



**File Code:** 1570  
**Route To:**

**Date:** JUL 03 2019

**Subject:** Objection Response for the Colville National Forest Land Management Plan

**To:** Regional Forester, Pacific Northwest Region

This is my response to the objections filed regarding the final Environmental Impact Statement (FEIS), draft Record of Decision (DROD), and revised Land Management Plan (LMP) for the Colville National Forest. All objections to the revised LMP have been consolidated into one set of issues and one response is being rendered. The issues were sufficiently similar to allow consolidation (36 CFR 219.57(b)(1)).

Twenty objections were submitted and accepted. In addition, eight parties were accepted as interested persons. All objectors and interested persons will receive this letter which is also available on the Forest Service Web site at <https://www.fs.fed.us/objections/> listed under Region 6 – Pacific Northwest Region.

#### **History of the Revised Plan:**

- The revised LMP was prepared under the provisions of the 1982 Planning Rule and utilized the 36 CFR 219, subpart B objections process.
- The Colville National forest began the initial public engagements in support of revising the 1988 Forest Plan in 2003; initially the Colville Plan was being revised together with the Okanogan-Wenatchee National Forests.
- In 2014, a decision was made to separate the Colville National Forest for revision.
- On February 19, 2016, a draft Environmental Impact Statement and draft revised LMP were published in the Federal Register.
- The FEIS, revised LMP, and DROD were released on September 6, 2018, and the 60-day objection period closed November 6, 2018.

#### **Review and Consideration of Objection Concerns:**

The process of reviewing the objections and assessing opportunities for resolution took longer than anticipated due to the closing of the Federal government during the lapse in funding in January, delaying the work of the review team. This contributed to the overall length of my review and extended the time to issue my final response.



The 20 objections received were clearly thought out and demonstrated a high level of engagement in the planning effort. Each of the objections received was considered in this review.

After reviewing the written objections received, I held an objection resolution meeting in Colville, Washington, on April 24-26, 2019. This meeting was well attended by objectors and interested persons, as well as members of your staff. The three days were spent discussing potential ways to resolve the objectors' concerns about the revised LMP. I found the information I received at the meeting to be very helpful in my consideration of the objectors' issues and my development of potential instructions. I commend the professionalism exhibited by your staff and appreciate their willingness to explain the various components of the revised LMP.

My staff undertook an intensive review of all objections received. Issues were consolidated based on the main topic of concern listed in the objection. Based on my review and the information I learned at the objection resolution meeting, I am issuing the following instructions:

### **National Forest Management Act**

- Based on learning from the discussions during the resolution meeting, clarify language in FW-STD-WR-01. It is unclear if this standard applies to all projects or only new projects. Ensure terms such as “impaired function” and “functioning at risk” are linked to substantive criteria or definitions (revised LMP, pp. 56).
- The current rationale in the DROD describing changes from INFISH and the Eastside screens does not describe the specific changes made, the scientific evidence or the rationale for the changes. Include these specifics in the explanation to strengthen the document.
- Additional documentation should be provided clarifying how the 1982 Planning Rule and the 2012 Planning Rule applied to this revision.
- The Region should add measures for timber required by the 1982 Planning Rule (Allowable Sale Quantity and Long Term Sustained Yield) to the revised LMP.
- The Region should revise the wording of FW-STD-WR-04 to replace the word “should” with “must.”
- The Region should review and consider defining what constitutes adequate forage under FW-STD-LG-02 or eliminating the standard.
- The Region should clarify how past monitoring was used to inform the forest plan revision.

### **National Environmental Policy Act**

- The Region should more clearly explain why the recommended wilderness was modified between the draft revised LMP and the final revised LMP.

### **Monitoring**

- The Region should revise the monitoring plan to adequately address the effectiveness of the monitoring question(s) to fully comply with the 2012 Planning Rule monitoring requirements.

### **Inventoried Roadless**

- FW-GDL-VEG-05. "Prohibition on Timber Cutting, Sale, or Removal in Inventoried Roadless Areas and FW-GDL-AS-06. Prohibition on Road Construction and Reconstruction in Inventoried Roadless Areas" directly quote the Roadless Rule. We recommend these Guidelines refer to complying with the Roadless Rule in affect at the time of project level decisions.

### **Recommended Wild and Scenic Rivers**

- Provide documentation indicating a reasonable review has been completed for each river from the 1988 study and conditions have not changed. If conditions have changed, describe why these are not significant enough for eligibility re-evaluation.
- Identify a schedule to complete the eligibility re-evaluation of Sullivan Creek in light of the dam removal and critical habitat listing; and work with interest groups for the re-evaluation.

### **Recommended Wilderness**

- The Region should review the 2009 National Visitor Use Monitoring (NVUM) report for mountain bike use in areas recommended for wilderness designation in the revised LMP. We suggest the Region revise the monitoring plan to establish current baseline indicators and a frequency of measure consistent with revised LMP components. Consider modifying standards MA-STD-RW-02 and MA-STD-RW-03 so that results of monitoring use do not trigger the need for a new decision.

