

From: [Shelby Herber](#)
To: [Norton, Michelle - FS](#)
Subject: Buckskin Saddle Integrated Restoration Project Comments
Date: Monday, September 9, 2019 4:58:47 PM
Attachments: [Buckskin Saddle Scoping Comments Idaho Conservation League 09092019.pdf](#)

Dear Ms. Michelle Norton,

I hope this email finds you well and having a great Monday! We met a couple months ago, but again, my name is Shelby Herber and I work as the Community Engagement Assistant for Idaho Conservation League (ICL) out of our North Idaho Sandpoint office.

Please see the attached pdf for ICL's Buckskin Saddle Integrated Restoration Project comments. If you have any questions or there are any issues regarding this file, please don't hesitate to contact me.

Your time is much appreciated.

Best,
Shelby Herber

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Shelby Herber

Community Engagement Assistant
Idaho Conservation League

[REDACTED] Sandpoint, ID [REDACTED]
[REDACTED]

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September 9, 2019

Ms. Michelle Norton
Sandpoint Ranger District
Idaho Panhandle National Forests
1602 Ontario Street
Sandpoint, ID 83864-9509

Electronically Submitted to: michelle.norton@usda.gov

RE: Scoping Comments for the Buckskin Saddle Integrated Restoration Project

Dear Ms. Norton:

Thank you for considering our scoping comments on the proposed Buckskin Saddle Integrated Restoration Project on Idaho Panhandle National Forest-administered public lands. Since 1973, the Idaho Conservation League (ICL) has had a long history of involvement with public lands issues. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters who have a deep personal interest in restoring our forests so they are more resistant to disease and threats posed by uncharacteristic wildfires, bolstering wildlife habitats, and improving recreation opportunities.

The Idaho Conservation League is also a member of the Panhandle Forest Collaborative (PFC) and we have consistently advocated for an increase in the scope and scale of restoration projects within the Collaborative Forest Landscape Restoration (CFLR) area. Forest Collaboratives like the PFC have proven to be successful ventures across Idaho for increasing the quality of Forest Service proposals, restoring forest and watershed conditions, and improving the dialogue among a wide variety of stakeholders. Our goal is to see a successful project that balances forest health, watershed, wildlife and community goals and that is implemented on the ground in a timely manner.

The Lands Council has been a member of the Panhandle Forest Collaborative and has been involved in forest restoration for over 30 years. We seek science based, collaborative solutions to helping the Idaho Panhandle restore the landscape. We work closely with the Idaho Conservation League to help restore forests on public lands.

The Project area encompasses approximately 50,000 acres on the Sandpoint Ranger District in Bonner County, Idaho and 500 acres on the Coeur d'Alene Ranger District in Shoshone County.

Within this area, the Forest Service is proposing 13,321 acres of commercial treatment, 6,643 acres of non-commercial treatment and 14,459 acres of prescribed burning.

The Forest Service is proposing to decommission 8 miles of existing roads and to construct over 32 miles of new system roads that would be placed into long term storage. The Forest Service is also proposing to expand four gravel pits and construct up to six new gravel pits.

These comments are intended to build on comments that the PFC submitted on Dec. 13, 2017. The PFC has been closely involved in the development of recommendations for the Buckskin Saddle Project. The PFC included specific recommendations for commercial thinning, variable retention and dry site restoration, old growth, aquatic and watershed restoration. Two of ICL's primary goals are to protect habitat for fish and wildlife, and promote forest restoration and healthy ecosystems. Our comments focus on potential areas for further improvement that align with our mission and the PFC goals for this project.

The Idaho Conservation League supports the overall purpose and need and appreciates areas where the Forest Service has adopted the PFC's recommendations. However, we have significant concerns over several project components, especially with regard to new road construction. The amount of proposed road construction is of concern for two reasons. First, new road construction increases the potential for sediment delivery to streams. This is of particular importance in watersheds with sediment TMDLs (Twin Creek and Johnson Creek). Second, roads are a concern from a wildlife standpoint. Although all of the proposed new roads would be stored and would not be legally available to the public for motorized access, the efficacy of closures would likely not be 100 percent. It is also worth noting that there have been documented cases of grizzly bears moving through the project area from the Cabinet Mountains to the Coeur d'Alene Mountains each year for the last four years. Available science suggests that open motorized routes reduce grizzly bear habitat security and may inhibit grizzly bear movement through an area.

