



National Forest Management Act (NFMA)

Eligible Objectors & Interested Persons for this issue:

- Sierra Club/Alliance for the Wild Rockies
- American Forest Resource Council
- Stevens County Cattleman's Association
- Williamson Consulting
- Northeast Washington Forest Coalition

Objections:

- The revised Land Management Plan (LMP) components lack strong, binding direction compelling managers to accomplish measurable outcomes in a specified timeframe. Some LMP standards include undefined terminology leaving them highly discretionary or unenforceable.
- The revised LMP fails to disclose any objective criteria by which the Forest Service has determined suitability as per the National Forest Management Act (NFMA) and Planning regulations.
- It is difficult to determine which parts of the revised LMP and final Environmental Impact Statement (FEIS) are legally bound to comply with the 1982 vs. 2012 Planning Rule.
- The Forest Service failed to conduct a Science Consistency review for the revised LMP and FEIS.
- The FEIS fails to provide an analysis of how well past management projects on the Colville National Forest met the goals, objectives, desired conditions, etc. stated in NEPA documents, and how well the projects conformed to LMP standards and guidelines. Failure to monitor the impacts of past management practices leads to inadequate empirical basis for professional judgment or conclusions made in the FEIS. Forest Service staff are not being held accountable for lack of monitoring.
- The revised LMP considers the Colville's current fiscal budget as the management level for the life of the LMP. This restriction reduces management opportunities and will fail to bring resource needs into balance, inconsistent with the 1982 Planning Rule.
- The planned sale quantities (PWSQ and PTSQ) established by the Forest Service, which are both constrained by budget, are not consistent with the 1982 Planning Rule.
- There should be a departure from non-declining flow for timber volume and these models should be part of the final Alternative P.
- The methodology the FEIS used is an inappropriate interpretation of the term "Sustained Yield".
- The FEIS gives inadequate recognition to the collaborative approval of post-disturbance restoration.

Resolution Options Proposed by Objectors:

- The Forest should analyze the unconstrained harvest calculation and departure from even-flow to more quickly get to Long-Term Sustained Yield (LTSY). The LTSY for the Colville National Forest is 97.4 MMBF. This volume can only be achieved when all the manageable timber acres have reached their historical range of variability (HRV). The

American Forest Resource Council requested a departure from non-declining flow for timber volume, and believe that these models should have been part of the final LMP. [American Forest Resource Council]

- The proposed LMP must reflect an adequate timber volume to support the local timber industry infrastructure and ensure community stability. The Forest Service planned FY19 timber sale program (PTSQ) is 82.6 MMBF. The PTSQ outlined in the Final Plan is 48.1 MMBF. The numbers in the Final Plan must reflect what the Forest is proposing to sell now if the Plan is based on using the current and static budget. [American Forest Resource Council]
- The revised LMP should not limit management options based on current or other budget considerations. The Forest's treatment of budgets in the revised LMP is inconsistent with the 1982 Planning Rule and results in artificial restrictions on timber production. As a result, the LMP's own direction is compromised from inception. At the least, the Forest should modify the LMP to clarify that the values described are based on current budget conditions and those values can and should be exceeded if the Forest is able to increase their capacity through increased budget allocations or shared stewardship. [American Forest Resource Council]
- The Forest should present Standards and Guidelines in a way that the distinction between the two is clear. As it is written, they are essentially the same. Yet, they leave the reader to believe one is much less restrictive than the other. These terms should be stricken from the FEIS, or carefully re-worded in a manner that provides latitude for project-specific analysis. Alternatively, they should include a clear description of how parameters set in the standards will be measured, what methods will be used, how Forest Service employees will be trained to do these measurements, and how contractors hired to do these measurements will be selected. [Stevens County Cattleman's Association]
- Change the analysis to specify the number of acres in need of treatment annually to accomplish the Desired Future Condition within 35 years. [Williamson Consulting]
- Change Table B-1 to "Initiate commercial and non-commercial management activities on at least 18 to 25 thousand acres per year.....". [Williamson Consulting]
- Withdraw the Record of Decision and include a statement emphasizing the agreements on post-restoration activities that will be analyzed on a project basis. [Northeast Washington Forest Coalition]