

Watershed and Riparian Management

- 5 – Washington Cattleman’s Association
- 8 – Sierra Club/Alliance for the Wild Rockies
- 14 – Stevens County Cattleman’s Association
- 16 – Conservation Northwest

Relative to Riparian Area Management:

- There is no ecological need for increasing restrictions in riparian areas.
- The revised plan 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 oddly allows commercial firewood cutting but bans personal use firewood cutting in Riparian Management Areas.
- Several statements in the FEIS are lacking substantiating documentation (see letter 14) – specifically lines 138-144 of the DEIS relative to damage to riparian areas and unauthorized trail development.
- The revised plan should specify that National Forest lands will maintain and restore aquatics rather than simply to contribute to aquatics.

Relative to Key Watershed Management:

- The revised plan 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 and that activities such as grazing and recreation could be negatively affected because of this.
- FW-OBJ-WR-09. Stream Restoration in Key Watersheds is unrealistic and is not likely obtainable and should be removed from the revised plan.

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.

ARCS BRIEF TIMELINE: The Colville NF Planner put together a brief timeline of the ARCS modification to assist with your review of this issue:

- Revised Forest Plan Proposed action, scoped in 2011
 - included ARCS 2008 version. All versions of ARCS included in alternatives are compared in the aquatic direction table starting on page 1403 of the FEIS.
- Draft EIS published in 2016-
 - included 2008 ARCS in Alternative O

- 2015 ARCS-mod in Alternatives P and R (2015 ARCS-mod updated the 2008 regional ARCS)
- Final EIS published in 2018-
 - included 2008 ARCS in Alternative O,
 - 2015 ARCS-mod in Alternative R, and
 - ARCS 2016 in Alternative P, with Colville specific modifications. (Colville ARCS 2016 reflected updates to the 2015 ARCS, based on comments received on the draft Plan and DEIS---note some of the modification to 2015 ARCS were based on comments and subsequent negotiations on Blues ARCS, which were incorporated into Colville Alt P to ensure regional consistency)

OBJECTION RESPONSE:

RULE (Law, Reg, or Policy) (if applicable):

NEPA; The scope of the riparian areas and the effects of these options are disclosed in the document. The need for this decision, how the alternatives affect riparian areas and watersheds are discussed, contrasted and evaluated.

ESA; The proposed riparian management zones are clearly intended to protect aquatic species. Information on how these areas achieve these goals are described within the FEIS and the Biological Assessment and then concurred by the regulatory agencies in the Biological Opinion.

NFMA; The specialist Fisheries report describes an approach to maintain viability of these species (page 27. This is brought into the EIS. Near stream areas are provided additional protections.

APPLICATION:

The FEIS discloses in general terms how it will prioritize actions in different watersheds (Key, Priority), the initial widths of areas near streams where aquatic function will be prioritized, and desired conditions at both the watershed and stream reach scale. Throughout the FEIS there is an attempt to balance simplicity (one size fits all) with relevancy (all sites are different). The document cites locally collected aquatic monitoring data which indicates general improvement in aquatic conditions overall, but that there are still stream reaches that are degraded (Appendix H). This balance between standards and flexibility must be done in a way that the effects described within our Biological Assessment does not get to a jeopardy finding and the Biological Opinion concurs with that finding – which it does.

CONCLUSION:

There is no violation of law, regulation of policy when addressing the watershed and riparian components as described in this plan. To a large degree the goals, objectives, standards, and guidelines are very similar to those currently in place. This aquatic strategy has seen numerous challenges in the courts and has prevailed. That is because they have done a good job at protecting the processes that maintain a healthy riparian zone and a functioning stream. A recent review found that riparian zones with these widths are among the most conservative in the region (Boisjolie, B. A., M. V. Santelmann, R. L. Flitcroft, and S. L. Duncan. 2017. Legal ecotones: a comparative analysis of riparian policy protection in the Oregon Coast Range, USA. *Journal of Environmental Management* 197:206-220). The wording within this plan is transparent about the potential of commercial timber harvest within Riparian Management Areas. This document makes it clear it is only allowing harvest or other management activities in riparian management areas if it is undertaken to improve aquatic function or reduce risk to these systems. The

