

Date submitted (Pacific Standard Time): 9/6/2019 12:00:00 AM

First name: Paul

Last name: Sieracki

Organization:

Title:

Comments:

Attached are some additional comments from myself.

Please confirm receipt of these.

Thank you,

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Paul Sieracki

Paul R. Sieracki
 [REDACTED]

Priest River, Idaho [REDACTED]
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Sept. 6, 2019

Re: Additional Comments on the Buckskin-Saddle Scoping Notice from Sieracki.

Dear Scoping Notice Comment Reviewers,

This is a request for this and all following timber sales for pre-logging reviews of the unit and the appropriate area around the cutting units.

-These unit specific reviews should be completed at the appropriate time and time of day and year before the unit or area is to be logged out in order to detect TES or other species such as raptors. Eg, March for most owls and early summer for flammulated owls.

-Unit field surveys should be conducted by the appropriate specialist for the discipline, eg. wildlife biologist, botanist.

-For some species, for example, the western toad, an IPNF sensitive species should have units scoured for toads during the logging operation, possibly at night. Individuals found should be moved to a safe area.

-The public should be notified of the date of these surveys and the results.

-If a species is found, action should be taken to protect that species.. eg wolf and sensitive species dens, raptor nests, woodpecker nests, rare plants or lichens.

-These actions would help preserve biodiversity at the local level and would assist the Forest in implementing the following standards and guidelines.

-When possible, a member of the public should be taken along to assist and monitor the effectiveness of the survey.

-These activities could be easily paid for by adding to a minimum bid price for the sale.

These actions would help the IPNF follow the guidelines below.

For Elk:

FW-GDL-WL-14. Big Game. Management activities should avoid or minimize disturbance to native ungulates during the birthing/parturition period.

For Raptors:

FW-GDL-WL-20. Raptors. Management activities on NFS lands should avoid/minimize disturbance at known active raptor nests, including owls. Timing restrictions and distance buffers should be based on the best available information, as well as site-specific factors (e.g.,

topography, available habitat, etc.). Birds that establish nests near pre-existing human activities are assumed to be tolerant of that level of activity.

For Wolves:

FW-GDL-WL-22. Wolf. Management activities should avoid or minimize disturbance to wolves near den and rendezvous sites during the times those sites are in use based on the best available information

For Bats:

FW-GDL-WL-21. Townsend's Big-eared Bat and Fringed Myotis Bat. Avoid or minimize disturbance at known active roosts and hibernacula in caves, abandoned mines, or rock outcrops using the best available information.

For Harlequin Duck:

FW-GDL-WL-23. Harlequin Duck. Management activities should avoid or minimize disturbance near known active nesting and rearing areas based on the best available information.

For Common Loon:

FW-GDL-WL-24. Common Loon. Management activities should avoid or minimize disturbance near known active nests based on the best available information.

For other TES species:

FW-GDL-WL-25. Management activities on NFS lands should avoid/minimize disturbance at known active nesting or denning sites for other sensitive, threatened, or endangered species not covered under other forestwide guidelines. Use the best available information to set a timeframe and a distance buffer around active nests or dens. Individual animals that establish nests and den sites near areas of pre-existing human use, inconsistent with the timeframes and distances in the other forestwide wildlife guidelines or in the best available information, are assumed to be accepting of that existing higher level of human use at the time the animals established occupancy. In those instances, as long as the individual animals continue to use the site, the higher intensity, duration, and extent of disturbance could continue but would not be increased beyond the level existing at the time the animals established occupancy.

Non Sensitive Woodpeckers:

These guidelines should also apply to non sensitive woodpeckers such as the pileated woodpecker which provided cavities for secondary cavity nesters.

Migratory Bird Treaty Species:

Also please do not schedule logging during nesting season for neotropical and non-migratory songbirds. Bird populations are declining everywhere and any direct impact to these birds can and should be avoided. Having a take permit to kill species protected by the MBTA during logging and roading operations is unacceptable.

Respectfully Submitted,

Paul Sieracki

Geospatial Analyst/Wildlife Biologist