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Organization: Kettle Range Conservation Group

Title:

Comments: Forest Planning comments

RE: Comments on Proposed Revised Land Management Plan for the Colville National Forest and Draft Environmental Impact Statement

Please accept these comments submitted on behalf of the membership of the Kettle Range Conservation Group. Attempts to upload them to your web portal were apparently unsuccessful.

Sincerely,

Timothy J Coleman

Executive Director

Kettle Range Conservation Group

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Protecting wild forests and wildlife of the Columbia Highlands since 1976. Be a part of our rural grassroots voice.
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Amy Dillon

Forest Plan Revision Team

Colville National Forest

765 South Main

Colville, Washington 99114

RE: Comments on Proposed Revised Land Management Plan for the Colville National Forest and Draft Environmental Impact Statement

Submitted via email to: colvilleplanrevision@fs.fed.us

Dear Amy Dillon,

The Kettle Range Conservation Group welcomes this opportunity to submit comments regarding the Colville National Forest (CNF) Long Range Management Plan (LRMP) and Draft Environmental Impact Statement (DEIS). Our group was formed in the mid-1970s and for over 40 years has been actively participating in volunteer activities including trail construction & maintenance, forest watch, summer hikes and collaborative groups including the Northeast Washington Forestry Coalition. The Colville Forest belongs to all Americans and we strongly support U.S. Forest Service management of the People's Forest.

Overview

Despite its essential breeding, rearing and migration habitat - a connective bridge for wildlife from the Cascade to Rocky Mountains - less than 3% of the Colville National Forest is currently protected as wilderness. The Wilderness standard to preserve and protect wilderness characteristics is the highest in the country and yet the Colville has the least of it of any national forest in Region 6. Wilderness management is a politically charged issue, more often than not inaccurately described by agency personnel and opponents alike, essentially crippling public dialog and community development that peer-reviewed economic analysis has found to benefit rural economies.

The U.S. Forest Service, Colville National Forest, is tasked with managing federal public lands for the good of all the people and as such must demonstrate its leadership in the interest of the Nation, not just rural northeast Washington.

Wild roadless areas on the Forest should be protected simply because they are rare and the majority of them are located in two wildland complexes in the Kettle Crest and the southern Selkirk Mountains. These wildland complexes must be stitched back together by closing roadways that degrade their habitat effectiveness, NOT expand motorized and mechanized recreation along roadways and connecting trails that now divide them. Alternatives that aim for lower road densities across more of the landscape will considerably reduce the negative effects of roads on wildlife habitat connectivity.

If sustaining, recovering and protecting sensitive wildlife were a key metric - and purportedly they are -- the DEIS and LRMP would have set a different course of action than the Preferred Alternative P. Alternative P is clearly deferential to a small segment of the recreating public that uses mechanized/motorized recreational vehicles. The DEIS does not fully analyze potential environmental impacts of past, present and reasonably foreseeable uses of these vehicles and its management direction to expand their usage. .

The LRMP establishes visual standards but not for sounds of nature even though sound was a key metric in your PWA analysis. Solitude is rarer today than at any time in history, yet the LRMP virtually ignore it. It has set no quantifiable metric for measuring, maintaining or restoring it. Why? Noise from motor vehicles has cumulative impacts to sensitive wildlife, including those that hunt by sound. Solitude conserves critical habitat for wildlife, supports dispersed outdoor recreation and benefits local economies. There is an inherent conflict between LRMP wildlife conservation metrics and those of recreation.

Whereas the Preferred Alternative P will increase human presence in wild areas, increase the rate of motorized recreation in the quietest areas of the Forest, the range of alternatives lacks an alternative that offer an increased level of habitat connectivity and solitude. Alternatives B and R are a good start, but a visionary approach would reduce human / wildlife conflicts especially related to motorized trail and road network.

Eighty percent of the Colville National Forest is not eligible to be recommended wilderness. The Forest Service "restricts" the ability of the public and wildlife to enjoy and survive in a place of solitude and instead Alternative P proposes to establish a Special Interest Area that when combined with existing and proposed ARS recreation sites would turn the Kettle Crest into a mechanized/motorized theme park. Consider this foreseeable future: dirt

bikes, ATVs roaring up & down Albion Hill Road and Twin Sisters Potential Wilderness Area (PWA) trails and mountain bikes racing down Jungle Hill, Wapaloosie and Old Stage, Stickpin and Ryan's Cabin trails.

Is this a picture of secure wildlife habitat for sensitive species? What are the foreseeable impacts of population growth, climate change, group camps at Jungle Hill, Wapaloosie, Old Stage Trail and Ryan's Cabin Trail, some hosting in excess of 100 campers, each with its own generator, barbecue, ATV, dirt bike and mountain bike riders? How will wildlife cope with a changing climate and a rush of thrill seekers who just want to spend a couple of days letting loose of their work-a-day stress? Add increases in winter recreation use of Albion Hill Road and Twin Sisters will exacerbate stresses to sensitive wildlife species. What this plan allows and promotes is wildlife stress, 365 days a year.

Of the 20 percent of the CNF that is eligible to be Recommended Wilderness, the wild roadless areas of the Kettle Crest are of paramount importance and must be protected as wilderness. We oppose the proposed Special Interest Area designation in the Kettle Crest because it is far too expansive and its "recreation emphasis" will be an ecological disaster.

At a minimum, please recommend the following PWAs as Recommended for Wilderness: Profanity, Bald Snow, Twin Sisters, Hoodoo, Thirteenmile, Abercrombie-Hooknose, Salmo-Priest Adjacent, Grassy Top, Hall Mountain, and Quartzite.

We are very supportive of the Special Interest Area as a concept but only where it aligns with and is beneficial to adjacent rural communities. Please establish SIAs for the Swan- Cougar Area south of Republic in Ferry County and Calispell and Baldy Mt. Areas in Stevens & Pend Oreille County.