plan bolsters the rationale for wide riparian management zones even as it acknowledges new science that supports some management activity within Riparian Management Areas. Most the objections seem to be focused on what could be authorized under the new plan. The sideboards provided within this plan are designed to maintain or improve conditions within the capacity of the agency to provide. As future projects subject to this plan have yet to be completed, they will have to be judged on their own merits and on how well they reflect the intent of this planning document. There are on-going monitoring efforts and commitment to continue these efforts into the future to insure the general trend is positive.

REMEDIES:

1) The Plan should avoid arbitrary riparian buffers and instead develop an adaptable alternative that provides site-specific flexibility. [*Washington Cattleman's Association*]

RESPONSE: We believe the Revised Plan does allow site-specific flexibility in defining riparian buffer width. The initial widths of Riparian Management Areas listed within the Plan are not arbitrary and have strong scientific support (that are cited throughout these documents) as being a conservative and maintaining low risk to the aquatic system and are the starting points for buffer widths that will protect aquatic and riparian dependent resources. These areas should receive primary management emphasis when the purpose and need includes improving watershed condition and aquatic species viability. There is flexibility within the standards as the document states, "When RMAs are properly functioning and aquatic and riparian desired conditions are being achieved, projects shall maintain those conditions." MA-STD-RMA-01. In contrast, "When RMAs have impaired function or are functioning-at-risk or if aquatic and riparian desired conditions are not yet being achieved and to the degree that project activities would contribute to those conditions, projects or permitted activities shall restore or not retard attainment of desired conditions." MA-STD-RMA-01. This plan describes desired conditions for stream and riparian areas and prioritizes sub-watersheds but recognizes specific conditions at a site will differ and need to be addressed at the project scale. **In principle this plan allows what the objectors ask for when it states "RMAs are not "no touch" buffers. Instead, management activities designed to benefit aquatic and riparian-dependent resources and move the landscape toward desired conditions are allowed and encouraged within them. While default RMA widths are uniform, the management of RMAs is not intended to be...activities are to be planned and implemented based on watershed and site-scale analyses that lead to project-specific designs...[which] must meet applicable standards and guidelines."** Colville Revised Forest Plan page 120

2) The Forest Service should be prioritizing rehabilitating existing sediment sources in damaged riparian zones, not risking them with more industrial activities. [*Sierra Club/Alliance for the Wild Rockies*]

RESPONSE: We believe the Revised Plan does prioritize rehabilitating existing sediment sources and reducing the amount of this material that enters the stream. The plan allows decisions that would focus on reducing sediment as a byproduct of sustainable timber harvest and/or improving watershed condition which are co-goals of this forest plan. Furthermore, the chosen alternative has numerous priority watersheds where there is a restoration focus at reducing the sediment effects of roads and road crossings on streams and fish. Erosion risk is part of the assessment of habitat conditions as it affects the viability of aquatic biota (see Table 77 and 78 of the FEIS). The plan does recognize that all actions taken to restore streams incur some risk of mobilizing sediment whether that is commercial timber harvest or decommissioning road beds. To permit these activities in this plan, all actions need to be shown to contribute to maintaining or improving aquatic systems over the long term. The plan sketches out the amount of riparian treatments projected in key watersheds in the fisheries report (Appendix 1). It projects 600-1,500 acres of treatment in riparian areas in key watersheds over the life of the plan (Alternative P). Given riparian areas make up around 15% of the 1.1 million areas, this suggests a small percentage (<1%) of riparian areas could be subject to commercial harvest. Therefor this timber harvest is unlikely to

contribute to sediment to the stream. Alternative R analyzed a more restrictive approach to riparian management. **The plan does prioritize rehabilitating existing sediment sources because it is a component of the analysis within the plan and is part of the metrics within the WCF priority classifications. Industrial activities would only be allowed to occur in damaged riparian zones if they restore or not retard attainment of desired conditions (standard MA-STD-RMA-01).**