As such, we recommend making several adjustments to reduce potential negative environmental consequences: reducing the amount of new road construction, drop several units where activities pose a threat to bull trout and grizzly bears, consider utilizing the Wyden Authority to allow for forest and watershed restoration treatments across other ownerships with the permission of land owners, coordinate restoration efforts across multiple ownerships in the spirit of "Shared Stewardship" and incorporating a multiparty monitoring effort.

We do not believe an Environmental Assessment (EA) provides adequate review for a project of this scale with its numerous components. The project's size (50,600 acres), the amount of proposed vegetation treatments (19,964 acres), the significant increase of road density, and potential conflicts between project objectives and habitat protections and enhancement demand the detailed and rigorous analysis provided in an Environmental Impact Statement (EIS). To address the larger scale forest health and accompanying issues, an EIS is needed to take a "hard look" at anticipated impacts, disclose these impacts to the public and address public concerns about these impacts.

If an EA is desired, the project scope and scale should be dramatically reduced to less complex forest types, soils, slopes within the Wildland Urban Interface and treatment methods limited to

existing road networks, commercial thinning and prescribed burning so that the impacts are easily assessed.

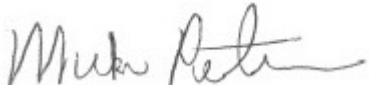
Once again we thank you for the opportunity to submit comments on this project. Please send us any subsequent documents related to the Buckskin Saddle Restoration. We look forward working with the Sandpoint Ranger District on this and future projects.

Respectfully submitted,

A handwritten signature in cursive script that reads "Shelby Herber".

Shelby Herber, Community Engagement Assistant, Idaho Conservation League

Please keep Idaho Conservation League informed as the Forest Service completes reviewing the public comments and any information regarding next steps. Brad Smith, the Idaho Conservation League's North Idaho Director, will be on sabbatical through September 30, 2019. Please include Brad Smith, [REDACTED], on any information going forward with the "Buckskin Saddle Integrated Restoration Project" from October 1, 2019 onward.

A handwritten signature in cursive script that reads "Mike Petersen".

Please sign Mike Petersen, Executive Director, The Lands Council on to the letter.

The Lands Council has been a member of the Panhandle Forest Collaborative and has been involved in forest restoration for over 30 years. We seek science based, collaborative solutions to helping the Idaho Panhandle restore the landscape. We work closely with the Idaho Conservation League to help restore forests on public lands.

Idaho Conservation League's Scoping Comments for the Buckskin Saddle Integrated Restoration Project

Information provided on Project website

We appreciate the amount of information included on the Forest Service website, especially draft design features. The Forest Service should also post the process for delineating the Community Protection Zone per the Idaho Roadless Rule.

Consistency with PFC recommendations

The PFC agreed that there is a need to improve the resiliency of forest vegetation in the Buckskin Saddle Project Area and recommended addressing the additional needs:

- Manage forest composition and structure to more closely align with the natural range of variability.
- Reduce fuels in the wildland urban interface and in stands adjacent to the BPA power line corridor
- Reduce erosion and sediment delivery to project area streams
- Improve habitat for flammulated owls, elk, and harlequin duck
- Improve and maintain roads, trails, and recreational infrastructure
- Support the local economy

The PFC noted that the following issues need to be addressed:

- Wildlife
- Water
- Old growth
- Recreation concerns
- Scenic integrity

Level of Analysis

The Buckskin Saddle Integrated Restoration Project consists of several components spread over a vast and diverse landscape. The project's size (50,600 acres), the amount of proposed vegetation treatments (19,964 acres), the significant increase of road density, and potential conflicts between project objectives and habitat protections and enhancement demand the detailed and rigorous analysis provided in an Environmental Impact Statement (EIS). If the project area consisted of a single vegetation component that would be treated with a limited number of undertakings encapsulated in (primarily) a single ecosystem, an Environmental Assessment (EA) could provide appropriate levels of documentation and study. However, this landscape-scaled project encompasses numerous ecosystems and watersheds, each deserving individual and specialized study.