We support Alternative B-modified that includes LSOF restoration scheduled on a 20-50 year return rate depending on PAGs, ie, dry-Douglas fir PAG would have a 20 year restoration return rate whereas mesic & wet forest PAGs would have a longer return rate. LSOF restoration treatments should be factored into Alternative B's ASQ. Thirty-seven mmbf/yr does not accurately represent Alternative B as it was devised by the Northeast Washington Forestry Coalition (NEWFC).

We strongly support the overall direction of the Plan Revision towards restoration-based land management where restoring and maintaining ecological resilience of forests, watersheds, and habitats are the main focus. The Plans recognition of the ecological role of insects, disease, fungi, fire, and other disturbance events as driving agents of change, shaping forest and watershed structures and functions represents a big step forward.

I. Wildlife

Draft Land and Resource Management Plan, pg 19, states that the Kettle Crest is identified as a core area that is important for the recovery of Canada Lynx in Washington.

Wildlife Habitats, pg 49, "Canada Lynx in the Colville National Forest includes a core area (Kettle Crest) that is important to the recovery of Canada Lynx in Washington". The forest does not have any designated critical habitat for Canada Lynx; please explain the incongruence of having a core area without a designated critical habitat.

The Kettle Crest (Profanity, Twin Sister, Jackknife, Owl Mountain, Deer, Hoodoo, Bald-Snow, Thirteenmile, S. Huckleberry and Cougar PWA and Selkirk Crest (Abercrombie-Hooknose, Salmo-Priest Wilderness, Salmo Adjacent, Grassy Top, Hall Mountain and Harvey Creek) are the only two wildland complexes in the entire 1.1 million acre Colville National Forest. The habitat effectiveness for seclusion-dependent species must be improved by closing roads stitching back together PWAs where possible, not separating them by authorizing increased recreation uses (motorized, mechanized and non-motorized).

The LRMP Chapter 3 provides just the weaker metric of Desired Condition (DC) but not standards or guidelines

regarding habitat effectiveness. Sights & sounds of human presence are known to create flight and stress reactions to sensitive wildlife. In fact, LRMP recreation metrics as compared to those for wildlife offer much more detail and as such, certainty, that DC will be met in the future for those uses.

The proposed Kettle Crest SIA "recreation focus" would overlay wildlife seclusion habitats that provide critical breeding, rearing and migration linkages between the Rocky and Cascade Mountains. Focused recreation in the Kettle Crest would significantly degrade its habitat capabilities to sensitive wildlife.

Land management decisions must consider the entire landscape, recognize abundance and scarcity of the land. Wild areas are spatially scarce - developed areas are abundant. A recreation focused managed landscape overlaying scarce wildlife refugia is to put a round peg in a square hole. It doesn't fit. The abundance of opportunities for recreation-focused management currently exists on at least 80% of the Colville National Forest. To perpetuate healthy wild landscapes - that are unique in Region 6 USFS -- and that provide essential habitat to sensitive flora & fauna, it is essential to maintain the integrity and resiliency of the Kettle and Selkirk Crest PWAs.

We ask the Forest Plan include standards and guidelines regarding rest-rotation in range management. Rest rotation will have significant positive impacts to wildlife habitats for birds and wild ungulates - as Forest Service specialists have noted. "Rest rotation [is] the best thing for wildlife....." (December 14, 2011 Boulder Complex Environmental Assessment, IDT Meeting Notes)

How ironic it is that after 13 straight months of record high temperatures, the DEIS approach to climate change and its impacts to sensitive species is "high-centered" on whether one of the most efficient and non-polluting mechanical devices ever created - the bicycle - justifies relegating core wildlife habitat to day-use thrill seekers who drive their cars - mostly from metropolitan areas - to recreate in the Kettle Crest. The irony is efficient, non-polluting technology, is being pitted against wildness and wildlife habitat effectiveness that in part depends on solitude and the absence of human presence. The speed with which mountain bikes ply these wildlands shrinks their habitat effectiveness for wildlife. These are the last core habitat for seclusion dependents species such as lynx, wolverine, grizzly bear, mountain caribou, etc. - there are better places where mountain biking can flourish and where it doesn't degrade one of the most important wildlife habitats in the Colville National Forest.

The Kettle River Mountains are the southern terminus of the Monashee Mountains in British Columbia. The Granby River (N. Fk Kettle River) and Christina Lake watershed are hydrologically and geologically connected to the Kettle River Mountains. Recent hair snag surveys by Clayton Lamb, et al, (Figure 1, Lamb, et al 2015) in the upper Kettle River watershed indicated there are 74 bears in that system - many more than previously thought. Some of these bears are known to use parts of the Colville National Forest, especially as spring range. The Kettle River Mountains are part of the home range of the Kettle-Granby grizzly.

The Kettle Range has a unique and regionally outstanding role in providing habitat connectivity for wildlife moving between the Cascade, Rocky Mountain, and British Columbia's upper Columbia mountains sub-range. Early habitat permeability modeling highlights the Kettle Range as a habitat concentration area and as connectivity habitat for grizzly bear, wolverine, wolf, and Canada lynx (Figure 2. Singleton et al. 2002). Subsequent work by the Washington Wildlife Habitat Connectivity Working Group (Figure 3. <http://waconnected.org>) identified core and connectivity habitat for lynx, black bear, elk, and marten in the Kettle Range. More recently, in the Colville National Forest rating of inventoried roadless areas in the Kettle Range for connectivity value, six of the nine roadless areas (including its two largest and most prominent roadless areas) were rated moderate-to-high value for connectivity (Potential Wilderness Area Evaluation 2008). Models show that "the upper elevation forests associated with the Kettle Range may provide important stepping-stone habitats that could increase the permeability of the landscapes between the Rocky Mountains and North Cascades [that are] likely important to the long-term conservation of Canada lynx" (Figure 4, Gaines 2012).

Figure 1 The study area for the 2015 Kettle-Granby Grizzly Bear Population Inventory, with the locations of the 124 baited hair snag sites identified by coloured circles. No grizzly bears were detected at the turquoise circles, while grizzly bears were detected during at least one check at the purple circles. While grizzly bears were detected throughout the study area, they were more commonly detected in the area in and around Granby Provincial Park.