- 3) **On lines 138 -144 of the DEIS it was stated: "... 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 - e.g., documented and measured impacts directly attributable to mountain bikes and off-highway vehicles, as a FOIA and the Forest refused to respond. They have reiterated these statements in the FEIS, without substantiating documentation and WE OBJECT! [Stevens County Cattleman's Association] We pointed out these deficiencies in our comments to the DEIS and they need to be addressed in this FEIS - The FEIS should be withdrawn and re-written to address these deficiencies. [Stevens County Cattleman's Association]**

RESPONSE: We believe the Forest appropriately responded to this 2016 request. Although we understand your concern, travel management decisions are made at the large-scale within subpart B of the Travel Management Plan and individual projects which are different, but related, decisions. The Forest Plan simply provides goals and objectives to put past and future motorized decisions in context. Mountain bike decisions are primarily affected by the wilderness designations that do differ among alternatives. That said, according to the plan it is likely that over time that there will be less total roads available for motorized travel over time. The information that supports these declines will be provided at the time project decisions are made. The proposed plan cites "Ouren, D.S., C. Hass, C.P. Melcher, S.C. Stewart, P.D. Ponds, N.R. Sexton, L. Burris, T. Fancher, and 25323 Z.H. Bowen. 2007. Environmental effects of off-highway vehicles on Bureau of Land 25324 Management lands: A literature synthesis, annotated bibliographies, extensive bibliographies, and 25325 internet resources: U.S. Geological Survey Open-File Report 2007-1353." which provide a good review – including those to aquatics – of the large-scale effects of off-highway vehicles on streams, riparian areas and watershed. A look at the documents cited in this bibliography provides strong support for treating off-highway vehicles as a threat to riparian areas and watershed conditions. The general threat of motorized vehicles to streams are cited in the FEIS. Future decisions that would be tiered to this decision would need to be judged on their own merits. The objectors point to no violation of and law or regulations except for failing to respond to a Freedom of Information Act (FOIA) request. **In terms of the FOIA issue, the objector was sent a letter on July 13, 2016, asking a) if they would agree to pay the costs associated with processing the request: b) whether they would like to modify their request to reduce costs; or c) whether they were requesting a fee waiver. The July 13 letter required a response before July 29, 2016, in order to proceed with the FOIA request. No response was received and the FOIA request was appropriately closed.**

- 4) **The objector strongly suggests Key Watersheds are "actually" prioritized (i.e. 1, 2, 3.....)**

RESPONSE: The Revised Plan appropriately utilized the Watershed Condition Framework (WCF) as a template approach to prioritize watersheds. Doing so follows the suggest path within the new Forest Planning rule. We do recognize there are many ways to prioritize watersheds, including ranking them numerically. There is, however, no required approach to be used in the Forest Planning process. The Forest Service chose to identify a subset of priority watersheds for multiple reasons. The primary rationale for having multiple priority watersheds is this provides a network of watersheds to protect at-risk native aquatic species (FEIS page 324) as well as areas to prioritize aquatic restoration. It should be noted the plan also focuses active restoration on a much more limited set of watersheds (FEIS 325). The objector points to no specific law and or policy that describes the way in which watersheds should be prioritized and the plan reasonably identifies the Watershed Condition Framework as a template for prioritizing watersheds for this process and then modifies this approach based on forest level information.

- 5) **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, then it is unreasonable to present these goals to the public. It gives them 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*]

RESPONSE: We think this level of stream restoration suggested is within the Forest's capacity. The FW-OBJ-WR-09 seeks to improve stream conditions in 81 miles of stream and the objectors suggest this is too high given the funding level. First, this plan is intended to cover 15 or 20 years so this works out to be four or five miles per year. This is within the range of what the forest currently completes (6 miles per year, see https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_034945.pdf). Given the level of work in the past we think this is doable and to meet this objective the program simply needs to continue on as it has over the last decade. There are no legal or procedural violations suggested by the objector. There is no commitment to fund these specific projects, the document simply identifies what is expected given past funding levels.

