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Comments: To Objection Reviewing Officer:

Washington Wild received notice of the U.S. Forest Service's draft decision notice to select Alternative P from the draft Environmental Impact Statement for the Revised Colville National Forest Plan. We are registering our objection to that decision.

#### Objector Information

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Washington Wild is a statewide 501(c)3 nonprofit organization focused on protecting wild lands and waters in Washington State through advocacy, education and civic engagement. Throughout Washington State we draw from a membership core of more than 1,500 and an advocacy base of more than 8,000 supporters. Founded in 1979 Washington Wild has played an invaluable role in permanently protecting nearly three million acres of Wilderness throughout Washington State while also preserving and enhancing recreational access. Coalition building is a major part of our success. By working alongside local businesses, religious leaders, recreation enthusiasts, sportsmen, local elected officials, other conservation organizations, among others, we are able to create a grassroots mobilization of environmentally informed and proactive citizens.

Washington Wild was a key participant in the development of the first forest plan for the Colville National Forest in 1988. We have followed with interest and participated in the current forest plan revision since 2005.

We appreciate the Forests' efforts early on in this process to make good on their obligation to review the

existing potential wilderness areas (PWA's) and update the boundaries of these areas in advance of the forest plan revision. Washington Wild was involved in giving input into that process and feels that the resulting inventory was far superior to the existing one.

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

There is a growing need for additional wilderness areas to meet the increasing need and demand for wilderness recreation in the Inland Northwest, especially for day trips, and additional recommended wilderness areas will help meet that need. Each year, millions of outdoor recreationists spend \$21.6 billion on outdoor recreation in Washington. Many of the potential wilderness areas provide outstanding opportunities for wilderness recreation, including day hiking, backpacking, backcountry skiing and snowshoeing, horseback riding, and wildlife viewing; all within an easy day's drive from the greater Spokane area.

Washington Wild submitted separate organizational comments regarding the draft Colville National Forest Plan Revision and Draft Environmental Impact Statement Environmental Assessment in July 2016.

#### Statement of Objection

The Colville National Forest plan revision is a significant management tool that is long overdue. The original forest management plan was adopted in 1988 and scheduled to be revised within 15 years (2003). The revision process kicked off in 2005 and has taken over a decade to arrive at the draft decision notice released in August 2018.

We have the following formal objections to the draft decision notice:

#### I. The Recommended Wilderness Process is 30 years overdue and deserves unique consideration

In addition to several general management issues that deserve to be reviewed and considered as part of the revised forest plan, the revision represents the first opportunity for the Colville National Forest to meet its obligation to review potential wilderness areas inventoried on the Forest and make recommendations to Congress for Wilderness designations. Despite being required in the 1964 Wilderness Act and the 1976 National Forest Management Act, no such recommendations were made in the 1988 plan due to language in the 1984 Washington Wilderness Act that postponed this important process to the plan revision. Unlike the other important management issues addressed in the plan, the recommended wilderness process is unique in that it is 30 years overdue and has never been considered over the life of the Forest.

## II. The Draft Decision Fails to Balance Recommended Wilderness with Other Management Goals.

There is clearly a need for additional wilderness on the Colville National Forest. Wilderness evaluations of Colville National Forest lands showed a need for additional wilderness on the forest. Currently the Salmo Priest Wilderness is the only wilderness area in northeast Washington and North Idaho. Less than 3% of the Colville National Forest is presently designated as wilderness - the least of any national forest in Oregon and Washington.

In 2011 the Proposed Action identified 220,000 acres of eligible potential wilderness areas on the Forest identified by the agency to have Wilderness characteristics. The Proposed Action supported roughly half of those areas (more than 100,000 acres) as recommended Wilderness.

In 2016, the preferred alternative (Alt P) the Draft Forest Plan Revision inexplicably reduced the amount of recommended Wilderness by 35% to just 68,000 acres. This is a significant decrease from the original amount of recommended Wilderness proposed by the Forest which was based on years of Wilderness character analysis and input from a two-year collaborative process in 2007 and 2008. The resulting recommendations amounts to less than a third of qualifying lands with wilderness qualities on the forest.

In 2018 the draft decision further reduces the recommended wilderness acreage to 61,700 acres - a 7,000- acre additional reduction. This additional reduction comes despite strong collaborative backing by local conservation and timber interests supporting a much higher acreage of recommended Wilderness. The draft decision also opted to manage recommended Wilderness area with the weaker of the two proposed options which would allow existing mechanized use to occur until such areas were designated by Congress.

The draft decision notice references the focus on balance stating, "I believe that the selected alternative provides the most balanced approach to management of the Colville NF, and provides for a variety of uses the public told me were important." (Draft Decision Notice, Pg. 8)

However, we fail to see how the progression of the plan revision is anything but balanced with respect to recommended wilderness. The initial threshold analysis on recommended Wilderness guided by input of a robust collaborative process resulted in what some could credibly argue as a balanced result for recommended wilderness identifying more than 100,000 acres or nearly half of the wilderness quality lands identified on the Forest as recommended wilderness. Having said that the Northeast Washington Forestry Collaborative comprised of conservation and timber interests and the Colville Collaborative group both demonstrated strong support for more recommended wilderness than was put forward as part of the Proposed Action in 2011.

The significant reduction in 2016 and additional reduction of recommended wilderness acreage in the current draft decision notice fails to provide any balance to this important ecological, economic and recreational asset of the Colville National Forest.

If there was any doubt about the lack of balance the revision has showed toward recommended wilderness the decision to add to the massive reduction of recommended Wilderness acreage with a weaker interim management for these areas makes the case even more dramatic.