Figure 2. The habitat network for forest carnivores, from Singleton, Gaines and Lehmkuhl (2002).

Figure 3. The habitat network of the montane species guild, from WWHCWG 2010.

Figure 4. Canada lynx Habitat Concentration Areas and potential linkages, from WWHCWG 2010.

Habitat connectivity in the LRMP will be affected by the amount, size, and spatial arrangement of habitat, and

proximity and intensity of motorized use, especially for riparian and late-successional habitats (DEIS, p. 451). Alternatives, like the Plan Revision, with standards and guidelines that provide riparian protections to intermittent streams, lakes, and ponds, and limit harmful activities within riparian habitats confer benefits to habitat connectivity (DEIS, p. 332). Similarly, Alternatives that aim for lower road densities across more of the landscape will considerably reduce the negative effects of roads on habitat connectivity (DEIS, p. 451). Road density goals are set by Management Area designation.

Given the importance of the Kettle River Mountains to habitat connectivity, we request that the 5th Field Watersheds within the core connectivity habitat area be designated as Focused Restoration Management Area. This includes sub-watersheds within national forest lands south of Republic and north of the Colville Reservation from the western boundary to the Kettle Range and then north to Owl Mountain and east through the Wedge (the land area located between Kettle and Columbia River) to the northern boundary.

We also request the Plan Revision better address connectivity by adding guidance on how to manage national forest land adjacent and in the approach zone to current and future wildlife crossing structures built by the Washington Department of Transportation (WSDOT) on highways that intersect important connectivity areas, such as Highway 20 and 395. It should also provide clear standards, guidelines, and management direction for managers and project staff to consider when an area on the forest is identified as important for habitat connectivity with respect to vegetation management goals, road management plans, and recreation and human access considerations. To that end, clear quantifiable benchmarks (at a watershed or finer scale) to facilitate evaluation and measurement of progress toward maintenance and restoration of habitat connectivity during the life of the forest plan would be valuable. We request this direction be developed and added as part of the Plan Revision.

II. Recreation

A. Special Interest Areas

Special Interest Areas (SIAs) are a category of administratively designated area with outstanding natural characteristics or unique recreation or cultural values. The management objective of each special interest area is to protect for public use and enjoyment, special recreation areas with scenic, geological, botanical, zoological, paleontological, historical, or other special characteristics or unique values.

Whereas we laud the SIA concept, believing it has the potential for a beneficial relationship between recreation and rural community economic prosperity, we strongly disagree with locating an SIA overlaying the wildland complex of Profanity, Twin Sisters, Hoodoo and Bald-Snow PWAs. SIA will likely result in degradation of core wildlife and connectivity habitats and risk the survival of sensitive wildlife.

1. Proposed Calispel and Baldy SIA

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

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

Values: At the southern end the Quartzite Roadless Area has numerous creeks and off-trail hikes, rising far up

the southern flank of Chewelah Peak. A trail system was designed by the Forest Service a number of years ago, but never implemented due to a lack of funds. Creating the SIA would allow implementation of this project and expand recreational opportunities in the Horseshoe Basin.

Just north of Quartzite roadless area is the only ski area on the Colville National Forest - 49 Degrees North Ski and Snowboard Resort. Most of the resort is on the Colville National Forest and offers some of the finest skiing in the Inland Northwest, as well as summer trails for hiking and mountain biking. Just north of the resort is the Chewelah Peak Learning Center, a year-around center with lodging and kitchen facilities. Travel routes for hiking, cross country skiing and ATV's abound on Calispel Creek and its tributaries, the North Fork Chewelah Creek, Tacoma Creek, and Ruby Creek. The entire area has important camping, hunting, and riding opportunities for a diversity of recreational interests.

The adjacent Little Pend Oreille Wildlife Recreation Area has connector trails and long riding routes extend past the popular Little Pend Oreille Lakes. Lake Leo, Frater Lake, Browns Lake are all very popular and Tiger Meadows is a beautiful meadow that is surrounded by a boreal forest appearing.

Nearby communities that will benefit from the SIA designation include Chewelah, Usk, Cusick, Colville, Lone and Metaline Falls.

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

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

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

Both Calispel and The Baldy proposed SIAs would provide outstanding four-season motorized and non-motorized trail opportunities and relative proximity to Spokane and communities surrounding the Colville National Forest.

2. Proposed Swan-Cougar SIA

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

B. Administrative and Recreation Sites

We do not support large group camps for 100+ people in or adjacent to Inventoried Roadless Areas / PWAs.

Large group camps must be located in the roaded and modified landscape and associated with Special Interest Areas.

C. Expanding Trail Opportunities

Please add to Chapter 3 guidelines to identify and locate where suitable new trails in restoration and stewardship project areas and as advised by collaborative groups.

III. Wilderness

Less than 3% of the Colville National Forest is presently designated as wilderness - the least of any national forest in Region 6 and even though the Forest is within 1-2 hours from the second largest city in Washington state. We support and applaud wilderness recommendations made in the Proposed Action and carrying those forward in the Selkirk Crest in the Preferred Alternative with additions, not retractions.

The DEIS identifies 220,000 acres of wilderness-quality lands in northeast Washington but proposes to recommend for Wilderness protection only 68,000 acres (less than a third of qualifying lands). That's a substantial decline from the 2011 Proposed Action recommendation of more than 100,000 acres, and it misses a substantial amount of quality and qualifying lands for wildlife and recreation.

We are appalled that just a portion of one Potential Wilderness Area (PWA) in the entire Kettle River Mountains - Bald-Snow PWA -- has been recommended wilderness in the Preferred Alternative.

