United States Department of Agriculture
Forest Service
Colville National Forest
Headquarter's Office
765 South Main Street
Colville, WA 99114
509-684-7000

File Code: 1570; 1950
Date: September 28, 2020

Tom Partin
AFRC
921 SW Cheltenham St
Portland, Oregon, 97239

email: tpartin@amforest.org

Dear Mr. Partin:

This letter is in response to your objection (#20-06-21-0003-218(B)) to the draft Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the Sanpoil Project, Republic Ranger District, Colville National Forest. I have read your objection and reviewed the project record, the draft DN/FONSI, and the final Environmental Assessment (EA). My review of your objection was conducted in accordance with the regulation at 36 CFR 218 (2013).

PROJECT DESCRIPTION

Project Overview: The legal notice announcing the Opportunity to Object for the draft decision notice (DN) and finding of no significant impact (FONSI) for the Sanpoil Project EA was published in the *Ferry County View* on May 27, 2020. In the Draft DN, the Responsible Official selected Alternative 2, which would authorize the following activities:

- Silviculture Treatments on 8,410 acres: Commercial Thinning (3,846 acres); Commercial Thinning with Openings (1,270 acres); Pre-commercial Thinning (2,520 acres); Small Pine Thinning (519 acres); and Shelterwood Treatments (255 acres).
- Fuels Treatments on 19,129 acres: Shaded Fuel Break (2,270 acres); Ladder Fuel Reduction (30 acres); Machine Pile Burn (7,256 acres); Hand Pile Burn (444 acres); Hand Pile Burn/Machine Pile Burn (463 acres); and Underburning (8,666 acres). It is noted that some of these treatments overlap and the 19,129 acres are not unique.
- Road Treatments: System Road Decommissioning (2.6 miles); New Temporary Roads (3.65 miles); Temp Road Use of Existing Templates (7.97 miles); Restoration of Existing Non-System Templates (67 miles); and New Road Construction (0.25 miles).

OBJECTION ISSUE DISCUSSION AND CONCLUSION

Specific to your objection, you raised issues regarding the need for additional treatment to enhance big game and habitat diversity, and concern over road decommissioning. I conducted my review of the record, final EA, and draft DN/FONSI.

The objection resolution meeting was held on July 27, 2020. An objection resolution response letter was sent to all objectors on July 31, 2020, that captured the offers made by the Forest

Service to reach resolution. Although full resolution was not reached, there was a commitment to continue working together through implementation of the Sanpoil project and future projects. With regard to providing adequate public information on Forest Service projects, we agreed to explore mapping products that could be offered to the public for future projects, which may include georeferenced products. These commitments/agreements will be included in the final decision.

- The draft decision clearly describes the actions to be taken in sufficient detail that the reader can easily understand what will occur as a result of the draft decision.
- The draft decision considered a range of alternatives that was adequate to respond to the Purpose and Need. The purpose and need and alternatives considered in the final EA reflect a reasonable range of alternatives, consistent with law, regulation and policy.
- The draft decision is consistent with or moves toward attainment of Forest Plan standards and guidelines.
- The draft decision is consistent with policy, regulation, law, direction, and the final EA contains adequate evidence to support the decision. The record and final decision contain site-specific documentation regarding resource conditions, and the Responsible Official's draft decision document is based on the record and reflects a reasonable conclusion.

This concludes my written review of the project. By copy of this letter and the enclosed response document, the Responsible Official may sign the decision after incorporating the commitments/agreements noted above, then notify interested and affected persons in accordance with the regulation at 36 CFR 218.12 and 36 CFR 220.7(d). This written response is the final administrative review by the Forest Service or the Department of Agriculture [36 CFR 218.11(b)(2)].

Sincerely,

Rodney D. Smoldon
Digitally signed by Rodney D. Smoldon
Date: 2020.09.28 17:08:29 -07'00'

RODNEY D. SMOLDON
Forest Supervisor
Objection Reviewing Officer

Enclosure

cc: Christy Merritt; Travis Fletcher: Lisa Larsen; Debbie Anderson; Heidi Hopkins

Sanpoil Project
Final Environmental Assessment (EA)
Republic Ranger District
Colville National Forest
Objection Statements
September 2020

Objector	**Objection Number**
American Forest Resource Council (AFRC)	#20-06-21-0003-218(B)
Kettle Range Conservation Group (KRCG)	#20-06-21-0004-218(B)
Northeast Washington Forest Coalition (NEWFC)	#20-06-21-0005-218(B)

NEPA/Purpose and Need

Overview and Objector's Suggested Remedies: These objection issues surround the concern that the selected alternative does not meet the purpose and need and also questions the range of alternatives and adequacy of the NEPA document. Suggested remedies by Objector AFRC include expanding the acres treated, planning regeneration treatment in big game winter range and conducting management activities in the Old Growth Dependent Species Habitat. Suggested remedies by Objector KRCG and NEWFC include modifying objectives and actions to include landscape-level objectives; modifying project actions by increasing unit size and/or showing that treatments create larger patch sizes and connects patches together; developing a collaborative agreement with them to define how to implement intra-stand variability during implementation; providing readable, georeferenced maps to the public; providing draft prescriptions and allowing for collaboration on prescriptions; providing an updated Silviculture Report Appendix A and enabling collaboration on applying landscape prescriptions; conducting an audit and supplemental information report to determine the impacts of precommercial thinning without a decision and if errors are a chronic issue; and withdrawing the EA and preparing an EIS to thoroughly evaluate a range of alternatives that addresses environmental and social concerns and assesses irreversible and irretrievable commitments of resources.

Objector Statement #1: Objector states that Alternative 2 does not meet the objectives of the project to the fullest extent, in that the project should maximize the acres treated to the extent possible, particularly in the shaded fuel break area, where the District reduced the amount of acres to be treated between scoping and the comment period. AFRC at 2 and 3[1]. Objector also states that the District should plan on doing regeneration harvest on the 6,904 acres of big game winter range in the area in order to produce additional early seral plant communities for big game forage. AFRC at 4.

Response: I find that the Responsible Official considered, but eliminated from detailed study, a requested alternative that included regeneration harvest of 6,904 acres in big game forage areas, and maximized acres treated in the project area, particularly in shaded fuel breaks. Instead of the requested alternative, Alternative 2 was selected which will meet the purpose and need of the Sanpoil Project.

The regulation at 36 CFR 220.7(b)(2) states that "The EA shall briefly describe the proposed action and alternative(s) that meet the need for action. No specific number of alternatives is required or

[1] The citation AFRC at 2 and 3 refers to the objector, in this case American Forest Resource Council, and the page number, in this case pages 2 and 3, where their issue can be found. This nomenclature is carried forward throughout this document.

prescribed. (i) When there are no unresolved conflicts concerning alternative uses of available resources (NEPA, section 102(2)(E)), the EA need only analyze the proposed action and proceed without consideration of additional alternatives."

The record shows that AFRC requested increased acres of treatment and thinning to wider spacing during scoping and the comment period. AFRC did state support for the commercial thinning acres proposed (5,340 acres) during the draft EA comment period, while encouraging maximizing the commercial volume removed from all treated acres. AFRC Comment Letter, February 26, 2019. AFRCs objection focuses on a decrease of shaded fuel break acres post draft EA comment. There was a decrease in acres of shaded fuel break (about 188 acres) in the final EA, due to the implementation of the revised Land Management Plan, primarily because of changes in management areas and because of new goshawk guidance. Draft DN at 1.

