

United States  
Department of  
Agriculture

Forest Service

Northern Region

April 2001



# **Coeur d'Alene River Ranger District Small Sales Project**

## **Final Environmental Impact Statement [Revised]**

### **Letters From the Public**

## LETTERS FROM THE PUBLIC

Enclosed are copies of letters received from the public based on review of the Small Sales Draft Environmental Impact Statement (EIS), and following notification of our intent to revise the Final EIS. Each letter has a comment identification number in the upper right corner.

Comment Letter #01	Walter W. Morris
Comment Letter #02	Ron Giddings
Comment Letter #03	Dave Reynolds
Comment Letter #04	John Neirinckx II
Comment Letter #05	Jeff Juel, Ecology Center
Comment Letter #06	Mike Mihelich, Kootenai Environmental Alliance
Comment Letter #07	Greg Tourtlotte, Idaho Fish and Game
Comment Letter #08	Amy Gillett, Idaho Forest Owners Association
Comment Letter #09	Charles and Sarah Gates
Comment Letter #010	Sara Denniston, Idaho Rivers United/Idaho Conservation League
Comment Letter #011	Diane Riley, Idaho Department of Environmental Quality
Comment Letter #012	Susan Weller, National Audubon Society
Comment Letter #013	Daugherty Logging Crew and Family
Comment Letter #014	USDI Office of Environmental Policy & Compliance*
Comment Letter #015	Richard Parkin, U.S. Environmental Protection Agency

\* Their letter simply stated that they did not have any comments to offer on the Draft EIS.

18 APR 2000

01

**April 16, 2000**

Coeur d'Alene River Ranger District  
Attention: Small Sales Project  
2502 East Sherman Ave.  
Coeur d'Alene, Idaho 83814

Gentlemen:

I would like to register my support for your project of properly managing the Coeur d'Alene National Forest. This would be to log any areas that are needed to prevent the spread of the Douglas Fir Bark Beetle. I am surprised to hear the timber here referred to as "old growth" it is my impression that most of the Red Fir timber is not a really long lived tree in the first place.

I snowmobile in these areas and see many millions of board feet of timber going to waste which seems to be the policy of our current federal administration. The current federal policies seem to ignore all the scientists and trained forests managers in making all their decisions regarding the national forests.

I am afraid if these policies are carried out according to the wishes of the current administration we will eventually see another "Great Burn". Apparently some critics are saying that there is 30,000 tons of sediment coming out of the North Fork annually. I don't know if this is accurate—the critics probably don't know either. Even if this is accurate it makes me wonder how much sediment was coming out of this area after the original "great burn" and how much will come out when the next one occurs.

This environmental group "the Lands Council" may well consist of only one or two people who have been funded by one of the many Green Foundations. Their agenda seems to be to get the public off the public lands at any cost and this is just another effort by these people to erode the freedoms of the American public and close off the national forest lands. I know it must be frustrating for you to know what must be done to protect "Americas Renewable Resource" and to have your hands tied by a bunch of people whose goal really has nothing to do with maintaining a healthy forest.

Thank you for taking your time to read my comments.

Sincerely,

*Walter W. Morris*

Walter W. Morris

Kellogg, Idaho 83837



18 APR 2000

02

Ron & Maryann Giddings

• Sandpoint, ID 83864

April 16, 2000

Coeur d'Alene River Ranger District  
Attention: Small Sales Project  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814

I have followed with interest the controversy over logging in the Coeur d'Alene National Forests for the past couple of years. I must admit that I suspect the Forest Service of occasionally not acting in the best interest(s) of forest health, rather having a tendency for promote logging for short-term economic gain.

I have been principally opposed to logging for to the so-called beetle outbreak but felt some logging may/might be advisable in the worse case scenarios. OK, that decision of last year is over, right? So, now I ask why more?

You are proposing another 1,400 acres logging and burning. I question the need or wisdom for such a project.

Studies show dead and dying trees can be important to forest health. One example that has been cited is the "Spruce Budworm" which, admittedly, kills trees. However, nature has a strange method of managing itself without human intervention. Birds will inhabit the trees that have died or are dying and many of these very birds will consume the budworms as food. Trees that die also provide natural fertilizer for future forests as the nutrients breakdown and penetrate the soil(s). Dying or dead trees also provide food for birds, help maintain soil integrity, provide a natural canopy to maintain soil moistures, and are a "natural" occurrence without man's intervention.

It appears there may be some justification for limited logging and burning(?). I can understand that if a large quantity of volatile fuel is left remaining that fire danger can be high. But that only allows for selective thinning and leaving some dead/dying trees to replenish the soils. I do question burning with the problems encountered with "controlled burns" in the past. Each time a major fire is resultant from a controlled burn it fuels my resolve that "controlled burns" should not be allowed.

Continued.....

Coeur d'Alene River Ranger District

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April 16, 2000

In the case of old growth forests I have a huge problem with logging. Again, perhaps, very sparse thinning by use of helicopters might be acceptable but for the most part these forests are a treasure to be enjoyed by all (humans, wildlife, birds, insects) and there are few remaining areas outside existing designated wilderness locations. They must be managed wisely (very little). Perhaps, from what I have read, the so titled "old growth forest" on Canfield might benefit from logging as it is apparently not a large or thickly wooded area. If what I have read is true, the dead and debris filled forest present a severe fire danger, then I do favor such a cleanup. Other proposed areas are apparently true "old growth forests" and should be left alone.

I oppose any further logging or road building on the North Fork! The damage from extensive logging and road building through the years is beyond reason. Silt and sediment entering the river is reprehensible. Certainly this area should be left alone for forty or fifty years to allow natural restoration to a healthier state.

Deficit logging sales should be outlawed! It matters not whether some business appreciates economic gain or if monies go into tax roles (counties, cities, or for schools). The bottom line is: "If total costs to the taxpayer outweigh the total profits and benefits, the sale(s) should not be awarded – period!" EVER!!! If the end sum is that it cost taxpayers more than is gained, someone thus has to fork up the difference. That someone is the everyday taxpayer who has little choice in the matter. This should stop! Sales should not be awarded if they are less than the engineer's estimate for a break even cost/profit margin.

In closing, I am not opposed to responsible logging...I use wood products, live in a wood constructed home, and enjoy these products and the use of wood. BUT, logging practices in the U.S. need drastic and further revamping. The U.S.F.S. needs to rebuild its' image of an agency that truly manages our forests for current and future use, in a wise manner. I direct your attention to the country of Sweden and other European countries that learned the hard way and now manage their forests in a conscionable manner.

Sincerely,



Ron Giddings

## Public can offer suggestions for project

By Zaz Hollander  
Staff writer

A plan to cut down old-growth timber infested with bark beetles is still evolving, although officials have picked their preference.

The public can submit written comments on the project — called Small Sales because it's a smattering of 16 proposed logging sites — until May 15.

The agency wants to log and burn 1,433 acres, with roughly 15 percent of the timber coming out of forests considered old growth or located within a roadless area near Wolf Lodge.

The Small Sales Environmental Impact Statement is the document out for public review.

According to the plan, the project involves:

- Salvaging beetle-killed trees and some green trees. Roughly 10 percent of the logging would involve green trees, according to Forest Service estimates.

- Clearing areas around ponderosa pines, which are more fire resistant.

- Intentionally setting fire to 438 acres — including 225 acres in the Skitwish Ridge Roadless Area — to improve winter forage for big game.

But the agency must consider other options under federal law, including no logging in the controversial old-growth or roadless forests.

The other options are:

- No action.

- Salvage logging only on the 1,433 acres, without the burning and other activities.

- Logging and burning on roughly 1,160 acres, without logging any old growth or entering the roadless area.

None of the options calls for construction of new forest roads; instead, nearly a mile of temporary roads would be built, according to the Forest Service.

After reviewing comments and any other information that becomes available, the Coeur d'Alene River Ranger District will release a final environmental impact statement, and a Record of Decision announcing the logging alternative selected by the district.

For more information, call (208) 664-2318. Send comments to: Coeur d'Alene River Ranger District, Attn: Small Sales Project, 2502 East Sherman Avenue, Coeur d'Alene, ID 83814.

I HEARTILY APPROVE OF THIS PLAN.  
ALL DISEASED OR BEETLE-KILLED  
TREES SHOULD BE HARVESTED AS  
SOON AS POSSIBLE. AMERICA'S  
RE SOURCES ARE TOO VALUABLE TO LET  
GO TO WASTE.

*Dave Reynolds*

DAVE REYNOLDS

172 KULLYSPELL DR

HOPE, ID 83836

5

Rec'd  
4-27-2000

04

April 22, 2000

Ms. Susan Jeheber-Matthews  
District Ranger  
Coeur d'Alene River Ranger District  
Attn: Small Sales Project  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814

Dear Ms. Jeheber-Matthews:

As I stated in an earlier correspondence, I am a private landowner who owns a home and forested property immediately adjacent to one of the Analysis Areas listed in the Small Sales Draft Environmental Impact Statement (EIS), dated March 2000. Therefore, I am considerably concerned about the large amount of dead and dying timber in this analysis area because of the extreme fire hazard it poses to my forested property.

Although I realize the purpose and benefits of a designated Old Growth Forest, I also believe that there are certain circumstances where human intervention is necessary to ensure the forest and any nearby homes will not be decimated. I believe the proposed action (Alternative 2) will provide the Old Growth Forest the necessary management to maintain its beauty for future generations, and at the same time ensuring the safety of those residing in the area.

Therefore after carefully reviewing the EIS, I wish to advise all whom are concerned in this matter that I am in complete agreement with the Forest Service's proposed action (Alternative 2) as a means to address the issues noted in the EIS.

Sincerely,



John E. Neirinckx  
[Redacted]  
Coeur d'Alene, ID 83816

**The Ecology Center, Inc.**

**801 Sherwood Street, Suite B**

**Missoula, MT 59802**

**(406) 728-5733**

**(406) 728-9432 fax**

***ecocenter@wildrockies.org***

05

May 12, 2000

Susan Matthews, District Ranger  
Coeur d'Alene River Ranger District  
2502 East Sherman Avenue  
Coeur d'Alene, Idaho 83814

Rec'd 5-15-2000

Ms. Matthews;

These are comments on the Small Sales Draft EIS, on behalf of the Ecology Center, the Lands Council, and Alliance for the Wild Rockies.

The Small Sales (SS) DEIS is an outline of the expansion of the Coeur d'Alene River Ranger District's portion of the Douglas-fir Beetle (DFB) project into roadless areas and allocated old growth within some of the same Analysis Areas included in the DFB FEIS, and into old growth, roadless, and other areas in new Analysis Areas. A reading of the SS DEIS reveals the Forest Service (FS) continues to avoid NEPA's requirement to fully analyze the combined DFB/SS actions. In fact Steve Bateman's remarks to a Coeur d'Alene Press reporter confirms this. He said "forest managers knew they would eventually have to address those (old growth and roadless) beetle-killed areas, but they also knew any proposal to log those areas would slow down the rest of the salvage timber sales" (3/11/2000 edition). In other words, compliance with NEPA was too time-consuming for the FS.

Even though the SS DEIS proposes logging to occur simultaneously in some of the same Analysis Areas as the DFB project, the analysis basically avoids genuinely analyzing the impacts of the combined actions.

The SS DEIS also continues the IPNF's "management by crisis" which, like the DFB project, is an extremely overblown reaction to an infestation of a native insect species—one that has been periodically infesting the forest without ill-effects for centuries. The SS and DFB projects are the culmination of decades of overcutting and excessive road building on this Forest, to the point that the only justification for more logging is to perpetrate a "forest health" and wildfire scare so an increasingly skeptical public can be temporarily confused into submission.

By designing a timber sale that would require extensive use of helicopters, the FS reveals that the main objective of this project is to keep large, capital-intensive timber operations in business, thus keeping the flow of PAC timber dollars into the hands of Congressional timber beasts, who then force-feed bloated timber budgets on the FS resulting in more unsustainable logging projects—like the Small Sales project. This also has the effect of marginalizing small-scale logging operations, which cannot compete in the bidding for public timber. Nowhere did the Forest Plan's EIS disclose

such effects on the local economy, and this DEIS continues the pattern by including an extremely narrow economic analysis.

It is important to note that the loose definitions of the cutting prescriptions and the loopholes provided elsewhere in the DEIS show that just about every tree in the proposed cutting units could be cut down and removed from the forest (p. 89-90). Yet the discussions of impacts are based on the assumption that only salvage and light thinning would occur in the non-“regeneration” units. The FS should assume responsibility and tighten up the “prescriptions” in the EIS.

In several places the DEIS refers to a “project area” yet nowhere does it define it. There is no acreage figure given, nor is there a “project area” delineated on any of the DEIS’s accompanying maps. NEPA’s implementing regulations mandate that actions that are the subject of a NEPA document must define the geographic area in order to specify the geographic scope. At 40 C.F.R. § 1508.18 it states:

(b) Federal actions tend to fall within one of the following categories:

(1) Adoption of official policy, such as rules, regulations, and interpretations adopted pursuant to the Administrative Procedure Act, 5 U.S.C. 551 et seq.; treaties and international conventions or agreements; formal documents establishing an agency's policies which will result in or substantially alter agency programs.

(2) Adoption of formal plans, such as official documents prepared or approved by federal agencies which guide or prescribe alternative uses of federal resources, upon which future agency actions will be based.

(3) Adoption of programs, such as a group of concerted actions to implement a specific policy or plan; systematic and connected agency decisions allocating agency resources to implement a specific statutory program or executive directive.

(4) Approval of specific projects, such as construction or management activities **located in a defined geographic area.** (Emphasis added).

Please refer to the definition of “Project Effect Areas” from R-1, Our Approach to Effects Analysis, Desk Reference, p. 11. According to that R-1 Desk Reference:

Bounding the Analysis - The geographic & temporal (time) extent of effect analyses are highly important legal and analytical considerations. The appropriate boundaries are issue specific. ...

(I) identify the appropriate boundaries then make use of the best available information to evaluate effects.

Logical Resource Units and Project Effect Areas determine the geographic boundaries of the cumulative effects analysis—the Analysis Area. The Analysis Area coincides with the Logical Resource Unit boundaries and **is generally larger than the area affected by the project** (emphasis added) . . . Only rarely would an issue be so narrowly defined spatially that the logical resource unit coincides with, or is smaller than, the Project Effect Area.

