



# Recommended Wilderness

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## Eligible Objectors & Interested Persons for this issue:

- Back Country Horseman of Washington
- Teck Washington, Inc., Pend Oreille Operations
- Washington Cattleman's Association
- Justin Hedrick
- Washington Wild
- Sierra Club/Alliance for the Wild Rockies
- Stevens County Commissioners
- Pend Oreille County Commissioners
- Ferry County Commissioners
- Gary Nielsen
- Washington Chapter, Backcountry Hunters and Anglers
- Northeast Washington Forest Coalition

## Objections:

- The revised Land Management Plan (LMP) only supports mountain bike and chainsaw use. Other trail maintenance tools used outside wilderness (such as wheelbarrows (powered and non-powered), excavators, drills, and motorized winches) should continue to be allowed in RWAs. The minimum requirements analysis (MRA) is available to managers to approve such activities, but it is very hard to nearly impossible to get an MRA approved. The revised LMP should encourage approval of trail maintenance tools via an MRA.
- The Forest Service improperly proposes to recommend areas of significant mineral resource and mining activity for designation as Wilderness, Research Natural Areas, and Backcountry Areas. It also proposes to manage those areas in a way that will interfere with mineral exploration and development.
- We object to adding the following areas east of Metaline Falls and west of Metaline Falls as recommended wilderness:
  - Sections 1, 2, 11, 12, T38N, R42E
  - Sections 25, 36, T39N, R42E
  - Sections 1, 8, 12, 13, 14, 17, 20, T39N, R43E
  - Sections 28, 29, 32, 36, T40N, R43E
  - Sections 29, 30, 31, T40N, R44E
- Teck's exploration activities have continued since 2016, and we have identified the following additional sections for prospective mineralization:
  - Sections 19, 30, 31, T39N, R43E
- Although the Forest Service indicates that recommended wilderness boundaries were modified to exclude some areas where existing mining claims are located, it did not explain why other mineral-rich mining areas with mining claims were not excluded.
- It is difficult to determine which areas are being recommended for wilderness designations.
- The revised LMP recommends adding 61,630 acres of wilderness without providing any justification.



## Recommended Wilderness

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- The Forest Service may not circumvent the statutory process of wilderness designation by imposing wilderness-like restriction in areas recommended for, but not designated as wilderness.
- The recommendation of 68,300 acres, 6 % of the Colville, as wilderness will have a long-lasting negative effect on livestock grazing. Further reduction of livestock grazing on the Colville is unacceptable.
- Recommended wilderness will make livestock monitoring more expensive. Permittees commonly use off-highway vehicles to management allotments.
- Recommended wilderness will take huge amounts of timber out of production forever, will limit grazing, will not allow effective firefighting, and will economically damage communities.
- There is a growing need for additional wilderness in northeast Washington. The Recommended Wilderness Process is 30 years overdue and deserves unique consideration. Research shows that increased wilderness improves economies of adjacent communities.
- The Forest Service did not adequately address the proliferation of electric battery assisted mountain bikes when allowing mountain bikes in recommended wilderness.
- Livestock grazing allotments should be retired in designated Wilderness and Recommended Wilderness.
- Wilderness-Congressionally Designated Management Areas in the revised LMP are far too weak in protecting wilderness values. In violation of the Wilderness Act, they break Wilderness into Semi-Primitive and Primitive Zones. Both fail to adopt “leave no trace” principles as LMP standards. The revised LMP also directs the creation of a “network of large group campsites”. The Minimum Requirements Decision Guide has not been demonstrated to be consistent with the Wilderness Act and should not be an LMP standard.
- MA-STD-WCD-05 (Human Developments - Primitive Zone) states, "No user-created human developments (such as game hangers, benches, firepits, tables) may be established in the primitive zone." This implies such uses can be permanently or indefinitely established in the Semi-Primitive Zone, which is illegal.
- MA-GDL-KCRA-02 (Communication Facilities) - "Communication facilities essential for provisional uses may be co-located with Forest Service repeaters." This is illegal under the Wilderness Act.
- Recommended Wilderness should not be included in the revised LMP. No law authorizes continued wilderness designation by the Forest Service. There is a need to disclose what act of Congress or law allows the Forest Service to continue recommending wilderness designations.
- Additional wilderness is not needed. The current wilderness is only used by 1% of Colville National Forest visitors.
- The revised LMP does not address problems associated with wilderness management when wilderness boundaries adjoin Wildland Urban Interface areas and private lands.
- The revised LMP should focus more on wilderness recommendations to protect important Roadless Areas.



