Data Submitted (UTC 11): 7/4/2016 7:00:00 AM

First name: Greg Last name: Griffith

Organization: State Historic Preservation Office

Title:

Comments: Original Message-----From: greg.griffith@dahp.wa.gov Sent: Tuesday, July 05, 2016 5:02 PM

To: FS-colvillecontactus <colvillecontactus@fs.fed.us>

Subject: WWW Mail: Comments on Draft CNF Management Plan Update

July 5, 2016

Mr. Rodney Smoldon, Supervisor Colville National Forest 765 South Main Street Colville, Washington 99114

In future correspondence please refer to: Project Tracking Code: 2016-01-00418

Re: Draft Colville National Forest Plan Update Dear Mr. Smoldon:

On behalf of the Washington State Historic Preservation Officer (SHPO), I want to thank you for the opportunity to review and comment on the above referenced plan update. In response, DAHP staff has reviewed the draft plan and Draft Environmental Impact Statement (DEIS). As a result of our review, the following comments are provided for your review:

- 1) We appreciate the draft plan and DEIS that includes discussion on how the Colville National Forest (CNF) will address protection of heritage resources on USFS lands.
- 2) DAHP also appreciates the work by CNF to identify and protect heritage resources affected by resource management activities as well as working to control damage to these resources from inadvertent recreation impacts and vandalism.
- 3) While we acknowledge that management of heritage resources will be addressed through the agency's Section 106 consultation responsibilities, we recommend a more proactive approach to managing CNF heritage resources. To this end, we recommend that the plan identify an approach to project planning that builds-in avoidance of heritage resources early in the process rather than mitigating adverse effects after plans are designed.
- 4) We encourage the plan to identify certain activities as afforded to take place under Section 110 of the National Historic Preservation Act, such as survey/inventory, nomination, planning, and outreach.
- 5) We recommend that the plan include content that addresses how CNF will approach heritage resource management issues such as disaster preparedness and response; challenges to heritage resources in wilderness areas; and potential surplus of historic CNF properties to other entities.
- 6) Finally, we recommend that the plan include great recognition of the overlap of heritage resource issues with other resource management issues such as recreation, Scenic Byways, and sustainability.

The above comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Also, we appreciate receiving copies of any correspondence or comments from concerned tribes and State of Washington * Department of Archaeology & Department of Archaeology & Department of Preservation P.O. Box 48343 * Olympia, Washington 98504-8343 * (360) 586-3065 www.dahp.wa.gov other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: http://www.dahp.wa.gov/programs/shpo-compliance. To assist you in conducting a cultural resource survey and

inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.

Thank you for the opportunity to review and comment. If you have any questions, please contact me. Sincerely,

Gregory Griffith
Deputy State Historic Preservation Officer
(360) 586-3073
greg.griffith@dahp.wa.gov

The concerns identified are addressed specifically in the Forest Service Heritage Program Managed to Standard direction. The Heritage Program will continue to follow all laws, regulations, and policy when administering its duties.