- 6) **WE OBJECT wholly to FW-OBJ-WR-09 and suggest it be stricken simply 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*]

RESPONSE: We think this level of stream restoration is within the Forest's capacity. This references the previous remedy requested (5) on FW-OBJ-WR-09 and more narrowly interpret the scope and cost of watershed restoration. The Fisheries Specialist Report (Appendix 1) identifies basins and types of projects that could be anticipated and is within what could be accomplished with past budgets but does not provide any guarantee these projects would be completed. There is no violation of law or policy in implementing this objective.

- 7) **Relative to FW-STD-WR-01: WE OBJECT AND EXPECT THIS STANDARD TO BE REMOVED, IN IT'S ENTIRETY! No other remedy will suffice!** [*Stevens County Cattleman's Association*]

RESPONSE: We think that FW-STD-WR-01 is a necessary forest-wide standard as it is related to properly functioning watersheds and adequate cites documents that can be used to classify the conditions of watersheds. On page 56 of the Revised Colville plan, where this standard is introduced, it cites the Watershed Conditions Framework Technical guide is one approach that can be used. Within this guide both aquatic and terrestrial aspects are used to define watershed condition and states a properly functioning watershed as one that "has minimal undesirable human impact on natural, physical, or biological processes and is resilient and able to recover to the desired condition when or if disturbed by large natural disturbances or land management activities" (page 4 Watershed Conditions Framework Technical Guide 2011. The tie to the use of Watershed Condition Framework is cited in the preamble of the of the 2012 Forest Planning rule Federal Register 77(68) April 9, 2012 page 21207) as a tool to prioritize watersheds for restoration. As these are how conditions are describe across disciplines it would be hard to remove this standard without changing how all management standards (e.g. timber, grazing) in this plan are worded. For example this is very similar to the FW-DC-VEG-03 which states "Forest structural classes are resilient and compatible with maintaining characteristic disturbance processes such as wildland fire, insects, and diseases. Habitat conditions for associated species are present. Structure contributes to scenic quality and contributes to desired landscape character, particularly along scenic byways and highways" page 34 of the Revised Colville plan. It would be inconsistent to explain why there is a need to restore function of forest conditions and not apply the same types of direction to

streams. To meet FW-STD-WR-01 watersheds need to be moved toward properly functioning condition or keep them as they are if they are currently functioning. We do recognize the difficulty in using the same terms “properly functioning” in to many ways. It is clear in the revised Forest Plan that this is related to determining the Watershed Condition Class rather than the BLM protocol. This protocol has many attributes than are very repeatable (road density) and other that are less so (rangeland vegetation condition). Together, however, they provide insight into watershed functions. Furthermore, eliminating this standard would alter the assessment in the Biological Assessment in a way that would require a new Biological Opinion from the Services, which could lead to a reduction in projects fostering forest health. There is no violation of law or policy in implementing this objective. **Agreeing to this remedy could provide avenues for other groups with different priority to attack the overall integrity of the Forest Plan FEIS.**

8) 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).

