

### Recommended Wilderness –

- 1 – Back Country Horseman of Washington
- 4 – Teck Washington, Inc., Pend Oreille Operations
- 5 – Washington Cattleman’s Association
- 7 – Washington Wild
- 8 – Sierra Club/Alliance for the Wild Rockies
- 15 – Gary Nielsen
- 17 – Washington Chapter of Backcountry Hunters & Anglers
- 19 – Northeast Washington Forest Coalition

### Objection Issues:

- **The LMP only supports mountain bike and chainsaw use, but 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 plan could 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 or 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 specific sections of land to the designation as recommended wilderness located east of Metaline Falls (addition to the Salmo-Priest Wilderness), and the following specific sections of land west of Metaline Falls that the Forest Service proposed to recommend adding to the Abercrombie-Hooknose Wilderness Area:**
  - **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 now identified the following additional sections with prospective mineralization:**
  - **Sections 19, 30, 31, T39N, R43E**
- **Although the Forest Service indicated 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 also not excluded.**
- **The materials on the Forest Service website are difficult to even determine which sections of land are included in recommended wilderness designations.**
- **The revised plan recommends adding 61,630 acres of wilderness without providing any justification. The plan alludes to wildlife habitat and recreational opportunities, but FS also states wildlife doesn't need wilderness in order to survive. Likewise for recreational needs.**
- **Objectors do not think recommended wilderness have to be managed as if they are already designated. Only Congress can designate Wilderness. The Forest Service may not circumvent this statutory process by imposing wilderness-like restriction in those areas before Congress acts.**
- **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 it more expensive for livestock monitoring. 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.
- In allowing mountain bikes in recommended wilderness the Agency did not adequately anticipate the proliferation of electric battery assisted mountain bikes and address them in the forest plan revision
- Objectors believe livestock grazing allotments should be retired in designated Wilderness and Recommended Wilderness.
- Wilderness-Congressionally Designated Management Area in the LMP is far too weak in protecting wilderness values. In violation of the Wilderness Act it breaks Wilderness into Semi-Primitive and Primitive Zones, both fail to adopt “leave no trace” principles as LMP standards, it also directs the creation of a “network of large group campsites”. Also, 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 the "We've already degraded the Wilderness with one structure, what's the big deal about adding another insult" rationale for allowing an unnecessary installation in Wilderness. It's also illegal under the Wilderness Act.
- Stevens County objects to the inclusion of Recommended Wilderness in the Land Management Plan. They find no place in law that authorizes continued wilderness designation for USFS. There is a need to disclose what act of Congress that was relied on for continued recommendation of wilderness areas to NFS? What Law?
- Pend Oreille County objects to more recommended wilderness. The current wilderness is only used by 1% of Forest visitors.
- Recommended wilderness did not address problems associated with wilderness management when boundaries adjoin Wildland Urban Interface areas and private land.
- Ferry County objects to more recommended wilderness. Similar reasons to above.
- Remove recommended wilderness from the plan and instead recommend those areas as backcountry allowing for multiple use activities.
- The Colville Forest Plan falls short in its recommendations for wilderness protection of important Roadless Areas.
- The plan 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 are inconsistent with other National Forest.
- The 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.” Furthermore,

**the plan fails to “Discuss mitigation measures to avoid or minimize the impact or loss of wilderness characteristics.”**

**REMEDIES:**

- 1) RESOLUTION: No further/additional wilderness and backcountry designations, beyond the Salmo- Priest. [5-17]
- 2) The Colville National Forest has chosen to retain the weaker interim management option for recommended wilderness areas as part of the draft decision. This management would not fully protect recommended area as Wilderness by allowing existing mechanized (mountain bike use) and use of chainsaws until a congressional wilderness designation were to occur. Motorized use and new mountain bike use would be prohibited. 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. Reducing both acreage of recommended wilderness areas at the same time as management protections of the wilderness character of these areas is disingenuous to a balanced outcome.[...]The following areas should be added if the weaker interim management is adopted:

- Profanity (37,700 acres) - The acknowledgment of the remoteness, solitude, natural beauty, ecological diversity, and primitive character of the Kettle Crest that would come along with wilderness recommendations for this area would add value to the Pacific Northwest Trail which passes through this potential wilderness area (PWA). Also, having hikes that access wilderness off of Sherman Pass would open up the opportunity for many people traveling the scenic byway who may not otherwise visit a wilderness area to be exposed to the National Wilderness Preservation System and have a relatively easily accessible wilderness experience.

- Cougar Mountain (6,210 acres) and Thirteenmile (10,890 acres) - Highlights like the Thirteenmile Trail providing a unique low-elevation, early season, Ponderosa pine dominated hiking environment, these areas provide an extremely remote, wild experience with exceptional opportunities for solitude. There is a need for more wilderness experiences in the Okanogan Highlands eco-region like the opportunities provided by the Thirteenmile area. This trail is one of the first trails on the Colville NF to be snow-free each spring and is an increasingly popular spring and fall day-hiking destination for people from the greater Spokane area. Because of its connectivity to the Bald Snow area and the Kettle Crest Trail via a network of hiking trails, this area provides a unique opportunity for multi-day treks from Sherman Pass. The Thirteenmile and Cougar Mountain PWAs are also important habitat and habitat connectivity for rare carnivores, including lynx, wolverine, and wolves. Prescribed fire and efforts to protect the area's old growth Ponderosa pine could also continue if these areas were recommended for wilderness.

