

Monitoring

WildEarth Guardians
Sierra Club/Alliance for the Wild Rockies

Objectors contend the monitoring parameters for the revised plan fail to comply with the requirements under the 2012 Planning Rule to develop a monitoring program enabling the responsible official to determine if a change in plan components is needed. This includes monitoring as a tool to increase knowledge and understanding of changing conditions, uncertainties, and risk identified in the best available scientific information as part of an adaptive management framework.

Objectors also express concern over a lack of monitoring of compliance with some specific standards and a lack of continuous monitoring of completed projects. They assert that the chosen monitoring indicators related to water and roads are meaningless. They also point out that where monitoring questions focus on effectiveness of treatments, it is unclear how the indicators listed will address this. Some comments focus on plan components being “unenforceable” without monitoring to document compliance.

Response:

Objectors do not make a clear case as to how the monitoring plan fails to meet the intended goals of increasing knowledge and understanding of changing conditions, uncertainties and risks identified in the BASI as part of an adaptive management framework. The examples they provide here do not help to clarify; they focus on documenting compliance with standards, not with addressing uncertainty or risks. There is no requirement for monitoring to demonstrate or prove compliance with standards (or other plan content), and to do so for all plan components would be beyond the fiscal capabilities of the unit.

The monitoring plan is not where the Forest should describe all activities that will be conducted, nor their rationale. The monitoring questions are each linked to a number of plan components to which they pertain, and this is where one should turn for details about the treatments planned. For example, one of the plan components tied to the monitoring questions the objectors list reads as follows:

FW-OBJ-WR-06. Key Watershed Road Treatments

Reduce road-hydrologic connectivity and sediment delivery on roads through storm damage risk reduction treatments, full hydrologic decommissioning, and other accepted treatment measures on 116 miles of hydrologically connected road within 15 years of forest plan implementation.

Restore or maintain aquatic organism passage and improve hydrologic and aquatic habitat function at 53 road/stream crossings for all native aquatic species, seasons, flows, and life stages in key watersheds within 15 years of forest plan implementation through culvert replacement or crossing improvement and natural channel design or other acceptable treatment measures that provide for natural stream channel function at all flows.

This is quite specific as to what “treated” means, and this information is thus included in the appropriate place in the plan.

One segment of this excerpt does resonate. The objectors state,

“To measure whether BMPs are being implemented and their effectiveness, the monitoring plan states the Forest Service will annually record the number of BMP evaluations completed, identify BMPs that are implemented correctly or incorrectly, and “identification of BMP effectiveness.” Revised Forest Plan at 163 (MON-WTS-04, MON-WTR-04-01). But the Forest Service does not explain how it

will determine BMP effectiveness, or how the Forest Service will respond if it determines that BMPs are ineffective at achieving desired conditions.”

To remedy this, the Colville should add appropriate indicators and in (later) development of a monitoring plan implementation guide, they should explain how monitoring sites will be situated on the ground to address effectiveness of treatments (perhaps through paired, similar treated and untreated sites). I am including this as a recommendation down below.

In the final sentence the objectors express concern over the management activities selected, finding the monitoring to be “meaningless” unless their preferred management practice is implemented. The Colville is correct to monitor these activities and their effectiveness even if, and perhaps especially because, there is a lack of agreement about which practices should be used.

An objector states the FEIS fails to recognize "continual monitoring and maintenance" is necessary following project completion. Continual monitoring of completed projects is unlikely to be within the fiscal capabilities of the unit, and is not a legal requirement.

An objector is concerned the LMP does not contain a monitoring and maintenance plan for culverts that will be left on closed roads. This also is not a legal requirement, but if the Colville has reason it is a concern they might consider engaging the public in monitoring and reporting any blocked culverts on closed roads.

Objectors asserts there is no disclosure in the FEIS of what has been learned in monitoring of the prior plan over the past 30 years. The FEIS does discuss some of the monitoring findings from past years, including topics such as stream, soil, range and recreation. There is no requirement to discuss or disclose all monitoring findings in the FEIS; [these findings can be found in the monitoring reports produced by the Colville](#).

The objectors expresses concern with the 2012 Planning Rule and a lack of requirement for plan components to detail how monitoring will be conducted. The Colville’s role is to comply with the rule, not modify it. I would recommend that the Colville include details on methodology, data storage and responsibility in a monitoring plan implementation guide, which they could write after the plan is finalized.

The concern the monitoring plan focuses on acres treated to the exclusion of on-the-ground conditions, offers a selective portrait of what the Colville has proposed. The monitoring question quoted “To what extent are management activities and natural disturbance processes trending toward desired conditions for structure/structural stage and fire regime condition class (FRCC), and increasing resistance and resiliency to disturbance factors including climate change?”, has six indicators listed in the plan; of these, two focus specifically on acres treated, two focus on acres of disturbance (wildfire, Rx fire, and insect / disease), and two focus specifically on vegetation attributes (structure, type, downed woody debris, and snags). I do not see the problem that the objectors’ argue is present in this example.

Objector specifically mentioned “MON-VEG-01-05: "Number of acres influenced by insects.”, with the question, “Is this a bad thing?” This point focuses more on our management priorities than monitoring. However, while a natural phenomenon, insect impacts to forest ecosystems is exacerbated by climate change. As the FS mission focuses on multiple-use, allowing insect-driven tree mortality on too great an extent of the forest could be inconsistent with other management objectives (such as supporting recreation and industry). It may also be inconsistent with providing habitat for a multitude of species.

Objector also mentioned, MON-VEG-03 "To what extent are management activities moving hazardous fuels toward desired conditions within WUI?", complaining that this monitoring doesn’t contain a real

metric since so many things can be counted. In addition, they don't believe MON-WTS-01-01: "Change in watershed condition class" is adequate, prefer measuring riparian conditions indicative of ecological functioning.

Monitoring of acres treated won't be of interest to all members of the public, but some are adamant we should be tracking and reporting on this in our monitoring plans.

The objectors don't explain why they consider reduction of hazardous fuels (or the fuels themselves?) an "illegitimate concept." Some explanation would be necessary for us to engage this comment substantively.

While there is no requirement to monitor riparian conditions, riparian areas tend to be sensitive and worthy of extra attention. The Colville could consider adding some monitoring on this topic, and it might also be fruitful to consider whether there is already monitoring underway through species-specific monitoring programs or through the work of other agencies that could be relevant here.

Remedy:

- 1) Revise the monitoring plan questions and indicators to track whether forest roads and motorized use on the forest is sustainable, not causing or contributing to a violation of water quality standards, and furthering the recovery of ESA listed species and designated critical habitat. Require annual reporting of compliance on these plan components. Include meaningful timelines and parameters that enables the responsible official to determine if a change in plan components is needed.

The monitoring plan meets the legal requirements established by 36 CFR Part 219.12.

No changes are needed to comply with legal requirements, and therefore no changes are needed before finalizing the plan. However, there are several changes that the Colville could make to their monitoring plan that will set them up better for conducting adaptive management based on their monitoring results. I will make several recommendations in the "Possible Instructions" section that I hope the Colville will consider either working into a monitoring plan implementation guide, or incorporating into a revised monitoring plan via an administrative change in the near future.