RESPONSE: The Revised Plan purposefully moved away from “maintain and restore” to “contribute” in an attempt to be realistic about the scale at which the agency contributes to watershed restoration work. It is important to recognize the Forest Service only oversees a portion of the lands within any area that fosters aquatic biota and that many large scale processes (climate – uncertainties are briefly described on the bottom of page 98 of the FEIS) are outside the control of the agency. Therefore, is it difficult for this forest plan to guarantee activities it conducts can maintain and restore aquatic function by themselves. Instead, this statement is intended to ensure action by the Colville National Forest contributes, where it can, to the overall restoration and maintenance of riparian, aquatic habitats and TES species (see middle of page 7 and top page 8 of the FEIS for example). This is a slight change of wording from the no action alternative, but it is more specific and realistic about the scale at which the agency contributes to restoration work. Furthermore the word “contribute” is much simpler to demonstrate than “maintain and restore”. There are many places in the document that indicate actions in aquatic areas are intended to improve conditions over the long term – see the description of Riparian Habitat Conservation Areas. Regardless, it is clear from the FEIS that the intent is to improve conditions on Forest Service lands while recognizing sub-basins, watershed, and sub-watersheds are often subject to activities not within the Forest Service control. This is more expressly stated in the Evaluation Criteria on the top of page 20 which states the document looks at, “The effectiveness of riparian management area widths and other plan components related to aquatic conservation in riparian and upland areas to contribute to and enhance the recovery of threatened, endangered and sensitive fish species, and maintain or restore watershed function, water quality, and natural flow regime.” So while the wording in the Desired Condition statement is “contribute”, the way it is evaluated is “maintain or restore”. Exactly how projects address these criteria will be addressed at the project level.

The objectors did not point out any specific laws that were violated, instead they state a preference for a specific word. What they suggest is going back to what is in the existing situation. **The Revised Forest Plan steps away from this is because it was often difficult to show that actions were maintaining and improving conditions – especially when the FS is not in control of all processes that determine conditions.**

POSSIBLE INSTRUCTIONS (if any): NONE suggested

Sample Comments:

“Current riparian management strategies are effective in maintaining or improving conditions; there is no ecological need for increasing restrictions in riparian areas. Riparian areas and water quality are either maintaining or improving under the current INFISH strategy. Fisheries Report at 47, 53.”

The ARCS-mod lacks flexibility to adapt to site-specific conditions. The current INFISH buffers are far too stringent as a "one-size fits all" approach to riparian management; ARCS-mod doubles current INFISH riparian buffers for intermittent streams, lakes and natural ponds. These arbitrary "one-size fits all" buffers do not allow for management decisions based on the existing ground conditions. [*Washington Cattleman's Association*]

The DEIS states that *"the narrow (Riparian Management Objectives) do not provide the same flexibility for adaptive management as the aquatic and riparian plan components in the proposed action and alternatives R, P, and O."* This is actually not a good feature of alternatives R, P, and O, because "adaptive management" actually means increased and widespread logging in riparian areas—the impacts of which are erroneously assumed negligible in the FEIS.

However, riparian area protections essentially all go out the window in the LMP. This is emphasized by the statement, *"Instead, management activities designed to benefit aquatic and riparian-dependent resources and move the landscape toward desired conditions are allowed and encouraged within them."* [*Sierra Club/Alliance for the Wild Rockies*]

The LMP standard FW-STD-WR-01 (Properly Functioning Watersheds) is an example of a standard that has important terminology and sounds ambitious, but key terminology is undefined, discretionary desired conditions are incorporated, and many loopholes are included to the degree that the standard constrains nothing:

“When aquatic and riparian desired conditions are being achieved and watersheds are functioning properly, projects shall maintain those conditions. When aquatic and riparian desired conditions are not yet achieved or watersheds have impaired function or are functioning-at-risk and to the degree that project activities would contribute to those conditions, projects shall restore or not retard attainment of desired conditions. Short-term adverse effects from project activities may be acceptable when they support long-term recovery of aquatic and riparian desired conditions. Exceptions to this standard include situations where Forest Service authorities are limited. In those cases, project effects toward attainment of desired conditions shall be minimized and not retard attainment of desired conditions to the extent possible within Forest Service authorities.” (Emphases added.) [*Sierra Club/Alliance for the Wild Rockies*]

The LMP would weaken direction from previous Forest Plan/INFISH requirements, which did not accomplish much restoration of native fish habitats or achieve abundant populations of native fish during 23-plus years of implementation. One of the major ways the LMP weakens INFISH is by opening the flood gates to allowing logging—and including logging machines—to occur in INFISH Riparian Habitat Conservation Areas which are now called Riparian Management Areas (RMAs) in the LMP. The LMP states, "RMAs are not 'no touch' buffers. Instead, management activities designed to benefit aquatic and riparian-dependent resources and move the landscape toward desired conditions are allowed and encouraged within them."