- Grassy Top (2,200 acres) & Hall Mountain (7,890 acres) - These connected blocks of wildland are above Sullivan Lake and adjacent to the Salmo Priest Wilderness Area. The Noisy Creek Trail and Grass Top Trail system provide excellent solitude through rugged terrain that is directly adjacent to the existing Salmo Priest Wilderness, and connected to the existing wilderness trail system, making multi-day wilderness treks throughout these areas possible. There is also a growing need for wilderness day hiking opportunities, and the Noisy Creek Trail (#588) provides

easy access from several campgrounds along Sullivan Lake for those interested in shorter, more accessible wilderness hikes. These areas are also part of designated habitat for grizzly bears and caribou and provide connectivity for those and other species; wilderness protection would provide added habitat security. Wilderness recommendation and eventual designation would also protect the scenic backdrop of and water quality for Sullivan Lake.

- Harvey Creek (5,720 acres) - Also known as the Bunchgrass Meadows and the Molybdenite Mtn area, this is a mountainous wild area south of the Sullivan Lake area provides excellent solitude and off-trail hiking and hunting and has some of the most diverse wildlife habitat of any potential wilderness area in the region, including the ecologically rich bunchgrass meadows, and hidden old growth groves.

- 3) Recommended wilderness for this area would help ensure that the upper reaches of the LeClerc Creek watershed, and important stream for bull trout, westslope cutthroat, and red band trout, are protected. It is also important, connected habitat for caribou, grizzly bear, lynx, wolverine, wolves, and other wildlife.

- Hoodoo (11,060 acres) - Hoodoo Roadless Area is one of the most frequented non-motorized recreation destinations in the Colville National Forest. Hikers travel the secluded, wilderness setting up through Hoodoo Canyon to discover hidden mountain lakes and sweeping views of granite cliffs. Hunting, hiking, and rock climbing are popular wilderness activities in this area. The developed recreation site at Trout Lake offers fishing and camping opportunities greatly enhanced by an adjacent wilderness area. Hoodoo's cottonwood, aspen, and shrub-steppe is a rare vegetation type in the state and provides crucial habitat for Canada lynx, wolverines, and nesting golden eagles. The series of remote lakes and ponds provides secluded habitat for frogs and other aquatic animals.

- Quartzite (5,340 acres) - The Quartzite PWA next to 49 Degrees North Ski Area should be recommended for wilderness. This would be the closest wilderness area to Spokane. Recommended wilderness would help ensure that this unlogged wild area and its large cedar trees and adjacent private wetland preserve would be protected for their scenic and environmental/nature study values.

- Twin Sisters (14,610 acres) - Twin Sisters PWA in the Kettle Crest forms the wilderness scenery backdrop to the east of the Kettle Crest Trail in the Jungle Hill/Wapaloosie area and enhances the scenic wilderness values along the Kettle Crest. The PWA rating used in the wilderness evaluation weighed the value for recreation, botany, habitat connectivity, source habitat, vegetation representation, fisheries and focal species. Twin Sisters was rated the same as Hoodoo and close to Bald Snow, but may not be considered wilderness quality because of two jeep trails. The use of the jeep trails is limited, and the trails are located in some of the best unaltered and roadless landscapes on the forest (DEIS, p. 565). Since these trails are rarely used and most off-road highway vehicle (OHV) on the Colville National Forest occurs on the nearly 700 miles of designated roads (DEIS, p. 565), if better trails for jeeps can be located elsewhere, a wilderness recommendation for Twin Sisters would help protect lynx and other wildlife habitat and landscape connectivity for rare carnivores.

· Owl Mountain (11,060 acres), Jackknife (8,940 acres) & South Huckleberry (9,680 acres) - These PWAs that contain areas with motorized trails also provide important wildlife habitat and connectivity and other values. We request that the portions of those PWAs that is currently designated as "Semi- primitive, Motorized Recreation" should be designated as "Backcountry Motorized" with the remaining portion of Owl Mountain, Jackknife, and South Huckleberry PWAs designated as "Backcountry" in the selected Alternative to protect lynx and wolverine habitat and habitat connections that facilitate adaptation to climate change. [7-7]

4) Other 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.[...]There is no reason why any of the above nonconforming uses should be allowed in Recommended Wilderness, either. [8-133]

5) Include additional areas as Recommended Wilderness Areas (RWAs), including Hoodoo, Thirteenmile, Profanity, all of Bald-Snow, and the western half of Twin Sisters Inventoried Roadless Areas.

6) Change standards and guidelines to clearly protect RWAs so that the wilderness characteristics will not be jeopardized before Congressional designation.