### III. The Draft Decision Fails to Provide Adequate Review and Consideration of Wild and Scenic River Eligibility

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

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

We believe that Sullivan Creek merits consideration of the its associated outstanding remarkable values and should be found eligible by the forest.

### Potential Resolutions

#### Objections #1 & #2

The Colville National Forest has chosen to retain the weaker interim management option for recommended wilderness areas as part of the draft decision. This management would not fully protect recommended area as Wilderness by allowing existing mechanized (mountain bike use) and use of chainsaws until a congressional wilderness designation were to occur. Motorized use and new mountain bike use would be prohibited. If the Forest retains this weaker interim management significant additional acreage of recommended wilderness areas should be added above and beyond the 61,000 acres identified in the draft decision notice. Reducing both acreage of recommended wilderness areas at the same time as management protections of the wilderness character of these areas is disingenuous to a balanced outcome.

The following areas should be added if the weaker interim management is adopted:

[middot] Profanity (37,700 acres) - The acknowledgment of the remoteness, solitude, natural beauty, ecological diversity, and primitive character of the Kettle Crest that would come along with wilderness recommendations for this area would add value to the Pacific Northwest Trail which passes through this potential wilderness area (PWA). Also, having hikes that access wilderness off of Sherman Pass would open up the opportunity for many people traveling the scenic byway who may not otherwise visit a wilderness area to be exposed to the National Wilderness Preservation System and have a relatively easily accessible wilderness experience.

[middot] Cougar Mountain (6,210 acres) and Thirteenmile (10,890 acres) - Highlights like the Thirteenmile Trail providing a unique low-elevation, early season, Ponderosa pine dominated hiking environment, these areas provide an extremely remote, wild experience with exceptional opportunities for solitude. There is a need for more wilderness experiences in the Okanogan Highlands eco-region like the opportunities provided by the Thirteenmile area. This trail is one of the first trails on the Colville NF to be snow-free each spring and is an increasingly popular spring and fall day-hiking destination for people from the greater Spokane area. Because of its connectivity to the Bald Snow area and the Kettle Crest Trail via a network of hiking trails, this area provides a unique opportunity for multi-day treks from Sherman Pass. The Thirteenmile and Cougar Mountain PWAs are also important habitat and habitat connectivity for rare carnivores, including lynx, wolverine, and wolves. Prescribed fire and efforts to protect the area's old growth Ponderosa pine could also continue if these areas were recommended for wilderness.

[middot] Grassy Top (2,200 acres) & Hall Mountain (7,890 acres) - These connected blocks of wildland are above Sullivan Lake and adjacent to the Salmo Priest Wilderness Area. The Noisy Creek Trail and Grass Top Trail system provide excellent solitude through rugged terrain that is directly adjacent to the existing Salmo Priest Wilderness, and connected to the existing wilderness trail system, making multi-day wilderness treks throughout these areas possible. There is also a growing need for wilderness day hiking opportunities, and the Noisy Creek Trail (#588) provides easy access from several campgrounds along Sullivan Lake for those interested in shorter, more accessible wilderness hikes. These areas are also part of designated habitat for grizzly bears and caribou and provide connectivity for those and other species; wilderness protection would provide added habitat security. Wilderness recommendation and eventual designation would also protect the scenic backdrop of and water quality for Sullivan Lake.

[middot] Harvey Creek (5,720 acres) - Also known as the Bunchgrass Meadows and the Molybdenite Mtn area, this is a mountainous wild area south of the Sullivan Lake area provides excellent solitude and off-trail

hiking and hunting and has some of the most diverse wildlife habitat of any potential wilderness area in the region, including the ecologically rich bunchgrass meadows, and hidden old growth groves.

Recommended wilderness for this area would help ensure that the upper reaches of the LeClerc Creek watershed, and important stream for bull trout, westslope cutthroat, and red band trout, are protected. It is also important, connected habitat for caribou, grizzly bear, lynx, wolverine, wolves, and other wildlife.

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

[middot] Quartzite (5,340 acres) - The Quartzite PWA next to 49 Degrees North Ski Area should be recommended for wilderness. This would be the closest wilderness area to Spokane. Recommended wilderness would help ensure that this unlogged wild area and its large cedar trees and adjacent private wetland preserve would be protected for their scenic and environmental/nature study values.

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

[middot] Owl Mountain (11,060 acres), Jackknife (8,940 acres) & South Huckleberry (9,680 acres) - These PWAs that contain areas with motorized trails also provide important wildlife habitat and connectivity and

other values. We request that the portions of those PWAs that is currently designated as "Semi- primitive, Motorized Recreation" should be designated as "Backcountry Motorized" with the remaining portion of Owl Mountain, Jackknife, and South Huckleberry PWAs designated as

"Backcountry" in the selected Alternative to protect lynx and wolverine habitat and habitat

connections that facilitate adaptation to climate change.

Objection #3

While it seems clear that the forest plan revision is the appropriate and optimal time to review and consider eligibility determinations under the Wild and Scenic Rivers Act, this did not occur over the 15 years of work associated with the forest plan revision. If the Forest plans to finalize the draft decision without consideration of additional rivers on the Forest as to their eligibility, a commitment to do that work moving forward is necessary.

We suggest that the Forest commit to doing an eligibility determination as part of future NEPA efforts associated with watersheds that include Sullivan Creek.

Thank you for the opportunity to register this objection and please contact me to discuss any remedies with respect to providing true balance to this plan revision and taking full advantage of the first opportunity for the Colville National Forest to identify recommended wilderness areas.

Sincerely,

Tom Uniack Executive Director Washington Wild