The proposed road management activities provides a perfect example of the project's complexity justifying a more detailed and complete analysis. The increase in new road construction (32.2 miles), road reconstruction (145.5 miles), and maintenance (14.5 miles) warrant hydrological studies to determine suitability, potential impacts to streams with increased sediment loads, and potential impacts to aquatic life due to stream crossings. Moreover, the Forest Service proposes

to expand four existing gravel pits and construct up to six new pits during the life of the project. The potential adverse effects associated with road construction and maintenance alone demands a thorough evaluation through an EIS, which would include several alternatives (including a No Action alternative), socio-economic studies detailing a cost/benefit analysis of constructing new pits versus using outside sources, and an analysis of potential wildlife and plant impacts.

The road management undertakings represent a small to moderate, but significant portion of the total project components. Recent documented cases of grizzly bear presence in the area calls for more complete studies focused on identifying habitat within the project boundaries and recommendations regarding travel management and road densities. When considering the totality of project elements it becomes clear that an EA falls short of fulfilling National Environmental Policy Act (NEPA) directives and protocols.

While it is possible to develop several alternatives through the EA process when there is unresolved conflict regarding a resource, EAs generally become applicable for projects with limited actions and scope. Given the project area size and component complexity, ICL currently envisions numerous potential adverse effects associated with the project as presented. Rather than expend valuable time and resources on an EA that inadequately assesses conditions and potential impacts in the project area, we recommend utilizing valuable effort and limited resources into a comprehensive EIS study that better maintains the ability to withstand scrutiny and allows for adaptive management and planning through project plan alternatives. Should the Forest Service chose to move forward with the EA process, ICL recommends a severe scaling back of the project's size and objective content.

Improving Habitat for Species of Greatest Conservation Concern

The Forest Service should identify which species of conservation concern will be the focus for restoration efforts. The Scoping Notice identifies the need to improve flammulated owl habitat within the project area, and makes note of bull trout habitat being present in Granite Creek and the lower portion of Johnson Creek. Further, westslope cutthroat trout are found in project area streams. ICL recommends the Forest Service consult with Idaho Fish and Game (IDFG) and the United States Fish and Wildlife Services (USFWS) before finalizing any project plans. In addition, the Forest Service should disclose the negative impacts of vegetation treatments on other species. Best Management Practices (BMPs) should direct habitat restoration specific to targeted species. Finally, a monitoring program should assess baseline conditions as well as the effectiveness of the different treatments on the productivity of these species.

Slash treatments

The Forest Service needs to manage slash in a timely manner so that fuel risk is minimized. We appreciate the fact that whole-tree yarding will be used to help reduce fuel loads within commercial treatment units but additional attention needs to be paid to how slash is handled once at the landing. We support the stacking of material usable for firewood at landings for public use and think that this should be utilized whenever practical. We also support utilizing this material at biomass cogeneration facilities.

We recommend that the Forest Service provide an estimate of the amount of material that will be managed through public firewood use, biomass utilization or pile burning at landings. Before

authorizing burning at remaining slash piles at landings, the Forest Service should carefully manage the size, location and burning windows of these piles to minimize adverse impacts to soils.

Prescribed fire

Slash left within treated areas will elevate fuel loads in the short term and should be managed through prescribed burning as soon as reasonably possible. The Forest Service should be sure to follow up with additional prescribed fire treatments as needed to meet fuel reduction goals.

The Forest Service should work with members of the public health services, the medical community, the Idaho Department of Environmental Quality, Bonner, Kootenai, and Shoshone counties, businesses, residents and homeowners to craft a prescribed burning program that minimizes adverse impacts of smoke to the public. This is especially important as much of the project area consists of Wildland Urban Interface (WUI) along the southern shores of Lake Pend Oreille. Particular attention needs to be paid to vulnerable populations. Issues to address include helping residents improve air filtration systems in homes or retrofitting at least one room to have cleaner air, designating public buildings where improved air filtration systems already exist or can be upgraded to serve as safe air places in the event of unhealthy air quality from prescribed burning or wildfires, and publishing advanced notice of prescribed burning so people vulnerable to poor air quality can plan accordingly.

Demonstration projects and tours

We recommend that the Forest Service select some demonstration projects where fuel reduction projects have already been implemented and host tours to showcase treatments that could be implemented on private property. The Forest Service should take full advantage of the Good Neighbor Authority while working in the WUI by establishing and strengthening relationships in the community, and providing information relevant to reducing fuel loads and improving forest health on private lands. For members of the public not able to attend a field trip, we recommend creating a Story Map of integrated restoration projects.