At a minimum, please recommend the following PWAs as Recommended for Wilderness: Profanity, all of Bald Snow, Twin Sisters, Hoodoo, Thirteenmile, Abercrombie-Hooknose, Salmo-Priest adjacent, Grassy Top, Hall Mountain, Harvey Creek and Quartzite. We also support Owl Mountain, Deer Creek, Jackknife, South Huckleberry, Bodie, Jackson Creek, Clackamas and Cougar as Recommended for Wilderness. Each of these areas is unique and deserving of the highest level of protection.

The Pacific Northwest Trail runs along most of the 45 mile-long Kettle Crest Trail. Increasing uses of this trail by equestrian and hikers if it is also mixed with increasing mountain bike usage is going to result in serious injury and even death. The Crest Trail and its feeder trails in particular, have steep, blind corners where a collision between biker and horse / hiker could be fatal.

Harvey Creek PWA, also known as the Bunchgrass Meadows and the Molybdenite Mtn area, 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.

Public opposition to wilderness - the largest percentage of which is in rural populations - is largely based on a long running misinformation campaign about wilderness management and fueled by anti-government (privatization movement) political organizations. Key inconsistencies and inaccuracies about wilderness management at multiple levels in the press, at public meetings (sometimes even by the Forest Service) and in personal conversations include not allowing: 1) hunting & fishing, 2) berry picking, 3) horse riding, 4) human uses, 5) trails to be maintained, 5) control of wildfires, 6) control of noxious weeds, 7) livestock grazing and that wilderness is 8) a sanctuary for wolves, and 9) is bad for the economy. All of these are completely false (see Section 4, (16 U.S.C. 1133), www.wilderness.net).

The CNF's PWA analysis rated Profanity, Hoodoo, Twin Sisters, Thirteenmile and Bald-Snow highly for several key criteria. These PWAs together with four adjacent Jackknife, South Huckleberry, Deer Creek, Owl Mountain and Cougar PWAs, is the largest wildlands complex between the Cascade and Rocky Mountains. PWA evaluation found these areas provide solitude, rare dark night skies for stargazing, wildlife habitat, solitude and lack of representation in the National Wilderness System. The importance to wildlife is supported by substantial modelling and is of increasingly critical for adaptation to a changing climate. In addition to climate change other priority objectives of the current administration as are water quality and quantity services - all of which are benefitted by forest wilderness.

We recognize that the Snow Peak Shelter in the Bald Snow PWA and mountain bike use of parts of Profanity PWA represent modest challenges, but these can be resolved or mitigated in ways that are fair, consistent with policy, and represent the best balancing of interests. There are numerous opportunities using existing trails and constructing new connector routes that could serve the interests of mountain bikers.

Exclusion of the north half of Bald-Snow PWA from wilderness management because of the Snow Peak Shelter is not supported by law. The Wild Sky Wilderness in Washington has a shelter (an old lookout) within its boundaries that Congress directed the Forest Service to continue its use. Compatible uses cannot be used to exclude PWAs from Recommendation for Wilderness.

The legal definition in the Act:

"(Sec 1(c)) a wilderness in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where the man himself is a visitor who does not remain. (c)(1) generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable, 2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation, 3) has a least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in the unimpaired condition and (4) may contain ecological, geological, or other features of scientific, educational, scenic, or historical value." [emphasis ours]

The historical use of the so-called "purity" standard again seems to be gaining favor within the Forest Service and in the realms of anti-wilderness groups regarding Kettle River Mountain PWAs and specifically the Snow Peak Shelter. Congress has clearly debunked this and by none better than Washington Senator Henry M. Jackson during congressional debate of the Eastern Wilderness Act:

"A serious and fundamental misinterpretation of the Wilderness Act has recently gained some credence, thus creating a real danger to the objective of securing a truly national wilderness preservation system. It is my hope to correct this false so-called "purity theory" which threatens the strength and broad application of the Wilderness Act." (The Enduring Wilderness, Doug Scott, 2004, p 69)

A.Colville Forest Planning Summit

The CNF's own Forest Planning Summit (March 2006 - January 2007) found strong support among stakeholders for retaining the "wilderness characteristics" of the PWAs. While some interests expressed a desire for that objective to be achieved through alternative labeling -- i.e. Backcountry and Special Interest Area - Forest Summit participants did not endorse either label as an alternative to Wilderness Management in the Kettle Crest. The facts were, however, the majority of Summit participants supported wilderness for the majority of PWAs.

During the Summit process participants agreed wilderness would be a key issue area discussed during this lengthy process. It was no accident or misunderstanding of the importance of wilderness - it was as deliberative an issue as was timber harvest. Yet the Forest Service facilitated discussions about wilderness often described it as "restrictive" rather than its true meaning as described in Section 4(a) of the Wilderness Act (P.L. 88-577):

(1) Nothing in this Act shall be deemed to be in interference with the purpose for which national forests are established June 4, 1897 (30 Stat. 11) and the Multiple-Use Sustained Yield Act of June 12, 1960 (74 Stat. 215)

The facts are clear, the Wilderness Act is by design is NOT about obstructing, restricting or otherwise interfering with the U.S. Forest Service management of wilderness within the National Forest System. Section 2 (a) clarifies Congress's intent:

"...these shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character...."

It was the consensus agreement of Summit participants that preservation of PWA's "wilderness character" was of paramount importance. The DEIS does not accurately portray outcomes of the Summit and to take a hard look at the past, present and future of environmental consequences of the Preferred Alternative.

B. Wilderness History in the Kettle Crest

The 1980 Kettle Range wilderness proposal - in total, 80,000 acres -- included Profanity, Twin Sisters, Bald-Snow and Thirteenmile roadless areas -- though it was supported by the U.S. Senate, Kettle Range was cut out of the final House wilderness legislation at the behest of Congressman Tom Foley. However, Senate report language clarified its desire regarding future management of the Kettle Crest:

U.S. Senate Report 98-461, 98th Congress, May 18, 1984

Senate Report 94-461 told the Forest Service to manage the Crest as "primitive" which is the non-mechanized Wilderness management standard -- and they did so until the mid-1990's.