In the District's response letter to Objector AFRC (May 11, 2020, Objection Record), the District Ranger responded to their issue of wider spacing, noting that "Post-harvest spacing for the Sanpoil Project will be determined by a silviculturist in order to maximize the potential vigor of residual trees and minimize the potential for crown fire, while retaining stocking levels consistent with a variety of other resource objectives (wildlife habitat, visual quality, etc.). For most areas treated with a commercial or non-commercial thinning, post- treatment spacing is expected to vary, but remain within ranges recommended by the revised land management plan as appropriate for individual tree and stand-level vigor (Powell 2000), as well as low fire risk (Peterson et al. 2005). Furthermore, these and other areas within the project will include silvicultural prescriptions for intermediate treatments with residual stocking approaching Forest Plan minimum stocking levels, intermediate treatments with up to 50% of each unit containing openings as a result of sanitation and salvage activity, and shelterwood prescriptions intended to regenerate young stands relatively free of disease." AFRC Response Letter at 1 and 2.

The response letter at 2 also notes that "All silvicultural prescriptions for the Sanpoil project will recommend the activity sequence that is expected to partially or fully achieve management objectives and is consistent with applicable laws, regulations, and policies. All silvicultural activities described in the Forest Plan, which allows for even and uneven-aged regeneration methods under various circumstances--will be considered to meet project objectives, including the expansion of early seral vegetation communities suitable for big game forage and/or fire-tolerant species."

The final EA also addressed unit placement and location. The final EA at 34[2] states that "Unit treatments and locations for the proposed action alternative were designed to meet the purpose and need of the project and to be consistent with the LMP. Treatments would aim to increase stand vigor and growth and reduce the potential for undesirable wildfire effects and insect and disease attacks and move toward desired distributions of structural classes by treating stands primarily in the Douglas-fir dry and subalpine fir / lodgepole pine forest vegetation types (see Table 7). Treatments would be designed and implemented to reduce stand density, canopy layering, and the preponderance of Douglas-fir and subalpine fir, all of which would generally reduce conditions favorable to forest insects, promote individual tree growth and resistance to biotic (diseases and mistletoes) and abiotic (drought) stressors. Silvicultural prescriptions would be designed to move stand-level susceptibility from a "High" or "Moderate" level to a "Moderate" or "Low" level or be designed to maintain a "Low" level of

[2] The citation EA at 34 refers to the document, in this case EA, and the page number, in this case page 34, where the information cited can be found. This nomenclature is carried forward throughout this document.

susceptibility. Project activities would also reduce or minimize conifer encroachment in delineated meadows) and enhance the extent and vigor of quaking aspen through conifer felling or burning over a period of approximately 10 years. The extent to which this would occur is estimated to be on the order of 50-500 acres within the footprint of planned activities, but the exact extent or location of each meadow and aspen stand affected is uncertain."

Suitability for vegetation treatments was also addressed. The final EA at 36 states that "The proposed action has been reviewed and is determined to comply or be consistent with the laws, regulations, policies and LMP direction as applicable to forest vegetation resources in the project planning area. The suitability of NFS lands for various uses and management activities are identified in the LMP, including planned and unplanned ignitions, forest products and timber production. There are no non-suitable uses planned as part of the Sanpoil project for any Management Area's where treatments are occurring."

Direction and compliance with the revised LMP was also addressed. The final EA at 37 states that "Fire and fuels treatments would help achieve LMP direction by providing cost efficient options for fire protection including compartmentalization of large landscapes, treatment of activity fuels and consideration for public safety along important ingress-egress routes. Treatments would improve community protection and enhance public and firefighter safety (LMP 38), move stands towards desired vegetative conditions and have landscapes dominated by FRCC I (LMP 39), and assist in achieving the objectives described in the management area descriptions and plan direction (LMP 93-153)."

Objector Statement #2: Objector states that the District should manage the 2,682 acres in the Old Growth Dependent Species Habitat, which they state are in need of commercial thinning to reduce the risk of wildfire and promote improved habitat and diversity for wildlife and plant communities. AFRC at 3.

Response: I find that the Responsible Official considered, but eliminated from detailed study, a requested alternative that included the commercial thinning in the Old Growth Dependent Species Habitat and instead selected alternative 2 which will meet the purpose and need of the Sanpoil Project.

The regulation at 36 CFR 220.7(b)(2) states that "The EA shall briefly describe the proposed action and alternative(s) that meet the need for action. No specific number of alternatives is required or prescribed. (i) When there are no unresolved conflicts concerning alternative uses of available resources (NEPA, section 102(2)(E)), the EA need only analyze the proposed action and proceed without consideration of additional alternatives."

In the District Ranger's response to AFRCs comment letter, he noted that "Consideration was given to treatments within project areas designated as Old Growth dependent species habitat (MA-1 in the 1988 Forest Plan). It was difficult to show a measurable benefit to wildlife species through commercial treatment as directed by the Forest Plan. Access to these areas would be difficult without the use of temporary roads. The Forest Plan directs us to limit activities in this allocation to those that would not increase disturbance or fragment existing habitat. Treatments should decrease fire risk and severity and could have a beneficial effect on Old Growth habitat while maintaining old growth characteristics." AFRC Response Letter at 2 and 3.

Objector Statement #3: Objector states that the draft Decision Notice (DN) and Finding of No Significant Impact (FONSI) are not in accordance with the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), the Administrative Procedures Act, (APA), the Collaborative Forest

Landscape Restoration Program, (CFLRP), the Omnibus Public Land Management Act of 2009 as amended, and the current Forest Plan for the Colville National Forest (CNF). KRCG at 2-3; NEWFC at 2.

Response: I find that the draft Decision Notice (DN) and Finding of No Significant Impact (FONSI) are in compliance with law, regulation and policy, along with the Collaborative Forest Landscape Restoration Program, (CFLRP), the Omnibus Public Land Management Act of 2009 as amended, and the current Land Management Plan.

The regulation at 36 CFR 220.7(c) states that a "decision notice must document the conclusions drawn and the decision(s) made based on the supporting record, including the EA and FONSI." The FONSI is based on the context of the project and intensity of effects on ten factors found at 40 CFR 1508.27(b).

The project complies with the NEPA because the project followed the regulations found at 36 CFR 218 and 36 CFR 220 for preparation of the EA. The National Forest Management Act of 1976 and the regulation at 36 CFR 219 require that actions taken by projects under specific Forest and Resource Management Plans (Forest Plans) are consistent with the applicable Forest Plan. The project complies with the NFMA and the current Forest Plan because the final EA at 5-6 and the draft DN/FONSI at 6 identify the Land Management Plan Management Areas that overlap the draft decision area and references the final EA at 27-34 for design elements that were developed to ensure consistency with the forest plan. The draft DN/FONSI at 7 states that "the actions that alter vegetation that are a part of the selected alternative meet the minimum specific requirements of the National Forest Management Act (NFMA)" because "no timber harvest[ed] for the purpose of timber management will occur on lands deemed unsuitable … 36 CFR 219.12(a)(2) [and] all stands with regeneration prescription would have the ability to be restocked within five years." This is consistent with the analysis in the silviculture report that was incorporated by reference (Silviculture Report at 28-33).

The Administrative Procedures Act provides that during judicial review, courts must "hold unlawful and set aside agency action, findings, and conclusions found to be … arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706(2)(A). The project complies with the APA because the Responsible Official documented the rationale and conclusions for the decision that were based on facts and evidence found in the EA and project record. The draft DN/FONSI at 2-4 documented the decision rationale based on the analysis in the EA and provides the rationale for the finding of no significant impact based on the context of the project and the intensity of the effects analysis, which were incorporated by reference in the body of the EA and within the project record. Draft DN/FONSI at 7-10.