### **Minerals**

- The Region should consider adding language to the Record of Decision (ROD) assuring the public that all lands, except those currently withdrawn from mineral entry, are still open to mining development and as such the Forest Service will process proposed plans of operation in accordance with law, regulation and policy.

**Recreation and Grazing**

- The Region should consider modifying plan component language related to grazing to specify measures to minimize conflicts between livestock and recreation use in allotment management plans.

**Threatened, Endangered, and Sensitive Species**

- The Region should review the new studies referenced by objectors (i.e., Kosterman 2014, Holbrook et al. 2018, Vianbianchi et al. 2017) and document the importance of these new studies.
- The Region should clarify how the Best Available Scientific Information (BASI) for Canada lynx was considered, selected and incorporated into Forest Plan documents.
- The definition of suitable habitat and habitat-disturbing activities should be clarified or standard FW-STD-VEG-02 could be removed or incorporated (without the survey and protection requirements) into guideline FW-GDL-VEG-01.
- It is unclear how many acres would be managed for Canada lynx habitat and the number of acres of grazing allotments that may be impacted. In particular, Canada lynx standards FW-STD-WL-02 to FW-STD-WL-06 could indirectly affect permitted grazing due to changes in vegetation patterns. The Region should clarify how many acres of grazing allotments may be impacted by these standards, particularly FW-STD-WL-06 which requires certain lands to be managed to >500 stems per acre.

**Management Indicator Species (MIS)/Surrogate Species**

- The Region should clarify the connection between surrogate species and management indicator species (MIS).
- The Region should clarify how surrogate species meet the MIS regulatory requirements in both the aquatic and wildlife sections of the LMP, as well as the terminology used.
- The Region should address how the Colville approach meets the following 1982 Planning Rule requirement (36 CFR 219.19 (a)(2)): "Planning alternatives shall be stated and evaluated in terms of both amount and quality of habitat and of animal population trends of the management indicator species".
- The Region should clarify how providing plan components for surrogate species provides for sensitive species.

## Range

- The Region should take a closer look at their interpretation of the procedure included in the document, “*Rangeland Suitability for Livestock Grazing at the Forest Plan Level and Standards for NEPA Display (Rev. 3/6/03)*” with respect to guidance related to forage production. The Region should correct any misinterpretation of this direction, particularly with respect to the following statement from the FEIS:

*“Range capability guidance suggests that lands incapable of producing 200 lbs./acre/year of forage be removed next. Because much of the potential forage resource occurs on transitory range in holes in the forest canopy, the team believed that this standard was inappropriately high. In such situations, levels of forage production are unlikely to reach the specified level on an acreage basis because, due to dense tree cover, up to 75 percent of an acre may produce little forage. A threshold of 50 lbs./acre/year is used instead. Within the soil resource coverages for the Forest, lands classified as shallow soils were removed from consideration at this stage because of inherent productivity limitations.” (FEIS, Vol. III, pp. 1334)*

- Relative to Term Grazing Permits, the following excerpt from the DROD, is not consistent, as stated, with 36 CFR 222.4(a)(7):

*“Contracts, authorizations of occupancy and use, or other instruments subject to annual operating instructions or operating plans will be made consistent with all applicable revised land management plan direction through the annual operating instructions or annual operating plan during the operating season after the final ROD for the revised land management plan is signed.” (DROD, page 37)*

- The Region should consider whether the agency wants to use the term “shall” or “should” in MA-STD-RMA-01 as one provides more stringent limitations on subsequent decision space than the other.

## Water Quality

- The Region should review how road density is calculated and clarify criteria for including or excluding certain roads in the calculation.

## Late and Old Structure

- The Region should clarify how wildlife connectivity is maintained as it relates to management of large trees.

### **Resolution Meeting Outcomes**

The objection resolution meeting held in Colville, Washington, April 24-26, 2019, focused on resolutions proposed by objectors. Issues brought up in objections that did not include proposed resolutions were reviewed, but not discussed at the objection resolution meeting. Resolution for all issues was not possible. I believe the attendees worked hard to come to a resolution acceptable to all objectors, recognizing the complexity and differences of opinion on many of the objection issues.

In particular, the following potential resolutions were discussed and I am directing the Region to implement these proposals where appropriate.

### **Watershed and Riparian**

- Improve or add Desired Condition that active management in riparian zones will remain supportive of diverse uses.
- Several objectors agreed to meet as a part of the Tri County Forest Group to work on proposed changes to certain language in the Desired Conditions for water resources (specifically FW-DC-WR-01, 02, 03, 05, 06, 07, 08, 09, and 11). The original proposal was to be changed “contribute” to “protect and enhance” or “maintain and restore”. In a letter dated May 28, 2019, the group documented they had met and decided to not propose changing the language.
- FW-STD-VEG-02 was discussed during the resolution meeting, particularly whether it applied to ongoing or new management actions. My subsequent discussions with the planning team indicated this standard is intended to apply to new projects. I would like the Region to add language clarifying the standard applies to new ground disturbing projects.