# Recommended Wilderness

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- The revised LMP fails to identify all wilderness-eligible lands in the Forest and include them in the analysis and alternatives.
- Recommended Wilderness should be managed as wilderness. Standards that allow mountain bikes and chainsaws in these areas are inconsistent with other National Forest's standards.
- The final Environmental Impact Statement (FEIS) violates 1909.12 by failing to "include site specific statements of the environmental consequences that a non-wilderness designation would have on roadless areas." More precisely, the final FEIS fails to consider the impacts the preferred alternative and the other alternatives would have on the natural integrity, apparent naturalness, remoteness, solitude, special features, manageability, logical boundaries, and special places or values in the Kettle River Mountains and Selkirk Mountains Inventoried Roadless Areas and other roadless areas.
- The area around Metaline Falls should not be considered for wilderness designation. The area is rich in mineral resources. There are also historic and on-going mineral exploration and mining activities in the area. It therefore lacks the pristine natural character and solitude necessary to be considered wilderness.
- The Forest Service claimed it took a second look at recommended wilderness between the previous and final revised LMPs but does not present any analysis done during this period.

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

- Trail maintenance tools used outside wilderness (such as wheelbarrows (powered and non-powered), excavators, drills, and motorized winches) should continue to be allowed in recommended wilderness areas. The minimum requirements analysis (MRA) is available to managers to approve such activities, but it is very hard to nearly impossible to get an MRA approved. The LMP should encourage approval of trail maintenance tools via an MRA [Back Country Horseman of Washington]
- Remove recommended wilderness from the plan and instead recommend those areas as backcountry allowing for multiple use activities. [Ferry County Commissioners]
- There should be no additional wilderness and backcountry designations, beyond the Salmo-Priest. [Washington Cattleman's Association]
- The Colville National Forest has chosen to retain the weaker interim management option for recommended wilderness areas as part of the draft decision. If the Forest retains this weaker interim management, significant additional acreage of recommended wilderness areas should be added above and beyond the 61,000 acres identified in the draft decision notice. The following areas should be added if the weaker interim management is adopted:
  - Profanity (37,700 acres)
  - Cougar Mountain (6,210 acres) and Thirteenmile (10,890 acres)
  - Grassy Top (2,200 acres) & Hall Mountain (7,890 acres)
  - Harvey Creek (5,720 acres)
  - Hoodoo (11,060 acres)
  - Quartzite (5,340 acres)
  - Twin Sisters (14,610 acres)
  - Owl Mountain (11,060 acres)



## Recommended Wilderness

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- Jackknife (8,940 acres)
- South Huckleberry (9,680 acres) [Washington Wild]
- Plan components such as MA-GDL-WCD-02, MA-GDL-WCD-04, MA-GDL-WCD-05, MA-GDL-WCD-06, MA-GDL-WCD-07 and MA-GDL-WCD-09 unnecessarily suggest loopholes for nonconforming uses and should be dropped. Nonconforming uses should also not be allowed in recommended wilderness areas. [Sierra Club/Alliance for the Wild Rockies]
- Include additional areas as recommended wilderness areas, including Hoodoo, Thirteenmile, Profanity, all of Bald-Snow, and the western half of Twin Sisters Inventoried Roadless Areas. [Northeast Washington Forest Coalition]
- Change standards and guidelines to clearly protect recommended wilderness areas so the wilderness characteristics will not be jeopardized before Congressional designation. [Northeast Washington Forest Coalition]
- The LMP should follow the Wilderness Inventory and Evaluation using the 2012 Planning Rule. [Northeast Washington Forest Coalition]