The purpose of the Collaborative Forest Landscape Restoration Program under section 4003(b) of the Omnibus Public Land Management Act of 2009 is to identify projects through a process that "(1) encourages ecological, economic, and social sustainability; (2) leverages local resources with national and private resources; (3) facilitates the reduction of wildfire management costs, including through reestablishing natural fire regimes and reducing the risk of uncharacteristic wildfire; and (4) demonstrates the degree to which--(A) various ecological restoration techniques--(i) achieve ecological and watershed health objectives; and (ii) affect wildfire activity and management costs; and (B) the use of forest restoration byproducts can offset treatment costs while benefitting local rural economies and improving forest health." (Section 4001 Omnibus Public Land Management Act of 2009 (16 U.S.C. 7303(b)).

The EA at 2 states that "the project falls within an area designated as a Collaborative Forest Landscape Restoration Act (CFLRA) Project" because the Sanpoil project proposes activities that are within the landscape restoration strategy and "will increase ecosystem resistance and resilience to disturbance, restore old-growth structure and function, and reduce wildfire risk and fire management costs by: 1) thinning small trees, reducing fuel loads and ladder fuels; 2) increasing fire breaks through landscape heterogeneity; 3) employing fire as a management tool; and 4) establishing a low-fuels buffer on the northern boundary of the Colville Indian Reservation." EA at 8. As such, the project complies with the CFLRA.

Objector Statement #4: Objector states that the project does "not adequately trend towards landscape resilience" because the project only includes objectives at the stand level, versus at the landscape-level, which would address mean patch size, patch density, intra-stand variability, connectivity and fragmentation. KRCG at 5-7; NEWFC at 4-5.

Response: I find that the Sanpoil EA properly established a purpose and need guided by management direction, with objectives that address the ability of forest vegetation resources to persist or recover over time, and the project does adequately trend towards landscape resilience.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

The Purpose and Need of a project is based upon the difference between desired conditions provided by applicable management direction, and existing conditions. Management direction provided for the Sanpoil Project area is described in section 1.3 of the EA and includes the 2019 Land Management Plan (LMP), the 2001 Roadless Area Conservation Rule, the Tribal Forest Protection Act, the Watershed Condition Framework, Vision 2020 & the Collaborative Forest Landscape Restoration Act, Community Wildfire Protection Plan, and the 2014 Insect and Disease Area designations. EA at 5-11. Chapter 1 of the EA discusses the concept of ecosystem resilience which implicitly addresses the historic ranges of variation in insect and disease disturbances, because the project purpose described in Section 1.2.1 is to enable forest vegetation resources to persist or recover despite variation of wildlife populations, habitat and disturbances over time.

The proposed action results from the comparison of the current conditions and the desired future conditions. EA at 4-5. While the proposed action includes objectives at the stand level, these objectives were developed with the actions of past, present, and future projects occurring at a landscape level.

The Silviculture Report at 6 describes that a landscape analysis was done for the Sanpoil Analysis Area using the Environmental Management Decision Support (EMDS) Landscape Process according to protocols described in Hessberg, et al., 2013. The process used aerial photo interpretation and models to interpret large volumes of information from the Sanpoil Planning Area to evaluate departures of key landscape patterns and processes from historical and climate change reference conditions, and provide recommendations for future vegetation treatments based upon the findings. EMDS findings of the analysis of the Thirteen and Ninemile watersheds show results that are reflected over much of the Eastern Washington and Oregon landscape (Hessberg and Agee, 2003; Hessburg, et al., 1999; Oliver and Larson, 1996). The analysis summarizes that a policy of fire exclusion, coupled with removal of the larger overstory trees, especially of the fire tolerant ponderosa pine and larch, in the 1940-1980s, left overly dense stands of primarily Douglas-fir. Starting in the 1970s or so, the practice of clearcutting and

regeneration harvests created artificially small homogenous patches interspersed over the landscape. Silviculture Report at 9.

Objector Statement #5: Objector states that the District failed to provide adequate public information that was needed to collaborate effectively, including lack of readable maps (particularly maps that include where the proposed fuel break is located), lack of specific prescriptions for proposed commercial harvest (resulting in lack of site-specific analysis, failure to take a "hard look" and lack of meaningful public comment), and lack of application of landscape prescriptions in the final EA. KRCG at 9-10 and 13-14; NEWFC at 8-9.

Response: I find that the District provided public information for collaboration and provided documents to the public by publishing information on the public website to provide easy access for wider distribution during the appropriate periods. All information was part of the overall project record and was incorporated by reference in the final EA and draft DN/FONSI and was available upon request.

The regulation at 36 CFR 220.4(h) states that "material may be incorporated by reference into any environmental or decision document. This material must be reasonably available to the public and its contents briefly described in the environmental or decision document. (40 CFR 1502.21)."

The final EA at 13 and the draft DN/FONSI at 5-6 describe the public involvement process that was used to engage the public. Materials were made available on the public website or during public meetings. See the EA at 13. Maps were also provided to the public via the public website, found at: https://www.fs.usda.gov/project/?project=50741 and are included in the EA. The map in the EA at 20 depicts the location of the shaded fuel breaks.

All available information was provided; final prescriptions were not available because they are not final until a decision is signed. The description of silvicultural treatments (EA at 16-17) provide an overview of silvicultural activities that are planned and that will be incorporated into the final prescriptions. In addition, Appendix C of the EA clearly describes that treatment proposed for each unit, which further allowed for meaningful comment and objection. Application of landscape-level analysis is described in the response to Objector Statement #4.

Objector Statement #6: Objector states that the EA failed to include a range of reasonable alternatives and that the range of alternatives is limited to "logging or doing nothing at all." KRCG at 14-15.

Response: I find that the EA included a reasonable range of alternatives.

The regulation at 36 CFR 220.7 states that "(2) Proposed action and alternative(s). The EA shall briefly describe the proposed action and alternative(s) that meet the need for action. No specific number of alternatives is required or prescribed. (i) When there are no unresolved conflicts concerning alternative uses of available resources (NEPA, section 102(2)(E)), the EA need only analyze the proposed action and proceed without consideration of additional alternatives."

Alternatives eliminated from detailed study contribute to the overall range of alternatives. The EA, Section 2.1 at 14 and 15, describes in detail five alternatives that were eliminated from detailed study. The EA disclosed the rationale as to why they were not feasible for this project. The proposed action is described in detail in the final EA at 15-22. A no-action alternative, as well as the proposed action, was analyzed in detail in Section 3.0 of the EA at 34-55. Comments received during scoping and on the draft

EA were reviewed and changes were incorporated into the proposed action and into the draft DN/FONSI DN/FONSI at 1-2. The EA addressed all issues through analysis, project design, responses to comments or within the decision document; therefore, no unresolved issues needed to be addressed through additional alternative development.

Objector Statement #7: Objector states that an EIS needs to be prepared because the project's impacts reach beyond the threshold of a finding of no significant impact (FONSI), including impacts from connected actions that encompass a wide geographic area, which include the Sherman Pass Project and Dollar Mountain Project. KRCG at 16-17. Objector states that a number of significance factors are implicated including significant direct, indirect and cumulative effects; impacts to unique characteristics and ecologically critical areas; impacts to public health and safety; highly controversial and uncertain effects; impacts to ESA-listed species and their habitat, particularly lynx; and the potential for significant cumulative effects. KRCG at 17.

Response: I find that an EIS is not required and that the EA, draft DN/FONSI and record adequately disclosed the direct, indirect, and cumulative effects of the project and that the Responsible Official documented the rationale as to why an EIS need not be prepared.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects. The regulation at 36 CFR 220.7(b)(3)(i) states that and EA "Shall briefly provide sufficient evidence and analysis, including the environmental impacts of the proposed action and alternative(s), to determine whether to prepare either an EIS or a FONSI (40 CFR 1508.9)."

Direct, indirect, and cumulative effects were disclosed throughout Chapter 3 of the EA and in the draft DN/FONSI at 7 and 9. The draft DN/FONSI at 7 addressed potential impacts to public health and safety. The draft DN/FONSI at 8 addressed potential impacts to unique characteristics and ecologically critical areas. The draft DN/FONSI documented that there are no highly uncertain, unique or unknown risks identified in the effects analysis for the Sanpoil Project.