The LMP and FEIS might make it sound like logging within RMAs would be the exception. However, the FS's whole purpose for such loopholes (which emphasize "restoration" in RMAs using, unsurprisingly,

logging) is to make logging in RMAs commonplace. Standard MA-STD- RMA-01 (Aquatic and Riparian Conditions) is so full of loopholes and vague language, it constrains practically nothing.

In fact, if one tries to find nondiscretionary restraint from widespread clearcutting in RMAs in the LMP, one will fail.

Guideline MA-GDL-RMA-03 (Landings, Skid Trails, Decking, and Temporary Roads) states: *"Landings, designated skid trails, staging, or decking should not occur in RMAs, unless there are no other reasonable alternatives..."* Since the purpose and intent of the loophole is to allow these activities, the guideline constrains nothing. To imply that simply not creating such disturbances is not a "reasonable alternative" is ridiculous. Similarly, MA-GDL-RMA-04 (Road Construction) and MA-GDL-RMA-05 (Temporary Road Reconstruction) provide more wiggle room for industrial machines than constraint.

The Forest Service fails to provide scientific support for these premises that claim vague "careful management" isn't highly risky. The Forest Service should be prioritizing rehabilitating existing sediment sources in damaged riparian zones, not risking them with more industrial activities.

Standard MA-STD-RMA-03 (Personal Fuelwood Cutting) is worthless. There is nothing in there that actually enforces the idea that removing valuable dead wood from RMAs is ecologically damaging. Oddly, MA-SU-RMA-01 sanctions such activity if it's "commercial" but bans firewood cutting for personal use.

FW-STD-WR-06 (Road Construction and Hydrologic Risk Reduction in Key Watersheds) contains language such as "no net increase" or "net decrease" which seem to constrain management, but as it turns out—not much. Given the loopholes, the guideline allows unlimited increases of temporary roads in these "Key Watersheds and in subwatersheds with ESA critical habitat" during projects. And nothing in the LMP actually mandates measurable reductions of existing roads, which is what is needed to recover bull trout populations.

MA-GDL-RMA-15 (Recreation Management - Existing Facilities): *"Consider removing, or relocating, or re-designing existing recreation facilities that are not meeting desired conditions in RMAs or are in active floodplains."* Manager: "I considered removing that heavily eroding trail, but we don't have much funding, and spending the money just didn't seem reasonable." No accountability.

MA-GDL-RMA-19 (*"...when burning masticated fuels within RMAs"*) and MA-GDL-RMA-20 (*"Direct ignition in RMAs should not be used unless..."*) merely sanction damage.

See: "Where did 300ft buffer come from?" for rationale for strong protection of RMAs. [*Sierra Club/Alliance for the Wild Rockies*]

FW-OBJ-WR-05. Key Watershed Restoration Prioritization:

"Management in key watersheds focuses on restoration or preservation of watershed, aquatic, and riparian function and recovery of threatened and endangered species. Improve watershed condition class in key watersheds that are a priority for restoration within 15 years of forest plan implementation. Key watersheds that are a priority for restoration include:

East Branch LeClerc Creek, West Branch LeClerc Creek, Deadman Creek, Barnaby Creek, Harvey Creek, North Fork Deadman Creek, North Fork Sullivan Creek, Sullivan Creek, Ruby Creek, Tonata Creek, Upper Sherman Creek, and South Fork Sherman Creek subwatersheds."