The latter section explains why the “Analysis Areas” used in the DEIS do not adequately determine the geographic boundaries for the DEIS’s effects analysis. There is no apparent logic for many of the Analysis Area boundaries, other than that they enclose proposed cutting units. They do not use watershed boundaries or other

Logical Resource Unit boundaries. When the DEIS combines some of them to analyze effects on wildlife, the logic is still lacking.

**Please explain why the SS DEIS does not use Logical Resource Unit boundaries, as your own guidance documents strongly recommend you do in order to address “highly important legal and analytical considerations.”**

The public must be able to understand the geographic location referred to in the effects analysis of a NEPA document. Such fundamental facts as the size and exact location of the “project area” must be disclosed. Failure to disclose important information renders an EIS inadequate. Without a properly defined project area, it is extremely difficult for the public to tell whether cumulative impacts of the SS project and other ongoing or reasonably foreseeable activities are adequately analyzed.

The analysis of cumulative effects of ongoing and foreseeable actions is inadequate. According to R-1, Our Approach to Effects Analysis, Desk Reference, “Any project affecting the same resources as the proposed project, over the same time period should be included in the examination of cumulative effects.” But the DEIS does not comply with the Forest Service’s own interpretation of NEPA.

When the Forest Service attempts to analyze the cumulative effects of a project that is extremely wide in geographic scope where similar and other actions are ongoing, and during the same temporal scope, the problems of genuinely analyzing—let alone understanding—cumulative impacts of all the projects becomes virtually insurmountable.

The DEIS discloses that the FS still plans to sell Horizon Moon and other timber sales in the vicinity of the SS project. However, the NEPA documents prepared for those sales are now out-of-date due to the conditions that have changed since their decision documents were signed. In no way did the Horizon FEIS, for example, anticipate the listing of the lynx, the impacts of the alleged Douglas-fir beetle “epidemic” and resultant logging, and many other factors. Simply put, selling Horizon Moon and the rest of those sales would violate NEPA. They must be re-analyzed in an updated NEPA public involvement process.

The cumulative effects analysis for wildlife species is hampered considerably by the illogically-defined cumulative effects analysis areas. The analysis seems to be centered primarily upon the actual cutting units, and lacks consideration of the cumulative effects of other activities. Whether or not surrounding areas are undisturbed habitat, or are experiencing ongoing logging, prescribed burning, grazing, etc. activities is the subject of a cumulative effects analysis. That is lacking for most species considered in the DEIS.

The DEIS discloses that logging will occur in unsuitable areas, it states that is okay since these areas are not being managed for timber production. However, timber production is the real reason for the SS project to begin with. Logging unsuitable areas for the flimsy reasons given doesn’t make sense, because in contradiction to the Forest Plan such an approach means logging would be allowed almost everywhere.

The Coeur d'Alene River District is home to the Canada lynx, this year added to the Endangered Species list as a Threatened species. The Forest Plan includes goals to maintain viable populations of existing native and desirable non-native vertebrate species. In December 1999, the Forest Service and Bureau of Land Management completed the "Biological Assessment Of The Effects Of National Forest Land And Resource Management Plans And Bureau Of Land Management Land Use Plans On Canada Lynx" (Lynx BA). The Lynx BA concluded that the current programmatic land management plans "may affect, and are likely to adversely affect, the subject population of Canada lynx."

The Lynx BA team recommended amending or revising Forest Plans to incorporate conservation measures that would reduce or eliminate the identified adverse effects to lynx. We contend that the Lynx BA's "Likely to adversely affect" determination makes Section 7 formal consultation on the IPNF's Forest Plan mandatory, before actions such as the SS project are approved.

The DEIS does not disclose that the Forest Plan "is likely to adversely affect" the lynx—effectively the Plan is a "taking" of lynx which is banned by the ESA. The IPNF must amend its Forest Plan before allowing the project activities in lynx habitat, because implementation of its present Plan is a factor that has led to the necessity for listing the lynx under the ESA.

The logic used by the FS to exclude analysis of the Threatened lynx is faulty to say the least. The basis upon which the conclusion that the areas to be logged are not lynx habitat is not given. Lynx use the large woody debris structure and canopy closure of old growth forests for denning, and other types of forest for travel and forage. Roadless areas are especially important for a species so easily trapped. The DEIS also avoids the road access and winter travel issues as well.

The DEIS misleads the public in regards to the degree of understanding scientists and land managers have of lynx ecology. For example, the concept of Lynx Analysis Units (LAUs) vastly oversimplify lynx habitat relationships, and this results in the DEIS not presenting a sufficient analysis for lynx.

The analysis for lynx suffers from deficiencies that preclude it from satisfying NEPA, NFMA, and the ESA in other ways. Simply put, the analysis uses methodology—a data base query—that is not adequate for delineation of lynx habitat components and thus lacks scientific integrity. This same problems exists for analyses of other MIS and Sensitive species, including the fisher, the northern goshawk, and others.

A big problem with relying on database-derived suitability models for habitat analyses is that such data is not reliable enough. The information is gathered by stand examiners who may or may not have biological training, and is often quite dated. The timber stand data was not designed nor intended for wildlife habitat analyses. Very recently, the IPNF has admitted that the use of database habitat information is suspect:

Habitat modeling based on the timber stand database has its limitations: the data are, on average, 5 years old; canopy closure estimates are inaccurate; and data do not exist for the abundance or

distribution of snags or down woody material... (Idaho Panhandle National Forests 1998 Monitoring and Evaluation Report)

The DEIS uses canopy closure as a way to designate habitat for the northern goshawk, yet it is obvious that the FS actually has accurate, up-to-date information on canopy closure for very few stands in the District.

The DEIS concludes that project design will result in no impacts to black-backed woodpeckers, but since the SS project would remove or cut down thousands of snags or future snags, this makes absolutely no sense. The IPNF has failed to conduct monitoring that proves its logging activities have maintained viable populations of snag-dependent species.

The rationale for eliminating the boreal toad from analysis is likewise flawed. The courts have found that the Forest Plan INFISH amendment is not adequate for protecting other species. The DEIS fails to disclose that boreal toads don't just stay within INFISH buffers, and could potentially be killed by logging activities.

The "no effects" rationale for the harlequin duck is flawed. Logging activities, such as helicopter flights, log trucks, etc. have the potential to disturb these ducks.

The DEIS fails to disclose that Townsend's big-eared bats use large, dead trees for roosting and thus would suffer habitat depletion by the removal of big trees.

The White-headed woodpecker was listed as Sensitive and has different habitat requirements from flammulated owls. The FS must disclose impacts in the EIS or Biological Evaluation.

The DEIS bases a "no impact" determination on wolverines based upon its claims that there is no wolverine denning habitat within or adjacent to the project areas on the Coeur d'Alene River Ranger District. The FS offers no evidence to support such claims, and in fact it is contradicted by current scientific knowledge.

Lofroth (1997) in a study in British Columbia, found that wolverines use habitats as diverse as tundra and old-growth forest. Wolverines are also known to use mid- to low-elevation Douglas-fir forests in the winter (USDA Forest Service, 1993). **The EIS should explicitly state why this scientific information should be discounted for the purposes of the SS project.**

Since the FS did not evaluate the DFB Project's cumulative effects based upon scientific knowledge that wolverines are likely to use the areas to be impacted by the project activities, its determination of "no impact" is not justified.

The DEIS ignores that the IPNF's old growth standards are based, in part, upon pileated woodpecker habitat needs (see Forest Planning documents 27 and 28). The Warren documents cited in the DEIS discuss the importance of snags at least 30" dbh for pileated nesting, and snags at least 20" dbh as preferred for foraging. The SS project would log the large trees. However, the DEIS completely fails discuss the impacts of removing these important components of the MIS pileated woodpecker's

habitat, and fails to discuss the impacts of the dead tree removal on Sensitive black-backed woodpeckers.

The DEIS failed to disclose important information on the status of fishers and relied on inaccurate information and false assumptions in analyzing the impacts to fisher populations and habitat. The DEIS states, "Studies indicate that the average home range for adult males is 40 square kilometers" (DEIS at 245). This assumption is inconsistent with the ICBEMP "forest carnivore" report, which states: "Home range sizes in Idaho average 83 km<sup>2</sup> for male fishers and 41 km<sup>2</sup> for females" (Witmer, et al, 1998). **Please explain why your own research is not acknowledged in the DEIS.**

The forest carnivore report raised issues concerning fisher conservation and management, including maintenance of riparian corridors to serve as travel routes and habitat supporting small mammals and birds as important prey patches for fishers. (Id. at 15.) Most of the analysis of fisher habitat relates to canopy closure, which is only one of this species' habitat needs.

The Forest Service also failed to disclose and analyze the uncertain and precarious population status of fishers, as described in the ICBEMP forest carnivore report:

The status of the fisher in the Western United States is poorly known but generally perceived as precarious and declining. This is a serious issue alone, but it also is a component of the larger problem of the decline of biological diversity. Recovery of species of concern must necessarily focus on the population level, because this is the scale at which genetic variation occurs and because population [sic] are the constituent elements of communities and ecosystems. Systematic habitat alteration and overexploitation have reduced the historical distribution of fishers in suitable habitat in the interior Columbia basin to isolated and fragmented populations. Current populations may be extremely vulnerable to local and regional extirpation because of their lack of connectivity and their small numbers.

Id. at 14 (internal citations omitted). The EIS must include this important information in its analysis.

The DEIS mentions concepts such as "High Integrity Area" and "Primary Conservation Area" yet they are poorly defined and certainly not located on any maps in the DEIS. This makes the discussions difficult for the public to understand.

The discussion of effects in the wildlife section is extremely difficult to follow. Therein the DEIS's definition of cumulative effects is rather tortured. NEPA regulations at 40 CFR § 1508.7 define "Cumulative impact":

"Cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

It is clear that the regulations require discussion of the sum total of all combined impacts—impacts of the proposed action plus the impacts of past, present, and

foreseeable actions—not just cursory mention of the impacts of other actions alone. Examine this statement at the end of page 248: “Based on past reductions of suitable habitat and security, the cumulative effects would be considered low.” This seems to merely address past actions, with nothing on ongoing and foreseeable actions. The writer seems unaware of all the ongoing DFB logging in the Hayden area. This kind of analysis is all too typical in the DEIS.

The DEIS at 250 states, “Past activities have reduced suitable fisher habitat resulting in a high cumulative effects (sic).” It goes on to say, “there could be an impact individuals (sic), but none of the alternatives would likely trend the species toward federal listing or cause a loss of viability to the species or the population.” What exactly does “population” refer to in this sentence? Also, please tell us where the viable populations of fishers are located, and explain the basis is for your assumption of viability. Witmer, et. al (1998) are saying that fisher in Idaho are likely not a part of viable populations—please explain the EIS’s inconsistency with this ICBEMP science document.

Please explain what kinds of information would exist that would lead the District to conclude that there is a “trend toward listing” of the fisher. Please explain what kinds of information would exist that would lead the District to conclude that some FS action might “cause loss of viability.” This is not a mere hypothetical question. We want to avoid the situation where there would be a trend toward listing or cause loss of viability, and the public needs to be able to help the FS avoid that situation.

ON page 252 the DEIS states: “Cumulative effects would be high.” From what follows that statement, it is clear that the writer does not understand the meaning of cumulative effects—the discussion is of direct effects. Again, such confusion is prevalent in the DEIS, especially the wildlife section.

The analysis for flammulated owls is similarly confused. On page 257 the DEIS declares, “no impacts” yet this contradicts the fact that snag habitat would be reduced and “A direct impact of logging could be the loss of flammulated owl nests” (p. 255). The DEIS is lacking the kind of scientific integrity and logic that NEPA requires.

The wildlife analysis is extremely confusing in other ways. Under “Alternatives 2, 3, and 4 on p. 259 it states, “The effects outlined for Alternative 1 apply to the action alternatives...” Under Alliterative 1 it states, “The effects to flammulated owls in the Hayden analysis area apply to the Scatterwall analysis area.” The meaning of these statements is extremely vague. What part of the Hayden analysis applies to Scatterwall? Also, “The same effects to the flammulated owl outlined for the Hayden analysis area apply to Coeur d’Alene Lake North analysis with the following differences...” (p. 257). Such a convoluted analysis is difficult for the public and decision maker to follow. It is not clear that the writer even understands the effects.

For the goshawk the analysis also suffers. Austin (1993) recommends using a management area of nearly 12,000 acres in the southern Cascades. The FEIS does not state why 5 to 6 thousand acres is used for the FS’s analysis. **Please state why your home range figure is more accurate.** The DEIS concludes that the projected loss of canopy in some area would create the same impact as some alternatives’

clearcutting. And it states that goshawks like to forage in clearcuts. On page 264 the goshawk analysis starts talking about fisher.

The DEIS doesn't even commit to surveys for goshawks before project implementation, even though goshawks are known to occupy some of these areas.

The SS DEIS cannot be tiered to another project-specific EIS (p. 261). A full analysis of direct, indirect, and cumulative effects must be disclosed in the SS EIS.

It is not apparent that the DEIS identifies the FS's preferred alternative. NEPA regulations at 40 CFR § 1502.14(e) requires the FS to: "Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement..."

The DEIS fails to analyze the impacts of each of the alternatives on two of the IPNF's old growth Management Indicator Species (MIS)—the pine marten and pileated woodpecker. For MIS that may be impacted by a project, the Forest Service must discuss the Forest Plan Standards for each MIS and explain how the project activities will maintain those Standards. See Neighbors of Cuddy Mountain v. United States Forest Service, 137 F.3d 1372 [C.A.9(ID)1998]; also see Idaho Sporting Congress v. Thomas, 137 F.3d 1146 [C.A.9(ID)1998].

The DEIS does not disclose whether or not the IPNF is meeting Forest Plan old growth standard 10 (b), which requires the FS to "Maintain at least 10 percent of the forested portion of the IPNF as old growth." The DEIS does disclose that the IPNF is failing to meet standard 10(c), which states, "Select and maintain at least five percent of the forested portion of those old-growth units that have five percent or more existing old growth."

The DEIS ignores Forest Plan old growth standard 10(d), which states, "Existing old-growth stands may be harvested when there is more than 5 percent in an old-growth unit, and the Forest total is more than 10 percent." It also ignores Planning document 28, which states, "Old-growth stands one designated as such should be left alone. Thinning is detrimental to old-growth. Similarly salvaging dying trees in an old-growth stand removes a vital component of the stand."