### **Forest Products/Silviculture/Old Growth**

- Objectors were concerned the revised LMP indicated a much lower level of timber harvest than what the Colville National Forest has been producing. During the resolution meeting, we discussed the way the Colville team currently plans out future vegetation management, including timber harvest, under the umbrella of the Forest Plan. As a result of this conversation, we agreed the Forest would post their most current long term Vegetative Management Plan on their website and update the website as plans are adjusted over time.

### **Recommended Wilderness**

- The Northeast Forest Coalition and Washington Cattleman agreed to collaborate to add language to the recommended wilderness standards/guidelines. This was completed and the proposed language was included in a letter dated May 28, 2019, from the Tri County Forest Group. The Region should consider this language as quoted from the letter:

“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 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.

Infrastructure related to grazing and range allotments, such as fences, water troughs and livestock trails, are allowed in recommended wilderness and can be constructed, reconstructed and maintained using chainsaws and other mechanized tools. The construction or reconstruction of deteriorated infrastructure is permissible through a district-level authorization.

The use of motorized equipment for needed grazing management, such as rescuing sick animals, injured people, and placement of feed is allowed in recommended wilderness along with aircraft use for delivering range improvement supplies and wildlife management purposes. The use of motorized equipment shall be expressly authorized in the grazing permits for the area involved.”

I encourage the Region/Forest to work with this group on finalization of the above quoted language.

- The Tri County Forest Group also agreed to look at the recommended wilderness boundaries. The group was unable to reach consensus. Therefore, I am not instructing the Region/Forest to modify any boundaries.

### **Focused Restoration**

- As a result of discussions during the objection resolution meeting, I would like the Region to change the wording of MA-STD-FR-01(revised LMP, pp. 107) from “affect” to “diminish.”

The following is a list of other items that were discussed during the objection resolution meeting that I would like the Region to consider. All of these items could help to improve the final decision and revised LMP:

**In the Revised Forest Plan:**

- Consider increasing the objective for acres treated annually from 6,000-12,000 up to 18,000-25,000 in Table B-1.

**In the Record of Decision:**

- The Colville National Forest has worked in a collaborative way to create a very successful shared stewardship model that has added value and stability to the communities that rely on the Forest. I would like the Region to add the story of the value of collaboration and how it resulted in the current successful management of the Colville National Forest.
- Tell the story of the recent success of the Forest in accomplishing restoration work, the innovation, and the alternative funding sources that have come with the innovation. In addition, this should include language specifying because of alternative funding sources, budget is not a constraining factor in the management of the Colville National Forest.
- State that with site specific analysis at the allotment scale, an increase in grazing capacity could be permissible.
- Consider adding language identifying the value of mining to the local economy and community.
- Add an explanation of Allowable Sale Quantity, Projected Timber Sale Quantity, etc., and how it is/is not connected to each other, and to the other direction in the Forest Plan.
- Based on comments from objectors, clarify how future travel management decisions, including winter travel planning, will be made.
- Because of discussions at the objection resolution meeting, consider adding language specifying that not meeting one of the annual grazing use indicators is not the basis for a notice on non-compliance to the permittee(s).
- In response to objectors concerns, the Region should correct the language in the ROD to reflect that Term Grazing Permits must be modified, and Allotment Management Plans amended to comply with revised Forest Plan direction.
- Objectors believe the value of grazing was not emphasized enough. I would like the Region to consider acknowledging the value of grazing.

After the Plan is signed, consider working with the collaborative and your communities to design a socio-economic assessment.




In closing, I would like to compliment the Region and the Forest on the working relationships they have with the communities surrounding the Colville National Forest. I was impressed with the level of engagement of the objectors with the planning process and their dedication to help make the revised Colville Land Management Plan an effective guide to the future management of the Forest. Continuing this level of engagement with the public and dedication of the staff as the plan is implemented will be valuable for everyone.

I would like to acknowledge there were a number of conversations during the objection resolution meeting (i.e. wolf management, stubble height management, social/economic) that do not translate directly into Forest Plan direction or decisions. These are issues I would encourage continued conversation around at the local level. For example the Forest can use the existing flexibility in adjusting livestock grazing to reduce conflicts with wolves; and share these actions with the public.

By copy of this letter, I am instructing Regional Forester, Glenn Casamassa to proceed with the issuance of a final ROD for this project once I have had a chance to review the implementation of the instructions identified in this letter.

There will be no further review of this response by any other Forest Service or U.S. Department of Agriculture official as per 36 CFR 219.57(b)(3).



ALLEN ROWLEY  
Reviewing Officer for the Chief