This could effect/limit/curtail all management activities, including grazing and recreation. You've identified ½ of all the watersheds on the Forest as "key watersheds" that are a "priority for restoration." That does not reflect any sort of meaningful prioritization! We strongly suggest that you actually prioritize - i.e., "this is our first priority, this is our 2nd priority..." and implement restoration needs as appropriate. When you identify ½ of the Forest as a priority, you've identified NOTHING. But, you give the Aquatics Program license to implement anything that strikes their fancy - because it's a priority area! This type of language demonstrates to the public that the Forest really does not have any idea where the most important issues lay and what should be done to address them. You're essentially calling everything a priority and not identifying any decision framework or process for selecting actions to address the highest priorities! It's ridiculous and disrespectful of the public interest! [*Stevens County Cattleman's Association*]

FW-OBJ-WR-09. Stream Restoration in Key Watersheds:

“Restore hydrologic, geomorphic, and riparian process and function on 81 miles of stream within 15 years of forest plan implementation through activities including streambank stabilization, restoration of lateral and vertical hydrologic connectivity, and improvement of stream channel and floodplain function.”

WE OBJECT and suggest that this is an unrealistic and likely unattainable objective. To have made such an objective strongly suggests that the author has little or no practical experience in stream restoration. First, it would be necessary for the manager of this program to have objective (i.e., numeric with appropriate metrics) data which identified the streams most in need of restoration and have critically identified the causal factors (i.e., on the ground analysis, following peer-reviewed protocol, that produce objective, numeric metrics that are replicable) and properly identified (i.e., following scientific methods) the most appropriate, site specific methodologies needed to affect the desired change. We doubt that those data exist - as we FOIA'd that information in 2016, in conjunction with our DEIS comments and that FOIA was ignored.

Secondly, streambank restoration is extremely expensive and requires an expert breadth of functional knowledge in order to identify the needed modifications and select appropriate methodology. Even if those data could be collected and appropriate methodology selected at an extremely high professional level, 81 stream miles seems an impossible goal!

Mechanical alterations of fluvial systems are a high-risk ventures. Failures are common, even when the structures have been designed and placed by the most experienced experts! Costs per mile can run deep into the 6 figure range![...]Before telling the public that you intend to obtain this objective, we request that you present a prioritized list of streams with identified problems and suggested remedies, on a per-reach basis - with a concurrent cost analysis! [*Stevens County Cattleman's Association*]

FW-STD-WR-01. Properly Functioning Watersheds:

"When aquatic and riparian desired conditions are being achieved and watersheds are functioning properly, projects shall maintain those conditions. When aquatic and riparian desired conditions are not yet achieved or watersheds have impaired function or are functioning-at-risk and to the degree that project activities would contribute to those conditions, projects shall restore or not retard attainment of desired conditions. Short-term adverse effects from project activities may be acceptable when they support long-term recovery of aquatic and riparian desired conditions. Exceptions to this standard include situations where Forest Service authorities are limited. In those cases, project effects toward attainment of desired conditions

shall be minimized and not retard attainment of desired conditions to the extent possible within Forest Service authorities."

This standard is little more than a thinly veiled reproduction of MA-STD-RMA-01 from the DEIS. We made substantive comments in which we decried the standard and methodology used to evaluate adherence to the STANDARD! We strongly objected and insisted that it be stricken from the FEIS.

There was some confusion regarding the verbiage in that standard (RMA-01) because the author of that section did not bother to identify origin of the verbiage Properly Functioning Condition. We assumed she was referring to Properly Functioning Condition Evaluation (PFC) because footnote 8, in that DEIS described PFC as the BLM methodology.) It's unclear if the author was actually referring to PFC as it is described in Watershed Condition Classification; Technical Guide (FS 978) or if they were referring to "PFC Assessment for lotic Areas, TR-1737-15; v.2, 2013".

However, since the STANDARD presented in the DEIS was expressed as an RMA (Riparian Management Area) Standard, we logically concluded that they were referring to the latter. Therefore, we contend that the comments we made regarding this STANDARD in the DEIS are wholly applicable to the FEIS and our reasons for demanding that it be stricken from the document remain valid!