The DEIS does not disclose whether or not the IPNF is meeting Forest Plan old growth standard 10 (f), which requires "One or more old-growth stands per old-growth unit should be 300 acres or larger. Preferences should be given to a contiguous stand; however, the stand may be subdivided into stands of 100 acres or larger if the stands are within one mile. The remaining old-growth management stands should be at least 25 acres in size. Preferred size is 80 plus acres."

Forest Plan old growth standard 10(a) requires the IPNF to use an accepted definition of old growth, which has been changed from Thomas (1979) mentioned in the Forest Plan to the North Idaho criteria. It is clear from the DEIS and the Audubon letter (discussing the FS's field trip) that much of the allocated old growth does not meet accepted criteria. The FS must allocate old growth based upon field surveys that compare the stands in question to the North Idaho definitions.

The DEIS fails to disclose that the IPNF has failed to monitor the population trends of its old growth MIS—including pine marten, pileated woodpecker, and the northern

goshawk. Forest Plan Monitoring item F-1 requires the annual monitoring of "Population trends of indicator species" and this monitoring information is to be reported every 5 years. Additionally, "Downward population trends" are the "threshold to initiate further action."

The EIS must disclose the District's methodology for maintaining viable populations of old growth species, since it lacks population monitoring information, is unable to meet forestwide and OGMU Forest Plan old growth standards.

The DEIS pays lip service to old growth values, promising to leave a specific number of snags with no solid commitments for size specifications. We know what this means for old growth "improvement" logging. Jeff Juel visited old growth "improvement" cutting unit 13 of the proposed Flat Moores timber sale, Priest Lake Ranger District (a part of the DFB Project) on February 17, 2000. 5, 1999. Some of the largest Douglas-fir trees are marked to cut. Of these trees, many looked healthy, showing no frass (sawdust sign on bark from Douglas-fir beetle attack) or pitch streamers indicative of imminent demise. Some of the large, marked Douglas-fir trees did have frass but had green, healthy-appearing crowns. And some of the largest Douglas-fir trees appearing be dead or dying were marked to be cut. **The kind of logging the IPNF promotes within old growth depletes rather than maintains old growth characteristics.**

The DFB FEIS implied that old growth would be lost due to the effects of the beetle, yet this DEIS does not project a loss in acres of old growth. This inconsistency should be addressed in the EIS.

One of the main objectives stated in the Purpose and Need is to reduce the risk of wildfire. Yet the DEIS admits that short-term risk will be increased. The DEIS fails to disclose the degree to which research has shown that logging activities will increase fire risk. The DEIS also fails to disclose that the project will do little or nothing to protect buildings and private property from wildfire risk.

The DEIS does not disclose that in several years, when the "short-term" fire risk increase has subsided, that the vegetation will have changed to the point where fire risk will have substantially changed—in many ways, increased.

The DEIS states on III-124 that clearcutting and burning "appears to be the best treatment to reduce fuel loads and reestablish seral species." If that's true, and if it is also true that reducing fuel loads and improving vegetative sustainability of the species composition is really a goal of the project, then it seems hypocritical for the FS not to be proposing an alternative to clearcut all the salvage and thinning units.

The National Forest roadless initiative means the FS must give special consideration to activities in roadless areas. The National Forest Roadless Initiative DEIS has been released, and the document includes alternatives that disallow such management activities within roadless areas. That is also the overwhelming sentiment of the public, based upon recent polling information. Until there is a decision made on the Roadless Area policy, actions that will alter the roadless characteristics such as the proposed logging must not take place.

The DEIS has no maps of roadless areas, to allow the public to see if the boundaries of inventoried roadless areas are correct. Boundaries can always be adjusted, but it is clear the FS doesn't even want to deal with this issue.

The DEIS has a heading Effects Common to All Alternatives on page 80, and then again in the same Forest Vegetation section on page III-106. This is extremely confusing.

Please provide a definition of "cost effective resource protection" (III-112).

There is no legal mandate for the FS to sell logs off national forest land. The DEIS is wrong to not include an alternative that would "promote long-term vegetative objectives" and "reduce fire risk" without a commercial timber sale like the DFB FEIS did.

Tiedemann, et. al., (2000) challenge the FS's claim to understand the concept of "historic range of conditions" and seriously calls into question the whole notion that we can, or even should, try to replicate such conditions. "Nearly 100 years of fire exclusion, possible climate changes, and past management practices may have caused these communities to cross thresholds and to reside now in different steady states." We request the FS also review Tiedemann et al. (2000) in order to improve the analyses of the proposed prescribed fire.

Figures III-5 and III-6 are fairly illegible, making it hard for anyone to understand the information presented.

Since the Forest Plan was written, there have been significant increases in the numbers of ORVs and snowmobiles in the Forest. Also, the technology has evolved such that machines can move easier, faster, and over areas not previously accessible. The cumulative impacts of those factors has never been analyzed at the Plan nor project level.

Without consistent and meaningful monitoring of this item, it is impossible for the IPNF to be able to understand the cumulative effects of ORV impacts to resources such as wildlife populations, soil productivity, and water quality. The SS DEIS purports to analyze impacts on these resources from the direct and indirect effects of the project activities, but is unable to adequately grasp the entire realm of cumulative effects including those brought on by ORVs in the Forest.

The Coeur d'Alene Ranger District's 1998 Access Management Environmental Assessment (AMEA) states that "Traditional recreation activities such as hiking, horse packing, hunting and other remote-area activities are being displaced by an increasingly mobile and motorized recreator." This sounds something like reporting for Forest Plan monitoring item D-1, but does not distinguish between ORV and other motorized travel. The relationship between the AMEA and monitoring item D-1 is unclear at best. The significance of the described conflict on recreationalists and the amount attributable to ORVs is unclear. Moreover, the AMEA's preferred Alternative would add an additional 143 miles of motorized trail. Future "reasonably foreseeable actions" include new trail construction for motorcycles and additional ATV trail systems.

The implications of increasing ORV use on the Forest include increasing the spread of noxious weeds along roads and trails. This is but another cumulative impact not analyzed in the SS DEIS.

The AMEA explicitly states that its Preferred Alternative is likely to bring wide-ranging furbearers "closer to listing under the Endangered Species Act," and that animals "unable to move great distances would either become acclimatized to the disturbance or their population numbers would be reduced." Obviously, there is serious concern about the impacts on wide-ranging furbearers of motorized and other access alone, let alone adding on the impacts of 12,019 acres of logging and fuels treatment, 18.4 miles of road reconstruction (much of it improving access on otherwise brushed in, inaccessible roads), constructing 3.9 miles of new roads, and constructing 13.4 miles of "temporary" roads in the Coeur d'Alene River District (DFB Project ROD at p. 6).

The AMEA states that existing roads have "contributed to the degradation of riparian areas and the decline in water quality." In addition, bull trout have been extirpated from the Coeur d'Alene River by logging, road building and other developments. Despite the serious need for road removal and watershed restoration, the action alternatives would open up additional miles of roads and fail to propose road obliteration or more closures.

In fact, the SS DEIS identifies several "opportunities" for watershed restoration but selection of action alternatives would not include commitments for actually doing the restoration. The DEIS does not disclose the impacts of the ongoing or potential watershed degradation which would occur if the work is not done.

Other facts from the AMEA are pointed out in comments the public made on the document. In essence, the astounding cumulative effects of ORVs—already poorly understood because of yearly increase in ORV use and because monitoring for Forest Plan item D-1 has not been adequate—will be highly exacerbated by the implementation of SS project. This would result in violations of NEPA's cumulative effects, disclosure and scientific integrity requirements as well as NFMA's management provisions.

The DEIS does not disclose which of the road segments in the affected watersheds are not currently meeting BMP standards. The DEIS does not disclose which of these road segments will still not meet BMP standards following project implementation. The DEIS does not disclose the impacts of the ongoing watershed degradation from road segments that do not and will not meet BMP standards.

The DEIS relies upon unvalidated modeling for its watershed cumulative effects analysis. Although the FS claims the models are to be used only for comparison between alternatives, it is clear the Forest Service exceeds those bounds and uses the results as if they are really quantitative estimates of predicted impacts.

Likewise with BMPs. Touted as the state-of-the art in protecting water quality and soils, their dismal failures are chronicled in the descriptions of stream conditions in areas of the IPNF that have been previously logged and roaded by the Forest Service.

If models and BMPs are as good at predicting impacts and protecting water quality and fish habitat as the Forest Service seems to believe, then please explain why so many IPNF streams fail to support viable populations of native trout.

The DEIS claims that due to the suppression of fire, most forested stands in general have a higher stocking level than occurred naturally and are dominated by Douglas-fir. However it provides no information on the numbers of Douglas-fir trees on any acre of land to support this supposition. It does not disclose any quantitative information based upon field measurements of present conditions. The conclusion that the forest is out of whack is extremely speculative, at best. The DEIS merely parrots the conclusions of the ICBEMP process, and like that process it isn't based upon information gathered in this specific area.

The DEIS omits site-specific information which would confirm or validate the vague assumptions made about overly dense tree stands, and the "desired future conditions" concept. There is no site-specific data on the historical range of conditions in any of the Analysis Area, nor is there site-specific data on the present conditions of any Analysis Area to show it does not sufficiently meet "desired future conditions" already.

Vegetative conditions analyses, of course, are based upon the level of understanding of the dynamics of forests down through the ages. Two problems thus emerge. First, the FS has very little data on this subject, and usually relies upon single snapshots in time. This single snapshot then becomes the target condition (i.e., "desired future conditions") which ignores the vast range of potential conditions. Using a single snapshot in time or just the mean does not represent a true range of conditions that could conceivably be considered essentially normal. It is important to understand that, scientifically speaking, "normal" is defined as a range of measures of a natural variable—it cannot be represented by a single number measuring a natural variable. Figures such as III-1 and III-2 are thus essentially meaningless, when single numbers—such as the mean—are given when the concept of the "normal range" would be far more meaningful.

We incorporate the Ecology Center's January 25, 2000 letter to the Forest Supervisor, which the Coeur d'Alene River District Ranger received a copy, as comments on this DEIS. Please place a copy of that letter in the Project File as responsive to your request for comments on the DEIS. The contents of the letter are based upon many years of experience in the public involvement process on the Coeur d'Alene River Ranger District, the IPNF and the national forests of the region as a whole. We also incorporate the Kootenai Environmental Alliance's comments on the Small Sales DEIS within our comments on the Small Sales DEIS.

Thank you for considering these comments. Please keep each group on the list to receive all future communications regarding this proposal.

Sincerely,



Jeff Juel

and on behalf of:

Mike Petersen  
The Lands Council  
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Spokane, WA 99202  
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Mike Wood  
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Literature cited

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Lofroth, E.C., 1997. Northern wolverine project: wolverine ecology in logged and unlogged plateau and foothill landscapes. Wildlife Branch, Victoria, British Columbia, May 7, 1997.

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USDA, Forest Service. 1993. Wolverine habitat guidelines for the Malheur National Forest. Prepared by Richard Haines, Malheur National Forest; Reviewed by Robert Naney, USFS Region 6, June 1993.

Witmer, Gary W.; Martin, Sandra K.; Sayler, Rodney D. 1998. Forest Carnivore Conservation and Management in the Interior Columbia Basin: Issues and Environmental Correlates. Gen. Tech. Rep. PNW-GTR-420. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 51 p. (Quigley, Thomas M., ed.; Interior Columbia Basin Ecosystem Management Project: scientific assessment).



*Kootenai Environmental Alliance*

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Susan Jeheber-Matthews  
District Ranger  
Coeur d'Alene River Ranger District  
Fernan Office  
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Coeur d'Alene, ID 83814

May 12, 2000

CERTIFIED

Ob  
Rec'd 5-15-2000

Dear Ms. Jeheber-Matthews:

The following issues are of concern in the Small Sales Draft EIS.

1. Old Growth: Pages 31 and 32 of Chapter II indicates that the proposed Alt's 2 & 3 would log 159 acres of old growth. It is also indicated on these pages that an amendment to the Forest Plan would be required if the logging of old growth were to take place. The Forest Plan standard requires retaining 5 percent existing old growth in an O.G. Unit.

Enclosed is a copy of a letter from Liz Sedler, dated Sept 24, 1991 to Peg Bachman of the Fernan R.D., attachment #1. The letter expresses concerns over the issue of the actual number of acres of true old growth that existed on what was formerly the Fernan District. The DEIS did not address the issue of whether there is in fact at least 18,000 acres of true old growth on the former Fernan District.

There is also the question as to whether certain areas that have trees that are classified as old growth, do in fact contain trees that meet the current definition of old growth. This would particular apply to the 65 acres listed as field verified Allocated old growth, and 107 acres of photo identified Allocated old growth in the Canfield Face/Fernan Creek area, Appendix D. An on the ground inspection of a portion of the Canfield Face area shows that it is high questionable whether there are in fact 65 acres of true old growth in this area.

It is not clear in the DEIS what portion of the 107 acres that are classified as photo identified are in the Canfield Face area, and what portion are in the Fernan Creek area.

The Final EIS needs to state whether the 65 acres of field verified old growth are in fact true old growth; indicate whether the 107 acres of photo identified old growth are true old growth,

and indicate the number of acres of photo identified old growth that are in each area.

The table in Appendix D lists 14,219 acres that have been field verified and meet minimum criteria for Old Growth. The table lists another 2,734 acres of allocated old growth that has been photo identified.

Enclosed as Attachment #2 is a copy of a letter from then District Ranger Steve Williams, Wallace R.D., to Liz Sedler. The letter indicates that 39,466 acres on the former Wallace R.D. had been allocated to old growth.

There should be a combined total of actual old growth on the Coeur d'Alene River R.D. of at least 57,446 acres. The Final EIS needs to indicate whether the current TSMRS data indicates there is at least 57,446 acres of actual old growth on the Coeur d'Alene River R.D. The Final EIS also needs to indicate whether there is at least 18,000 acres within the boundaries of the former Fernan R.D.

If the total is less than 57,446 acres, the old growth section in the FEIS should contain an extended discussion of the reasons why current actual old growth is less than 57,446 acres on the entire District.

