



# Threatened and Endangered Species

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## Eligible Objectors & Interested Persons for this issue:

- WildEarth Guardians
- Washington Cattleman's Association
- Sierra Club/Alliance for the Wild Rockies
- Stevens County Cattleman's Association
- Northeast Washington Forest Coalition

## Objections:

- The final Environmental Impact Statement (FEIS) relies on outdated information because it does not incorporate findings from US Fish and Wildlife Service's 2017 Biological Opinion (BiOp).
- The revised Land Management Plan (LMP) and FEIS do not adequately protect Canada lynx.
  - The revised LMP states, "The Canada Lynx Conservation Assessment and Strategy (2013 version) was used to develop management direction." However, the revised LMP does not adopt the Canada Lynx Conservation Assessment and Strategy (LCAS). The analysis in the revised FEIS is therefore inaccurate. Overall, the protections afforded the Canada lynx by the revised LMP are weaker than those recommended in the LCAS.
  - The revised LMP does not consider the best available science to assure viability of Canada lynx populations, does not include scientifically-based direction that would protect connectivity between Lynx Analysis Units (LAUs) in the Kettle-Wedge Core Area and beyond, and does not restrict industrial management activities in lynx habitat.
  - Preferred Alternative P of the FEIS promotes high-use recreation on over 80,000 acres of the Coleville NF. This would increase human impacts in scarce and critically important Canada lynx and grizzly bear habitat.
- FWS's 2017 BiOp is flawed. Given the Forest Service's reliance on a flawed BiOp to determine the impacts of proposed management actions, it fails to comply with the Endangered Species Act (ESA).
- Encouraging fencing to avoid livestock trampling of areas with threatened and listed species, as the revised LMP proposes, would (1) be detrimental to wildlife movement, (2) diminish the growth and health of vegetation inside the enclosure, and (3) increase the pervasiveness of weeds and invasive species.
- The revised LMP and FEIS do not adequately protect grizzly bear.
  - In the LeClerc Bear Management Unit (BMU), revised LMP standard FW-STD-WL-07 would (1) allow road densities to exceed recommendations from best available science and (2) require minimum percent core amounts less than recommended by the best available science.
  - The revised LMP fails to provide scientifically defensible grizzly bear habitat protections outside the Selkirk Mountains Grizzly Bear Recovery Area. No



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scientifically defensible methodology is presented for habitat protections inside the recovery area that would facilitate connectivity between and among BMUs.

- The revised LMP fails to provide any scientific basis that baseline road densities in linkage zones can support natural augmentation or recovery of grizzly bear populations.
- The FEIS does not disclose whether the CNF has been managed consistent with Standard 3 of the 1988 LMP, nor does it disclose population abundance or population trends for Management Indicator Species (MIS) identified in the 1988 Forest Management Plan. There is no assurance of the viability of these MIS.
- Standards FW-STD-WL-02, FW-STD-WL-03, FW-STD-WL-04, FW-STD-WL-05, FW-STD-WL-06 will affect forest access and use. However, what activities are permitted where is unclear because the FEIS lacks specific reference to acreages (and accompanying maps) that demonstrate what areas will be affected by each Standard.
- Standard FW-STD-VEG-02 is stated as a requirement but is not feasible because it would require intensive and non-exclusive monitoring surveys across the Forest prior to allowing any management action.
- The proposed Kettle Crest Recreation Area would overlies wildlife seclusion habitats that provide critical breeding, rearing, and migration linkages between the Rocky and Cascade Mountain Ranges. Emphasizing recreational use, including mechanized and motorized recreation, in the central Kettle Mountains would effectively reduce habitat viability, creating a bottleneck constriction to wildlife movement sensitive to human disturbance.
- Alternative P proposes at least one motorized loop trail in the Twin Sisters Inventoried Roadless Area (IRA) (revised LMP p 134, MA-OBJ-KCRA-02). This will further reduce habitat suitability throughout the year for lynx, grizzly bear, wolverine, elk, and other species of concern.
- The revised LMP weakens protection of old growth, late successional forests and Eastside Screens, which (especially in contiguous, roadless areas) provide critical habitat for a range of TES/SCC.

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

- Refrain from any final decision related to the revised plan unless and until the flaws related to Section 7 consultation identified above have been addressed in a revised BiOp. [WildEarth Guardians]
- Use flexible and concise language that allows for practical implementation of project activities when riparian management areas are functioning properly. [Washington Cattleman's Association]
- Guideline FW-GDL-WL-08 (Transportation System within the Kettle-Wedge Core Area) contains protective language, but it is defined vaguely ("results in increased traffic speed and volume") and is too discretionary ("should be avoided" "should not be located"). This must be written as a mandatory standard with clear definitions. [Sierra Club/Alliance for the Wild Rockies]



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- We object to standards related to Canada lynx and state they should be stricken from this text until the information related to restrictions in lynx habitat can be included within the text, so every reader can ascertain the scope of impacts associated with the implementation of these restriction. This is especially true when the US Fish and Wildlife Service (the regulatory agency charged with managing lynx) has chosen to not designate habitat for this species in the Colville National Forest. That is because they have almost no information regarding the occurrence of this species in the Forest or their distribution. The Forest is right on the southern fringe of the range of the Canadian lynx and it is ridiculous to propose restrictive standards, that will likely preclude or greatly hinder a number of other uses on the Forest, including permitted livestock grazing. [Stevens County Cattleman's Association]
- This (FW-STD-VEG-02) is a classic example of a standard that is unattainable. It is not conceivable that these inventories, species identification, and continued monitoring and cataloging could be kept accurate and up-to-date. Nor could they be completed (in a timely manner) to allow the implementation of the wide array of Forest Management activities and/or uses that occur across the Forest on an annual basis. Because of this, we ask that this standard be deleted from consideration and inclusion in theses texts. Affirmation of this standard will greatly impede and essentially preclude most forest current management practices and public uses. [Stevens County Cattleman's Association]
- In reference to FW-STD-VEG-02: How will these surveys be completed, prior to turn-out? How will these be completed across 58 allotments by 2017. Hundreds of thousands of acres will have to be re-inventoried on an annual or bi-annual basis, because new populations could emerge at anytime. There are thousands of seed dispersal vectors on the Forest. This standard has to be stricken or the Forest needs to notify the public that, with the implementation of this LMP, grazing and most other forest uses that could "possibly" disturb habitat (intentional or not) will no longer be allowed until comprehensive surveys are completed. [Stevens County Cattleman's Association]
- This standard (FW-STD-VEG-02) should be stricken from the FEIS. It leads the reader to believe these measurements and evaluations will be conducted. When, in fact, there is no logistically reasonable means by which they Forest can conduct these inventories and evaluations before "habitat disturbing activities". It is impossible to believe these inventories and assessments will be completed and kept up to date! This is another example of the Forest Service making statements that deceive the public into believing this standard will be met and these inventories and assessments will be completed. [Stevens County Cattleman's Association]
- We ask that detailed standards and guidelines be developed to protect old growth habitat to "insure" wildlife viability and protect wildlife diversity, as required by the National Forest Management Act. [Northeast Washington Forest Coalition]