Unfortunately, the 1984 Washington Wilderness Bill also contained what was called "hard release" language that forbade the Forest Service from recommending wilderness in the 1988 Colville National Forest Long Range Management Plan.

The facts clearly show that Congress planned to take a second look at the Kettle and Selkirk Crest at some point in future wilderness legislation and it directed the Forest Service to manage these roadless areas so as to preserve that option. The Forest Service must account for the fact that Profanity, Bald-Snow, Twin Sisters and Thirteenmile in the Kettle Crest (and Grassy Top, Harvey Creek and Hall Mountain in the Selkirks) would have been recommended as wilderness in the 1988 LRMP - there was little opposition at that time to wilderness management and much support for it. Twenty eight years later, population growth, climate change and other issues have increased the need for wilderness management for the Kettle and Selkirk Crest and all other PWAs in the Colville National Forest.

C. Need

Less than 3% of the Colville National Forest is designated wilderness and managed as such.

This is the lowest level in Region 6 - that averages 19% per Forest -- and one of the lowest in the western U.S. The Colville Forest's unique geological, geographical and ecological features and its location just an hour north of Spokane, Washington's second highest populated city, makes preserving its PWAs essential to future generations.

D. Conflicting Uses

The only conflicting use occurring in the Profanity, Bald-Snow and Abercrombie-Hooknose PWAs that would not continue under Alternative B and R is mountain biking. Even if all PWAs were managed as per B & R and

mountain bike use was disallowed (the majority of PWAs are not now used by mountain bikers), 80% of the Colville Forest would be open to mountain biking. There are clear choices - PWAs are in fact scarce compared to the roaded landscape.

KRCG embraces collaborative problem-solving and we are hopeful the mountain bike community will join us in this enterprise. There are numerous opportunities to mountain biking including loop trails in the Gibraltar Mountain area Boulder Pass to Taylor Ridge and Sherman Trail to Kettle Crest, and there are trail-use opportunities that have not been fully explored that would make wonderful mountain bike accessible trails.

E. Motorized PWAs

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 similar 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 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.

Motorized PWA trails, such as Owl Mountain, Jackknife, Twin Sisters and South Huckleberry also provide important wildlife habitat and connectivity and other values and are currently designated as "Semi-primitive, motorized MA-10." The motorized accessible area within these PWAs should not be expanded. To protect lynx and wolverine habitat and habitat connections that facilitate adaptation to climate change and for these and other purposes, existing wilderness qualities within Potential Wilderness Areas should be maintained whether or not they are recommended for wilderness designation.

F. The Vote Not Counted

Alternative P is purported to be a mix of all other alternatives. Alternative O is alleged to represent agreements by participants of the Colville Forest Plan Summit that took place from March 2006 to January 2007, but it does not accurately reflect consensus agreements to maintain "wilderness characteristics" of Potential Wilderness Areas.

It is critically important to recognize the Forest Planning Summit participants wanted solutions and were willing to compromise to get them. Participants were strongly supportive of the NEWFC Blueprint (represented best by Alternative B) and its wilderness proposals. The poll below (Figure 1) was taken by the Forest Service at the January 20, 2007 Collaboration Workshop on wilderness, part of the Summit process. The majority of participants indicated "strong support" of wilderness designation for 14 of the 18 PWAs (Inventoried Roadless Areas), while 16 of the areas received "strong" or "some" support for wilderness from the Collaboration participants.

In general, these results are consistent with timber management and other elements of the NEWFC Blueprint that were actively debated by Summit participants. Although this vote was not reported in the Forest Service's official notes of the collaboration Summit Round-Up on March 1, 2007. Comments submitted by KRCG, The Wilderness Society and Washington Wilderness Coalition to the Proposed Action (2011) made note of this error. The DEIS and Alternative O ignore these facts.

Figure 1. Recommended Wilderness - Participant voting at the Colville Forest Planning Summit, January 2017

IRA Name ABCD Total A+B%

1 Salmo Priest Adjacent 28 11 13 190% 94%

2Hoodoo176132763%85%
 3Deer Creek198333358%82%
 4Grassy Top194332966%79%
 5South Huckleberry156242756%78%
 6Hall Mountain174332763%78%
 7Abercrombie Hooknose184623060%73%
 8Thirteenmile192532966%72%
 9Profanity191442868%71%
 10Bald Snow182442864%71%
 11Jacknife145262752%70%
 12Owl Mountain182362962%69%
 13Twin Sisters182452962%69%
 14Cougar Mountain153542756%67%
 15Quartzite126742941%62%
 16South Fork Mountain106742737%59%
 17Harvey Creek151310293%21%
 18Lost Creek12116205%15%

A = Strong Support as Recommended Wilderness Area

B = Some Support as Recommended Wilderness Area

C = Limited Support as Recommended Wilderness Area D = No Support as Recommended Wilderness Area

These results of the above vote are particularly illuminating due to the experience and knowledge of the Forest that the participants at the Summit collectively represented. Importantly, this in-depth knowledge and the results of the vote were informed by the year-long commitment of Summit participants to share information and collaborate to reach a balance of Forest uses. As such, these results must be interpreted as well-informed, representative of interests, especially when compared to the place-based workshops conducted after the Summit that were short term, not collaborative and specifically whose agenda just addressed the wilderness issue but absent all other uses, whereas the Summit addressed a plethora of inter-connected multiple uses and interests.

G.Economic Benefits of Wilderness and other Protected Lands

An October 2014 study by Headwaters Economics detailed how protected federal lands (such as Wilderness or National Parks) not only preserve unique landscapes, but have the potential to attract in-migrants such as baby boomers, which in turn help support a robust local economy. <http://headwaterseconomics.org/public-lands/protected-lands/insights-baby-boomers-move-near-protected-lands-help-drive-economies/>

The Baby Boom generation is retiring in droves (up to 10,000 each day), and many of these newly-minted retirees are on the move. But where are they moving to? The criteria are as varied as the retirees, and include housing, climate, and family. But as research by Headwaters Economics and others has shown, boomers are also moving to places with protected public lands.