The Final EIS also needs to supply data from the TSMRS that will indicate if Alt's 2 or 3 would log any stands of trees that contain old growth characteristics in any of the Analysis Areas.

The Final EIS also needs to supply data from the TSMRS that will indicate the total number of acres that have been logged between calendar years 1991 and 1999, from both District's, where the logging has removed trees with a basal area > 14".

## 2. Water Quality/Fisheries:

2A. Page 143 of Chapter III discusses the WATBAL Technical User Guide regarding hydrological regime and on page 145 regarding erosion and sediment. On page 15 of the 1989 WATBAL Technical User guide there is a discussion of sediment routing. It is stated "Once the sediment from any source has reached the live-water system, it must be transported through the system to the point of interest. This is a routing process. WATBAL uses a primitive equation based on a function of the area of the watershed to perform this function. It is recognized that this lack of accurate stream routing and insufficient recognition of stream dynamics is the weakest and as a critical element must be given top priority in future developments."

The DEIS in Chapter III does not address this issue of lack of accuracy regarding stream routing and insufficient recognition of stream dynamics in relation to Sediment Routing. There is also no discussion on pages 143, 144, and 145 regarding the WATSED model and the degree of accuracy that exists regarding stream routing and stream dynamics related to Sediment Routing with WATSED, that

we were able to observe.

If there is a specific page number(s) in the current WATSED manual that clearly indicates a high degree of scientific accuracy for stream routing with a high level of recognition of stream dynamics, the Final EIS needs to supply the page number(s).

The DEIS also in Chapter III does not indicate the year when either the WATBAL model or WATSED model was first used for the timber sales that took place in and adjacent to each of the Cumulative Effects Analysis Areas. The year in which either one of the Models was first used is a critical component of NEPA's requirement at 1500.1(b) regarding accurate scientific analysis, high quality information, and expert agency comments. The use of either Model and associated expert professional judgement is directly related to the current NPF and FAR watersheds, pages 140 and 141 of Chapter III.

There also is the issue of the size of each of the watersheds described in Chapter III and the WATBAL and WATSED models. We were unable to locate in Chapter III a discussion of the minimum size in acres of a watershed that can be analyzed by each model. The Final EIS must indicate the minimum number of acres in a watershed that can be modeled by the WATBAL model and by the WATSED model.

Page 143 discusses estimated peak flow and cubic feet per second per square mile of drainage area, and WATBAL. Pages 143, 144, and 145 mention WATSED in relation to watershed hydrologic responses estimates. There is no discussion as to the minimum size of a watershed that can be modeled by WATSED, on pages 143, 144, and 145, or page 151 of the DEIS.

The Final EIS needs to state whether there were any watersheds or subwatersheds in any of the Analysis Areas that could not be modeled due to size of the watershed or subwatershed.

The Final EIS also needs to clarify which model was used to estimate peak flow. Page 143, under Hydrological Regime, implies that the WATBAL model was used to estimate peak flows. Page 151 under Peak Flow, states "The WATSED model also was used for this analysis to estimate the effects....." If both Models were used to estimate peak flow, the Final EIS must state the reasons why both model were used.

2B. There are a number of issues relating to bedload and bedload movement within the Analysis Areas. These issues are not adequately addressed or analyzed in Chapter III of the DEIS. Chapter III does not provide high quality data that indicate the amount of bedload movement occurring in the streams within each Analysis Area.

The following statements are taken from part II of the EPA document "Monitoring Guidelines to Evaluate Effects of Forestry Activities on Streams in the Pacific Northwest and Alaska",

MacDonald, Lee H, et al, EPA 910/9-91-001. From page 105 of Chapter 4 "Large amounts of easily transported bedload tend to fill in pools and reduce the larger-scale features that are important sources of fish habitat". Also from page 105 "The type and amount of bedload is very important in determining the amount of microhabitat available for juvenile fish and macroinvertebrates (Section 5.6.1). In general, coarser material provides more habitat space, whereas fine sediments tend to fill up the interstitial spaces between larger particles." From page 119 of Chapter 5 "The frequency of bedload transport is of critical importance for fish spawning and the other organisms utilizing the stream bottom for cover, foraging, or as a substrate."

The following statements are taken from the 1993 Prichard Creek Final EIS, Wallace Ranger District. On page 38 of Chapter III there is the following sentences "Excess bedload movement is believed to be the major factor limiting fish habitat on the Wallace Ranger District. Excess bedload movement is related to an imbalance between the supply of water and sediment." On page 27 of Chapter III the following statements are made "Excessive bedload can fill stream pools necessary for salmonid spawning and rearing habitat, and is often detrimental to other cold water biota. Therefore, excessive bedload in the stream system is an alteration of the physical properties of the water of the state (IDAPA, Water Quality Standards and Wastewater Treatment Requirements, 1992)."

The 1992 Skookum EA, Fernan Ranger District, had the following sentence on page 28 of Chapter III. "Excess bedload movement is believed to be the major limiting factor in fish habitat on the Fernan Ranger District."

The Final EIS must supply accurate high quality analysis and data regarding actual and projected bedload movement in the streams within the Analysis Areas, under Alt's 2, 3, or 4. This would include "the frequency of bedload transport" as described in the EPA document cited earlier.

2C. Regarding the discussion of stream temperature on pages 147 and 150 of Chapter III, the State of Idaho has certain requirements regarding stream temperatures. In IDAPA 16.01.02, Section 250 Surface Water Quality Criteria for Aquatic Life, page 101 under Cold Water, there is the following sentence "Waters designated for cold water aquatic life are to exhibit the following characteristics:

b. water temperatures of twenty-two (22) degrees C or less with a maximum daily average of no greater than nineteen (19) degrees C."

Page 102 under e. "Salmonid spawning: waters designated for salmonid spawning are to exhibit the following characteristics during the spawning period and incubation for the particular species inhabiting those waters:

ii. Water temperatures of thirteen (13) degrees C or less with a

maximum daily average no greater than nine degrees (9) degrees C."

Also on page 102 parts f and i list temperature requirements concerning bull trout. Page 103 under Seasonal Cold Water at b. "Water temperatures of twenty-seven (27) degrees C or less as a daily maximum with a daily average of no greater than twenty-four (24) degrees C."

The DEIS on pages 147 and 150 did not mention these requirements. Pages 216 and 217 of the DEIS, concerning Westslope Cutthroat trout do not have data that indicate the State temperature requirements are currently being met and there is no data that shows the State temperature requirements would be met under the logging proposed in Alternatives 2, 3, or 4.

Concerning Bull Trout, it is not clear on page 218 of the DEIS regarding water temperatures for bull trout, whether each of the 5 streams mentioned fully meet the temperature requirements listed on page 102 of IDAPA, at f and i. The Final EIS should include a discussion of the State temperature requirements for bull trout tributary waters, and also indicate if the State temperature requirements will be fully met with Alternatives 2, 3, or 4.

The expected cumulative effects to water temperature in the streams in each Analysis Area, from the ongoing and planned Bark Beetle timber sales and the logging proposed in Alternatives 2, 3, or 4, and State water temperature requirements need to be fully described in the Final EIS.

The Final EIS also needs to state the procedures that will be used by the Forest Service to measure the water temperatures in the streams where logging is being proposed, and the months when the temperatures will be recorded.

2D. There is also the issue of State requirements concerning: Dissolved Oxygen Concentrations in Cold Water; Dissolved Oxygen and Intergravel Dissolved Oxygen concerning salmonid spawning waters, and Dissolved Oxygen Concentrations for Seasonal Cold Water, pages 101, 102, and 103 of Section 250, IDAPA 16.01.02. The DEIS in Chapter III does not list the State requirements regarding Dissolved Oxygen. It is not clear that each of the State requirements are currently being met in any or all of the 16 groups of watersheds mentioned on page 211 of the DEIS. Due to the currently degraded fisheries conditions in each of the Analysis Areas, it is also not clear if the proposed logging will negatively affect dissolved oxygen Concentrations in the streams within each Analysis Area.

The Final EIS needs to supply analysis of these State requirements in relation to the streams where the proposed logging would take place.

The Final EIS also needs to indicate if there will be any

cumulative effects from adjacent DFB Bark Beetle timber sales and the proposed timber sales that will negatively impacted dissolved oxygen concentrations, and Intergravel Dissolved Oxygen, especially in the salmonid spawning waters within the Analysis Areas.

### 3. Monitoring/Evaluation:

Page 43 discusses monitoring and evaluation of Forest activities and the Forest Plan. It is stated on page 43 "For activities related to the Small Sales project, all alternatives would comply with specific monitoring requirements identified by the Forest Plan (Forest Plan, Chapter IV)."

There is a 21 page Overview of the Forest Plan, dated September 1987 that includes a discussion of Monitoring and Evaluation. Page 21 of the Overview, under Monitoring and Evaluation, includes the following sentences "During evaluation, data provided through the monitoring effort will be analyzed. This will provide annual and periodic data necessary to determine if implementation is within the bounds of the Plan. Recognizing the interest in monitoring and evaluation, the Forest will keep the public and other agencies informed and aware of monitoring information and the results of evaluation."

Also on page 21 under the Monitoring section there is the following sentence "The basic questions being addressed are: Did we do what we said we were going to do?", "Is the activity doing what we wanted it to do?", and "Is there a better way to meet forest planning objectives?." The 21 page Overview document was signed by then Forest Supervisor William Morden.

There is also the Forest Plan Amendment No. 1 Decision Memo, dated September 8, 1989, that concerns Monitoring and Evaluation. The Decision Memo was also signed by Forest Supervisor Morden.

Amendment No. 1 under n. water includes the following sentence "Water quality that is below Forest standards will be improved through restoration projects (see soil objective) and through the scheduling of timber harvest and road building activities where appropriate."

Appendix JJ, the IPNF Water Quality Monitoring Program is included as part of Amendment No. 1. On the first page of Appendix JJ, in discussing Monitoring activities it is stated "However, in no case will the objectives and accuracy of the water quality monitoring plan be compromised."

The 3rd page of Appendix JJ under Effectiveness Monitoring has the following sentence "Both on-site and off-site methods together constitute monitoring that evaluates and documents the effectiveness of Forest/project plan standards and guidelines, and specialized BMP's identified in project plans."

On page 4 under B. Off-Site there is the following sentence "Effectiveness monitoring results will be interpreted in terms of Idaho State water quality standards and Forest/project plan standards and objectives."

It is clear that the 1987 Forest Plan and the 1989 Forest Plan Amendment No. 1 required not only Monitoring but also Evaluation of the Monitoring data.

The Final EIS must indicate if there is Forest Service monitoring data with accompanying written evaluations, of the monitoring that has been performed for each of the following timber sales. These timber sales have taken place within or are adjacent to each of the Cumulative Effects Analysis Area boundaries.

The Final EIS must also indicate which Evaluation report(s) contain analysis and data that show measureable improvements to water quality and fisheries habitat, including pool depth, due to activities associated with the following timber sales.

- A. Hayden Lake Area: Deersham t.s., sold 1987, 13 MMBF
- B. Canfield Area: Yellow Stacel t.s., sold 1988, 8 MMBF
- C. Fernan Creek: Junglebreey t.s., sold 1989, 8 MMBF
- D. Blue Creek: Jungleberry t.s., sold 1989, 8 MMBF
- E. Thompson Creek: Carrill t.s., closed 1991, 8 MMBF
- F. East Rutherford: Horizon t.s., sold 1992, 30 MMBF
- G. Cedar Creek: Cedar Creek t.s., closed 1991, 9 MMBF
- H. Fourth of July Creek: Mason t.s., closed 1989, 8 MMBF.
- Rantenan t.s., sold 1989, 9 MMBF. Crinkle Cut t.s., sold 1992, 7 MMBF, Mill Rose Curran t.s., sold 1992, 7 MMBF
- I. Cataldo Face:
- J. Prado Creek: Prado t.s., sold 1991, 10 MMBF
- K. Cougar Creek: 4H t.s. 16 MMBF, Bumblebee t.s., closed 1991, 13 MMBF
- L. Lower Little North Fork: Brown Owl t.s., closed 1991, 17 MMBF, TeBreak t.s., closed 1989, 17 MMBF. Breakwater t.s., sold 1988, 8 MMBF, Murray t.s., sold 1988, 12 MMBF
- M. Beaver Creek: Beaver Copter t.s., 10 MMBF
- N. Prichard Creek: Prichard Peak t.s., closed 1991, 14 MMBF. Nocelly t.s.
- O. Shoshone Creek: Dry Ferguson t.s. closed 1988, 15 MMBF
- P. Downey Creek: Golden Canine t.s., closed 1992, 7 MMBF
- Q. Callis Creek:
- S. Studer Creek: Studer Lightner t.s.
- T. White & Potosi Area: Upper White t.s., sold 1990, 5 MMBF. Alder Kid t.s., sold 1989, 8 MMBF. Unknown Pony t.s., 9 MMBF, and Lower White t.s., 6 MMBF,

The Final EIS also needs to indicate if there have been additional timber sales since 1987 in each of the Analysis Areas that have Monitoring data and written Evaluations of the effects to fisheries habitat from these timber sales.

As has been pointed out in the DEIS in Chapter III- Watershed Resources, pages 155 - 210, nearly every watershed in every Analysis Area is either classified as NPF or FAR. The NPF and FAR watersheds do not meet the requirements of Amendment No. 1 of the

IPNF Forest Plan at n. Water, regarding water quality that is below Forest standards. The Amendment is over 11 years old and the water quality in the watersheds are still below the 1987 Forest standards. The DEIS does not contain expert Agency comments, as required by NEPA, that explain why in spite of the Monitoring and Evaluation requirements contained in the Forest Plan, there are still so many damaged watersheds in the Analysis Areas. Evidence has not been presented in the DEIS that shows the Forest Plan Water Quality Monitoring Program requirement "... in no case will the objectives and accuracy of the water quality monitoring plan be compromised" has in fact been met in the past or will be met with the proposed timber sales.

Monitoring of past timber sales has been confined to large 4th and 5th order drainages. The lack of monitoring in 1st, 2nd, and 3rd order drainages has resulted in misleading findings in the DEIS that there will be no impacts to NPF and FAR watersheds in the Analysis Areas.

The Decision Memo for Amendment No.1 also stated "The amendment is needed to bring the Forest Plan into compliance with the Water Quality Act of 1987 and Idaho nonpoint source water quality requirements."