Impacts to listed species and their habitat are addressed in both the EA, Biological Evaluation (BE) and Biological Assessment (BA), as well as in the draft DN/FONSI at 9. Table 10 in the EA at 41 documents the effects determination for the Canada lynx and the grizzly bear as "May affect, not likely to adversely affect" and for wolverine, the project is "Not likely to jeopardize the continued existence of wolverines, lead in a trend towards federal listing or loss of viability, or result in the destruction or adverse modification of proposed critical habitat." The District submitted a Biological Assessment for the lynx, grizzly bear, and wolverine to the US Fish and Wildlife Service and they concurred with this determination of effects on December 20, 2018. Based on the implementation of design criteria and the rationale described in the Biological Assessment, the US Fish and Wildlife Service expects the effects from the proposed action to be both insignificant and discountable to lynx.

Objector Statement #8: Objector states that the District failed to respond to public comment and that an EIS process would more thoroughly address the impact of the project and be more responsive to public input. KRCG at 18.

Response: I find that the District adequately responded to public comment and that the EA addressed the potential impacts of the project.

The regulation at 36 CFR 218.25 provides the requirements for soliciting comments on an EA. Forest Service Handbook 1909.15 Chapter 11 provides more information regarding agency policy for scoping and public involvement procedures. The regulation at 36 CFR 218.25(b)(1) requires that the responsible official consider comments submitted on an EA.

See response to Objector Statement #5. Public involvement was described in detail in the EA at 13 and the draft DN/FONSI at 5-6. Alternatives eliminated from detailed study were developed in response to comments received. The decision maker provided responses to comments addressing specific issues identified and received on the draft EA, including responding to the objector's comments. See the response to Objector Statement #7 as to why an EIS need not be prepared.

Final Remedies/Resolution for NEPA/Purpose and Need: The EA, draft DN/FONSI and project record document how the project complied with law, regulation, and policy and how the purpose and need would be met. No remedies or resolution is needed.

Wilderness, Inventoried Roadless Areas (IRAs), Scenery, National Trails

Overview and Objector's Suggested Remedies: These objection issues surround the concern that the project will adversely affect Recommended Wilderness Management Areas, adversely impact IRAs and preclude their consideration for future designation as Wilderness, impact Congressionally designated trails, and adversely impact scenery. Suggested remedies include demonstrating that the project maintains wilderness qualities or modify it as needed to maintain wilderness qualities; address stakeholder comments and concerns; remove the shaded fuel breaks along Hall Creek Road between the Bald Snow Recommended Wilderness Management Area (RWMA) and Thirteenmile IRA and along Road 2054 between the Cougar and Thirteenmile IRA; limit fuel reduction treatments along Road 500 and Road 600 to hazard trees within one tree length from the roads edge; supply scenic assessment materials for review during collaboration; collaborate on viewshed implementation, including collaborating on prescription design so as to not visually disrupt natural appearing scenic integrity; expanding the Scenic Integrity Objectives (SIOs) to natural watershed break points (particularly ridgelines) and feathering treatments in Very High and High SIOs to include background vistas; analyzing the Pacific NW National Scenic Trail reroute through the project area in an action alternative; and analyze trail sections that are currently motorized to include a non-motorized option in an action alternative.

Objector Statement #9: Objector states that the project may not adequately maintain wilderness characteristics of the Bald-Snow RWMA and within the IRAs because of the shaded fuel breaks. KRCG at 7 and 13-14; NEWFC at 6. Objector notes that the recreation report states that IRA characteristics would be negatively affected, but that the EA concludes that roadless characteristics would be maintained or improved and finds this contradiction "troubling." KRCG at 7 and 14; NEWFC at 6. Objector states that they have repeatedly raised concerns about the use of shaded fuel breaks in these areas and that their concerns have not been addressed, stating that the fuel breaks lack proven efficacy, have high costs, lack social acceptance, do not link to the purpose and need, and have adverse impacts to both wilderness qualities and to the environment. KRCG at 7; NEWFC at 6.

Response: I find that the EA and objection record document potential impacts in IRAs and that there are no proposed treatments in recommended wilderness areas.

The regulation at 36 CFR 218.25(b)(1) requires that the responsible official consider comments submitted on an EA. The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

Impacts to the Bald-Snow Recommended Wilderness Area would not occur, as there are no proposed treatments within the Recommended Wilderness Area. EA at 20; draft DN/FONSI at 8.

Contrary to the objector's assertion, the District considered an alternative that would drop treatments planned in the Inventoried Roadless Areas (IRAs). EA at 15. The EA documented that the landscape underburning treatments would improve habitat for several species, including grizzly bear and big game, and would minimize cutting trees in wildlife corridors. EA at 15 and 53; Biological Evaluation (BE) for Terrestrial Species at 21. In addition, the shaded fuel breaks are anchor points from which the landscape burns can be accomplished. EA at 15. The link to the purpose and need is documented in the EA at 2, 4 and 15 under the need of forest health and resilience.

The EA at 7 and 8 documents the nine roadless area characteristics that could be affected by the proposed action. The 2001 Roadless Area Conservation Rule requires maintenance or improvement of one or more roadless area characteristics; it does not require maintenance or improvement of all nine roadless area characteristics. EA at 15. The EA at 53 and the Recreation Report at 8-11 both note that the proposed treatments would impact several roadless area characteristics, including impacting the quality of the existing semi-primitive non-motorized recreation and affecting naturally appearing landscapes; however, underburning would beneficially impact habitat for species in the area, which was also noted in the EA at 15.

Objector Statement #10: Objector states that the impacts to wilderness characteristics from the 67 miles of non-system road have not been taken into account. KRCG at 8.

Response: I find that the District considered the impacts of the 67 miles of non-system road on the environment and I also find that the objector did not specifically comment on the impacts of non-system roads on wilderness characteristics.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects. The regulation at 36 CFR 218.8(c) requires that issues raised during objection be based on previously submitted comments, unless the issue is based on new information that arose after the opportunity for comment.

The draft DN/FONSI at 8 documents that there are no treatments planned within recommended wilderness. Because the issue of non-system roads impacting wilderness characteristics was not previously raised, it need not be addressed. However, for transparency, I asked my staff to determine if there would be any impacts to the recommended wilderness area from existing non-system roads and to clarify the context and intensity of the potential impacts. I found that the LIDAR interpretation conducted to determine the possible presence of non-system roads indicates that there may be one short segment of non-system road that extends off of the 2050-680 spur road that has not been field verified. Thus, because it appears as though there may be a short segment of non-system road in the recommended wilderness, the determination by the Responsible Official that there would be no significant impact to the recommended wilderness from this project is justified.

Objector Statement #11: Objector states that they are concerned that the project does not maintain scenic integrity near trails (including Congressionally designated trails such as the Pacific NW National Scenic Trail), or within and near IRAs, specifically noting concern about scenic integrity near commercial thin units 1, 116, 117, 118, 119, 123 and 224 near the IRA. KRCG at 10-11, 14-15 and 18. Objector believes that the project violates the Forest Plan guideline "FW-GDL-SCE-01" and "MA-GDL-RW-01 by altering the Very High and High Scenic Integrity Objectives (SIOs). KRCG at 10-11; NEWFC at 8-9.

Response: I find that the Sanpoil Project documented how scenic integrity would be maintained near trails and within IRAs. I note that there is no Unit 123 found in the project area.

