



Watershed and Riparian Management

Eligible Objectors & Interested Persons for this issue:

- Washington Cattleman's Association
- Sierra Club/Alliance for the Wild Rockies
- Stevens County Cattleman's Association
- Conservation Northwest

Objections:

Relative to Riparian Area Management

- There is no ecological need for increasing restrictions in riparian areas.
- The revised Land Management Plan (LMP) allows a variety of activities in riparian areas that are not conducive to achieving Desired Conditions or riparian recovery.
- Degradation would occur because logging would be allowed within Riparian Management Areas, specifically referencing Standard MA-STD-RMA-01.
- MA-SU-RMA-01 allows commercial firewood cutting but bans personal use firewood cutting in Riparian Management Areas.
- Several statements in the FFEIS are lacking substantiating documentation– specifically lines 138-144 of the final Environmental Impact Statement (FEIS) related to damage to riparian areas and unauthorized trail development.
- The revised LMP should specify that National Forest lands will maintain and restore aquatic resources, rather than simply to contribute to these resources.

Relative to Key Watershed Management

- The revised LMP does not constrain temporary roads, or cause measurable reductions of existing roads, recreation sites, etc. in Key Watersheds needed to recover ESA critical habitat.
- Key Watersheds were not meaningfully prioritized in the revised LMP. As a result, activities such as grazing and recreation could have negative impacts on watershed integrity and functionality.
- FW-OBJ-WR-09. Stream Restoration in Key Watersheds is unrealistic and is not likely obtainable and should be removed from the revised LMP.

Relative to the Aquatic and Riparian Conservation Strategy (ARCS)

- Information regarding the development of ARCS-mod is inadequate, lacks transparency, and there was no public involvement in updating plan components.
- The updated ARCS plan components impose unreasonable restrictions on livestock grazing and expand the key watershed network.
- The ARCS-mod standards and guidelines are strongly objected to because:
 - Current riparian management strategies are effective in maintaining or improving conditions;
 - The ARCS-mod lacks flexibility to adapt to site-specific conditions;
 - The ARCS restrictions will degrade riparian resources.



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Resolution Options Proposed by Objectors:

- The revised LMP should avoid arbitrary riparian buffers and instead develop an adaptable alternative that provides site-specific flexibility. [Washington Cattleman's Association]
- The Forest Service should prioritize rehabilitating existing sediment sources in damaged riparian zones, not risking them with more industrial activities. [Sierra Club/Alliance for the Wild Rockies]
- On lines 138 -144 of the draft FEIS it states: "... *damage to riparian areas and unauthorized trail development are of particular concern.*" We asked: "Please provide any and all documentation that you have which numerically substantiates this statement" as a FOIA and the Forest refused to respond. They have reiterated these statements in the final FEIS without substantiating documentation and we object! The final FEIS should be withdrawn and re-written to address these deficiencies. [Stevens County Cattleman's Association]
- Relative to FW-OBJ-WR-09: The remedy here would be: Retract this objective or word it in a much less aggressive manner, without unattainable mileage expectations. Unless the author of this section anticipates an annual budget approaching 7 figures, these goals are unreasonable. This objective gives the public the impression that conditions on the Forest are so grave that heroic and expensive intervention is needed to prevent catastrophic failures. We doubt this to be the case and ask that the author present the data to back up these claims before publishing them as a needed objective! [Stevens County Cattleman's Association]
- We object to FW-OBJ-WR-09 and suggest it be stricken because it proposes unattainable objectives, given the current budget structure. If not removed, then a prioritized list of streams with identified problems and suggested remedies, on a per-reach basis (with a cost analysis), should be presented. [Stevens County Cattleman's Association]
- Relative to FW-STD-WR-01: We object and expect this standard to be removed, in its entirety. [Stevens County Cattleman's Association]
- Modify the Forest Wide Desired Conditions for Water Resources by replacing "contribute" with "maintain and restore"
 - For the following: FW-DC-WR-01, 02, 04, 05, 06, 07, 08, 09, 11
 - Using the following as an example: FW-DC-WR-01. Natural Disturbance Regime of Aquatic and Riparian Systems National Forest System lands maintain and restore the distribution, diversity and resiliency of watershed and landscape-scale features..." (Underlined text added to existing content).