



# Wildlife (General)

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## Eligible Objectors & Interested Persons for this issue:

- WildEarth Guardians
- Merrill Ott
- Sierra Club/Alliance for the Wild Rockies
- The Lands Council
- Conservation Northwest

## Objections:

- Standards for road density is absent from the Access System plan components. Road density is a critical factor for wildlife. Omitting these standards is contrary to the 1982 planning rules requiring forest plans provide for adequate fish and wildlife habitat to maintain viable populations of existing native vertebrate species and provide that habitat for species is maintained and improved to the degree consistent with multiple-use objectives. 36 C.F.R. § 219.27(a)(6).
- The final Environmental Impact Statement (FEIS) does not cite or utilize best available science concerning off-road motorized and mechanized use impacts on wildlife.
- The revised Land Management Plan (LMP) fails to provide a rational explanation for plan components that weaken wildlife protections (including INFISH).
- The Forest Service should ensure (1) habitat protections and conditions are in place to foster essential genetic connectivity between isolated grizzly bear populations, including the NCDE population, (2) wildlife habitat connectivity and recovery can occur throughout the Colville and beyond, including for grizzly bear, bull trout, Canada lynx, woodland caribou, and wolverine.
- The FEIS fails to acknowledge the controversy of the coarse filter approach and fails to provide a scientific basis for using a vegetation plan to ensure the presence of habitat for threatened, endangered, and candidate species. Focusing only on composition, structure, and processes within a landscape may miss some components of biological diversity important to functional habitat.
- The revised LMP's fine-filter components (desired conditions, objectives, standards, and guidelines) are too minimal and would fail to protect biological diversity and species viability.
- Vegetative conditions should not be used, as suggested in the revised LMP, as a substitute or proxy for monitoring wildlife populations, given the complex and poorly understood interplay between animals and vegetative components, structures, patterns, and processes.
- It is not possible to analyze viability for all the aquatic species present in subbasins within Colville National Forest (CNF) using the proposed surrogate species.
- Within the revised LMP, there is confusion and conflation of the terms "surrogate species" and "management indicator species."
- The revised LMP contains no Plan Components for "Region 6 sensitive species, state-listed species, or other species for which the published literature has identified concerns for their viability" nor for "Management interest" species, or "Federal and WNHP State rank" species (with the exception of the bald eagle and peregrine falcon).
- The revised LMP fails to recognize the important keystone function of beaver.



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- The revised LMP fails to set meaningful thresholds for species population viability. In the absence of meaningful thresholds of habitat loss and no monitoring of wildlife populations at the Forest level, projects will degrade habitat across the CNF.
- The revised LMP fails to comply with the National Forest Management Act's (NFMA's) diversity requirements because it does not make strong, science-based commitments to manage habitat for species whose habitat may be impacted by the cumulative effects of multiple, simultaneous management actions.
- The revised LMP fails to require monitoring of wildlife population trends.
- The FEIS fails to provide scientific support that the agency's logging/fuel reduction regime will, as it claims, benefit wildlife species.
- Standard FW-STD-WL-01 (Nest Sites) would seasonally protect four species, but only if active nest sites are known. It does not provide guidance, based on best available science, for identifying and protecting previously unknown nesting areas. Standard FW-STD-WL-10 and Guideline FW-GDL-WL exhibit a similar problem, seasonally protecting only known woodland caribou calving habitat and common loon brood-rearing areas, respectively, without providing direction for finding these areas.
- The FEIS presents no analysis of how much snag loss has resulted from the current management policy (Standard FW-STD-WL-12--Large Snag Habitat) or would result under the revised LMP.
- Standard FW-STD-WL-13 (Bighorn Sheep and Disease Transmission) isn't specific enough regarding prohibiting domestic sheep grazing adjacent to bighorn sheep source habitats.
- Guideline FW-GDL-WL-01 (Hiding Cover for Wildlife) is based on inadequate scientific information and provides inadequate goals for habitat cover.
- Guideline FW-GDL-WL-13 (Mule Deer, White-tailed Deer, and Elk Habitat - Human Activities) contains an all-encompassing loophole allowing ungulate displacement through winter logging.
- Guideline FW-GDL-WL-15 (Fire-dependent Surrogate Wildlife Species) fails to provide any quantitative protections for surrogate species.
- The revised LMP contains no scientifically sound requirement to manage old growth to sustain old-growth-dependent wildlife species.
- The FEIS does not include a cumulative effects analysis of trapping and road/trail use on fisher.
- The revised LMP arbitrarily rejected the fisher from the Species of Conservation Concern (SCC) and Sensitive Species lists for the Colville National Forest, even though the forest is within the species' historic range and the species is listed as Endangered in the state of Washington.
- The pileated woodpecker should be a SCC or focal species. The pileated woodpecker also fits the definition of a keystone species (and is therefore an appropriate focal species).
- The FEIS fails to quantify the cumulative loss of snags in previously logged areas and management areas.
- The pine martin was arbitrarily dismissed as a SCC in the revised LMP, even though it was a MIS species under the previous plan.