The revised Colville National Forest Land Management Plan at 89 states that "FW-GDL-SCE-01. Scenic Integrity Levels Project-level activities should be planned and designed to meet the established desired SIOs assigned to the management area (see appendix D)." The Forest Plan notes that "Short-term deviations (3 to 6 years) to the existing scenic integrity of an area should be limited to the immediate surroundings of the stand, recreation attraction, or feature of concern. Rehabilitation actions may be taken when scenic integrity is compromised by atypical disturbances, such as uncharacteristic wildfires, insect or disease outbreaks, or floods. Treatments should not diminish the scenic quality more than the anticipated disturbance would have. Enhancement actions may be taken to increase positive scenic attributes in the viewshed, such as exposing large tree boles or geologic features for viewing.
In landscape areas where an ecosystem is out of the historical range of variability, the forest setting may exist at a lower scenic integrity during treatment activity and recovery to restore and sustain the landscape character to the assigned SIO. No more than one-third of project landscape area would be lowered by one scenic integrity level in sensitive scenic viewsheds where the SIO is high or moderate to avoid having too much landscape being altered in a short time frame and to minimize visual effects. Treatments would be implemented in phases over a longer (5 to 15 years or longer) time period if multiple treatments are needed to achieve the desired results. Up to 30 percent of a project area may be lowered from prescribed SIO by one level in a staged time frame (first treatment in 5 years, second treatment 5 to 10 years, third treatment 10 to 15 years, life of plan) depending on scenic concern sensitivity level, viewshed seen area, and scope of project."

The revised Colville National Forest Land Management Plan at 161 states that "MA-GDL-RW-01. Wilderness Characteristics The wilderness characteristics (untrammeled, undeveloped, natural, opportunities for solitude or a primitive and unconfined type of recreation) of each recommended wilderness should remain intact until a congressional decision on wilderness designation is made."

There are no treatments proposed within the Very High SIO, as documented in the Scenery Analysis Report at 8 (note that the Very High SIO overlaps with the Bald Snow Recommended Wilderness Area and that there are no treatments to the Recommended Wilderness Area, as documented in the response to Objector Statement #9). Design elements to meet the High SIO are included and apply to units near trails. EA at 29.

Units 1, 116, 117, 118, 119 and 224 are proposed for commercial thinning (EA at 21) and are located along or adjacent to road 2050-600 and occur along the border of both the Thirteenmile IRA and the Bald Snow IRA and Recommended Wilderness Area. The area is designated as having High Scenic Integrity and is within the General Restoration Management Area under the 2019 Revised LMP. Objection Record, Sanpoil Scenic Integrity Objectives Map.

None of these units are within the designated corridor for the Pacific Northwest National Scenic Trail. The EA at 28-29 states that "For the Pacific Northwest National Scenic Trail Corridor, a "passing through treatment units" sign will need to be posted on both ends of active units along forest system roads 2050600 and at access points to the PNT throughout the project area to warn through hikers of potential safety hazards during project implementation. This applies to all treatment types. The purpose for this design feature is to protect recreationists from potential injury or harm." This applies to units 1, 117, 118, 197, 541, 557, and 560, even though these units are not within the designated corridor for the Pacific Northwest National Scenic Trail. While the final trail route has yet to be designated, this design feature was included to alert hikers that may travel cross-country to adjacent road systems to continue hiking in the area, as noted in the Recreation Report at 4, which states that "FR 2050600 is expected to continue to be used by an ever increasing number of through hikers for the duration of project implementation."

The Recreation Report at 7 also addressed the High Scenic Integrity Objective in and around trail heads by including design features that state that "Marking of trees within the immediate foreground areas of the listed recreation sites will not be visible from the developed sites. This may include different methods for marking or not marking trees or blacking out marked trees as needed."

The Recreation Report at 9 also addressed how the project may potentially impact the naturally appearing landscapes with high scenic quality in IRAs. The report notes that adjacent to roads 2050-600, 2054, and 2100-500, "fuel treatments would extend up to 500 feet into the IRAs from the listed roads and would result in a "park like" setting where eight inch diameter and down trees are removed, piled, and burned adjacent to primary road systems. In addition, the 4,020 acres of proposed landscape burns (underburning) would likely benefit the quality of the natural appearing landscape by restoring ecosystem composition and structure back to the area's historic range of variability."

Objector Statement #12: Objector states that no alternative addressed the issue of improving sections of the Pacific NW National Scenic Trail that crosses through the project area, despite the request from the public to include trail improvements and reroutes. KRCG at 14 and 18. Objector states that failure to address public comments about the National Scenic Trail violates the Forest Plan Objective NT-01. KRCG at 15 and 18.

Response: I find that Responsible Official specifically addressed the issue of the Pacific Northwest National Scenic Trail in an alternative that was considered but eliminated from detailed study.

The regulation at 36 CFR 218.25(b)(1) requires that the responsible official consider comments submitted on an EA. The regulation at 36 CFR 220.7(b)(2) states that an EA "shall briefly describe the proposed action and alternative(s) that meet the need for action. No specific number of alternates is required or prescribed."

The 2019 Colville National Forest Revised Land Management Plan at 113 documented the objective (MA-OBJ-NT-01) for the Pacific NW National Scenic Trail, which is that "Within 15 years of plan implementation, relocate 10 to 15 percent of the trail miles currently located on roads into a non-motorized trail setting."

The EA at 15 specifically notes that an alternative was considered that would have tied a trail from the town of Republic to the proposed Pacific Northwest National Scenic Trail (PNT). The EA notes that "since the PNT corridor was designated by Congress, this type of proposed re-route would need to be decided

on by the PNT Advisory Council as it completes the comprehensive plan for the trail, which will, in part, identify where the trail will be located and constructed. Therefore, the Sanpoil Project, signed by the District Ranger, would not be the correct decision document in which to change the designated PNT route."

Final Remedies/Resolutions for Wilderness, IRAs, Scenery and National Trails: The EA and supporting documentation in the record documented consideration of and potential impacts to recommended wilderness, IRAs, and scenery. No remedies or resolution is needed.

Aquatic Habitats

Overview and Objector's Suggested Remedies: This objection issue surrounds the concern that the project will not meet the purpose and need to maintain and improve aquatic habitats. Suggested remedies include field verifying all non-system roads and taking action to repair/stabilize them as needed; modifying the proposal to decommission or mitigate low benefit roads; and accurately assessing the effects of reopening old, closed roads as new construction.

Objector Statement #13: Objector states that the project may not meet the purpose and need of maintaining and improving aquatic habitats. Specifically, objector states that the project area includes 67 miles of non-system roads, but that the condition and impacts of these roads to the aquatic system have not been field verified, which means an adequate effects analysis cannot be conducted. KRCG at 8. Objector also states that the Best Management Practices listed in the Fisheries and Hydrology Reports does not list any action for roads that are rated as high risk/low benefit (for example, Road 2050180), medium risk/low benefit or low risk/low benefit. KRCG at 8; NEWFC at 7.

Response: I find that the effects of non-system roads were addressed adequately in the EA and associated documents.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

The draft DN/FONSI states that "Section 2.3.3 of the EA describes the extent and general range of conditions of these templates. Information on the location of existing templates derived from LIDAR was completed only a few years ago, and efforts to understand issues and systematically restore problem segments are ongoing and evolving. Generally speaking, existing road templates that are problematic are those templates that intersect a stream or lie within riparian areas adjacent to a stream. The Forest Service may use a variety of tools to accomplish restoration of non-system road segments. This may include the use of task orders in stewardship contracts, separate engineering contracts for restoration, or other tools and processes yet to be determined. While potentially informative, I do not expect, nor has my team indicated, that additional surveys of temporary roads would reveal significant environmental effects or would change the project proposal. My decision is to authorize restoration, where needed, on any segments of existing temporary road within the Sanpoil project area. Which segments receive active restoration treatments will be determined based on access, need, funding, and condition. Restoration may take place at any time during the life of this NEPA document and would be coordinated with other management activities." Draft DN at 3-4.