Protected federal lands (such as Wilderness or National Parks) not only preserve unique landscapes and natural resources, but have the potential to attract in-migrants such as baby boomers, which in turn help support a robust local economy.

This chart shows the difference in migration rates between counties with low and high levels of protected public lands during the past 40 years for three different age groups: all seniors 55 and older, those 55-64 or "pre-retirees", and retirees aged 65-74. [These patterns also hold for each decade.]

The difference in migration is greatest for pre-retirees, who are likely to be active and enjoy outdoor recreation on these lands. The difference in net migration is smaller for older retirees, but is still significantly higher in counties with high protected public lands.

Previous research by Headwaters Economics has shown that protected public lands help to create a competitive economic advantage, contributing to growth in employment, population, and personal income.

Migrating baby boomers provide a unique economic stimulus, bringing along with them an influx of retirement and investment income. This income can then boost other parts of the economy, including the health care and retail sectors.

In another report (January 2013) Headwaters found that county-specific analysis that built on earlier work (West Is Best, December 2012) by Headwaters Economics that looked at the U.S. West's 286 non-metro counties as a region, and found a meaningful relationship between the amount of protected public land and higher per capita income levels in 2010. According to this analysis, the effect protected public lands have on per capita income can be most easily described in this way: on average, western non-metro counties have a per capita income that is \$436 higher for every 10,000 acres of protected public lands within their boundaries. The study found that three economic measures were positively associated with protected public lands: per capita income (2010), growth in per capita income (1990-2010), and growth in per capita investment income (1990-2010). (Rasker, R., P.H. Gude, M. Delorey. 2013, Journal of Regional Analysis and Policy).

H. Specific Comments on the PWA Wilderness Evaluations

Compatible uses cannot be used to exclude proposed wilderness areas (PWAs) from Recommended Wilderness. The following activities are compatible with wilderness designation were indicated as reasons that the Potential Wilderness Areas may not be recommended for wilderness:

- Wildland Urban Interface (which we define as .25 miles from a community and where fuels reduction is allowed within wilderness)
- grazing
- traffic noise
- city lights
- adjacent motorized activity
- adjacent private property

IV. Late-successional and old forest habitat conditions

Forest research has yielded a wealth of information on the availability of large trees and snags, the role they play in ecosystems, and how they were arranged in stands across the landscape of northeastern Washington. Forest spatial patterns and landscape ecology have been transformed by timber harvest, fire suppression, road construction, and domestic grazing, resulting in substantive changes to disturbance regimes, and wildlife habitat availability and distribution (Hessburg et al. 1999, Hessburg and Agee 2003). Late-successional and old forest habitats are generally below their historic range of variability (DEIS, p. 76, 380); there is "considerably less old forest and associated habitat on the landscape than would have historically occurred." (DEIS, p. 132, 279).

Late-successional forests provide disproportionately high ecological value as wildlife habitat, carbon storage, and resilience to natural disturbance. Late-successional conditions include large and old trees, snags, and down woody debris. Scientists have described large and old trees as the ecological backbone of dry and mesic forests (Franklin and Johnson 2012, Hessburg et al. 2015, Stine et al. 2014). Old trees have distinct qualities related to crown structure, bark thickness and color, heartwood content, and decadence which take a century or more to develop. Large old trees are the primary source of large snags and down wood, which support a broad diversity of species across forest types. In fire prone forests, large old ponderosa pine, western larch, and Douglas-fir are most likely to survive fire events, and serve an important role in post-fire recovery ecological processes.

Although the Revised Plan has a clear and practical standard for retaining large snags, it offers no explicit protections for large and old trees and only aspirations for restoring large tree habitat across the landscape (e.g. FW-DC-VEG-06. Biological Legacies. Plan Revision, p. 32). The goal of improving ecological resilience through restoring forest structures to historic ranges of variability cannot be achieved without clear and practical standards for retaining and recruiting large and old trees, and restoring landscape spatial patterns. The dynamic landscape approach has ambiguous guidelines regarding large and old trees that must be clarified and quantified.

We strongly recommend diameter guidelines for the following reasons:

1. Diameter guidelines (with specified exceptions) are crystal clear, and operational.
2. Diameter guidelines ensure effective large and old tree and snag retention, and provide spatial variability in tree and snag distribution (heterogeneity, such as clumping and variable spacing).
3. Diameter guidelines facilitate monitoring and accountability.
4. Large trees and snags are scarce in the region, and effective protection is crucial for meeting ecological objectives.
5. Large trees and snags have inordinate ecological and economic value. Diameter guidelines mitigate the economic incentive to remove the largest, most ecologically valuable trees and snags from the site.
6. Diameter guidelines (with specified exceptions) will not impair attainment of forest management objectives and will ensure ecological resilience goals will be achieved.

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

FW-STD-WL-13. Large and Old Tree Habitat:

Large and old trees are currently below the desired conditions. Trees older than 150 year of age of all species shall be retained unless they pose a safety hazard, and identified using visual ratings such as the Van Pelt guide (Van Pelt 2008). Trees greater than 21" dbh of priority species shall be retained based on vegetation type (Table below), unless they pose a safety hazard or unusual operational conflict, or for ecological reasons that are documented, justified, and assessed at the project level. In areas lacking 21" diameter trees, generally retain the upper 25 % of the site's diameter distribution of priority species

Vegetation Type Priority Species

Douglas-fir Dry Forest Ponderosa Pine, Western Larch

Northern Rocky Mountain Mixed Conifer Forest Ponderosa Pine, Western Larch, Douglas-fir, Western White Pine

All other veg types Ponderosa Pine, Western Larch, Douglas-fir, Western White Pine, Western Red Cedar, Engelman Spruce

IV Landscape Pattern

Most of the major functions being managed for on the Colville NF (e.g. resilience, habitat, aquatic function, etc.) are driven by large scale patterns of vegetation structure and composition (Lindenmeyer and Franklin 2002, Bisson et al. 2003, Benda et al. 2004, Jain et al. 2008, 2012, Dare et al. 2009, Ager et al. 2010, Turner 2010, Moritz et al. 2011, Perry et al. 2011, Peterson et al. 2011a, Franklin and Johnson 2012, Stine et al. 2014). Yet, the standards and guidelines in the plan revision do not provide concrete guidelines for restoration of landscape pattern. Although the importance of pattern is mentioned in the DEIS and Vegetation Report, there is little detailed discussion of how pattern across the CNF has been altered through past management and how it should be assessed and restored (see Hessburg et al. 2015). The general guidance to restore heterogeneity across the landscape is vague. In watersheds that are already too fragmented, creating additional small to medium patches of different structure/cover types can further impair habitat and other ecosystem functions.