Both PFC and WCC are subjective assessments with no replicable metrics. WCC does utilize GIS data, but that is presented at a gross, landscape scale, encompassing an entire sub-watershed. PFC assessments at least require site visits to perform the assessment. But they are both exercises that provide broad scale assessments with no replicable data that can be compared when objective comparisons are made. "Scoring" where the information from a broad scale evaluation is assigned a classification (e.g., properly functioning, functioning at risk, not functioning) does not constitute a measureable metric that can be compared or tracked from year to year to provide comparable data. They simply provide a standardized, broad-scale, classification for an assessment - one that can fit into 1 of only 3 categories![...]The author of this STANDARD has simply substituted WCC for PFC, made minor modifications to the verbiage and referenced WCC, FS 978 instead of BLM PFC. but it still does not even come close to presenting a measureable STANDARD!

In FW-STD-WR-01, PROPERLY FUNCTIONING WATERSHEDS: The author of this standard has simply substituted the words Functioning Watersheds for Functioning Riparian Areas and the same, immeasurable STANDARDS.

Adherence to these STANDARDS will result in serious reductions or outright elimination of several important forest uses, without any measurable justification! The author states, in FW-STD-WR-01: *"When aquatic and riparian desired conditions are not yet achieved or watersheds have impaired function or are functioning-at-risk and to the degree that project activities would contribute to those conditions, projects shall restore or not retard attainment of desired conditions."*

If this standard were to be implemented most, if not all current Forest uses would be precluded. In the text of the 2016 DEIS the author of this section told us "2/3rds of the SUB-WATERSHEDS on the Forest were NOT-FUNCTIONING PROPERLY.

In fact, in review of the WCC language in FS 978, the description of conditions necessary to attain a rating of "PROPERLY FUNCTIONING" would likely only be found in the most unmolested portions of the WILDERNESS!

Sadly, I must conclude that the author of this section intentionally selected inappropriate methodology and stipulated an end-point condition that they knew would almost never be depicted, while utilizing the methodology they had specified! [*Stevens County Cattleman's Association*]

“The objectives for Riparian Management Areas are to maintain and restore riparian and aquatic structure and function of intermittent and perennial streams, confer benefits to riparian-dependent plant and animal species, enhance habitat conservation for species dependent on the riparian/upslope transition zone, improve water quality and flows, and contribute to greater habitat connectivity in the watershed [FEIS p 227].”

“Watersheds, streams, and riparian areas and associated fish and wildlife are sustained by properly functioning ecosystem functions and processes. Given the habitat quality and species viability issues on the Forest, the FEIS highlights a specific need to accelerate improvements in watershed condition across the forest, and to provide management direction to maintain and restore properly functioning watersheds (FEIS p 339). The Region's Aquatic and Riparian Conservation Strategy (ARCS) ensures a consistent broad scale baseline approach to conserving fish and aquatic habitat that is essential to wide-ranging species, while allowing local conditions to dictate modifications. The purpose of aquatic and riparian management in the region is to maintain and restore the ecological health of watersheds and aquatic and riparian ecosystems, including networks of properly functioning watersheds that support fish and wildlife, and dynamic ecological processes responsible for creating and sustaining habitats (FEIS p 232-222).”

Given the importance of maintaining functional conditions and restoring degraded conditions, the Plan Revision should specify that National Forest lands will maintain and restore aquatics rather than simply to contribute to aquatics. Maintaining and restoration aquatics will insure that the viability requirements of NFMA are met. 16 U.S.C. § 1604. [*Conservation Northwest*]

The information regarding the development of ARCS-mod is inadequate and lacks transparency. There has been no public involvement in updating plan components in ARCS. [*Washington Cattleman's Association*]

Additionally, the ARCS plan components were updated for the purposes of clarification and that the interdisciplinary team "considered operational constraints." However, the interdisciplinary team went well beyond "clarification" and imposed unreasonable restrictions on livestock grazing standards and guidelines and expanded the key watershed network. [*Washington Cattleman's Association*]

Despite these procedural missteps, the ARCS-mod standards and guidelines are strongly objected to by WCA because (1) current riparian management strategies are effective in maintaining or improving conditions, (2) the ARCS-mod lacks flexibility to adapt to site-specific conditions, and (3) the ARCS restrictions will degrade riparian resources. [*Washington Cattleman's Association*]