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Title: Director, Rivers of Puget Sound & Columbia Basin
Comments: November 6, 2018

USDA Forest Service

Attn: Chris French, Objection Reviewing Officer 1400 Independence Ave SW

EMCLEAP, Mailstop 1104

Washington, DC 20250

RE: Objection regarding the revised Colville Land Management Plan

Submitted via email to: objections-chief@fs.fed.us

To Objection Reviewing Officer:

American Rivers and American Whitewater 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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American Rivers is a national nonprofit 501(c)(3) river conservation organization founded in 1973. American Rivers protects wild rivers, restores damaged rivers, and conserves clean water

for people and nature. Headquartered in Washington, DC, American Rivers has offices across the country and more than 200,000 members, supporters, and volunteers including many in Washington state. We have been working to protect and restore rivers in the Pacific Northwest for over 25 years through conservation advocacy, Wild and Scenic River designations and management, integrated watershed management, floodplain restoration, and dam removal projects. American Rivers and its members have an interest in the health of the rivers of the Colville National Forest.

American Whitewater is a national nonprofit 501(c)(3) river conservation organization founded in 1954. With approximately 6,000 members and 100 local-based affiliate clubs, the organization represents tens of thousands of whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. Our members enjoy recreational opportunities on rivers of the Colville National Forest.

American Rivers and American Whitewater submitted joint organizational comments regarding the draft Colville National Forest Plan Revision and Draft Environmental Impact Statement Environmental Assessment in July 2016.

As with our comments submitted in 2011 on the Okanogan-Wenatchee and Colville Forest Plan Revision Proposed Action and in 2016 on the Draft Programmatic Environmental Impact Statement, this objection is limited to Wild and Scenic River eligibility.

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 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 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 conditions" (e.g., federal fisheries listings, land ownership changes, changes in recreational use patterns, plans for aquatic restoration, etc.) equally apply to the Colville National Forest and should be given such consideration. Such a review is perhaps even more important for the Colville National Forest, given that only two rivers (Kettle River and South Salmo River) were found eligible in the first forest planning effort.

For example, we believe that Sullivan Creek merits consideration of the following outstanding remarkable values and should be found eligible by the Colville National Forest:

Sullivan Creek

Sullivan Creek is one example of a river on the Colville National Forest that should be further analyzed due to its outstandingly remarkable recreation, fisheries, and other values. In addition, specific "changed conditions" since the previous analysis of nearly 30 years ago justify an updated review, which is incumbent upon the U.S. Forest Service to give new data a hard look. Sullivan Creek flows through a scenic river canyon in the Colville National Forest. Sullivan Creek has a long and rich history of human development, including the construction and subsequent removal of Millpond Dam. The removal of the dam has further enhanced the regionally and nationally significant values as outlined below. The recent settlement agreement to remove an old hydropower dam on this river will further enhance the regionally and nationally significant values as outlined below.

1. Recreation - Sullivan Creek offers paddlers an opportunity to float meandering Class II upper reaches, and a spectacular and remote Class V lower Canyon. It offers one of the few creek boating opportunities on the Colville National Forest and is known to attract paddlers from throughout or beyond the region of comparison. The regional significance of Sullivan Creek for whitewater boating represents a changed condition since the inventory completed for the 1988 Forest Plan.

2. Scenery - Sullivan Creek offers views of a clear blue stream tumbling over falls and rapids in its lower slate canyons, and as it meanders through moist forest in its upper reaches.

3. Fisheries - Abundant clear and cold water support bull trout and other native fish like Westslope Cutthroat trout. Sullivan Creek is listed as critical habitat for Bull trout, a "changed condition" that has occurred since the inventory completed for the 1988 Forest Plan, and provides the best salmonid spawning and rearing habitat of any tributary of the Boundary

Reservoir. This habitat makes Sullivan Creek very important for Bull trout and other native species that are the primary beneficiaries of Millpond Dam removal and river restoration.

4. Wildlife - Sullivan Creek is home to numerous nationally and regionally rare wildlife species

including lynx.

Potential Resolutions

Objection to Wild & Scenic Rivers review

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

We request that the Forest commit to doing an eligibility determination as part of future NEPA efforts associated with watersheds that include Sullivan Creek and consider the changed conditions over the past 30 years.

Thank you for the opportunity to register this objection and we look forward to discussing any remedies with respect to providing true balance to this plan revision and taking full advantage of this opportunity for the Colville National Forest to identify eligible wild and scenic rivers.

Please do not hesitate to contact us with any questions regarding our comments or for further discussion.

Sincerely,

Wendy McDermott

Director, Rivers of Puget Sound and Columbia Basin

Thomas O'Keefe, PhD

Pacific Northwest Stewardship Director