Watershed Improvements

We support the proposed system road decommissioning, unauthorized road restoration and fish passage improvements. The scoping notice states that the Johnson Creek and Twin Creek drainages are classified as Impaired by the State of Idaho. The scoping notice goes on to state that Granite Creek and the lower portion of Johnson Creek provide bull trout habitat; the scoping notice fails to provide functioning status for Granite Creek. While the notice does make note of “shotgun” culverts being present in the project area, and the desire to remove and replace these and other movement impeding devices, specific plans and projects must be delineated prior to project implementation. A draft EIS should describe the anticipated improvements at each location and anticipated function improvement ratings.

Water quality

The Forest Service should also disclose any water quality issues from historic mining activity that may be having an impact on aquatic organisms or public health. There may be the possibility that some restoration activities can help address this issue.

Recreation Improvements

We generally support improving recreation opportunities on our public lands if proposed actions align with best management practices (BMPs) for road density, trail/road construction, and community values. Where there are opportunities to designate spur roads or landings as dispersed campsites, we recommend considering some dispersed sites for walk in, “far car” camping sites where families can hike a short distance to a camping area. Where there are opportunities to designate redundant roads as trails, we recommend designating some short, non-motorized, non-mechanized trails for families. We recommend working with the community of Clark Fork and tribal authorities on opportunities to post interpretive signage about the cultural and natural history of the area.

The Scoping Notice states that many of the trails in the Buckskin Saddle Project area were not designed for motorized travel and subsequent use by motorcyclists and other motorized trail users has caused erosion, trail deterioration, and stands out as a primary contributor to sedimentation in associated waterways. The Scoping Notice states the Forest Service proposes to reconstruct 56 miles of trails in the project area, bringing them up to motorcycle standards; two trails would be reconstructed to accommodate all terrain and side-by-side OHVs. ICL understands that the Forest Plan emphasizes motorized trail opportunities; however, these opportunities should be thoughtfully placed and carefully constructed. We recommend closing and obliterating many of the steep, heavily eroded trails that lack switchbacks (or have excessively sharp switchbacks) in the project area, retaining those that can form loop opportunities, close and obliterate “cherry stem” unauthorized roads and trails, remove roads and trails from riparian areas where possible, and ensure that all roads and trail densities align with the Forest Plan and BMPs for road density (best recommended is 1 mile of road per square mile; we recommend reducing densities found above 2.5/1).

We support the Forest Service’s proposal to repurpose an existing gravel pit at the junction of NFS Road 1018 and 278 as a new trailhead parking area. ICL encourages the Forest Service to extract materials from the pit for road maintenance and construction, and backfill/reclaim the location using spoils produced from this and other locations during construction of the proposed trailhead parking area.

Road and Travel Plan Management

We appreciate the Forest Service’s proposals to improve water quality and aquatic habitat through road decommissioning, culvert replacement and trail/road rerouting activities. Specifically, we support re-routing NFS Road 1073 from alongside Granite Creek to a mid-slope or ridgetop position. We understand that moving roads from riparian areas, which tend to be direct access, to mid-slope and ridgetop locales may result in an increase in road mileage due to switchbacks and longer travel routes to ensure a non-erosive and sediment producing design.

ICL finds the amount of proposed road construction problematic for two reasons. First, roads are a concern from a wildlife standpoint. Although all of the proposed new roads would be stored and would not be legally available to the public for motorized access, the efficacy of closures would likely not be 100 percent. It is also worth noting that there have been documented cases of grizzly bears moving through the project area from the Cabinet Mountains to the Coeur d’Alene Mountains each year for the last four years. Available science suggests that open motorized routes

reduce grizzly bear habitat security and may inhibit grizzly bear movement through an area. The Scoping Notice states that motorcycle use within the project area represents a significant component of motorized recreation, and also contributes to erosion and stream sedimentation. Motorcycles represent the most adaptable and versatile motorized travel and stored roads offer multiple unauthorized uses.

Second, new road construction increases the potential for sediment delivery to streams. This acts in opposition with Project Objective 4, reducing sediment delivery to streams from the forest road and trail networks (Scoping Notice, p. 5). This is of particular importance in watersheds with sediment TMDLs (Twin Creek and Johnson Creek).

Several of the proposed roads cross streams to access just one and sometimes two, management units. In an effort to minimize the effects of new road construction, ICL recommends dropping the following units and their associated roads from the project plan.