In a letter to the objector in response to their comments, the District Ranger stated that "Effects of those templates now as well as effects of hydrologic stabilization do not approach significance, nor do they prevent consistency with a finding of significance impact (FONSI)." Response letter to NEWFC at 2.

National Best Management Practices (BMPs) for roads were followed for the Sanpoil Project, as documented in the Aquatics Report at 29-30. The Travel Analysis Report at 15 documented the risk/benefit rating for routes in the project area, along with opportunities on how to address them during the project. For Road 2050-180, the High/Low rating resulted in a "Maintain and Mitigate" opportunity. The EA at 27 notes that this road would remain as a closed road and become part of the trail system; there is a minor washout on this road at milepost 1.36 that would be addressed to ensure no impacts occur.

Final Remedies/Resolutions for Aquatic Habitats: Non-system roads were addressed to the extent practical. The project addressed use of and compliance with Best Management Practices. Aquatic resources would be adequately protected. No remedy or resolution is needed.

Wildlife Impacts

Overview and Objector's Suggested Remedies: These objection issues surround the concern that this project does not adequately address the impacts to wildlife. Suggested remedies include conducting a wildlife viability analysis in concurrence with the 2019 plan; dropping shaded fuel breaks along Road 500 and Road 600; and withdrawing the EA and draft DN to fully analyze threatened, endangered and sensitive (TES) species habitat in an Environmental Impact Statement (EIS).

Objector Statement #14: Objector states that the "EA and specialist reports do not contain any analysis of the landscape pattern when addressing wildlife viability, a key consideration" in violation of FW-DC-WL-03. KRCG at 11. Objector is specifically concerned about the analysis of wildlife habitat for northern goshawk, white-headed woodpecker and American marten, which were not part of the wildlife reports, noting that the results from the landscape evaluation differs from that in the wildlife report, particularly with regard to available acres of potential habitat. KRCG at 11-12; NEWFC at 9-10.

Response: I find that the EA and specialist reports contain analysis of the landscape pattern with regard to wildlife viability, including the northern goshawk, white-headed woodpecker, and American marten and is not in violation of FW-DC-WL-03.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

The EA is a summary of the resource specialist's reports, the Biological Evaluation, and the Effects to Management Indicator Species for the Sanpoil project. These reports were incorporated by reference in the EA at 39. The EA at 39 and 40 discusses the historic range of variability (HRV) under the alternatives and how that will affect the components of wildlife habitat. The EA at 41 summarizes the components of grizzly bear, Canada lynx and wolverine habitat on the landscape. The EA at 42 and 43 summarizes potential impacts to goshawk, great gray owls, Lewis' and white-headed woodpeckers, gray wolf, and sensitive invertebrate habitat components on the landscape. In addition, Table 12 in the EA at 44-48 and Table 13 (EA at 48 and 49) summarizes effects of the project on surrogate species and other species

groups (big game, primary and secondary cavity-nesting species, mammals, and invertebrates as well as landbirds) and their habitat conditions.

The wildlife reports (Biological Evaluation (BE) and Additional Terrestrial Wildlife Analysis Report) contain analysis of the landscape patterns for several species when addressing wildlife viability, starting with Wildlife-Related Project Design Criteria at 8-37 of the BE, and Surrogate Species in the Additional Analysis Report at 5-21.

Objector Statement #15: Objector states that reconstructing old roads has ecological impacts similar to that of new road construction and that the proposed road construction, restoration and reconstruction will significantly impact elk and threatened, endangered and sensitive (TES) species. KRCG at 11-12.

Response: I find that proposed road construction, restoration, and reconstructing old roads will not significantly impact elk and TES species.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

The EA at 40 states that "The Wildlife analysis looked at effects to species listed as threatened or endangered under the US Endangered Species Act and those listed on the 2015 USFS sensitive species list. There are no major wildlife issues associated with the project, and comments through public scoping and the draft period have been considered. Therefore, there are no wildlife issues that would result in unresolved conflicts or changes to the proposed action."

The EA at 48 in the effects determination for big game noted that "The proposed project will have temporary negative effects on big game species due to an increase in human activity within the project area. In the long-term project activities will improve forage habitat conditions and maintain appropriate levels of hiding cover, moving habitat towards the HRV. All LMP guidelines will be incorporated into project design. Therefore, the project as proposed will not contribute to a negative trend in viability of big game populations on the CNF". Also, in the Sanpoil Vegetation Management Project: Additional Terrestrial Wildlife Analysis Report at 16, it states, "The level of human disturbance in the project area would increase for the duration of the project (estimated 5 years)". "While project activities are occurring on re-opened or temporary roads, the zone of human influence would increase in the project area. Post project, all roads opened for the project would be reclosed or obliterated so the zone of influence will return to its pre-project level. Post-project, about 14.65 miles of road, including temporary road would be closed, 2.6 miles of road will be decommissioned all of which are currently closed, and approximately 1 mile of currently open road will become closed to public vehicular use, slightly reducing the level of human influence but not at a significant level."

For TES species such as the grizzly bear, the EA at 41 notes that project activities "May affect, not likely to adversely affect" as "there would be an increase in disturbance and a small reduction of core habitat during project implementation. Post-project, drivable road densities would be reduced and core habitat would be increased. Hiding cover would be degraded in the short term, hiding cover would be maintained along open roads when possible."

For the gray wolf, the BE at 35 states that "Seclusion Habitat - Recent information suggests that wolves are becoming more adapted to human activity (Weaver et al. 1996) but minimization of wolf-human

conflicts are still important for wolves since the primary source of wolf mortality is due to human interactions (Mech 1995, Mladenoff et al. 1995). Refer to the grizzly bear analysis for information on the amount of existing seclusion habitat (page **Error! Bookmark not defined.**). There is no management objective for open road density specific to wolves."

For lynx, the BE at 17 states that "Lynx have been known to use roads as travel-ways where there is adequate cover on both sides of the road. Herbaceous plants and shrubs that grow along road edges can attract hares. It is possible that lynx hunting near roads could be more susceptible to predation or human-caused mortality." The BE notes that however, "at this time, there is no compelling evidence to recommend management of road density to conserve lynx" (Ruediger et al. 2000). Neither the 2000 version nor the 2013 version of the LCAS provided a recommendation for target road densities on the lynx range."

For TES species that use medium-large trees/cool moist forest habitat, the EA at 45 discusses the risk factor for roads, "*Road density* - Project activities will temporarily increase road density through the project area due to the temporary roads needed to provide access to units. In the long term road density will decrease within the project area as temporary roads will be closed after use and restored to hydrologically stable conditions, and additional previously open roads will be decommissioned."

Finally, the draft DN/FONSI at 9 notes that "The effects on endangered or threatened species and their habitats is discussed in the Biological Assessment in the project record. Endangered or threatened species which may inhabit the project area will not likely be adversely affected. These include the Canada Lynx (threatened), grizzly bear (threatened), and North American Wolverine (proposed for ESA listing). The selected alternative is expected to have no effect on bull trout. The U.S. Fish and Wildlife Service has concurred with the Biological Assessment's findings (December 20th, 2018)."

Objector Statement #16: Objector states that shaded fuel breaks and silviculture treatments will degrade snowshoe hare and red squirrel habitat, as well as impact lynx habitat suitability, in violation of the Forest Plan STD-WL-06 and GDL-WL-06. KRCG at 12.

