Scenic Rivers.

This section and the entire notion of expanding wilderness within the Colville National Forest is extremely controversial! Certainly the authors of this document are aware of that. Yet, for unknown reasons, they chose to avoid highlighting this section - there is very little introductory verbiage (7 lines - to be exact) and it is extremely easy for the reader to completely miss this section; especially when one considers that this is buried deeply within nearly 1000 pages of text! The Forest should know better - and we suspect that they do and simply chose to present this in the most unrecognizable manner possible, with the express intent of having the public fail to notice this section.

Line 3310; Wilderness - Recommended: As mentioned, this is a very controversial subject with the public and particularly for the SCCA. In general, we oppose the establishment of any new wilderness within the Colville National Forest. We do this for two primary reasons. First, it is our believe that the Recommended Wilderness (RW) does not meet the criteria for wilderness. Each of these sites contain numerous sections where the use by man is "substantially recognizable" and therefore, the characteristics necessary for designation as wilderness have not been met! This is simply a political concession and the decision maker is well aware of the fact that these proposed areas do not meet national criteria for consideration as wilderness!

Our first and foremost problem with the designation of these lands as "RW" is simply this: Once a RW has been designated it EFFECTIVELY BECOMES Wilderness, essentially forever. Once a RW has been designated, "Wilderness characteristics are protected until Congress either designates the area as part of the National Wilderness Preservation System or the area is released from consideration". The problem is simple: The designation of new wilderness is controversial across the entire nation. So, for the most part, Congress tends to postpone these considerations indefinitely. But, the never "release and area from consideration" - those areas are simply "tabled" and forgotten. That way Congress doesn't have to take the heat for designating wilderness in an area that will have adverse impacts to American Citizens. They just avoid the decision.

The problem is, when Congress avoids the decision, the wilderness becomes de-facto in nature and ALL restrictions to use that are associated with Designated Wilderness, become implicit with the RW designation - in perpetuity!

In that context, DCs, STDs, and GDLs all become the same - they all must be adhered to. So, with the implementation of MA-GDL-RW-01: "The wilderness characteristics (untrammelled, undeveloped, natural, opportunities for solitude or a primitive and unconfined type of recreation) of each recommended wilderness should remain intact until congressional designation..." How will a grazing permittee be able to construct or maintain needed infrastructure (e.g., water developments, fencing, livestock handling areas) while Congress is "considering" the merits of designation? The answer is that they WILL NOT BE ABLE TO DO ANY OF THIS!

Line 3355; MA-GDL-RW-01 is directly contradicted by MA-GDL-RW-02. THIS IS A FATAL FLAW in this Draft LRMP!

To be clear the SCCA opposes the recommendation for any new wilderness within the Colville National Forest!

Line 3514; Forest Plan Monitoring Questions, Table 37: This table is deeply flawed! It is SEVEN PAGES in length and very prescriptive! Yet, it does not tell the reader whether Class "A" monitoring will be employed or Class "B" monitoring will be utilized. THAT is a very important distinction and without presenting that information, the public (and the SCCA) have no reasonable opportunity to review this table and make educated comments!

Class "A" methodology utilizes "quantitative methods that are widely accepted with repeatable results and statistical validity. Reliability, precision, and accuracy are very good." Class "B" methodology is just something else. There is no distinction made. A Class "B" Survey (lets say they were evaluating livestock use adjacent to a stream - but outside of a DMA) - could easily entail a seasonal technician walking through a site, with their hands in their pockets, whistling a tone as they strode merrily along. At the end of the "survey" they determine, without any quantitative data or specific training or a breadth of experience that would validate their "appraisal", that negative impacts are occurring. That is a big deal - one that could have huge economic impacts for the permittee AND the community! Yet, it fits the parameters for that class of survey.

If the Colville National Forest felt it was important enough for Table 37 to take up SEVEN PAGES OF TEXT, it's only reasonable to expect that they would denote the type of monitoring that would be applied to each and every aspect that they have outlined! Without that information the public and the members of the SCCA cannot reasonably evaluate or comment on the proposed action. This is an intentional and blatant example of critical information is being withheld!