V. Assessment and Restoration of Spatial Patterns

The Plan Revision must incorporate a process for assessing and restoring landscape pattern in order effectively address the need to "focus restoration actions in Douglas-fir dry and Northern Rocky Mountain mixed conifer landscapes, and create conditions that are more resilient to anticipated disturbances" (DEIS, p. 5). This is especially important with a dynamic landscape approach where managers will be able to manage a greater portion of the landscape and will thus need clear, empirically based guidance for how to restore landscape pattern.

We request that the selected Alternative be modified to include restored landscape pattern as a desired condition, in title (e.g. add landscape as in: FW-DC-VEG-04: Forest and Landscape Structure, Plan Revision, p.

30) and content (e.g. "The historical landscape pattern of forest structure and composition is the desired condition. The historical landscape pattern is the configuration of landscape mosaics (e.g. patch sizes, distribution, connectivity, etc.) derived from landscape evaluation." Plan Revision, p. 30). Underlined text added to existing content.

We also request that clear language be included in the Plan Revision that states that a scientifically credible process to holistically evaluate departure and address restoration needs for landscape pattern in project planning will be developed and formally adopted. Development of this process should involve outside scientific involvement and review. Our support of the dynamic landscape approach and its likelihood being effective is contingent on such a process.

VI. Aquatic and Riparian Conditions

Aquatic and riparian conditions on the Colville National Forest are generally not very good. As a result, trout populations are not doing well. A recent Aquatic Ecological Condition (AEC) assessment of the Colville National Forest rated most sub-watersheds as "functioning at risk or not properly functioning" including poor scores for local fish populations and watershed condition in most watersheds (DEIS, p. 188). Low ratings for large woody debris and channel shape and function, high road and riparian road density, and degraded riparian conditions are the primary culprits (DEIS, p. 189, 215). Riparian degradation in many areas has been caused by livestock grazing, mining, timber harvest, fire management, road construction and water developments (DEIS, p. 163, 272). The viability of westslope cutthroat trout, interior redband trout, and bull trout is at risk within all subbasins (DEIS, p. 255).

Related assessments of physical and biological conditions through the "Watershed Condition Framework" indicate that 82% of the Colville National Forest's subwatersheds are functioning at risk (DEIS, p. 270). In general, while aquatic physical conditions are mostly good (72% of subwatersheds are properly functioning), aquatic habitat and wildlife in most subwatersheds are functioning at risk or not properly functioning. Roads were the main driver for nearly all subwatersheds to be rated as functioning at risk or not properly functioning terrestrial physical conditions (Table 88. DEIS p. 269-270).

Stream surveys indicate that many stream reaches are not meeting INFISH riparian management objectives including pool frequency and size, large woody debris, channel width, stream bank integrity, and road density (DEIS, p. 164). Other INFISH monitoring showed that channel conditions for streams in managed watersheds were in poorer condition than reference watersheds (DEIS, p. 271).

Watersheds, streams, and riparian areas and associated fish and wildlife are sustained by properly functioning ecosystem functions and processes. Given the habitat quality and species viability issues on the Forest, the Plan Revision highlights a specific need to accelerate improvements in watershed condition across the forest, and to provide management direction to maintain and restore properly functioning watersheds (DEIS, p. 297). The Region's Aquatic and Riparian Conservation Strategy (ARCS) ensures a consistent broad scale baseline approach to conserving fish and aquatic habitat that is essential to wide-ranging species, while allowing local conditions to dictate modifications. The purpose of aquatic and riparian management in the region is to maintain and restore the ecological health of watersheds and aquatic and riparian ecosystems, including networks of properly functioning watersheds that support fish and wildlife, and dynamic ecological processes responsible for creating and sustaining habitats (DEIS, p. 200-201).

The dire need for change is partially addressed through the Plan Revision's ARCS-modified which aims to increase restoration pace and scale, adds additional key watersheds where focused restoration will occur, widens buffers on certain streams, takes better account of grazing impacts, and includes other components to improve aquatic conditions (DEIS, p. 328). The Plan Revision also provides clarity with Riparian Management Areas standards to maintain conditions in properly functioning areas and to restore conditions in areas that are not properly functioning, all of which we support as we believe they will improve outcomes and efficiency.

Also crucial to addressing the need for change is the Desired Conditions (goals) in the General Restoration Area of two miles of road per square mile (DEIS, p. 89) and for one mile of road per square mile in Focused Restoration Area (DEIS, p. 87). Roads have wide ranging, chronic and long term impacts to aquatic processes and functions (DEIS, p. 182, 198, 280-1). Aquatic conditions would continue to be impaired with road densities above 2.4 miles per square mile, generally considered indicative of a not properly functioning watershed and not conducive to supporting strong fish populations (DEIS, p. 221). We strongly support the Plan Revision's road density goals because they are essential to ensure progress towards restoring aquatic ecosystem function, preventing further degradation, and improving conditions for imperiled trout.

But more - quite a bit more - is needed to prevent additional degradation and ensure a trend toward improved fish and aquatic habitat. The Plan Revision must include plan components that for habitat conditions that will support viable populations.