7) Follow the Wilderness Inventory and Evaluation using the 2012 Planning Rule. [19-6]

**Response:**

**Use of 1982 Planning Rule:**

Draft ROD: page 5

“I have elected to follow the provisions of the planning regulations in effect prior to May 9, 2012, referred to collectively in this document as the 1982 Planning Rule, as this land management plan revision process was initiated before 2012. References in this draft ROD refer to the 1982 Planning Rule unless indicated differently in the citation...However, in consideration of transition time requirements identified in the 2012 Planning Rule, the revised land management plan includes a monitoring plan per 36 CFR 219.12 of the 2012 Planning Rule.”

**Wilderness Evaluations:**

FEIS Volume III Appendix E – Response to Comments: page 1118

“The Forest followed the steps and criteria outlined in FSH 1909.12 chapter 70 (January 2007 version) that describes the process used to identify, evaluate, map and document the wilderness evaluation process... The public was heavily engaged throughout the evaluation process, with two series of collaborative meetings providing rich dialogue that informed the Forest Service of public uses, perceptions, and intimate knowledge of the landscape. Public comments on recommended wilderness were accepted and reviewed by the revision team until the release of the final revised EIS. Unroaded areas that met the criteria in FSH 1909.12 Section 71.1 (January 2007 Version) for placement on the inventory of areas that may be suitable for inclusion in the National Wilderness Preservation System were carried forward into the evaluation process. Evaluations for each unroaded area were completed by the forest plan revision team and were measured against the tests of availability, capability, and need. A summary document comparing how each unroaded area met the factors for capability, availability and need was provided to the

responsible official to help inform the decision regarding which of the unroaded areas would be taken forward as recommended wilderness in the proposed action that the public commented on in 2011. Public comments submitted in response to the proposed action were analyzed by the forest plan revision team, and where appropriate, resulted in suggested changes to the recommended wilderness designations. Suggested changes were approved by the responsible official prior to the release of the proposed revised forest plan. Public comments received on the draft forest plan were also reviewed by the forest plan revision team and led to additional suggested changes to the recommended wilderness area boundaries. These suggestions were reviewed by the responsible official and used to make further adjustments to the recommended wilderness boundaries prior to the release of the revised forest plan. Appendix F of the FEIS describes the process followed in making the suitability determinations for unroaded areas and includes a summary for each area's capability, availability, and need."

FEIS Volume II Chapter 3 – Affected Environment and Environmental Consequences: pages 692-693

"When a forest plan is revised, the 1984 Washington State Wilderness Act requires the Forest Service to review, evaluate, and determine whether inventoried roadless areas should be submitted to Congress for consideration as recommended wilderness."

"In the summer of 2005, the forest plan revision team for the Colville and Okanogan-Wenatchee National Forests began the process of evaluating inventoried roadless areas with the help of interested members of the public. Although inventoried roadless areas are evaluated for potential wilderness, it does not necessarily mean that the inventoried roadless area would automatically become (or not become) a new wilderness area. It is an evaluation process, not a final decision on designation. Only Congress can designate additional wilderness."

"The result of this two-step process was an individual wilderness evaluation report for all 21 areas that may be suitable for inclusion in the National Wilderness Preservation System located on the Forest, detailing each area's contribution to the evaluation factors of capability, availability, and need. All of the areas were determined capable of meeting the handbook definition of wilderness, though on a sliding scale. Wilderness capability was impacted by existing developments, vague boundaries, geographic shape, and impacts from sights and sounds of human activities. Availability as wilderness was influenced by existing recreational activities that would be displaced, existing mineral interests, the wildland urban interface, and the need for ecosystem maintenance..."

"...The wilderness evaluation process also identified that trade-offs exist between the recreation need for additional wilderness and the public's desire to maintain existing backcountry motorized and mechanized recreation opportunities and the use of an existing backcountry rental cabin and an historic fire lookout."

Draft ROD: page 12

"Approximately 56,177 acres (95 percent) of these recommended wilderness areas are already within IRAs as identified under the 2001 Roadless Area Conservation Rule. Currently, these areas are not suitable for scheduled timber production, timber harvest for resource benefit, roads, or motorized recreation. Managing these areas as recommended wilderness under the revised land management plan does not represent a change to the way they are currently managed."

FEIS Volume II Chapter 3 – Affected Environment and Environmental Consequences: pages 697

“The Kettle Crest National Recreation Trail is a 44-mile trail located along the top of the Kettle River Range Mountains and traverses through the Bald-Snow and Profanity Potential Wilderness Areas. This non-motorized trail was designated in 1979, and provides access to outstanding regional views, an historic fire lookout, a backcountry cabin, and excellent winter cross-country touring opportunities. Primary users include hikers, stock, mountain bikers, and skiers.”

Recreation and Travel Management Report: pages 56-59

“This alternative attempts to balance the public’s desire for additional wilderness with existing backcountry recreation opportunities such as mountain biking and OHV riding. As a result, not all of the Forest’s areas that may be suitable for inclusion in the national wilderness preservation system that possess wilderness characteristics were recommended as wilderness in this alternative. Instead, Alternative P retains approximately 54,600 acres (5% of the Forest) of backcountry for motorized recreation opportunities, and approximately 129,100 acres (12% of the Forest) of backcountry for recreation opportunities that would be inconsistent with wilderness management direction such as mountain biking, rental cabins and historic structure maintenance. See Table 6 for a comparison of backcountry and backcountry motorized management acres by alternative.”