Response: I find that the shaded fuel breaks and silviculture treatments do not degrade snowshoe hare and red squirrel habitat, impact lynx habitat suitability, and are not in violation of Forest Plan STD-WL-06 or GDL-WL-06, even though shaded fuel breaks are not specifically discussed.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

The EA at 40 states "The proposed action would move the project area closer to its historic condition with regards to the tree species mix, stocking levels, stand structural stages, and fuel loading. Thinning would reduce the risk of destructive, stand-replacing fires, adding improved potential for late structural stage stands to persist on the landscape over time." The EA also notes that "Snowshoe hare habitat could be recruited within created openings in 15-20 years, potentially benefitting lynx" and that "The project as proposed would be consistent with LMP standards and guidelines for TES and other wildlife." In addition, the EA at 40 states that "The project would be consistent with management recommendations in the LCAS (Interagency Lynx Biology Team 2013)".

Project design elements were included to ensure compliance with LMP standards and guidelines and laws and regulations. Design element number 34 in Table 6 of the EA at 33 addresses FW-STD-WL-06 and shows which units this design element would apply to, while design element number 35 protects snowshoe hare habitat within the LAU. Although treatments in alternative prey habitat could be reduced for tree squirrels for up to 20 years in relation to the amount and heterogeneity (clumpiness) of the canopy retained in the harvested units (BE at 18), it is only 15% of the alternative prey habitat within the West Sherman LAU and 12% in the Hall Creek LAU (Table 7 in BE at 19), so there would continue to be available habitat within the LAUs (FW-GDL-WL-06). In addition, all logs that are in later stages of decay would be left on site and mechanical fuels treatments would impact non-commercial sized trees only, which would have insignificant or discountable effects to dead wood habitats. (EA at 49, addresses FW-GDL-WL-06).

Objector Statement #17: Objector states that the EA did not fully analyze impacts to TES species including wolves, wolverine and grizzly bear. KRCG at 12. Objector specifically notes that the EA did not disclose where potential lynx den sites are located, nor is there a firm commitment to avoid those areas, thus resulting in a failure to take a hard look at impacts to lynx. KRCG at 12.

Response: I find that the EA does fully analyze impacts to TES species including lynx, grizzly bears, wolves, and wolverine.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

The wildlife information discussed in the EA is a summary of the full analysis. The full analysis, including a "hard look" at impacts to lynx, is discussed in other documents which were incorporated by reference and made available. As stated in the EA at 39, the 3.4.1 Wildlife section is summarized from the resource specialist's reports, the Biological Evaluation, and the Effects to Management Indicator Species for the Sanpoil project. These are located in the project file and were posted on the project's website.

The lynx rationale for determination summary in Table 10 of the EA at 41 states, "Stands with potential den sites would be protected by avoidance. Activities near these stands would occur outside of the denning time period." Further information on the issue of avoidance to a potential den site is found in the BE at 18, which states that "Den Habitat – Within the Hall Creek LAU approximately 77 acres of stands that currently provide potential denning habitat would be treated with fuels treatments." The BE notes that "The normal operating season in timber sale contracts generally starts July 1 to avoid soft roads and wet soils. Contract activities in higher elevation areas are likely to be further delayed. Thus, the potential for the project to disturb an active lynx den should be insignificant or discountable."

The stands with potential den sites can be found in Figure 1 in the biological evaluation at 17. This map displays potential denning habitat within the West Sherman and Hall Creek LAUs found in the project area.

Objector Statement #18: Objector states that the EA failed to meaningfully address the issue of distribution of lynx habitat types after project implementation; failed to disclose and analyze the effect of the project on dense horizontal cover needed for lynx; failed to disclose the amount of dense horizontal cover that currently exists and what would exist after project implementation, including failure to disclose impacts to snowshoe hare. KRCG at 12-14.

Response: I find that the EA adequately addressed the distribution of lynx habitat types after project implementation as well as the effects to lynx habitat and their prey species.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

The EA is a summary of the resource specialist's reports, the Biological Evaluation and the Effects to Management Indicator Species for the Sanpoil project. These were incorporated by reference in the EA at 39. The BE at 18-19 address the issue of distribution of lynx habitat types after project implementation in the Environmental Consequences section. Table 6 breaks down the proposed treatments by the LAUs and displays the acres that would be affected by habitat type. In addition, a map of the distribution of lynx habitat components is displayed in Figure 1.

The effects of the project on dense horizontal cover is discussed in the BE at 18 under primary prey habitat. The BE at 15 and 16 displays the current acres of dense horizontal cover as primary prey habitat in Table 5, while Table 6 at 19 displays the acres of treatment by LAU, and Table 7 at 19 displays the acres of habitat after implementation. Impacts to snowshoe hare are discussed in the BE at 18 in the primary and alternate prey habitat sections and in the Effects Determination section at 20, as well as in the EA at 41 in Table 10.

Final Remedies/Resolutions for Wildlife Impacts: Impacts to wildlife species were adequately addressed in the EA and project record. No remedy or resolution is needed.

Roads

Overview and Objector's Suggested Remedies: This objection issue surrounds the concern that the proposal includes decommissioning roads that might be needed in the future. Suggested remedies include closing, rather than decommissioning roads.

Objector Statement #19: Objector states that the planned decommissioning of 2.6 miles of road could impact roads that area still needed for future fire access, forest treatments and recreation, and suggests a more thorough analysis be conducted to determine if those roads are needed. AFRC at 3.

Response: I find that Responsible Official considered, but eliminated from detailed study, a request for additional analysis to determine if planned decommissioning of 2.6 miles of road was warranted.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

During project design, the interdisciplinary team conducted a travel analysis for the project and identified the roads with the highest resource impacts and the lowest access needs and proposed these roads for decommissioning. Hydrologically stabilizing the decommissioned roads helps reduce the risk of road blowouts that could deliver high amounts of sediment downstream and that could damage system roads downslope. These activities would help meet the purpose and need for water quality, watershed function, and aquatic habitat. EA at 36.

The draft DN/FONSI at 3 also noted that "Comments received regarding roads showed concerns with the ability of the Forest Service to maintain the road system within the project area, concerns with regulatory compliance, and issues with methods of decommissioning roads. A data-driven scientific approach was used by the interdisciplinary team (IDT) to categorize roads based on risk to resources, and net benefit of a road to current and future management activities. The travel analysis completed for this project identified a road system that is adequate for land management activities associated with the Sanpoil project and beyond. Assessing the transportation system with this method was used to comply with regulatory requirements and ensure that the Forest Service could strike a balance between accomplishing this project, retaining adequate access for future management goals, providing access to Forest Service lands for the public, and limiting impacts to natural resources. After project implementation, the road system will provide an appropriate balance between use and protection, while still meeting regulatory requirements. Therefore, I have no concerns with how the project will impact the road system within the project area and feel that it will provide an appropriate level of access for management activities and the public in order to create the greatest public benefit."

The EA at 26 stated that "A meeting of the IDT was held in April of 2017 to evaluate the transportation system in the Sanpoil project area and determine the need for modifications to the system in order to support this project as well as future management activities. The team used the forest wide transportation analysis as a baseline for desired and existing maintenance levels of all system roads. Resource specialists weighed in with high, medium, or low need for access for timber, range, and wildfire management. Specialists also provided information on the potential for risks to resources such as aquatics and wildlife. These overall ratings were tallied and a subset of roads that showed low benefit (timber, range, and fire management) and high risk (aquatics, wildlife) were discussed as possibilities for decommissioning or other changes to the maintenance level. A subset of roads that showed low benefit (timber, range, and fire management), and low risk (aquatics, wildlife), were discussed as possibilities for closure. This analysis and the discussion from the IDT were used by the line officer to determine which roads were appropriate for closure, decommissioning, and which roads would receive mitigation for any issues and be maintained."