To meet the Plan Revision's identified needs requires clear direction in the form of desired conditions, objectives and standards and guidelines for watershed and site scale processes and functions, including riparian management areas. In Riparian Management Areas, the Plan Revision establishes some clear standards to ensure the stated objectives will be achieved. For example, the standard "MA-STD-RMA-01 Aquatic and Riparian Conditions" provides that properly functioning riparian management areas will be maintained by project activities and not properly functioning riparian areas will be improved (Plan Revision, p. 99). This is great.

But the standard allows site-level degradation in riparian areas, provided long term benefits will accrue. Given the poor condition of riparian areas and concerns about species viability (DEIS, p. 208), we request that the selected Alternative be modified to prevent degradation at the site level, particularly in degraded riparian areas. Site level impacts, such as sedimentation and channel or bank alterations (see DEIS, p. 274 - 283 for other examples), can have significant, immediate, and longstanding harmful effects to aquatic habitat and species viability in areas directly adjacent to project areas as well as at the watershed scale.

We request the selected Alternative add the following language to acknowledge near term, site-level effects:

MA-STD-RMA-01 Aquatic and Riparian Conditions

"Project activities in riparian management areas shall not result in long-term degradation to aquatic or riparian conditions at the site or watershed scale. Limited short-term or site-scale effects from activities in properly functioning riparian management areas may be acceptable when they support and do not diminish long term benefits to aquatic and riparian resources. Activities in riparian management areas that are not properly functioning shall maintain or improve conditions at site and watershed scale." Plan Revision, p. 99. Underlined text added to existing content

It's important to note that managing riparian conditions alone will not necessarily protect aquatic conditions. Project activities outside of Riparian Management Areas also strongly influence aquatic conditions (see e.g. DEIS, p. 274-283 for role of upland (non-riparian) activities such as timber harvest and road construction on watershed function; also at DEIS, p. 268: "...water quality and aquatic habitat are related to the integrity and functionality of the upland and riparian areas across the watershed (Potyondy and Geier 2010)").

We request that the selected Alternative be modified to include a Forestwide Standard for Aquatic Conditions:

FW-STD-WR-06. Watershed and Subwatershed Conditions

When subwatersheds are properly functioning, project activities shall maintain those conditions

When subwatersheds are not properly functioning, and to the degree that management activities would drive or contribute to improper function, project activities shall be implemented to improve those conditions.

Project activities in subwatersheds shall not result in long-term degradation to aquatic or riparian conditions at the site or watershed scale. Limited short-term or site-scale effects from activities in properly functioning watersheds may be authorized when they support and do not diminish long term benefits to aquatic and riparian resources. Activities in subwatersheds that are not properly functioning shall maintain or improve conditions at site and watershed scale.

Given the importance of maintaining functional conditions and restoring degraded conditions, the Plan Revision should specify that National Forest lands will maintain and restore aquatics rather than simply to contribute to aquatics.

We request that the selected Alternative modify the first ten Forest Wide Desired Conditions by replacing "contribute" with "maintain and restore" using the following as an example:

FW-DC-WR-01. Natural Disturbance Regime of Aquatic and Riparian Systems

National Forest System lands maintain and restore the distribution, diversity and resiliency of watershed and landscape-scale features..."

The objectives for Riparian Management Areas are to maintain and restore riparian and aquatic structure and function of intermittent and perennial streams, confer benefits to riparian-dependent plant and animal species, enhance habitat conservation for species dependent on the riparian/upslope transition zone, improve water quality and flows, and contribute to greater habitat connectivity in the watershed (DEIS, p. 195). INFISH included quantified riparian objectives which should be incorporated into the Revised Plan as Desired Conditions.

To ensure that the demonstrated benefits of INFISH continue into the future, we request that the selected Alternative include Desired Conditions for Riparian Management Areas for pool frequency, water temperature, large woody debris, bank stability, lower bank angle, width/depth ration and other habitat features as dictated by advances in scientific understanding.

It's important to recognize that the Plan Revision has no direction for watershed analysis or evaluations, which runs against INFISH and the Aquatic and Riparian Conservation Strategy. Watershed analysis serves a critical role in providing for aquatic and riparian conservation and management. In planning efforts, the overall watershed condition and array of processes operating there need to be considered. Watershed condition includes channel and riparian areas, the condition of the uplands, distribution and type of vegetation, land use history, and species distribution and abundance. These factors and others strongly influence the structure and function of aquatic and riparian habitat. Watershed analysis serves as the basis for developing projects and monitoring and restoration needs. The selected Alternative must describe how watershed and landscape evaluations will be used to assess broad scale ecological functions and direct and prioritize project activities.

In what might be an oversight, the Plan Revision describes size of Riparian Management Areas for different aquatic features (Plan Revision, p. 96-98), but defines it as "Background Information" which is not a plan component and projects and activities are not expected to be consistent with background material (Plan Revision, p. 14). Riparian Management Areas for fish bearing streams, permanently flowing non-fish bearing streams, intermittent streams, lakes, ponds, wetlands, and unstable and potentially unstable areas must be designated management areas where projects and activities align with land designation boundaries. Clarification on this point is requested.

Wetlands, moist meadows, and riparian ecosystems provide habitat for the bulk of documented sensitive plants on the forest (DEIS, p. 100). There is a need to change management in order to avert actions that will contribute to population or species decline or loss of viability (DEIS, p. 102, 113). Grazing affects hydrologic and aquatic functions are most pronounced in riparian areas because these areas are most sensitive to livestock disturbance and where use is often concentrated (DEIS, p. 279). We support the Plan Revision's standards and guidelines to better reflect science and improve management in areas critical to aquatic and riparian function, including bank stability (DEIS, p. 231).

Conclusion:

We appreciate this opportunity to submit comment the CNF DEIS and LRMP. We are most hopeful that the ROD, FEIS and LRMP will assimilate recommendations made in this comment letter. We look forward to working collaboratively with the U.S. Forest Service in the spirit of cooperation and that is beneficial to the forest ecosystem and for the greater good.

Sincerely,

Timothy J. Coleman
Executive Director