“In addition, this alternative recommends approximately 80,300 acres be included in a Recreation Area along the Kettle Crest in Ferry County that would include all of the Profanity, Hoodoo, and Twin Sisters areas that may be suitable for inclusion in the national wilderness preservation system and the part of the Bald-Snow area that may be suitable for inclusion in the national wilderness preservation system not included in a recommended wilderness management area. The Recreation Area would support the existing outstanding recreational trail (motorized and non-motorized) values associated with the Kettle Crest region while also maintaining the existing semi-primitive characteristics that make these areas popular with both motorized and non-motorized recreationists. Within the Kettle Crest Recreation Area (KCRA), areas that may be suitable for inclusion in the national wilderness preservation system would be managed as either backcountry (Profanity, Bald-Snow, and Hoodoo) or backcountry motorized (Twin Sisters) and all existing recreation opportunities would be retained. Acres attributable to the KCRA are included in the backcountry and backcountry motorized acres listed in the above paragraph.”

“The areas that may be suitable for inclusion in the national wilderness preservation system that would be designated as backcountry motorized management areas in this alternative include Owl Mountain, Jackknife, Twin Sisters, South Huckleberry and Lost Creek. Combined, these areas would provide access to all of the Forest’s existing backcountry motorized trail systems. As a result, there would be no loss of existing summer motorized recreation use if this alternative was implemented.”

“Implementation of Alternative P would designate thirteen areas that may be suitable for inclusion in the national wilderness preservation system as backcountry management areas including: northern part of Bald-Snow, Bodie Mountain, Clackamas Mountain, Cougar Mountain, Deer Creek, Grassy Top, Hall Mountain, Harvey Creek, Hoodoo, Jackson Creek, Quartzite, South Fork Mountain and Thirteenmile. Combined, these areas that may be suitable for inclusion in the national wilderness preservation system contain approximately 53 miles of backcountry mountain bike trail opportunities. However, if the RW areas listed in this alternative become wilderness, mountain bike trail opportunities would no longer be available on approximately 61,700 acres across the Forest. This equates to approximately a 90 mile (30%) reduction in the number of

available mountain bike trail opportunities that are associated with the Forest's existing summer non-motorized trail system. As a result, Alternative P provides the third highest number of mountain bike trail miles of all the alternatives. For a comparison between alternatives of backcountry management acres open to mountain biking and the number of trail miles open to mountain biking, see Table 7. Managing these areas as backcountry would also allow the Forest to continue to manage its only backcountry recreation rental cabin and to maintain a popular historic fire lookout."

Recreation and Travel Management Report: pages 52-53

"Alternative P proposes the second highest amount of non-motorized backcountry of all alternatives and a lower amount of recommended wilderness (RW) than the Proposed Action to address public concerns that wilderness designation may result in lower revenue to local economies due to reduced recreational opportunities. The backcountry motorized (BCM) management areas are similar to those in the Proposed Action. Participants in the Colville Collaborative group that worked on forest plan issues around wilderness and vegetation management agreed that the Kettle Crest was a special area for semi-primitive recreation opportunities, but did not agree that the area should be wilderness because of the impacts to recreation opportunities such as mountain biking and OHV riding as well as motorized trail maintenance. The proposed Kettle Crest Recreation Area (KCRA) was added as a component of this Alternative to address public disagreement about recommending this area for wilderness. The backcountry and backcountry motorized management areas within the KCRA would be managed to maintain their existing semi-primitive characteristics while allowing recreation activities that would be inconsistent with wilderness designation to continue, such as mountain biking, OHV riding, and the use of a recreation rental cabin."

"Public issues concerning potential impacts that desired road densities and motorized trails in the proposed action may have on aquatic, riparian, and wildlife habitats, including grizzly core areas and habitat connectivity, are addressed through lower road densities in the focused and general restoration management areas and the higher number of combined recommended wilderness and backcountry non-motorized management acres."

"This alternative also responds to public comments that asked for additional protections for riparian areas and addresses public concerns that the Proposed Action may not provide adequate protection that is as effective as the current forest plan amendments in managing activities within the riparian areas."

Recreation and Travel Management Report: pages 63

"By Forest Service policy, those areas that may be suitable for inclusion in the national wilderness preservation system located primarily on adjacent forests that would not meet the minimum acreage requirements necessary to be recommended as wilderness on the Colville National Forest alone would typically be evaluated for wilderness recommendation through the Idaho Panhandle and Okanogan-Wenatchee National Forests respective forest plan revision processes. The preferred alternative for the Idaho Panhandle forest plan revision process did not support the South Fork Mountain or Grassy Top areas as recommended wilderness and the Okanogan-Wenatchee forest plan process did not support the Jackson Creek, Bodie Mountain, and Clackamas Mountain areas as recommended wilderness in its proposed action for forest plan revision."