Dry Creek

- Unit 13
- Unit 18
- There is also a proposed road near the forest boundary that does not appear to access any units

Twin Creek

- Unit 41
- Unit 89
- Unit 54
- Unit 55

Johnson Creek

- Lower section of Unit 125
- Unit 138
- Unit 139
- Lower Section of Unit 131
- Unit 161
- Unit 163

Granite Creek

- Unit 143
- Unit 146

Precommercial thinning units with no riparian buffers

There are also several pre-commercial thinning units with no riparian buffers. Standard INFISH buffers should be applied to the following units:

- Unit 448
- Unit 443
- Unit 442

- Unit 427

The Forest Service needs to consider Idaho shade rules in all units and areas with riparian habitats and live streams regardless of stream crossings.

Dry site old growth unit with a proposed road

Unit 231 appears to be a dry old growth type. A road is proposed within the stand to carry out dry site improvement. ICL recommends accomplishing the prescription goals for Unit 231 without building an additional road if at all possible.

Legacy Tree Retention

The goal of protecting Legacy Trees and maximizing retention of large diameter trees is outlined in the Collaborative Forest Landscape Restoration Act; Sec. 4003(D) fully maintains, or contributes toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health and retaining the large trees contributing to old growth structure; (E) would carry out any forest restoration treatments that reduce hazardous fuels by-- (i) focusing on small diameter trees, thinning, strategic fuel breaks, and fire use to modify fire behavior, as measured by the projected reduction of uncharacteristically severe wildfire effects for the forest type (such as adverse soil impacts, tree mortality or other impacts); and (ii) maximizing the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire-resilient stands.

The Forest Plan and Wildlife Conservation Strategy highlight the value of these mature trees for wildlife. The Forest Service's purpose for this project includes promoting an increase in large tree class size, reducing canopy cover, and to promote an increase in the number of early seral species in early and late growth stages. With the goals clearly outlined, it is important to find the best means of protecting Legacy Trees and maximizing the retention of large diameter trees.

While Ponderosa pine, western larch and Western white pine are the preferred species for retention, Douglas and Grand fir also occur in the project area with old growth/legacy tree/large tree characteristics. Because the large tree component is underrepresented across the majority of our nation's forests, the majority of all particularly large native trees, regardless of species, should be protected for both wildlife and as part of the forest's natural heritage. Girdling undesired tree species could be one tool to retain the large tree structure important for wildlife while eliminate competition for water and nutrients with more desirable, seral tree species.

Commercial vs. Non-Commercial Treatments

We found the Scoping Notice, and in particularly the Proposed Action section, confusing and potentially misleading. Page 9 of the Scoping Notice states, "As noted in Table 1 there would be *approximately 267 acres of commercial treatments* [emphasis added]. Each of those commercial treatments would entail harvesting some merchantable forest projects [sic] and also involve various fuel reduction treatments..." Table 1 on Page 10 shows 267 acres of designated Commercial Thin; however, this acreage total does not come close to representing the entirety of proposed Commercial Treatments, as implied by the statement previously described on Page 9. The actual commercial vegetation treatment acreages total some 13,321, not 267. The second

sentence of the quoted text suggests there are more than one Commercial Treatment category. This discrepancy is misleading and does not represent the actual number of commercial acres proposed for treatment and should be corrected in the draft EIS. A further example of the need for additional “eyes” on the document prior to release is in the same quoted sentence; “merchantable forest projects” most likely should have read “products.”

Openings Larger than 40 Acres

Several areas are proposed to be cleared as seed tree or shelterwood units. Forty-nine of these clearings would exceed the 40-acre limit in the Forest Plan but are allowable under the direction of the Regional Forester. The PFC acknowledged that there are ecological justifications for some openings of greater than 40 acres and recommended design features for selecting leave trees, retaining snags, and reducing edge effects, and selecting “aggregates” or “skips” as retention areas in at least 29% of an opening.

However, we have concerns regarding the justification provided for all proposed 49 openings greater than 40 acres within the project area. The Scoping Notice states that the openings are proposed to, “increase the patch size of young forest stands to trend the pattern of forest vegetation towards desired conditions in the Forest Plan,” (p. 10). Further, “Forest Service policy directs land managers to normally limit the size of harvest openings created by regeneration treatments to 40 acres or less,” (p. 10). Exceptions are allowed with Regional Forest approval. We believe the key to understanding these guidelines lie in the word “exceptions.” Many of the proposed openings encompass far more than 40 acres, with many (such as OF 12 found in the East-side group of proposed openings) being up to and in excess of 320 acres.