The bigger problem is this: The Colville NF has demonstrated that it has little expertise or interest in using Class "A" methodology! It's expensive, it's time consuming, and it requires a sophisticated level of expertise to obtain precise, replicable results! So, they prescribe SEVEN PAGES of monitoring, then don't bother to tell the public or the SCCA how they intend to conduct this monitoring! WE DEMAND THAT THIS SECTION BE REVISED WITH EXPLICIT EXPLANATION of the monitoring methodology that will be employed for every resource AND monitoring Question. It is not possible to answer specific monitoring questions unless you first display the methods that will be utilized to answer those questions. Only then can the SCCA and other publics make an informed evaluation and provide insightful comment! IT'S IMPERITIVE THAT THIS ENTIRE TABLE BE RECONSTRUCTED (as described above) OR DELETED FROM THIS TEXT!

Line 37745; Livestock Grazing: How do you propose to "work with permittees, the State, tribes,, and other organizations to maintain or improve rangeland conditions?" The words maintain and improve imply that activities will occur in the ground. What role, or more importantly, expertise can the Tribe, provide with regard to improving rangeland conditions? This effectively gives numerous and unnamed outside entities unrequited

authorization and expectation that they will actively be involved in rangeland management! Are you really going to embark on a program where all rangeland management is relegated to "working groups?" Seriously?

Line 3827 - 3828 and TableC-3 FISH:

Please provide any and all information pertaining to exact management methods the Colville will employ or has employed to differentiate between Westslope Cutthroat trout and any other introduced or hybridized species, across the Forest AND all interconnected waterways (that would provide pathways for migration of genetically "impure" species! This is very concerning because the SCCA is worried that the Forest will simply begin to refer to any cutthroat trout as a "westslope" and, as a result, many unsubstantiated restrictions may be imposed.

Please provide any and all information pertaining to exact management methods the Colville will employ or has employed to differentiate between redband trout and any other introduced or hybridized species of rainbow trout, across the Forest AND all interconnected waterways (that would provide pathways for migration of genetically "impure" species! This is very concerning because the SCCA is worried that the Forest will simply begin to refer to any "rainbow" trout as a "redband" and, as a result, many unsubstantiated restrictions may be imposed. The information provided will be provided to the public, free of charge, at a forum to be held later this year!

It's common knowledge that many genetic variations of trout and char have been introduced to waters that are hydrologically connected to the Colville National Forest. Without sophisticated and extremely costly (both in terms of time and money) DNA analysis it is essentially impossible to differentiate between the various strains of trout. Indeed, that is precisely why the USFWS has declined to consider listing these species under the ESA. It's irresponsible of the Forest to designate fish as "sensitive" when those fish originated in hatcheries where there is no objective to maintain genetic purity. Millions of fish from an unknown number of genetic stocks have been introduced to these waters over the past 100 years. The introduced species of rainbow trout and cutthroat trout dominate (in terms of numbers and distribution) populations of these fish across the Forest.

There is no reasonable way for the Forest to expect to differentiate between fish found in one local vs. another without expensive laboratory testing. That is not ever going to occur on a wide scale. Therefore we strongly recommend that these designations be limited STRICTLY to those isolated waterways where the Forest has documentable proof that those strains retain genetic purity and that they will remain genetically isolated from other populations! Otherwise, this designation has no true meaning and it will only serve to restrict management and recreational activities across the entire Forest

and possibly stream channel stability. However, it is the opinion of most experts in the field of range riparian ecology (myself included) that the preferred method to monitor woody shrub use, condition, and trend is through the utilization of thoughtfully placed and faithfully replicated photo-points. This monitoring tool is simple to

implement, inexpensive to maintain, and is completely without subjective bias. When properly implemented a variety of observers can expect the same results year after year!

It's interesting to note that many of these TES species are found, predominantly, within the boundaries of existing grazing allotments. This clearly suggests that grazing activities are conducive to the completion of one or more of the life cycles that are constrained by this requirement. Yet, the bias against grazing is so prevalent across the texts of these documents that it is unconscionable.