“Specific direction for the management and protection of wilderness characteristics in recommended wilderness is included in the revised land management plan and complies with the planning regulations (36 CFR 219) and agency policy (Forest Service Handbook 1900)...”

“These preliminary administrative recommendations are consistent with my responsibilities under 36 CFR 219.17. These recommendations will receive further review and possible modification by the Chief of the Forest Service, Secretary of Agriculture, and the President of the United States. Congress has reserved the authority to make final decisions on wilderness designation. Until such time Congress chooses to act to designate these areas, these areas will be managed as recommended wilderness under the revised land management plan.”

**Inconsistent Uses:**

Recreation and Travel Management Report: pages 57-59

“Under this alternative [P], some inconsistent uses would be allowed to continue until Congress designates the RW areas as wilderness. Existing inconsistent uses within the recommended wilderness areas include mountain biking, chain saw use, and motorized trail maintenance and reconstruction. Except for chain saw use, the use of motorized trail maintenance and reconstruction equipment would not be allowed in recommended wilderness under alternative P. In addition, no new inconsistent uses would be allowed.”

“Even with the continuation of mountain biking and chainsaw use for trail maintenance, the existing wilderness characteristics associated with the RW areas listed in Alternative P are not expected to be altered prior to designation as wilderness by Congress. This determination is based on the fact that the allowed inconsistent uses are of short duration, utilize existing developments (trails), and in the case of chainsaw use for trail maintenance, can increase (due to the lower cost of logcut operations when compared to crosscut saw logcut costs) the level of maintenance the existing trail system would receive on an annual basis over the life of the revised Forest Plan. Increased trail maintenance could reduce the likelihood of resource damage caused by storm events which would help maintain or improve the RW area’s natural appearance and the functioning of the RW area’s ecological systems and plant communities.”

“Allowing mountain biking and chainsaw use for trail maintenance to continue would not affect the RW areas’ “capability” determinations made as part of the 2009 PWA evaluation process. The “capability” determination was based on an assessment of the principal wilderness characteristics – natural, undeveloped, outstanding opportunities for solitude or primitive and unconfined recreation, special features and values, manageability – as identified in the Wilderness Act.”

“The natural appearance and ecosystem health of each RW area would be unaltered by the presence of mountain biking and chainsaw use for trail maintenance. There would be no expected increase in the presence of non-native species, the presence of developments that would change the free-flowing nature of area streams, the level of light pollution, or the presence of pollutants. The RW area would remain undeveloped except for the presence of trails and would continue to provide opportunities for solitude or primitive and unconfined recreation. Each RW would continue to support the existing ecologic, geologic, scientific, educational, scenic, historical, and cultural features of significance contained within each RW.”

“Finally, there would be no change in the Colville National Forest’s ability to manage the boundary of each RW area if mountain biking and chainsaw use for trail maintenance are allowed to continue.”

“The presence of mountain biking and chainsaw use for trail maintenance may affect the degree of solitude and level of primitive recreation that some user’s experience while recreating in the RW areas while these activities are actively taking place. Whether the effect of these activities are positive or negative and how strong the effect is would depend on each individual user’s value system and cannot be effectively measured. However, since mountain bike use and chainsaw use for trail maintenance do not represent long-term or irreversible commitments of resources, the non-esoteric effects to solitude and level of primitive recreation would be temporary. In addition, when the RW areas are designated as wilderness by Congress, the effects on solitude and level of primitive recreation would be eliminated assuming that the wilderness legislation passed by Congress prohibits these uses.”

“Allowing mountain biking and chainsaw use for trail maintenance and reconstruction to continue would not affect the RW areas’ “availability” determinations made as part of the 2009 PWA evaluation process. All National Forest System lands determined to meet wilderness “capability” requirements are considered potentially “available” for wilderness designation. The determination of “availability” is conditioned by the value of and need for the wilderness resource compared to the value of and need for other resources. Since no new inconsistent uses would be allowed under Alternative P, there would be no change in the basis for the 2009 “availability” determination.”

“Likewise, allowing mountain biking and chainsaw use for trail maintenance and reconstruction to continue would not affect the RW areas’ “need” determinations made as part of the 2009 PWA evaluation process. In determining whether there is a “need” to recommend an area as RW, the following factors are considered:”

1. The location, size, and type of other wildernesses in the general vicinity, their distance from the proposed area, the accessibility of the area to population centers and user groups, and public demand for wilderness.
2. Present visitor pressure on other wildernesses, the trends in use, changing patterns of use, population expansion factors, and trends and changes in transportation.
3. The extent to which nonwilderness lands on the NFS unit or other Federal lands are likely to provide opportunities for unconfined outdoor recreation experiences.
4. The need to provide a refuge for those species that have demonstrated an inability to survive in less than primitive surroundings or the need for a protected area for other unique scientific values or phenomena.
5. Within social and biological limits, management may increase the capacity of established wildernesses to support human use without unacceptable depreciation of the wilderness resource.
6. An area’s ability to provide for preservation of identifiable landform types and ecosystems which is helpful in rounding out the National Wilderness Preservation System.