First, the Forest Service cannot reasonably argue that an EA will adequately assess the potential adverse effects of creating such large and numerous openings. Moreover, Forest Service Policy allows for creating some larger patches with Regional authority, but authorizing 49 openings greater than 40 acres, many consisting of a half-section or more, runs counter to the term “exception.” Merriam-Webster defines “exception” as, “a case to which a rule does not apply.” The proposed expansion of openings greater than 40 acres for the Buckskin Saddle project area represents a programmatic use rather than an exceptive use.

Second, the Scoping Notice cites Project Objective 6 as, “Improve the scenic quality as seen from Lake Pend Oreille, the town of Clark Fork, and other important viewing locations identified in the Forest Plan,” (p. 7). This objective specifically points out unnatural appearing edges and boundaries associated with previous logging operations and utility Rights-of-way (ROWs), and the desire the blend or “feather” these areas to improve the visual quality of the region. As presented, the proposed 49 openings larger than 40 acres appears to directly contradict the stated goals of Objective 6. Despite the Forest Service’s desire to shift species composition and density throughout the project area by planting preferred species seedlings in the openings, tree growth will not be sufficient to blend these proposed seed tree and shelterwood areas for decades. In fact, the openings would appear more like clear-cut logging operations than forest restoration activities.

Finally, the Forest Service needs to complete an economic cost/benefit analysis regarding the creation of these openings over 40 acres. Questions that require discussion include, but are not limited to: will the currently soft market support the merchantable materials derived from the

opening creations; can existing operators and infrastructure support this influx of materials while maintaining prior commitments; and what are the potential environmental downfalls of creating numerous openings over 40 acres and how do potential recovery costs weigh against alternative management practices such as thinning. As with roads, this component of the proposed project maintains the potential to release a significant amount of sediment into surrounding streams and waters, working against Objective 4. The component's complexity and potential associated adverse effects also support an EIS analysis over the currently proposed EA.

Inventoried Roadless Areas

The Idaho Roadless Rule was developed to protect lands, "(1) containing outstanding or unique features, where there is minimal or no evidence of human use; (2) containing culturally significant areas; (3) containing general roadless characteristics, where human uses may or may not be more apparent; and (4) displaying high levels of human use," (Roadless Area Conservation, Final EIS) while protecting property and forests from the negative effects of severe wildfire and providing access to private property within a roadless area. The majority of both IRAs within the project area fall into the Backcountry Restoration category, designating them lands with lower quality roadless characteristics and assigning them fewer management restrictions. ICL supports restoring forest health in these areas, and we understand that mechanical treatments require safe access. However, we are concerned that project proposals to reconstruct over 15 miles of motorized trails within the IRAs, particularly the Packsaddle IRA, will lead to creation of unauthorized trails unless accompanied by additional outreach, education and enforcement efforts.

ICL understands Forest Service efforts to promote firefighter and public safety through proposed improvements to NFS Road 2711 in the ; however, we are concerned that improving the road, which provides access and egress to private property in the Kilroy Bay/Pine Cove vicinity, may lead to additional public use and the development of unauthorized motorized routes which stem from NFS Road 2711. Moreover, the road provides motorized access to Unit 261, which is also an Over 40-Acre parcel (OF 46). Improvements may prove more beneficial for operators to extract and haul commercial-valued logs from the unit. If this is the case, this road use should be clearly defined and explained in future documents. "No road actions are currently being considered within this IRA. However, NFS road 2711, which bisects the western portion of the IRA, is proposed for reconstruction to improve public and fire fighter safety," (Scoping Notice, p. 17). These two sentences clearly contradict each other and the Forest Service cannot claim no road actions while proposing road improvements in the next sentence. We recommend reconciling these statements and either removing OF 46 from the proposed list of Over 40-acre parcels and alter the unit's proposed treatment or maintain the current proposal with altered language and transparency.

Regarding the Packsaddle IRA, nearly 15 miles of motorized single-track trail is proposed for reconstruction, focusing primarily on steep and sharp switchback areas with erosion problems. The Scoping Notice states no road actions are proposed for the IRA; however, one new bridge and one bridge replacement are proposed for trails within the IRA. The vast majority of the trail in question appears to follow streams and stays near or within riparian areas and crosses streams at least 4 times, the two bridge locations included. We recommend relocating trails from sensitive areas to more sustainable locations as well as rehabilitating unauthorized user created routes.