As for road decommissioning, the EA at 26-27 documented that the "IDT completed a travel analysis for all NFS roads in the project area. The proposed action would decommission approximately 2.6 miles of NFS roads in the project area that are generally linked to riparian or hydrologic resource damage and have been deemed unnecessary for future activities. Approximately 1.2 miles of decommissioning involves the conversion of closed roads to non- motorized trail. Approximately 0.4 miles of decommissioning will involve rerouting of the 2050290 road to prevent the road from capturing the stream." The EA goes on to display the roads that would be decommissioned, noting that "The method of decommissioning is dependent on the site-specific resource needs and will be coordinated between the resource specialists and the design engineers."

Final Remedies/Resolution for Roads: The EA documented the Travel Analysis Process conducted by the District, which shows that the District complied with agency policy and regulation. No remedy or resolution is needed.

Unauthorized Precommercial Thinning

Overview and Objector's Suggested Remedies: This objection issue surrounds the concern that precommercial thinning in the project area occurred without a final decision. The suggested remedy is to engage in more thorough communication in the future.

Objector Statement #20: Objector states that 739 acres of precommercial thinning have been implemented without a decision, and that although they are generally supportive of PCT, they are not supportive of illegal activities. Objector states that they would have liked to see these activities implement variable density thinning and hope that these collaborative changes can happen in the future. KRCG at 13.

Response: I find that the District recognized that some of the units proposed for precommercial thinning under this decision were inadvertently included in a contract and that further action on those units has been put on hold until a decision is reached with this project.

I asked my staff to update me as to what had occurred and they indicated that they were aware of the administrative error and had stopped any further implementation of the portion of the contract that included units associated with the Sanpoil Project.

As for variable density thinning in precommercially treated units, I have asked my staff to consider this prescription in future planning efforts.

Final Remedies/Resolution for Unauthorized Precommercial Thinning: While I recognize that precommercial thinning was conducted prior to a decision for some areas, I am committed to ensuring that no further action occurs until after a decision is made.

Grazing

Overview and Objector's Suggested Remedies: These objection issues surround the concern over impacts of grazing. Suggested remedies include identifying specific locations where additional grazing acres will be located; withdrawing the EA and preparing an EIS; and withdrawing and revising the Forest Plan and grazing sections in order to comply with NFMA.

Objector Statement #21: Objector states that the EA failed to discuss impacts of livestock grazing in created openings and failed to discuss impacts to TES species, particularly because the EA adds 10,585 "capable acres" to range and notes that range infrastructure would be identified during layout, but was not included in project documentation. KRCG at 15-16.

Response: I find that the Responsible Official discussed the reduction of grazing impacts in the project area and noted impacts to TES species. Rangeland improvements have been previously identified, however any additional unidentified improvements that are found will be properly delineated and protected.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

The EA at 51 notes that "The proposed action would increase foraging as treatments would add 10,585 capable acres to the Quartz allotment, increasing capable acres to 41,242. Treatments would decrease

intensity of livestock grazing achieving better distribution on the landscape with an increase to 126 acres per cow/calf pair. Water quality and overall riparian health would benefit from better distribution and transitory rangeland being created in the uplands of the allotment, which falls directly in line with the purpose and need of the Sanpoil Project. Other treatment effects include possible changes in current natural barriers that would cause additional range improvement infrastructure in order to control livestock, though treatments would not impact current range improvement infrastructure."

The EA at 51 goes on to note that "The spatial boundaries for analyzing cumulative effects to rangelands are limited to the allotment boundaries for the Quartz allotment, as no other allotments are impacted by the project. The temporal boundaries for analyzing effects are from the time of project implementation to 30 years in the future due to transitory range being temporary. The Sanpoil project would produce some effects regarding a change in livestock management, habituation of livestock on the landscape, effects to range infrastructure, changes in natural barriers and changes to the stocking rate. However, the activities in the proposed action combined with past, ongoing and reasonably foreseeable future actions would not cumulatively affect range management within the Quartz allotment."

The EA at 63 also documents that "The Quartz allotment overlaps with the Sanpoil project area. Grazing is currently permitted for 328 cow/calf pairs. Cows graze this pasture for a season of use between June and October 31. Allotment is managed under a three pasture deferred rotation grazing system."

As for range improvement, the EA at 28 documents that "All rangeland improvement projects, such as developed springs, water troughs and fences not previously identified by the NEPA inventory and analysis would be delineated during layout and protected during harvest and burning activities. If identified range improvement projects become damaged as a result of the proposed action, contract provisions would provide for needed repairs."

Impacts to TES species were adequately addressed; see the response to Objector Statement #17 and #18. Impacts from grazing were specifically addressed for grizzly bear (EA at 41), gray wolf (EA at 43), (grizzly bear), Cassin's Finch (EA at 44), Tiger Salamander (EA at 45), Fox Sparrow (EA at 46), Wilson's Snipe and Columbia Spotted Frog (EA at 47) and MacGillivray's Warbler (EA at 48).

Objector Statement #22: Objector states that the "EA ignores the impacts of project activities on recolonizing gray wolf and grizzly bear related to grazing even though this project will effect species habitat." KRCG at 16. Objector also states that the EA does not attempt to "address potential future impacts, or assess range management issues directly connected to this project that could only be addressed through application of silvicultural prescriptions to create pasture and transitory range" that would allow for range improvements to livestock management to occur, which could include bunching and herding, sight distance and aquatic resource conservation. KRCG at 16.

Response: I find that the Responsible Official considered impacts of grazing activities on TES species and in particular, the gray wolf and grizzly bear and their habitat. The "May affect, not likely to adversely affect" determination for the grizzly bear as well as the "May impact individuals but is not likely to lead in a trend towards federal listing or loss of viability" determination for the gray wolf and sensitive invertebrates is a result of considering effects/impacts of all proposed treatments of the Sanpoil project and the cumulative effects, including grazing.

The regulation at 36 CFR 220.7(b)(3) requires that an EA include a discussion of the environmental effects of the proposed project and any alternatives, including disclosing the direct, indirect, and cumulative effects.

Table 10 of the EA at 41 summarizes the impacts of grazing activities to grizzly bears, stating that "In grizzly bears recovery areas, biologists evaluate and monitor habitat over individual bear management units (BMUs). Since the project area is not within a recovery zone, the cumulative effects area can be described as the CNF west of the Columbia River. Past, present, and reasonably foreseeable future projects considered for cumulative effects to grizzly bears include; other vegetation management projects, wildfires, and grazing. The proposed project would create a decrease in hiding cover for approximately 5 years, a decrease in seclusion habitat due to an increase in human disturbance, and a potential increase in forage habitat. These effects would be cumulative to those resulting from other similar vegetation management projects that are active or proposed. Wildfires which have recently occurred on the landscape would create an influx of forage habitat as growth of understory plants would be stimulated, creating a beneficial cumulative effect to forage. Conversely, grazing decreases the amount of forage available on the landscape. This action adds a negative cumulative effect to grizzly bear habitat."

In the EA at 43, the impacts of grazing to gray wolves is summarized in Table 11, in the cumulative effects section, documenting that "A characterization of cumulative effects to this species can reasonably be made at the Forest-wide scale. Refer to grizzly bear cumulative effects to forage and seclusion for analysis as effects are the same." In addition, grazing impacts on sensitive invertebrates is summarized in the cumulative effects section of Table 11, noting that "The cumulative effects area for sensitive invertebrate species is the Sanpoil project area. Activities considered for cumulative effects include treatment of private land, and grazing. Treatments on private lands would have similar effects to invertebrates as the proposed action along with the likelihood that down logs and wetland areas would have less protections potentially adding a negative effect to invertebrate habitat. The proposed action in addition to grazing would have an added negative cumulative effect to invertebrate habitat within the project area. Grazing has the potential to remove forage and host plants and alter the integrity of meadows and riparian habitats which are vital habitat areas for the sensitive invertebrates found on the CNF."

Final Remedies/Resolutions for Grazing: The potential impacts from grazing to listed and other species was addressed. No remedy or resolution is needed.