“Factors 1, 2, 3, 5, and 6 would not be altered by the presence of mountain biking or chainsaw use for trail maintenance and reconstruction. Factor 4 has been analyzed by resource specialists (wildlife, rare plants, fisheries, etc.) in their respective analysis for the revised Forest Plan and no species were identified that would be unable to survive if mountain biking and chainsaw use for

trail maintenance and reconstruction were allowed to continue. Therefore, mountain biking and chainsaw use for trail maintenance and reconstruction would not affect the “need” determination made in the 2009 wilderness evaluation process.”

“Ultimately, inconsistent uses, including mountain biking and chainsaw use for trail maintenance, were identified during the 2009 PWA evaluation process and their presence did not preclude the roadless areas from meeting the evaluation criteria (capability, availability, and need) for inclusion on the inventory of Potential Wilderness Areas. Therefore, allowing these inconsistent uses to continue at use rates similar to when the wilderness evaluations were completed should not detract from the inherent wilderness characteristics associated with the three recommended wilderness areas.”

“Below is a list of Alternative P’s recommended wilderness areas and the trails that would be closed to mountain bike use if the recommended wilderness areas are designated as wilderness by Congress.

1. Bald Snow: Barnaby Buttes #7, Barnaby Buttes #70, Edds Mountain #3, Kettle Crest #13 South (portion of trail south of Snow Peak Cabin).
2. Abercrombie – Hooknose: Sherlock Peak #139, South Fork Silver Creek #123, North Fork Silver Creek 119, Abercrombie #117, Flume Creek #502.
3. Salmo-Priest Adjacent: Slate Creek #525, Halliday #522, North Fork Sullivan Creek #507, Red Bluff #553, Elk Creek #560, Crowell Ridge #515, Salmo Divide #535, Shedroof Cutoff #511.

“If the RW areas listed under Alternative P are designated as wilderness by Congress, trail maintenance and reconstruction costs could increase on the 90 miles of trail that access approximately 61,700 acres of recommended wilderness. This cost increase is based on the required change from using motorized (chainsaws, power toters, trail dozers, etc.) trail maintenance equipment to non-motorized equipment (cross-cut saws, pack mules, pulaskis, etc.) which would likely result in annual tasks, such as spring logout, and reconstruction efforts taking more time to complete, additional people, or both.”

Revised Land Management Plan: pages 149-151

Desired Conditions:

MA-DC-RW-01. Uses Prior to Congressional Designation

“Prior to congressional designation, mountain bike and chainsaw use are allowed to continue on existing trails and as long as their use does not compromise wilderness eligibility.”

Standards:

MA-STD-RW-01. Existing and Proposed Uses

“Management actions must maintain the wilderness character of the recommended wilderness areas that were identified in the 2009 wilderness evaluations for the Abercrombie Hooknose, Salmo-Priest Adjacent, and Bald Snow recommended wilderness areas prior to designation or release from wilderness consideration by Congress.”

MA-STD-RW-02. Uses Inconsistent with Wilderness Character

“Recreational mountain bike use and the use of chainsaws for trail maintenance on existing National Forest System Trails are the only uses inconsistent with wilderness designation allowed in recommended wilderness. If monitoring suggests an increase of user-created mountain bike trails, mountain bike use will be curtailed in recommended wilderness. See chapter 4, monitoring.”

MA-STD-RW-03. Trail Use

“No newly constructed National Forest System Trails will be open to uses (mechanized or motorized) that are inconsistent with wilderness designation. User-created trails will be closed and naturalized to prevent resource damage. Use of trails closed to mountain biking or off-trail use by mountain bikes that cause resource damage will result in the closure of the recommended wilderness to mountain bike use.”

Guidelines:

MA-GDL-RW-02. Trail Use

“Mechanized (on existing trails only) and non-motorized travel may occur in recommended wilderness, to retain wilderness character, as long as wilderness character remains intact.”

MA-GDL-RW-03. Motorized Equipment

“Chainsaws may be used for trail maintenance and reconstruction of existing trails only, to retain wilderness character, as long as wilderness character remains intact.”

Revised Land Management Plan: page 168

Monitoring Questions:

MON-AR-02: “What is the trend in mountain bike use in recommended wilderness and is that use impacting the wilderness characteristics of the forest’s recommended wilderness areas.”

Indicators:

MON-AR-02-01: “Assess mountain bike use through trail registration trend analysis.”

Frequency: Annual

MON-AR-02-02: “Identify new user-created mountain bike trails or impacts (i.e. hill climbs, accelerated growth of banked turns) to natural or special features along existing trail systems in recommended wilderness caused by mountain bike use.”

Frequency:

“20% of all trail miles open to mountain bike use within recommended wilderness will be monitored annually for new or recurring impacts from mountain bikes.”

“Reported cases of user-created routes within recommended wilderness will be investigated annually.”

Recreation and Travel Management Report: page 30

aIncomplete and Unavailable Information:

“Trail use figures are not available for the Colville National Forest for total use or by type of recreation use (hike, bike, horse, ski, ATV, etc).”

