



# National Environmental Policy Act (NEPA)

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## **Eligible Objectors & Interested Persons for this issue:**

- WildEarth Guardians
- Teck Washington, Inc., Pend Oreille Operations
- Washington Cattleman's Association
- Sierra Club/Alliance for the Wild Rockies
- The Lands Council
- Stevens County Cattleman's Association
- Northeast Washington Forest Coalition

## **Objections:**

- The length and complexity of the revised Land Management Plan (LMP) and final Environmental Impact Statements (FEIS) preclude most people from participating in comment periods.
- The Forest failed to respond to specific comments, in violation of National Environmental Policy Act (NEPA), or "ignored, mischaracterized, and/or downplayed" public comments.
- The revised LMP failed to include alternatives that address: demands for grazing, reduced grazing, no grazing.
- Alternatives B and C in the FEIS were not fully considered or properly analyzed.
- The FEIS does not acknowledge some Allotment Management Plans have not been updated in 40 years.
- The revised LMP and FEIS do not consider or incorporate best available science in the formulation of alternatives and disclosure of impacts.
- The FEIS does not disclose the reliability of data and limitations of models.
- The Forest Service failed to conduct monitoring directed by the 1988 Forest Management Plan, which compromised the FEIS's ability to analyze and disclose cumulative effects.
- This revised LMP seems to be setting site-specific standards and values without the accompanying site-specific evaluations.
- No maps are provided (or referenced) that allow the reader to understand the magnitude of restrictions (access, use, etc.) created by the revised LMP.
- It was difficult to determine if comments on earlier draft EISs were addressed in the final EIS. Inadequate responses were provided to public comments on the earlier revised LMP and draft EIS.
- The Forest Service had privileged meetings with the Kalispel Tribe during the development of the revised LMP. These meetings were not on the public record and violated NEPA.
- County Commissioners were given more weight in the recommended wilderness decisions than were other interests.

## **Resolution Options Proposed by Objectors:**

- Revise the analysis in the FEIS to accurately disclose essential information that allows for meaningful public comment, as required by NEPA. [WildEarth Guardians]
- Revise the analysis in the FEIS, Appendix E, to meaningfully respond to and address public comments. [WildEarth Guardians]



- The Aquatic and Riparian Conservation Strategy (ARCS), like INFISH, is a major decision with long-term implications and was, appropriately, open to public comment and review. Similarly, the ARCS-mod updates to ARCS will have long-term implications as well as direct, immediate consequences. The Forest Service must be willing to change the ARCS in response to public comments on the plan. The Forest Service should consider modifying INFISH to provide more flexible restrictions tailored to site-specific conditions to avoid imposing limits beyond what is needed for the optimal level of stream protection. [Washington Cattleman's Association]
- Design the revised LMP to recognize the contribution of grazing to the economy and social wellbeing of people in the region. We recommend developing an alternative that is consistent with Forest Service policy and the Colville's desired conditions, but which also meets the demand for authorized grazing by restoring grazing on the 16 vacant allotments, modifying INFISH standard to be more (not less) flexible, and maximizing livestock grazing on suitable lands. [Washington Cattleman's Association]
- We request the Forest Service prepare a Supplemental EIS that addresses the analytical and scientific issues identified in this objection, and simultaneously undertake the Science Consistency Review process (Guldin, et al., 2003) for the Supplemental EIS. We request the Supplemental EIS takes a hard look at the science of climate change. We request the Forest Service prepare and publicize written responses to comments on the revised LMP and EIS, as NEPA requires. [Sierra Club/Alliance for the Wild Rockies]
- We request the Forest Service include, for full analysis and comparison to other alternatives, Alternative C as conceptually outlined in our FEIS comments and herein. We remain prepared to advise the agency on the composition of such an ecological/biocentric alternative. [Sierra Club/Alliance for the Wild Rockies]
- The Remedy would be to withdraw this document, trim it down to a manageable size and present the aspects of the plan in a manner that can be understood by an average reader/commenter. We assert this plan, as written, does not offer that opportunity. [Stevens County Cattleman's Association]
- This LMP should be withdrawn and presented in a manner that is reflective of the Mission of the Forest Service, which is Multiple Use Management. Indeed, even the title of the Document identifies it as a "Land Management Plan." This is a major divergence from previous management plans, which were entitled "Land and Resource Management Plan (LRMP)." It infers that the agency is managing the land, but no longer feels compelled to manage the resources (e.g., timber, grazing, minerals) for the good of the people. [Stevens County Cattleman's Association]
- The remedy would be to allow us to reference literature, as was done in the text of this document, without having to send hundreds of pages of copies of the literature we wished to cite! [Stevens County Cattleman's Association]
- This plan should be withdrawn and re-written as an oversight document, with requirements that are site-specific in nature reserved for site-specific NEPA proposals that are developed under the "umbrella" provided by this document. [Stevens County Cattleman's Association]