Page 1 of Appendix JJ contains the following sentence " Mandates for monitoring come from the National Forest Management Act, the Clean Water Act, and State of Idaho water quality laws and regulation."

Monitoring and Evaluations of past timber sales in each of the Analysis Areas did not improve or protect water quality in streams in the Analysis Areas. The degraded fisheries and degraded water quality in the streams classified as NPF and FAR is a violation of the CWA and the Forest Plan.

#### 4. Road construction/reconstruction:

The DEIS on page 28 of Chapter II discusses road construction in relation to the Forest Plan. Page 34 indicates that all road construction would be completed using State BMP's. Page 140, Chapter III discusses the failure of roads, road fills, and landings that are in close proximity to streams. Page 145 indicates that one of the primary disturbance factors to watershed response is related to roads that encroach on stream channels or floodplains. Page 147 of Chapter III states that an extensive road network was constructed in the 1960's throughout the analysis area.

The NFMA, P.L. 94-588 dated October 22, 1976 has specific requirements for logging and road construction on the National Forests. From Sec 6(g)(3)(E) "..... insure that timber will be harvested from National Forest System lands on where--  
(i) soil, slope, or other watershed conditions will not be irreversibly damaged;

(iii) protection is provided for streams, streambanks, shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat."

Road construction is also discussed in the following USDA Forest Service publication "Forest Hydrology, Hydrologic Effects of Vegetation Manipulation", part II, Haupt, H.F., et al, 1976. Section 4 of the publication has a discussion that concerns protection of fish habitat and road construction on National Forest lands. Among the references cited are the following: "Criteria for designing and locating logging roads to control sediment", Packer, Paul E., Forest Science, 13(1) 2-18-(1957). Another reference is "Guides for controlling sediment from secondary logging roads", Christenson, G.F., Intermountain Forest and Range Experimental Station, Northern Region Handbook, U.S. Forest Service, Region 4 (1964). There are also 3 references cited that have a publication date of 1970. These references all address the issue of Forest roads, roadbuilding and sediment production.

A literature search of Forest Service documents and University research documents related to road construction that have been published between the years 1957 and 1987 would probably amount to a number substantially in excess of 50. There is no discussion in Chapters II or III of the DEIS that explain why road construction that damaged watersheds and fisheries in the Analysis Areas occurred when there has been Forest Service road construction research that extends back to at least 1957. The Final EIS needs to supply expert agency comments with accurate scientific analysis, as required by NEPA, that explain the reasons Forest Service roads were constructed that damaged the watersheds and fisheries in the Analysis Areas.

Chapter III of the DEIS also does not mention nor discuss the road building that took place between the years 1986 and 1996 in the North Fork Coeur d'Alene River drainage, Coeur d'Alene National Forest. We wish to enter into the record the following Forest Service data that was released in 1996. On the former Fernan R.D., between the years 1986 and 1996, 72 miles of new roads were constructed and 153 miles were reconstructed. On the former Wallace R.D., between the years 1986 and 1996, 181 miles of new roads were constructed and 192 miles were reconstructed. This amounts to 253 miles of new road construction, and 345 miles of roads that were reconstructed after 1986.

Have there been any negative effects to the watersheds and fisheries in each of the Analysis Areas from road construction and reconstruction that took place after 1976?

If there has been, have these effects from the new road

construction and reconstruction that took place after 1976, when NFMA became law, damaged one or more watersheds and fisheries? If there are, these effects are not mentioned or described specifically in the DEIS.

If there are Forest Service documents with analysis and data that indicate roads constructed and reconstructed before 1976 are solely responsible for the damaged watersheds and fisheries, the Final EIS must supply the findings and supporting data.

Data should also be supplied in the Final EIS that will indicate the miles of roads constructed and miles of road reconstructed between the years 1960 and 1976, and between the years 1977 and 1985, in the Coeur d'Alene River drainage, if this data exists.

The new road construction that took place after 1985 in the North Fork Coeur d'Alene River drainage included: 18.53 miles for Brown Owl t.s., 10.74 miles for the Bumblebee t.s., 3.7 miles for Prado t.s., 11.57 miles for the TeBreak t.s., 4.99 miles for the Murray t.s., 10.43 miles for the 4H t.s., 2.52 for the Alder Kid t.s., 2.76 miles for the Dudley t.s., 3.1 miles for the Lower White t.s., and 14.78 miles for the Unknown Pony t.s.

The Final EIS needs to indicate whether Forest Service data exists that shows the number of miles of new road construction and reconstruction that took place from the following timber sales: Mason, Rantenan, Crinkle Cut, Millrose-Curran, and Horizon Sun.

#### 5. Timber sales:

The DEIS on page 65 of Chapter III contains table 3-7 which indicates there has been 0 acres clearcut in the 556 acre East Rutherford analysis area. There is no explanation on page 65 as to why the Horizon timber sale units that are adjacent to analysis area were not counted.

Page 66 of Chapter III, table 3-8 lists 23 acres of past clearcuts in Cedar Creek analysis area. Did the 9 MMBF Cedar Creek t.s. of 1979, clearcut only 23 acres?

Page 69 of Chapter III, table 3-11 lists 25 acres of past clearcuts for the Prado Creek analysis area. Our information shows that there were at least 14 clearcut units in the Prado t.s., with 281 acres being clearcut with reserves from the 10 MMBF t.s..

Page 70 of Chapter III, table 3-12 lists 32 acres of past clearcuts in the Cougar analysis area, which is listed as 1,313 acres. Page 186 of Chapter III lists the size of the Cougar Creek watershed as 19.3 sq miles, or 12,352 acres. Have there in fact been only 32 acres clearcut in this watershed?

Page 71 of Chapter III, table 3-13 lists 1,464 acres of past clearcuts in the LLNF analysis area. Our data lists 1,887 acres being clearcut from the following timber sales: Brown Owl, 439 acres cc, Breakwater 345 acres cc, Murray 498 acres cc, and Tebreak 605 acres cc.

Page 74 of Chapter III, table 3-15 lists 102 acres of past clearcuts in the Prichard Creek analysis area. Page 197 of Chapter III lists the size of the Prichard Creek watershed as a 97.7 acre watershed. We believe it should read 97.7 sq miles or 62,528 acres. We do not believe the figure of 102 acres of past clearcuts is accurate for this watershed.

Page 75 of Chapter III, table 3-16 lists 143 acres of past clearcuts in the Shoshone Creek analysis area, which is stated to be 1,169 acres. Page 200 of Chapter III lists the size of the watershed as 69.3 sq miles or 44,352 acres. We do not believe the figure of 143 acres of past clearcuts is accurate for this watershed.

Page 76 of Chapter III, table 3-17 lists 73 acres of past clearcuts in the Downey Creek analysis area. Page 204 of Chapter III lists the size of the Downey Creek watershed as 9.5 sq miles or 6,080 acres. The figure of 73 acres of past clearcuts is inaccurate for this watershed, as Compartment 138, Yellowdog, has had over 4,300 acres clearcut.

The Final EIS needs to supply accurate high quality data for the current number of acres that have been clearcut in each of the watersheds listed from pages 60 to 78. The boundaries of the Analysis Areas described on pages 60 thru 78 of the DEIS have been arbitrarily drawn up and do not accurately account for the past logging that is within a true cumulative effects analysis area.

The Analysis Areas boundaries currently listed on pages 60 through 78 of Chapter III need to be revised in order to fully meet the requirements for cumulative impact, NEPA at 1508.7, and effects, and both direct and indirect, NEPA at 1508.8.

7. Lack of site specific data/Significance:

The DEIS does not address the issue of locating new logging units adjacent logging units from previous timber sales.

The DEIS Analysis Area maps do not inform the public of the locations and the size of logging units that are adjacent to or near to the proposed logging units.

The DEIS in Chapter III, pages 79 thru 109 lacks site specific analysis and data that would indicate the locations of current regeneration logging units, and the size of each of the units that are within 100 yards of proposed logging units.

The DEIS lacks site specific analysis and data that would indicate the locations of current regeneration logging units that

are within 1/2 mile of proposed logging units.

There are a number of Analysis Areas that have had intensive logging but there is no discussion of, or analysis of the impacts to water quality and fisheries from new logging units being placed adjacent to current regeneration units. These Areas include: East Rutherford, Cedar Creek, Prichard, Gimlet, Owl, Little Tepee, Cataldo Face, Fourth of July, Downey, Shoshone, Cougar, Prado, Studer, White and Potosi. NEPA at 1500.1(b) requires information be made available to the public before decisions are made and before actions are taken.

NEPA at 1508.27 (a) & (b) also addresses the issue of Significantly. 1508.27 (b) at (7) includes the sentence "Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment." There are significant water and fisheries issues associated with the placement of new logging units adjacent to regeneration units already present, including clearcut units.

The Final EIS needs to indicate whether Alt's 2, 3, or 4 would locate new logging units in any of the Analysis Areas that would be adjacent to current logging units.

The Final EIS also needs to provide an analysis of expected impacts to the environment in each Analysis Areas where new logging units would be adjacent to current logging units.

#### 8. Insects:

Page 106 of Chapter III states that there is a current bark beetle epidemic on National Forest System lands. No data is supplied in the DEIS from Forest Service research publications that state how many acres in a 701,000 acre Forest are required in order to be classified as an epidemic. There is also no discussion in the DEIS of the fact that the Forest Service has known for over 40 years of the relationship and interactions between the Douglas fir beetle and Douglas-fir(DF) trees. Forest Service entomologists Furniss and Carolin in their book "Western Forest Insects" stated on page 4 "The most ambitious effort to identify and estimate insect-caused losses in the Western United States was in 1952 (USDA Forest Service 1958)." [R. L. Furniss, V.M Carolin, retired, Pacific Northwest Forest and Range Experiment Station, Misc publication No. 1339, Nov 1977, February 1980 with corrections, USDA Forest Service]

In spite of the knowledge gained over 40 years ago by Forest Service entomologists, the Forest Service continued to plant DF trees across thousands of acres of the Coeur d'Alene National Forest. The Purpose and Need, page 1, does not provide expert agency comment as why this happened and the Vegetation section of Chapter III also does not provide expert agency comment why the planting of DF continued through 1998.

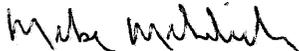
9. Road Maintenance:

Page 28 of Chapter II has a section devoted to Transportation Planning. It is indicated that 102 miles of roads, both system and nonsystem, would be required to yard and haul timber. There is no information on page 28 that indicates whether the system roads planned to be used are now receiving regular road maintenance, including regular culvert inspections.

Page 28 does not indicate if the non system roads planned to be used are completely brushed in, and if there are any plugged culverts on the nonsystem roads. We were unable to locate anywhere in Chapter III a detailed discussion of road maintenance issues and the requirements of Idaho Administrative Rules IDAPA 20.15 Department of Lands, Rules and Regulations Pertaining to the Idaho Forest Practices Act, Title 38, Chapter 13, Idaho Code. Rule 4d has a number of specific requirements that apply to the Forest Service regarding active and inactive roads. The lack of detailed information in the DEIS concerning road maintenance issues does not meet NEPA requirements for an explanation of missing or unavailable information.

A watershed restoration Alternative should have been selected as the proposed action. The DEIS completely ignored the watershed restoration programs associated with the Clean Water Action Plan and the federal funds that have been allocated for the highest priority watersheds in need of restoration.

Sincerely,



Mike Mihelich

Forestry Committee

enclosures: Attachments 1 & 2

# 1

Sept. 24, 1991

Liz Sedler  
Audubon Society  
PO Box 1203  
Sandpoint, ID 83864

Peg Bachman  
Fernan Ranger District  
2502 East Sherman Ave.  
Coeur d'Alene, ID 83814

Dear Peg,

It appears that we are still at an impasse in regards to the old Growth allocation on Fernan. At our meeting on July 11 you indicated (correct me if I'm wrong) that you are satisfied with the information that you and your staff have gathered regarding the inventory and that you agree with the inclusion of many acres of "EA" old growth (OG) in the allocation, in spite of the fact that most of it does not meet Draft Minimum Criteria (DMC). We (Audubon) feel the information is incomplete, as presented, and that the designation of thousands of acres of non-OG in the allocation is inappropriate.

I think that our differences are based on a disagreement regarding the purpose of the OG inventory and allocation. The original purpose of the allocation was to determine whether the IPNF could meet the 10% OG requirements of the Forest Plan. The inventories that were completed on the districts were a rough estimate of existing OG. The allocations assigned to districts were based loosely on those rough estimates. In the course of the allocation process the districts are taking a second closer look at the inventory to determine which stands meet the priorities for designation as well as starting to accumulate field data on questionable stands.

It is entirely possible that Fernan does not have 18,000 acres of "real" or viable OG. The first priority for allocation should be to determine where the real OG stands that are viable are located and designate them. The DMC is a tool to be used for the purpose of initial separation of candidate OG from non-OG in stands that have been examined. It has many flaws, among which is that the DMC queries failed to produce all the stands that meet the DMC and field checking has shown that stands that the queries produced are not necessarily real OG, as you are no doubt aware. However, it is the chosen method at this time and in order to keep some semblance of similarity on the Forest re OG allocation, the stands that apparently meet the DMC (unless or until field-checking indicates that they are not OG) should be first priority in the allocation.

I suggest that <sup>you</sup> start by identifying DMC stands, separating them from the EA OG. The purpose of the zero age query is to eliminate the possibility of missing some DMC due to unreliable ages due to averaging of plot age information. That query has been used on other districts in conjunction with information from original

stand file folders to find more candidate OG stands. Given the unavailability of stand file folders on the Fernan district, other data that is available will have to be accessed. One possibility, a procedure used by Henry Logsdon in Wallace, is to query REDIT for Tables 1 and 4, Option 3. Table 1 gives diameters of 2" to 25" by species and stocking by tree status. Table 4 gives mean DBH, actual age, height, etc. by species. Combined, the two tables offer detailed information unavailable in the DMC query or Form 23 of the Stand History Master List that can be used in conjunction with and in addition to the Zero age query results to identify stands that meet the DMC. Henry combined the information from Tables 1 and 4 with Form 21, modified to give only Stand Id., Acres, Habitat Type and Elevation to overcome the data base problems with older (pre '81) stand information, as I understand it. I'm sure Henry is available for consultation on how he accomplished these queries and how they subsequently applied them to the inventory process.