**CONCLUSION:**

The planning process followed existing law, regulation, and policy. See responses to remedies and potential instructions below.

**YOUR RESPONSE TO THE REMEDIES BROUGHT FORTH BY OBJECTORS:**

**Use of 1982 Planning Rule: Remedy 7**

The final EIS and revised land management plan were developed according to the NFMA, its implementing regulations at 36 Code of Federal Regulations (CFR) part 219; National Environmental Policy Act (NEPA) (1969); the Council on Environmental Quality (CEQ) NEPA regulations at 40 CFR 1500–1508; and the Forest Service NEPA regulations at 36 CFR 220. According to transition language of the 2012 Planning Rule at 36 CFR 219.17(b)(3), the responsible official may elect to use the provisions of the prior planning regulations (1982 Planning Rule, dated September 30, 1982, and as amended) to prepare plan amendments and revisions. The Responsible Official elected to follow the provisions of the planning regulations in effect prior to May 9, 2012, referred to collectively in this document as the 1982 Planning Rule, as this land management plan revision process was initiated before 2012

**Wilderness Evaluations: Remedies 2, 3, 5**

The Forest followed the steps and criteria outlined in FSH 1909.12 chapter 70 (January 2007 version) that describes the process used to identify, evaluate, map and document the wilderness evaluation process. The public was heavily engaged throughout the evaluation process, with two series of collaborative meetings providing rich dialogue that informed the Forest Service of public uses, perceptions, and intimate knowledge of the landscape. Public comments on recommended wilderness were accepted and reviewed by the revision team until the release of the final revised EIS. Unroaded areas that met the criteria in FSH 1909.12 Section 71.1 (January 2007 Version) for placement on the inventory of areas that may be suitable for inclusion in the National Wilderness Preservation System were carried forward into the evaluation process. Evaluations for each unroaded area were completed by the forest plan revision team and were measured against the tests of availability, capability, and need. A summary document comparing how each unroaded area met the factors for capability, availability and need was provided to the responsible official to help inform the decision regarding which of the unroaded areas would be taken forward as recommended wilderness in the proposed action that the public commented on in 2011. (FEIS, Volume III, Appendix F: Wilderness Evaluations in tables F-3 and F-4 on pages 1274-1275) Public comments submitted in response to the proposed action were analyzed by the forest plan revision team, and where appropriate, resulted in suggested changes to the recommended wilderness designations. Suggested changes were approved by the responsible official prior to the release of the proposed revised forest plan. Public comments received on the draft forest plan were also reviewed by the forest plan revision team and led to additional

suggested changes to the recommended wilderness area boundaries. These suggestions were reviewed by the responsible official and used to make further adjustments to the recommended wilderness boundaries prior to the release of the revised forest plan. Appendix F of the FEIS describes the process followed in making the suitability determinations for unroaded areas and includes a summary for each area's capability, availability, and need.

**Wilderness Recommendations: Remedies 1, 2, 3, 5**

*See response above regarding Wilderness Evaluations*

The National Forest Management Act of 1976 (Public Law 94-588) provides for multiple use on National Forest System lands. These uses, as outlined in the Act, include the coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness. As with all these uses, the Forest Service must seek a balance, where no single use predominates over the others, and the Forest Service must also find a balance within each single resource use that provides sustainable ecologic, economic, and social conditions for current and future generations.

Here, the Colville NF utilized a robust wilderness evaluation and public engagement process to determine the areas to designate as "Recommended Wilderness". The Responsible Official reasonably decided to recommend three areas for inclusion in the National Wilderness Preservation System in consideration of providing a balanced approach to management of the Colville NF while recognizing that public opinion varied widely.

Forest Service regulation requires units to assess and recommend wilderness additions during the plan revision process (36 CFR 219.17 (a)), and Forest Service policy (Forest Service Handbook) directs that any area recommended for wilderness or wilderness study is not available for uses or activities that may reduce the wilderness potential of an area. The intent is that areas recommended for wilderness retain the wilderness characteristics that make them eligible for inclusion in the National Wilderness Preservation System as established by the Wilderness Act. The Forest Service can only recommend wilderness area allocations; only Congress can designate wilderness areas through the legislative process. Recommended Wilderness Areas are therefore managed to preserve wilderness characteristics, but they are not designated Wilderness, and therefore are not subject to the statutory prohibitions outlined in the Wilderness Act.

Designated wilderness does represent more restrictive management compared to other management areas. This restriction is statutory and is purposely designed as stated in the Wilderness Act (Public Law 88-577). Section 2 (c) of the Wilderness Act states: "An area of wilderness is further defined to mean in this Act an area of Undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions..." Special Provisions (Section 4 (d) (1) of the Wilderness Act provides for specific management actions, stating: "In addition, such measures may be taken as may be necessary in the control of fire, insects and diseases, subject to such conditions as the Secretary deems desirable."