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- Guideline FW-GDL-WL-19 (Northern Goshawk Nesting Sites) fails to (1) provide mandatory, nondiscretionary protections for the species, or (2) require surveys to find active nest sites.
- The revised LMP lacks strong, binding standards for maintaining adequate habitat for elk. The FEIS fails to provide a meaningful analysis of cumulative impacts of proposed management actions on elk populations.
- The revised LMP includes no coherent viability strategy or analysis of habitat requirements for:
  - Wolverine
  - Owl species
  - Pileated woodpecker
  - Elk
  - Pine martin
  - Northern goshawk
  - Black-backed woodpecker
- The viability of the black-backed woodpecker, which could be considered a keystone species, is threatened under the revised LMP by fire suppression and other forest policies which specifically attempt to prevent the development of the species' fire-dependent habitat.
- The revised LMP does not include adequate management direction for habitat connectivity and linkage zones. The FEIS does not present an analysis of the quality of habitat in linkage zones.
- There is no analysis of the impacts of historic management actions on forest fragmentation and associated habitat degradation.
- The revised LMP fails to acknowledge the impacts of wolves on livestock and fails to establish guidelines related to wolves, including: salt block placement, pasture assignment, and emergency response on grazed allotments containing a known active wolf den or rendezvous site.
- The revised LMP and FEIS fail to analyze the direct, indirect, and cumulative effects of livestock grazing on wildlife species.
- The revised LMP fails to (1) provide key benchmarks and strategies for protecting the McGillivray's warbler, or (2) emphasize the need to protect ground-nesting warblers from livestock grazing.
- The revised LMP fails to examine impacts of livestock grazing on snowshoe hare habitat (e.g., shrubs and sedge) and the resulting impacts on endangered Canada lynx.
- The revised LMP fails to require focal and general restoration management areas be managed to insure wildlife viability and to protect wildlife diversity and connectivity, and therefore violates NMFA's viability requirement and the National Environmental Policy Act's requirement to follow best available science.
- According to US Fish and Wildlife Service, lynx habitat areas in the Kettle Crest region of the Colville National Forest have changed since the development of previous drafts of the



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revised LMP. The Wildlife Habitat section of the revised LMP should be updated to reflect the USFWS's most current stance.

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

- Revise plan components and the analysis in the FEIS to demonstrate how the Forest Service analyzed and located motorized use designations with the objective of: minimizing harassment of wildlife, disruption of wildlife habitat, and damage to forest resources. [WildEarth Guardians]
- Revise plan components to adequately protect wildlife (including bull trout, grizzly bear, Canada lynx, caribou, elk, deer, wolverine, moose and wolf), wildlife habitat, and connectivity between habitats. [WildEarth Guardians]
- Revised LMP standard FW-STD-LG-02 (Deer and Elk Summer and Winter Range) states, "Livestock shall be managed within range allotments so that adequate forage is available for deer and elk on summer and winter ranges." This should be restated to specify what "adequate forage" means. [Sierra Club/Alliance for the Wild Rockies]
- Modify Allotment Management Plans and Allotment Operating Instructions, and put into place Forest-wide Standards and Guidelines for the following:
  - Livestock grazing should only be permitted on acreage considered capable/suitable.
  - Livestock grazing should only be permitted in open defensible spaces; failure to limit grazing to these spaces puts livestock and wildlife in harm's way.
  - Livestock will not be released or managed in areas within one mile of a known active wolf site, den, or rendezvous.
  - Wildlife management should implement appropriate seasonal restrictions based on site-specific consideration and potential activity effects to reduce disturbance to wolves and protect livestock.
  - Do not authorize turnout or grazing of sick or injured livestock.
  - Remove sick and injured livestock and remove carcasses so they do not become predator attractants.
  - Do not authorize salt or other livestock attractants near a known, active wolf den or rendezvous site.
  - Do not authorize turnout of livestock in an area of known (during the same calendar year that use is documented) wolf den or rendezvous site. Alternative grazing sites away from known wolf areas should be offered when possible.
  - Remove livestock from grazing allotments when conflict with wolves or other wildlife occurs.
  - Require a 24-hour human presence on an allotment following documented conflict with wolves or other wildlife to protect livestock and public trust wildlife.
  - Establish grazing guidelines and standards to protect native wildlife - including gray wolf, native fish and plants. [The Lands Council]
- Designate the 5th Field Watersheds within the core connectivity habitat area as Focused Restoration Management Area. This includes watersheds south of Republic and north of



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the Colville Reservation from the western boundary to the Kettle Range and then north to Owl Mountain and east through the Wedge to the northern boundary, including Upper Sanpoil, Lynx/Hall, Sherman, Curlew, Vulcan, Boulder/Deadman, and North Lake Roosevelt. [Conservation Northwest]

- Wolf/livestock conflict has been abundant on allotments in the CNF due to current grazing practices that allow livestock to be grazed on rugged, densely forested terrain ill-suited to the practice. Forest management practices should prioritize protection of wildlife over livestock grazing. [The Lands Council]
- Grazing should be limited in geographical scope and focused in areas that are open and defensible. Allotments with multiple years of wolf/livestock conflict should be closed to grazing and analyzed to determine if grazing should be a permissible practice in the future. [The Lands Council]
- Focal and general restoration management areas should be managed to insure wildlife viability and to protect wildlife diversity and connectivity, as required by NFMA. [Conservation Northwest]
- According to US Fish and Wildlife Service, lynx habitat areas in the Kettle Crest region of the CNF have changed since the development of previous drafts of the LMP. The Wildlife Habitat section of the revised LMP should be updated to reflect the USFWS's most current stance. [Merrill Ott]