Stands that have no information in the data base but look promising on the aerials and meet the viability criteria should also be included pending field-checking.

The steps that need to be accomplished, as outlined in Suzanne's Aug. 10 letter to Don Bright, are essential in arriving at an accurate estimate of how much OG there is on Fernan and selecting stands for the allocation so that it will reflect the best available information and therefore be representative of the OG that is out there.

Enclosed please find a copy of a letter from Anna E. Hammet from the Sandpoint RD describing their approach to the OG selection process. They also generated lists of OG acres in the allocation by Forest Type and Management Areas, Forest Type and Habitat Type, and acres of each Survey Type (A1,2,3, B1, etc.) for each OG Unit.

I hope this letter and the enclosed helps you better understand our position and the level of information that we feel is essential to achieve a meaningful OG allocation.

Best Regards,



Liz Sedler

cc: Suzanne Hempleman  
Brad Gilbert  
Scott Reed

# 2

United States  
Department of  
Agriculture

Forest  
Service

Wallace  
Ranger District

Box 14  
Silverton, ID 83867

REPLY TO: 2400

DATE: November 23, 1993

SUBJECT: Old Growth Allocation

TO: Liz Sedler  
Audubon Society  
PO Box 1203  
Sandpoint, ID 83864

Dear Liz,

This field season the District completed stand exams on allocated old growth previously identified through photo interpretation. We also field-checked some stands for which we questioned the available information. Based on the results of the field exams, more detailed examination of conditions through the NEPA process, and the ongoing updating of the data base (e.g. better delineation of stands), we have made minor adjustments to the allocated old growth acres on the District.

Examined stands which did not meet criteria for old growth were dropped from the allocated acres. However, some stands which fell slightly short of meeting all criteria (e.g. no more than 5 years) were kept in order to maintain large blocks or important linkages. In some cases, stands meeting all criteria but previously not allocated were added. All changes are consistent with Forest direction, your input, and our objectives for old growth management.

The District has been allocated 38,000 acres to comply with Forest Plan old growth standards. To meet the intent of Forest Plan standards (e.g. large blocks, linkages, distribution) and Ecosystem Management, we have identified 39,466 acres which at this time will be allocated to old growth on the District. These acres have all been examined and found to meet the criteria for old growth as defined by the North Idaho Old Growth Committee (with a few exceptions as noted above) and all other Forest Plan standards for old growth management. In our judgment, these acres represent the highest quality old growth across the District.

Your input and perspective which has benefitted us, is reflected in the outcome of the allocated acres on the District. As a part of the next step in implementing the Forest old growth standards we are requesting that you provide us with an acknowledgement of your agreement with the Wallace Ranger District's allocated old growth.

Liz Sedler

If you have any questions or wish additional information, contact me at 752-1221. Once again, thanks for your assistance in resolving this issue on the District.

Sincerely,



STEVE E. WILLIAMS  
District Ranger



#06

Rec'd 2-12-01

*Kootenai Environmental Alliance*

P.O. Box 1598 Coeur d'Alene, ID 83816-1598

Bob Rehnborg  
Coeur d'Alene River Ranger District  
Fernan Office  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814

Feb 9, 2001

Dear Mr. Rehnborg:

The following comments are in regards to the Legal Notice description of the Revised Small Sales FEIS and cumulative effects analysis.

Page 38 of the DEIS had the following sentence in the Watershed/Fisheries section. "The cumulative effects from management activities most likely would not be discernible at this scale for increases in peak flows or sediment over what would occur under the No-Action Alternative".

The Revised FEIS should supply analysis with data regarding historical peak flows and flow volumes in each of the watersheds where logging is being proposed in relation to the following information.

A. Attachment #1 is an IPNF letter, dated Nov 17, 2000 in response to a KEA letter that concerned gauging stations located on the Coeur d'Alene NF. The letter indicated the operational history for 8 Creeks, and the letter also indicated that the IPNF does not have any record of gauging stations on the mainstem of the Little NF Coeur d'Alene River. It appears that for the 8 Creeks the operational history of gauging stations has been limited.

The Revised FEIS should indicate if the following watersheds mentioned in of Chapter 3 of the DEIS are now equipped or were at one time equipped with either a staff gauge or a full-time water level recorder. Hayden Lake, Fernan Lake, Wolf Lodge Creek, Cedar Creek, Thompson Creek, Fourth of July Creek, Cougar Creek, Prado Creek, Beaver Creek, Downey Creek, and Trail Creek.

Concerning the 24.9 sq mile Lower Little North Fork watershed, if any Creek listed on page 189, other than Bumblebee, has not had any gauging station equipment installed and therefore there is no historical or current flow volume data available, this information should be included in the Revised FEIS.

For the watersheds that have had gauging station equipment installed, the year the equipment was installed in each watershed should be indicated in the Revised FEIS

document. If gauging station equipment was installed and there is historical flow data for the watersheds where Alternative 2 proposed logging, the Revised document should supply flow data that dates back several decades. Flow data is needed in order to contrast historical flow volumes and current flow volumes in these watersheds. The cumulative effects of past logging to increases in flow volumes in these watersheds should be described in the Revised FEIS.

Information obtained by KEA shows that significant volumes of water have been moving in the following watersheds. Data for the Prichard Creek watershed shows that between the years 1974 and 1979, the maximum stream flow recorded was 193 cfs. This is approximately 86,642.19 gallons of water per minute.

Flow data for the Shoshone Creek watershed shows that between the years 1979 and 1997, the maximum stream flow was 1,904 cfs. This is approximately 854,572.32 gallons of water per minute. Historical flow data for these watersheds would indicate whether the cfs flows listed have changed in these watersheds over the past 40 or more years. If there have been no cumulative effects from the past logging in these two watersheds in relation to increases in flow volumes, there should be flow volume data that would show flow volumes have not changed over the past 40 or more years.

B. For the watersheds that have never had gauging equipment installed, the Revised FEIS should describe the methods that were used to estimate historical flow volumes in these watersheds. Past logging in the watersheds that has resulted in significant canopy openings would be expected to increase flows of water in each watershed.

Concerning the 15,936 acre Lower Little North Fork Coeur d'Alene River Analysis Area and flow volumes, page 189 of Chapter 3 of the DEIS indicated that the LLNF is considered as Not Properly Functioning. The EPA also lists the LLNF as a 303(d) watershed. Page 190 of Chapter 3 mentioned high flow events and large volumes of water moving through a smaller channel.

The large volumes of water that end up in the Lower Little North Fork apparently is coming from the watersheds in and adjacent to the LLNF Analysis Area. The Revised FEIS needs to supply accurate scientific analysis of the cumulative effects from the past logging in and adjacent to the 24.9 sq mile area in relation to increases in peak flows and increases in the volume of water moving in the watersheds. The Revised FEIS should include data for the number of acres that have been clearcut in the 24.9 sq mile watershed over the past 40 years.

The following analysis is taken from the 1995 Wallace Ranger District Cougar Creek EA. Page III-27 of the E.A. had a discussion of the rain on snow zone and the equivalent clearcut area (ECA model).

"The rain-on-snow zone is an elevation band (2500-4500 feet) in which both the rate of snow accumulation and melt in harvested areas is greater than in similarly unharvested areas above and below this zone. The rain-on-snow analysis method (Kappesser, 1991) assigns the greatest risk to south, southwest, and southeast facing slopes. The model does not allow for any recovery of rain-on-snow risk until 40 years after harvest, at which point the stand is considered equivalent to a partial harvest until 68 years. The rain-on-

snow recovery is premised on observations that existing clearcuts 40 years or older do not seem to be accumulating and retaining as much snow as do younger clearcuts (H. Logsdon and S. Russell; 1992, Idaho Panhandle National Forests) as well as information from technical literature (Harr and Coffin, 1991). The procedure assesses the relative vulnerability, or exposure of the snowpack to direct rainfall and warm moist winds that accompany rain-on-snow events. Snowpack melt rate increases with increasing vulnerability of the snow surfaces. Rapid melt of a large part of the snowpack can result in large instantaneous peak flows.”

Page 190 of Chapter III in the DEIS stated “Both monthly peak flows and the risk of rain-on-snow generated peak flows are presumed to be elevated from past management activities within the majority of the tributaries.” A nearly identical sentence is found throughout the Watershed section in Chapter 3, including pages 184, 187, 193, 197, 200, 204 and page 208.

The watersheds listed in the Watershed section of Chapter 3 that have clearcuts less than 40 years old have not recovered hydrologically in relation to rain-on-snow risks. A majority of the watersheds described in Chapter 3 are classified as either NPF or FAR and some of the watersheds listed include estimated Peak Flows in Q2 cfs. As an example, page 172 lists the Estimated Peak Flow for the Wolf Lodge Creek Watershed as 26 cfs. 26 cubic feet per second of water per sq mile of drainage area, 38.5, equals 1001 cfs. This is approximately 449,278.83 gallons of water per minute or 26,956,680 gallons of water moving per hour.

If this is an incorrect description of cfs, is it correct then that the 26-cfs figure calculates to just 26 cfs for the entire watershed at Peak Flow? If this is correct, the flow of water per minute is 11,669.58 gallons.

If the figure of nearly 27 million gallons of water per hour at estimated Peak Flow every 2 years is correct, the Revised FEIS should indicate if this estimated figure has increased or decreased since 1993, when the Horizon Sun timber sale became active.

If the estimated 26 cfs at Peak Flow is approximately 11,670 gallons of water per minute for the entire watershed, and this includes the effects from the Horizon Sun timber sale, the Revised FEIS should include this information. The Revised FEIS should also clarify the Q2 cfs figures for the watersheds that have this data.

For the watersheds that have; no historical flow volume data, no Estimated Peak Flow in Q2 cfs, and no flow volume comparisons are possible, the Revised FEIS needs to indicate how previous logging in these watersheds have not affected cfs flow volumes or Peak Flow volumes after logging took place in the watersheds.

Sincerely,



Mike Mihelich

Forestry and Water Committee

Attachment #1: 17 November 2000 letter



File Code: .2540

Date: 17 November 2000

Mike Mihelich  
Kootenai Environmental Alliance  
PO Box 1598  
Coeur d'Alene, ID 83816-1598

Mr. Mihelich:

In response to your letter of inquiry of November 6, 2000:

1. The operational history for Bumblebee Creek, Steamboat Creek, Teepee Creek, Independence Creek, Flat Creek, Falls Creek, Shoshone Creek, and Prichard Creek are enclosed with this letter.
2. We do not have any record concerning gauging on the mainstem of the Little North Fork of the Coeur d'Alene River.
3. Please contact Bob Kasun, the Forest's lead hydrologic technician, at your convenience to review or discuss the operational histories of the gauging stations you requested. Bob's phone is (208) 765-7414.

If there are any other questions concerning the Forest's water resource monitoring programs, contact Rick Patten, Forest Hydrologist, at (208) 765-7403. Thank you for your interest.

Sincerely,

for  
DAVID J. WRIGHT  
Forest Supervisor

Cc:  
Rick Patten  
Bob Kasun

Enclosure



This is in response to the letter from the Kootenai Environmental Alliance requesting information regarding the history of the following creeks:

Station: Bumblebee Creek

Period of record: 1978-83

Remarks: Station was equipped with a staff gauge.

Station: Steamboat Creek

Period of record: 1977-80

Remarks: Station was equipped with a staff gauge.

Station: Tepee Creek

Period of record: 1977-80

Remarks: Station was equipped with a staff gauge.

Station: Flat Creek

Period of record: 1977-80

Remarks: Station was equipped with a staff gauge.

Station: Falls Creek

Period of record: 1977-80

Remarks: Station was equipped with a staff gauge

Station: Prichard Creek

Period of record: 1977-79

Remarks: Station was equipped with a staff gauge.

Station: Shoshone Creek

Period of record: 1977-97

Remarks: Station was equipped with a staff gauge until 1980 when a full-time water level recorder was installed and in operation until 1996.

Station: Independence Creek

Period of record: 1977-present

Remarks: Station was equipped with a staff gauge until 1982 when a full-time water level recorder was installed and is still in operation.



07

**IDAHO FISH & GAME**  
PANHANDLE REGION  
2750 Kathleen Avenue  
Coeur d'Alene, Idaho 83814

Dirk Kempthorne/Governor  
Rod Sando/Director

May 7, 2000

Ms. Susan Jeheber-Mathews  
Coeur d'Alene River Ranger District  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814

Rec'd 5-16-2000

Dear Susan:

**REFERENCE: SMALL SALES DRAFT  
ENVIRONMENTAL IMPACT STATEMENT**

We have reviewed the district's small timber sale proposal. Alternative 2, the proposed action, proposes a variety of prescriptions over 1,433 acres. Alternative 3 proposes only salvage harvest over the same number of acres. Both alternatives 2 and 3 propose timber harvest that would negatively impact 159 acres of allocated old growth timber stands. Alternative 4 would treat 1,160 acres with a variety of prescriptions, but would not enter any allocated old growth. All of the action alternatives call for construction of 0.8 miles of temporary road.

With alternatives 2 and 3, we have serious reservations concerning the impact of the proposal upon old growth resources. If either alternative is implemented as proposed, old growth stands in five old growth management units will be reduced below the 5% minimum level required by the Forest Plan. Given the paucity of old growth in the Coeur d'Alene River Ranger District, we find it difficult to understand why old growth stands are being targeted.

Historically, old growth timber stands occupied a much higher percentage of the landscape on the IPNF. Not only were old growth stands more abundant on the landscape, many were large, contiguous blocks. Today, the vast majority of the large historic blocks of old growth have been fragmented and connectivity between the blocks has been eliminated. This reduction and modification of old growth forest habitat has detrimentally impacted obligate old growth wildlife species. This problem has been recognized for some time, and is the reason old growth management units and minimum old growth levels were identified in the Forest Plan.

We recognize that multiple forest pathogens are at work within the old growth stands proposed for harvest, but it is widely recognized that pathogens are a common and necessary component of old growth stands. Pathogens help to develop the high densities of snags and downed woody debris normally found within old growth stands, and create the diseased trees cavity nesting birds and mammals seek. Pathogens cause openings to form and multi-tiered canopies to develop. In short, pathogens are required to develop the structural attributes obligate old growth wildlife species require.