**Inconsistent Uses: Remedy 2, 4, 6**

*See response above regarding Wilderness Evaluations and Wilderness Recommendations.*

Section 4(c) of the Wilderness Act of 1964 states,

*“Except as specifically provided for in this Act, and subject to existing private rights, ...there shall be no temporary road, no use of motor vehicles, **motorized equipment** or motorboats, no landing of aircraft, **no other form of mechanical transport**, and no structure or installation within any such area.”* (emphasis added)

Under selected alternative P, some inconsistent uses would be allowed to continue until Congress designates the recommended wilderness areas as wilderness. Existing inconsistent uses within the recommended wilderness areas include mountain biking, chain saw use, and motorized trail maintenance and reconstruction. Except for chain saw use, the use of motorized trail maintenance and reconstruction equipment would not be allowed in recommended wilderness under alternative P. In addition, no new inconsistent uses would be allowed.

This determination, as identified in the Recreation and Travel Management Report is based on the fact that the allowed inconsistent uses are

*“of short duration, utilize existing developments (trails), and in the case of chainsaw use for trail maintenance, can increase (due to the lower cost of logcut operations when compared to crosscut saw logcut costs) the level of maintenance the existing trail system would receive on an annual basis over the life of the revised Forest Plan. Increased trail maintenance could reduce the likelihood of resource damage caused by storm events which would help maintain or improve the RW area’s natural appearance and the functioning of the RW area’s ecological systems and plant communities.”* (page 57)

If the recommended wilderness areas listed under Alternative P are designated as wilderness by Congress, the report states that,

*“...trail maintenance and reconstruction costs could increase on the 90 miles of trail that access approximately 61,700 acres of recommended wilderness. This cost increase is based on the required change from using motorized (chainsaws, power toters, trail dozers, etc.) trail maintenance equipment to non-motorized equipment (cross-cut saws, pack mules, pulaskis, etc.) which would likely result in annual tasks, such as spring logcut, and reconstruction efforts taking more time to complete, additional people, or both.”* (page 59)

There has been considerable dialog in the wilderness/recommended wilderness community as to whether using chainsaws or crosscut saws is cheaper, safer, more efficient, etc, depending on site conditions and local availability of crews. If there is data to support the statement that trail maintenance, can increase with chainsaw use due to the lower cost of logcut operations when compared to crosscut saw logcut costs, then consider including this information in the Recreation and Travel Management Report. Recognizing that no two recommended wilderness areas are the same, this information could also be provided on the individual area evaluations, if available.

The Recreation and Travel Management Report also states:

*“Ultimately, inconsistent uses, including mountain biking and chainsaw use for trail maintenance, were identified during the 2009 PWA evaluation process and their presence did not preclude the roadless areas from meeting the evaluation criteria (capability, availability, and need) for inclusion on the inventory of Potential Wilderness Areas. Therefore, **allowing these inconsistent uses to continue at use rates similar to when the wilderness evaluations were completed** should not detract from the inherent wilderness*

*characteristics associated with the three recommended wilderness areas.*” (emphasis added, page 59)

However, the report acknowledges that **“Trail use figures are not available for the Colville National Forest for total use or by type of recreation use (hike, bike, horse, ski, ATV, etc)”** (page 30). How will the Forest determine what the use rates were in 2009 when the wilderness evaluations were completed? Are chainsaw use figures available? Consider adding any missing data or methodology related to inconsistent uses to the project record, especially since the Revised LRMP includes the following Standards (page 150):

MA-STD-RW-02. Uses Inconsistent with Wilderness Character

*“Recreational mountain bike use and the use of chainsaws for trail maintenance on existing National Forest System Trails are the only uses inconsistent with wilderness designation allowed in recommended wilderness. **If monitoring suggests an increase of user-created mountain bike trails, mountain bike use will be curtailed in recommended wilderness. See chapter 4, monitoring.**”* (emphasis added)

MA-STD-RW-03. Trail Use

*“No newly constructed National Forest System Trails will be open to uses (mechanized or motorized) that are inconsistent with wilderness designation. User-created trails will be closed and naturalized to prevent resource damage. **Use of trails closed to mountain biking or off-trail use by mountain bikes that cause resource damage will result in the closure of the recommended wilderness to mountain bike use.**”* (emphasis added)

and Monitoring Questions: page 168

MON-AR-02:

*“**What is the trend in mountain bike use in recommended wilderness and is that use impacting the wilderness characteristics of the forest’s recommended wilderness areas.**”* (emphasis added)

#### **POSSIBLE INSTRUCTIONS (if any):**

The Recreation and Travel Management Report acknowledges “Trail use figures are not available for the Colville National Forest for total use or by type of recreation use (hike, bike, horse, ski, ATV, etc)” (page 30). How will the Forest determine what the use rates were in 2009 when the wilderness evaluations were completed? Are chainsaw use figures available? Add a timeline to the ROD for how and when the existing use levels of mountain bicycling and chainsaw use in the recommended wilderness will be determined to establish a baseline for the monitoring program.

Review the 2009 Nat. Visitor Use Monitoring Report for mountain bike use in areas recommended for wilderness designation in the revised Plan. Revise the monitoring plan to establish current baseline, indicator, and frequency of measure to be consistent with Forest Plan components. Consider making an adaptive decision in the ROD in response to MA-STD-RW-02.