Gravel pits

Road maintenance and relocation will require new gravel which will help reduce sedimentation and will improve watershed conditions. The Forest Service is proposing to expand four gravel pits and construct up to six new gravel pits. Development of these pits will also have permanent impacts on the landscape. The Forest Service should estimate the volume of gravel needed for this project, examine the proximity of each pit to the road subsystem, estimate the amount of suitable material available from each pit and sequence the development and reclamation of each pit to minimize the total surface disturbance at any one time.

The Forest Service should also evaluate the effects of rock crushing activities at these sites in terms of noise, dust and emissions and create design features to avoid, minimize and mitigate impacts. It is also important to monitor and control noxious weeds at gravel pits to prevent spreading noxious weeds when resurfacing roads.

The Forest Service should consider future maintenance needs for roads in and around the project area. Coarse woody debris from project activities may be helpful in gravel pit reclamation efforts and for preventing unauthorized motorized use. When reclaimed, gravel pits may also serve potential uses as trailheads or staging areas.

Other wildlife issues

Regarding Goshawks, we encourage you to incorporate *Management Recommendations for the Northern Goshawk in the Southwestern United States* (Reynolds et al. 1992).

With regard to elk, we support using permanent or seasonal road closures to enhance elk security habitat in areas where there are redundant routes. The Scoping Notice proposes increasing closures within the project area by 2.5 weeks during the hunting season. We recommend considering some seasonal closures during calving season, as well. Research shows that cow elk disturbed more than 10 times during calving season will more likely lose or abandon their calf than a cow disturbed fewer times.

Riparian treatments

We recommend carefully pre- and post-treatment monitoring of any riparian treatments to ensure that Watershed Condition Indicators are maintained or improved. Within RCAs, additional attention should be paid for retaining large-diameter trees of all species. We appreciate the RCA vegetation treatments are not proposed in the Indian and Bear Creek subwatersheds because they contain bull trout critical habitat. No new roads should be built in Riparian areas, and existing roads should be moved to mid-slope or ridge tops whenever possible.

Snag retention

A sufficient number of snags need to be left standing in each treatment area for cavity nesters until snags can be replaced by natural recruitment. Standing trees need to be overstocked to ensure sufficient habitat until new trees mature. Snags should be clumped rather than spaced evenly. Regional Snag Management Guidelines should be adhered to as part of this project and should be addressed in an EIS. We are also concerned about the removal of snags by firewood cutters and recommend design features that ensure that large snags important for wildlife will not be cut.

Coarse Woody Debris

To promote development and protection of soils, coarse woody debris should be maintained in accordance with the recommendations in *Managing Coarse Woody Debris in Forests of the Rocky Mountains* (Graham et al, 1994).

Hazardous Materials

Because machinery will be used during the proposed Buckskin Saddle Restoration project, a hazardous material plan needs to be in place in the event of a fuel or solvent leak. Hazardous wastes, including grease, oil, and fuels, need to be disposed of off-site in an environmentally appropriate manner. We are especially concerned about the use of fuels, lubricants, solvents, and other toxic chemicals in or around streams and drainages. The use of these hazardous materials must be carefully evaluated and an approved spill containment kit should be on-site at all times. Secondary containment systems should be in place. Fuel depots and storage facilities should be at least 300' from any live stream or water source.

Noxious Weeds

Vehicles and equipment serve as vectors for the spread of noxious weeds when proper inspection and cleaning are not practiced to limit their spread. Disturbed soil needs to be stabilized to prevent erosion and expansion of noxious weeds. All equipment should be inspected, cleaned, and washed prior to the operator entering public lands. Work crews trained in noxious weed recognition and removal should patrol the project area and mechanically remove any weeds or microtrash. The Forest Service should use this opportunity to restore native vegetation, and ICL recommends the use of all native species in the project area, especially areas that have direct associations with temporary roads and/or skid trails.

Project implementation

The Forest Service should host an implementation and monitoring website for this project so the public can track the areas through different restoration activities over time. The Forest Service should clarify that a variety of methods may be used to treat a single area to avoid the perception of double counting. A map could be updated as needed to describe the treatments and locations.