The Department recognizes the intent of the Coeur d'Alene River Ranger District to address forest ecosystem health issues by converting shade tolerant timber stands to long-lived seral species. We also recognize that harvesting stands of dead and dying timber has support from some segments of the public, and in some instances has value as a land management tool. However, we do not believe these justifications provide a strong enough rationale to deviate from the intent of the Forest Plan and further

reduce a landscape component (old growth) already in short supply. We recommend timber harvest activities target common, younger stands.

From a watershed/fisheries perspective, on the surface it appears that none of the proposed alternatives are expected to negatively impact watershed condition or fish populations. Some data, such as equivalent clearcut acreages (ECA), are missing for some of the watersheds, including some described as not being in properly functioning condition. We are also somewhat perplexed by the designation of some watersheds (such as Wolf Lodge Creek) in a "functioning at risk" category, when stream condition, channelization, intermittency, and collapsed fish populations indicate they are not functioning properly at all. As noted in the DEIS, westslope cutthroat trout are the species most likely to be affected. Westslope cutthroat trout continue to provide an important sport fishery in parts of the project area, and a number of the streams currently or historically served as important spawning and rearing areas for migratory fish.

There has been a considerable amount of discussion and analysis of the impacts resulting to stream systems from timber harvest. We agree that roads are the single greatest threat to watershed conditions on the Coeur d'Alene River Ranger District, but given past logging (particularly riparian logging) and road construction practices, we believe many watersheds are at risk from increased peak flows. Often these risks are not measurable on third and fourth order streams, but in headwater drainages even relatively small openings created in the forest canopy can contribute to watershed problems which are then transferred downstream. The analysis indicates that most of the trees to be harvested would be losing canopy anyway, due to mortality, but the DEIS does not provide a clear analysis of the differential risk to first and second order streams from timber harvest as opposed to tree mortality. We recommend that the final EIS assess ECA's across headwater watersheds, and the condition of those watersheds. Significant, negative watershed impacts can result from timber harvest which affects a relatively minor percentage of a third or fourth order stream, because it impacts a significant percentage of one of those streams' first or second order tributaries. Negative impacts to fish habitat and populations have been tied to disturbed watershed conditions.

It does not appear that any of the proposed small sales include watershed restoration activities, but rather that the District is relying on the restoration projects proposed under the Douglas-fir Beetle EIS. As the list of proposed restoration projects associated with the beetle EIS is not exhaustive, nor is all of the funding guaranteed, we recommend the District look to use receipts from proposed small sales to accomplish restoration work.

At this point Alternative 4 would appear to have the lowest level of negative impact on wildlife because it avoids harvest of allocated old growth, a habitat feature in limited supply. We recommend, however, modifying one or more of the alternatives to include watershed restoration work, and to include analysis of watershed effects on headwater streams.

Thank you for the opportunity to comment. If you have any questions or would like to discuss our comments, feel free to contact either Chip Corsi or Bryan Helmich of my staff at the Coeur d'Alene office.

Sincerely;



*for*  
Greg Tourlotte  
Regional Supervisor

GIT:CEC:BH:kh

C: Tracey Trent, IDFG, Boise  
USFWS, Spokane



**Idaho Forest  
Owners Association**  
(208) 762-9059  
Post Office Box 1257  
Coeur d'Alene, Idaho 83816

17 MAY 2000

08

May 1, 2000

U.S. Forest Service  
CdA River Ranger District  
Fernan Office  
2502 E. Sherman Ave  
Coeur d'Alene, ID 83814

Dear Sir:

Upon review of the "Small Sales Draft EIS" for the Coeur d'Alene River Ranger District, we **support Alternative 2**, the proposed action and we would urge immediate implementation of the action. Many of the lands mentioned in this EIS are adjacent to private, non-industrial forest lands. Owners of these lands are concerned that the threat of severe wildfire on the adjacent Forest Service lands will result in disaster this summer when the hot, dry weather begins. Furthermore, insects and disease have been spreading from Forest Service lands to adjacent private lands, causing unexpected mortality to the private landowners. It is the responsibility of the Forest Service to not only manage your forests in a healthy manner, but to also minimize the risks of wildfire and unhealthy forests to your neighbors.

Furthermore, although the EIS discusses harvesting in "old growth" areas, it is doubtful that true "old growth" exists on any of the Forest Service lands mentioned in the EIS. Intense fires in the early 1900's, combined with harvesting throughout the 1900's removed most of the larger, older trees. In the EIS it is mentioned that these trees are 100-150 years old or younger, which does not qualify as "old growth" in our definition. Furthermore, what few trees are remaining of this age group are typically Douglas-fir and grand fir which will soon succumb to diseases such as root rot, further reducing the number of trees in this age category. We would suggest harvesting many of these trees before they die, lose their value, and increase the risk of catastrophic wildfire.

Finally, we support the proposal of prescribed burning in Alternative 2, but we would urge the Forest Service to use **extreme caution** in determining when to burn and what methods to use. Fuel loads are very high on many of the lands discussed in the EIS, and extreme care must be taken such that prescribed fires do not spread onto adjacent, private lands.

We thank you for your time, and we applaud you on your efforts to continue practicing forest management on Forest Service lands on the Coeur d'Alene River Ranger District.

Sincerely,



Amy Gillette  
Executive Director

09

Coeur d'Alene, Idaho 83815  
May 10, 2000

Small Sales Project  
2502 East Sherman Avenue,  
Coeur d'Alene, Idaho 83814

Dear Sirs,

We live on Canfield Mountain and our land adjoins the Coeur d'Alene National Forest. For thirteen years we have hiked the trails, almost every day year-round, and we have a deep appreciation for this opportunity. When we heard the Forest Service would be logging the mountain, we hoped and expected that we would approve of the results.

We are horrified at what happened during the course of the logging operation. I saw the trees that were marked for cutting, many very large green trees, and the ones that were left are weak and sickly or dead. The felling of trees and the operations of the helicopter ripped branches of standing trees and felled and uprooted many others. If ice-storm fallen trees contributed to the proliferation of the bark beetle, then all this additional fallen wood on the ground will only exasperate the problem. Except for one small area, all the slash has been left, which obviously increases the fire danger. Are they ever going to clean it up? I counted 50 large trees illegally cut within 50 feet of the creek, which is a year-round creek, although it was identified as temporary (Come see it in September!), and the creek is absolutely covered with debris.

I am concerned that people who are making decisions for the Forest Service have not seen the results of logging on Canfield Mountain. Please take the time to come see it, and please clean up the mess, and please don't allow anymore logging under this Small Sales Project. Entering the roadless area and logging old growth would seem out of the question.

Sincerely,

Charles and Sarah Gates



PO BOX 633  
BOISE, ID 83701  
(208) 343-7481  
FAX (208) 343-9376  
iru@idahorivers.org  
www.idahorivers.org

**EXECUTIVE DIRECTOR**  
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Boise/Stanley

Curtis Webb  
Twin Falls

May 17, 2000

22 MAY 2000

10

Coeur d'Alene River Ranger District  
Attn: Small Sales Project  
2502 E. Sherman Ave.  
Coeur d'Alene, ID 83814

Dear Ms. Jeheber-Matthews,

Please accept these comments from Idaho Rivers United (IRU) and Idaho Conservation League (ICL) on the Small Sales Project Draft EIS. IRU is statewide river conservation group with over 1,600 members. ICL is a statewide conservation organization with 3,000 members.

The conservation groups are concerned that the DEIS is inadequate. The DEIS does not consider an adequate range of alternatives. There is a no action alternative, but there is little difference between the action alternatives. The range of timber harvest volume ranges only from 6.3 MMBF to 4.7 MMBF. There is also little significant difference between proposed fuels treatments, proposed road work, and proposed yarding systems under the three action alternatives. In addition, the maps included are very difficult to read. The use of low resolution black and white maps makes it very difficult to discern the type and location of proposed treatments.

IRU and ICL also object to the proposed action, Alternative 2. The Forest Service should craft an alternative which does not include any clearcuts or logging in old growth stands. These activities are unnecessary and unduly harmful to fish, wildlife, forest health, and stream health. Furthermore, the Forest Service failed to adequately explain why it believes logging is necessary in old growth stands.

The selected alternative also should not include any logging in roadless areas, regardless of whether any road building is necessary. Roadless areas provide our healthiest forests, cleanest water, and best fish and wildlife habitat. As steward of these lands the Forest Service should not engage in activities that are harmful to these last best places. Logging is extremely harmful to forest ecosystems regardless of whether roads are constructed for the operation. Logging is a key factor in the downward spiral of Idaho's native coldwater fish populations. Protection of native fish habitat should be a primary objective for any proposed land management activities.

It is also inappropriate for the Forest Service to commit to any activities that might be prohibited under the President's Roadless Initiative until a final roadless rule has been implemented. The Roadless Initiative DEIS includes alternatives that would limit or ban logging in roadless areas. Therefore, the Panhandle National Forest's proposal to log in roadless areas could very well be in violation of that final rule.

By considering this proposal before a final decision has been made on the roadless initiative, the Forest Service is undercutting the administration's attempt to formulate a cohesive national policy on management of roadless areas. Considering this proposal at this time also undercuts the NEPA process for the Roadless Initiative by making an irretrievable commitment of resources before the NEPA analysis is completed.

Furthermore, at this time there is not enough information and too many uncertainties for the Forest Service to make an informed decision on this proposal as required by NEPA. Until a final roadless policy is in place, any analysis of this proposal would necessarily involve speculation as to the feasibility and effects of the proposal.

The selected alternative must also include sufficient riparian buffer zones for logging and road building activities that do occur. Logging and road building are extremely harmful to fish, wildlife, and stream health throughout the forest. It is not enough to rely on the INFISH buffers which are merely a minimum standard. In order to sufficiently protect water quality, fish habitat, and riparian areas, no logging or road building should occur within 1/4 mile of any stream.

Thank you for the opportunity to comment.

For IRU and ICL,



Sara C. Denniston  
River Conservationist  
Idaho Rivers United



STATE OF IDAHO  
DIVISION OF  
ENVIRONMENTAL QUALITY

Post-it® Fax Note	7671	Date	5/22	# of pages	1
To	Bob Rehnborg	From	Diane Riley		
Co./Dept.		Co.	DEQ		
Phone #		Phone #			
Fax #	208-769-3062	Fax #			

1410 North Hillon • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Administrator

May 22, 2000

11

Bob Rehnborg  
Project Team Leader  
Coeur d'Alene River Ranger District  
Idaho Panhandle National Forests  
2502 East Sherman Ave.  
Coeur d'Alene, ID 83814

Mr. Rehnborg:

This letter is in response to the Federal Register (Vol. 65, No. 73; April 14, 2000) notice of availability of the Small Sales Draft Environmental Impact Statement (DEIS).

The DEIS indicates that there will be prescribed fire treatment on approximately 1,900 acres. Page 27 indicates air quality was an issue not addressed in detail. Page A-2 refers to the "Project File (Air Quality)" for more information. Without the project file, it is difficult to evaluate whether air quality was adequately addressed. Please provide a copy of the project file. There should be a summary of the air quality analysis from the project file included in the DEIS.

In any case, good smoke management is the responsibility of the burner even if there is compliance with all existing air quality requirements. The DEIS should disclose information such as: maximum number of acres to be burned in a day; PM<sub>10</sub> and PM<sub>2.5</sub> emission estimates; smoke sensitive areas; emission reduction techniques; public notification process; mitigation actions during smoke intrusion episodes; alternatives to burning considered and used; and coordination with other burn activity. EPA's Interim Air Quality Policy on Wildland and Prescribed Fires (May 19, 1998) requires alternatives to burning be considered and used as much as possible. It would be useful to see an analysis of the emission reductions gained from harvest followed by burn treatment as compared to a burn only treatment. You can find the policy at the following web site:  
[www.epa.gov/ttn/oarpg/t1pgm.html](http://www.epa.gov/ttn/oarpg/t1pgm.html).

We support a coordinated effort between state, interstate, federal, tribal, and local agencies. All planned wildland and prescribed fire activities must include careful consideration of air quality impacts and requirements. We look forward to working with you as you develop the DEIS and at the individual project level as well. Thank you for the opportunity to comment and if you have any questions, please contact me by phone at (208)373-0214, by e-mail at [driley@deq.state.id.us](mailto:driley@deq.state.id.us), or at the address on the letterhead.

Sincerely,

Diane Riley  
Air Quality Analyst  
Air Quality Management Unit

DR/slh C:\HAYLETT\WP61\DIANE\REHNBOG.WPD

cc: COF  
Smoke Management File



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

#11

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

September 11, 2000

Bob Rehnberg  
Project Team Leader  
Idaho Panhandle National Forest  
2502 East Sherman Ave.  
Coeur d'Alene, ID 83867

Dear Mr. Rehnberg:

This letter is in response to the Federal Register (Vol. 65, No. 156; August 11, 2000) notice of availability of the Small Sales Supplemental Environmental Impact Statement (SEIS). We have the following comments on air quality issues related to the use of wildland and prescribed fire.

In response to our request for additional information, you indicate that you are limited to brief discussions for issues that aren't significant (40 CFR 1500.4(c)). The DEIS indicates 1,900 acres will be prescribed burned. This is a large area in close proximity to several smoke sensitive areas. Last fall there was an exceedance of the PM<sub>2.5</sub> standard due to prescribed burning in this area. We believe that air quality is a significant issue for this project and full details should be disclosed.

Thank you for sending us the air quality project file. The project file lists the Cabinet Wilderness, and Sandpoint and Pinehurst nonattainment areas as sensitive areas near the project. Please identify any other smoke sensitive areas nearby (populated areas, recreational sites). The project file mentions the Idaho/Montana smoke management program and that it operates from September through November. The program has gone to year-round operation. The project file indicates that the smoke management program is part of our State Implementation Plan (SIP). This is true in Montana but not in Idaho. In Idaho, the program is voluntary and not part of the Idaho SIP. The project file indicates FOFEM was used to estimate emissions. Please provide these data.

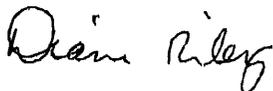
While it is important to meet all existing requirements and programs, good smoke management is still the responsibility of the burner. An air quality analysis should include: an estimate of maximum number of acres to be burned in a day, acres per burn unit, maximum duration of burns, and maximum daily and burn unit PM<sub>10</sub> and PM<sub>2.5</sub> emissions; smoke sensitive areas; predominant meteorological patterns; smoke monitoring procedures; emission and smoke impact reduction techniques; public notification process; mitigation actions during smoke intrusion episodes; alternatives to burning considered and used; and coordination with other burn activity.

**Bob Rehnborg**  
Idaho Panhandle National Forrest  
September 11, 2000  
Page 2

In addition, EPA's Interim Air Quality Policy on Wildland and Prescribed Fires (May 1998) establishes basic smoke management elements: burn authorization; emission reductions; non-burning alternatives; public education and awareness; and surveillance and enforcement. The policy also requires burn plans to include emission reduction actions; smoke dispersion evaluation; public notification; public exposure reduction; and air quality monitoring. A description of what will be included in your burn plans should be included in the EIS. (The policy can be found at the following web site: [www.epa.gov/ttn/oarpg/t1pgm.html](http://www.epa.gov/ttn/oarpg/t1pgm.html).)

We support a coordinated effort between state, interstate, federal, tribal, and local agencies. All planned wildland and prescribed fire activities must include careful consideration of air quality impacts and requirements. Thank you for the opportunity to comment. If you have any questions please contact me by phone at (208) 373-0214 or by e-mail at [driley@deq.state.id.us](mailto:driley@deq.state.id.us), or at the Department of Environmental Quality.

Sincerely,



Diane Riley  
Air Quality Analyst  
Air Quality Management Unit

DR/jst

C:\Johnna\Word97\DIANE\rehnborg.doc

cc: COF  
Prescribed Fire Correspondence File

21 May 2000

Bob Rehnborg  
USDA Forest Service  
Coeur d'Alene River Ranger District  
2502 East Sherman Avenue  
Coeur d'Alene ID 83814-5899

12

Dear Mr. Rehnborg,

I am writing to formalize Coeur d'Alene Audubon's comments on the Small Sales Draft Environmental Impact Statement issued by your district. First, let me thank you for the opportunity to tour many of the old growth units with you. You are a knowledgeable guide and I always learn something from our trips.

I have spent a long time considering the matter of your proposal to enter old growth to salvage timber killed by bark beetles. As you know, Coeur d'Alene Audubon is not against using logging as a management tool. We are, however, opposed to entering old growth forests for any reason. A conundrum is presented when one closely examines some of the proposed harvest units: many of the units designated as old growth forest simply do not yet fulfill the promise of old growth habitat. Might these old growth units then be managed toward the promise of providing habitat for old growth dependent species? With some care, I say perhaps.

After poring over maps of old growth units on the Coeur d'Alene River Ranger District, I realize that the Canfield Unit must be traded for more viable old growth elsewhere. Perhaps Canfield can provide a buffer for the remaining 10,000 acres of old growth in OGU 26. Canfield would benefit from timber and prescription fire management--but that only provides the tree component. A noxious weed eradication program followed by an aggressive public awareness campaign might help improve both the spotted knapweed and the "off-roading" problems. Canfield needs much care and is a long way from a true, old growth "character."

Canfield Mountain is used for a number of different outdoor pursuits which makes the threat of human-caused fire a possibility. The remaining forest in OGU 26 would be at risk if a fire started or got out of control on Canfield. Because of its proximity to Coeur d'Alene, human-caused fire is also a possibility at Blue Creek. Blue Creek is in much better shape than Canfield but still does not exhibit old growth "character." If you enter here to salvage trees, please do so with care. You entered here once before and did exactly as you said you would. We thank you for that and ask only that you remember that the exploding woodpecker population will need more snags on which to feed. Let northern Idaho's woodpecker population do their job.

As for entry into the remaining old growth harvest units proposed for timber salvage particularly Thompson Creek--Coeur d'Alene Audubon is opposed and favors the No Action Alternative. We think entry into these areas for the action proposed goes beyond the mission of the Forest Service regarding actual old growth in old growth units. Many factors weighed heavily in our thoughts and decisions. For example, the black-backed woodpecker is listed as a Sensitive Wildlife Species in your EIS. When the ice storm happened, one could easily predict the bark beetle explosion would occur followed by a woodpecker explosion. Woodpeckers need living trees as well as dead and dying trees.

Why not let the predator\prey cycle play out naturally? Humankind could not have accomplished such an impressive feat of wildlife management as is currently playing itself out on our national forest. Let me quote a Portland Audubon report on the black-backed woodpecker by David Marshall. The following text fell under the title "Factors Affecting Continued Existence."

Existing forest management practices which are directed at controlling beetle outbreaks through removal of infested trees and harvest of trees before they reach the age of being most susceptible to beetle outbreaks is contrary to the needs of the black-backed woodpecker.

Marshall quotes the management recommendations of Takekawa et al., "that the needs of insectivorous species like the black-backed woodpecker be considered in forest management as a means of biological control of insects which damage trees." That is Coeur d'Alene Audubon's wish as well.

Another factor that weighed in during Audubon's analysis was the fact that most of the old growth on the Coeur d'Alene Ranger District is fragmented, isolated, or both. Further disturbance by entry for salvage logging puts more stress on old-growth-dependent species struggling in substandard habitat.

One of the project objectives in your proposal overview was to "allow recovery of the economic value of dead and damaged timber." In designated old growth, only the economic value of a snag to primary and secondary cavity nesting species should be considered.

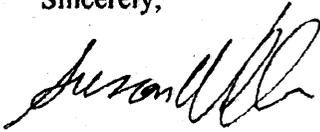
Bob, I share your desire to see more ponderosa pine, white pine, and western larch growing in our forests. As one may observe in Figures III-1&2, changes in forest type and structure are drastically out of balance. Your idea of "day lighting" large diameter ponderosa pine to protect them from crown fires and promote growth is a good one. I just wish it could be achieved through a habitat restoration project rather than through a salvage sale.

As regards the candidates for recruitment old growth that we visited, I should mention that the Fortier Creek and Stella Creek old growth units will be substantially bolstered by adding the proposed trade areas. I sincerely hope you will consider Audubon's suggestion to do so. I agonized over Canfield and Blue Creek but realized that the old growth in the other two units is more valuable. Fortier and Stella Creek were the only locations where we encountered old-growth indicator species (black-backed woodpecker) in the air and on the ground.

Let me restate Audubon's position on the proposal to salvage bark-beetle-killed trees within old growth stands located within the boundaries of old growth units: we are against it. We propose trading old growth at Canfield and Blue Creek for old growth at Stella and Fortier Creeks, allowing Canfield and Blue Creek to be managed with timber harvest and fire strategies. We feel this is an appropriate action because the habitat at Stella and Fortier Creeks actually exhibits some characteristics of old growth.

Thank you once again for the opportunity to participate in the planning process regarding old growth on the Coeur d'Alene Ranger District. Coeur d'Alene Audubon remains at your service and looks forward to working with you again in the future.

Sincerely,



Susan Weller, president  
Coeur d'Alene Audubon

\*\*\*END\*\*\*

MAY 23 2000

13

ATTN: SUSAN MATTHEWS,  
FOREST SERVICE USDA IPNF  
Concerning: DEIS

I AM WRITING THIS TO COMMENT HOW IMPORTANT IT IS TO CONTROL THE TIMBER DAMAGE IN NUMEROUS STANDS ON THE CDA, RIVER RANGER DIST.

MOST DEFINITELY IT SHOULD GO WITH ALT. 2 WITH HARVESTING, REGENERATION, SALVAGE, & THINNING JUST IN THE PAST 2 YEARS DRIVING AROUND OUR FOREST. IT IS DEVASTATING TO SEE HOW MANY TREES THAT HAVE DIED AS A RESULT OF THE BUG KILL ETC. AND IT LOOKS LIKE IT DOUBLED FROM LAST YEAR.

BEING FROM A LOGGING FAMILY I FEEL THE TIMBER IS GOING TO WASTE & IS A FIRE DANGER WHICH WILL END IN LOSING MORE.

WE NEED TO STAY TO OUR NATURAL RESOURCES & BY ALT. 2 THIS WILL AID IN MORE IN HELPING & PROTECTING OUR COMMUNITY, SCHOOLS, ETC.

DON'T LET OUR FOREST BE MISMANAGED BY LETTING IT GO TO WASTE.

WE NEED TO TAKE CARE OF IT AS SOON AS POSSIBLE & TAKE DRASTIC MEASURES TO CONTROL THIS PROBLEM IMMEDIATELY BEFORE IT IS TOO LATE.

Sincerely, DAUGHERTY LOGGING, CREW & FAMILY.



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
500 NE Multnomah Street, Suite 356  
Portland, Oregon 97232-2036

14

IN REPLY REFER TO:

May 17, 2000

ER 00/252

Ms. Susan Jeheber-Matthews, District Ranger  
Coeur d'Alene River Ranger District  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814-5899

Dear Ms. Matthews:

The Department of the Interior reviewed the Draft Environmental Impact Statement for the Small Sales, Idaho Panhandle National Forests, Kootenai and Shoshone Counties, Idaho. The Department does not have any comments to offer.

We appreciated the opportunity to comment.

Sincerely,

Preston A. Sleeper  
Regional Environmental Officer



15

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

NOV 24 2008

Reply To  
Attn Of: ECO-088

Susan Jeheber-Matthews, District Ranger  
Idaho Panhandle National Forest  
Coeur d'Alene River Ranger District  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814-5899

Dear Ms. Jeheber-Matthews:

We have received and reviewed the draft environmental impact statement (EIS) for the **Small Sales Draft Environmental Impact Statement (EIS)**. We reviewed it in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. We review EISs to assess the environmental impacts of the proposed federal action and the document's adequacy in meeting NEPA requirements. Please refer to the attached information, *EPA's Section 309 Review: The Clean Air Act and NEPA*, for further explanation of our EIS review responsibility.

Based on our review, we have rated the draft EIS, EC-2, Environmental Concerns - Lack of Information. We are concerned about proposed treatments in special areas like old growth stands and roadless areas. We are also concerned that there may be an unsustainable amount of salvaging between this, the Beetle Project, and harvesting of green trees from other projects. Enclosed is an explanation of the EPA rating system. This rating and a summary of the comments will be published in the Federal Register.

We are concerned about the salvage of dead or dying trees in old growth stands. As stated in the draft EIS, this is likely to have a detrimental effect on the quality of old growth characteristics. We appreciate the concerns of neighboring landowners regarding the heightened risks of wildfires if these stands are not treated. However, in the five analysis areas where there will be treatment in old growth units, the EIS does not clearly characterize the fire risk from these old growth units to the nearby landowners. The EIS needs to clearly discuss, for each of the analysis areas where old growth units will be treated, the level and nature of risk to landowners

00-002-AFS  
CEQ # 000087

and the standards that will govern salvage in the old growth stands.

Our principal concern in our comment letter on the Douglas-fir Beetle Project Draft EIS was that, "it would be just the first of many harvesting efforts to utilize timber damaged by bark beetles over an area of nearly 270,000 acres. Harvesting over such an enormous area could be far more intrusive than sustainable by the ecosystem, especially in light of the timber sales and other projects already planned for the area." The Forest Service responded that, "This project does take a hard look at all existing and reasonably foreseeable projects. The Reasonably Foreseeable Actions on both Forest Service and other lands are all listed in Appendix E of the document." However, the EIS did not appear to list in *Appendix E - Reasonably Foreseeable Activities* the Small Sales projects. Is this correct? And, will there be more small sales?

Coupled with the above concern, we also requested in the Douglas-fir Beetle Project draft EIS comment letter that, "the EIS should at least identify timber sales that will not need to go forward in light of the timber from this project." We agree with the statement on page 29 that, "it is desirable to salvage dead and dying timber to help meet some of the demand so that there is less pressure to harvest green trees." In response to our comment the Forest Service said that, "it would be premature to identify timber sales or other activities that would not proceed prior to publication of this FEIS and before a decision has been made." Since the FEIS and ROD have been made final, is there some way you can now respond to our concern and to demonstrate that these salvage sales will result in less pressure to harvest green trees?

I thank you for the opportunity to review and offer comments on this project. If you have questions, please contact me at (206) 553-8574 or Andy Smith at (206) 553-1750.

Sincerely,



Richard B. Parkin, Manager  
Geographic Implementation Unit

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

#15

Reply To  
Attn Of: ECO-088

SEP - 8 2000

Jose Castro, Acting District Ranger  
Idaho Panhandle National Forest  
Coeur d'Alene River Ranger District  
2502 East Sherman Avenue  
Coeur d'Alene, ID 83814-5899

Dear Mr. Castro:

We have received and reviewed the final environmental impact statement (EIS) and the Record of Decision for the **Small Sales Project Final EIS**. We reviewed them in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). A modified version of an alternative to the proposed action (Alternative 4) was selected. In this alternative, 1,160 acres (4.7 MMBF) will be harvested while avoiding harvest in old growth stands and inventoried roadless areas. However, you feel this alternative leaves 273 acres in six analysis areas adjacent to private land ownership in need of activities to reduce the level of fuels. You intend to identify and implement appropriate treatment for each area with separate decisions. We appreciate the difficult issue of protecting old growth trees and old growth character while reducing the risk of a stand-replacing fire of old growth and private stands. We recommend that one NEPA process be used to determine the treatment for the six old growth parcels. This will allow public involvement, as well as a thorough analysis of cumulative impacts on the old growth.

We believe that the final EIS adequately responds to our comments on the draft EIS. We thank you for the opportunity to review and offer comments on this project. If you have questions, please contact me at (206) 553-8574 or Andy Smith at (206) 553-1750.

Sincerely,

Richard B. Parkin, Manager  
Geographic Implementation Unit

00-002-AFS  
CEQ # 000270

22 FEB 2001



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
911 NE 11th Avenue  
Portland Oregon 97232-4181

#16

IN REPLY REFER TO:  
AES/HC

February 15, 2001

USDA Forest Service  
Coeur d'Alene River Ranger District  
2502 East Sherman Avenue  
Coeur d'Alene, Idaho 83814-5899

Subject: Review of ER-01/0043 NOI for the Coeur d'Alene River Ranger District Small Sales, Idaho Panhandle National Forest

Dear Sir/Madam:

In response to your January 12, 2001, Notice, the U.S. Fish and Wildlife Service offers no comment on the subject document. Please refer any comments to Julie Concannon, Regional Environmental Specialist at (503) 231-6154.

Sincerely,

MBR  
Regional Director