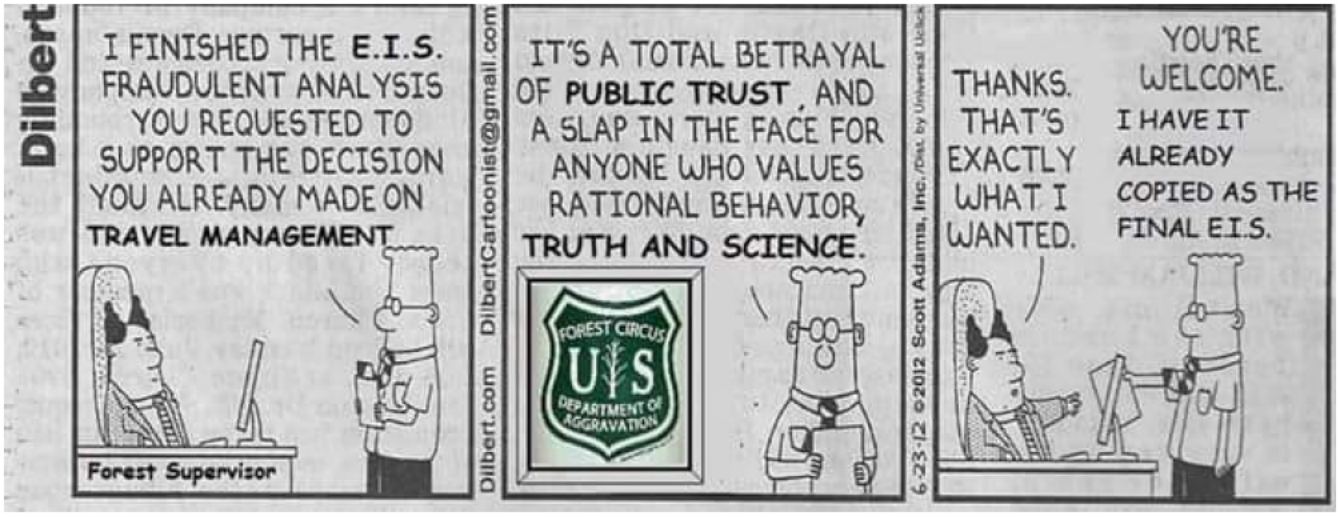
Paul R. Sieracki
[redacted]
Feb. 1, 2020

Re: Comments on the Buckskin-Saddle dEA from Sieracki.

Dear dEA Comment Reviewers,

I am resubmitting the Scoping Notice comments because they have not been sufficiently addressed or addressed at all in the dDA. There is no point in rewriting comments because the project has not changed significantly from the SN to the dEA. The comments below show that sufficient analysis of many issues has not taken place. The best available information has been discounted in favor of older more logging-permissive science in the case of fisher. Wildlife write-ups are superficial or designed to justify logging while harming wildlife in terms of forest canopy removal, building of new roads, lack of surveys, permitting lead poisoning of predators, allowing trapping. Resource damage is occurring and area closures should be implemented.

Failure to involve interested non-collaborative publics in the initial stages of the alternative planning process leads to litigation. When is the USFS going to learn that using logging collaboratives to support their actions eliminates the spectrum of citizens interested in participating? Logging collaboratives all have different protocols and and tone policing thresholds. They are not consistent across the USFS, leading to skewed cabals supporting illegal to mediocre at best timber sales. Then the USFS pushes collaborative supported alternatives through the NEPA process without serious consideration of public input (Dilbert is right):



There are several issues that I would like to emphasize.

Lack of environmental ethics of the USFS and "conservation groups" supporting the construction of 30 miles of new roads which will negatively affect grizzly bears and all wildlife responsive to road densities.

Relief Requested:

- Eliminate using logging collaboratives.
- Involve all interested publics from the start of the project.

Failure to address issues in regards to trapping.

Relief requested:

- Initiate an area closure on trapping activities based on natural resource damage, if not applicable, change USFS law on allowing harm by trapping to wildlife on Federal Lands.

Failure to address poisoning of carnivores and scavengers by allowing lead ammunition.

Relief requested:

- Initiate an area closure on the use of lead or other toxic metal ammunition. This is not only a hunting issue, it is a widespread contamination with a toxic substance issue that may impact TES species.

Failure to map and analyze elk calving areas, wintering areas, failure to quantify species and productivity of "forage" and the number of elk in the project area.

Relief requested:

- A professional evaluation of elk and their habitats must be completed, including the issues discussed above.

Lack of wildlife surveys

- The wildlife report admits that there were no surveys for the pygmy nuthatch. Then states few records are in the area. The point being that there are many records that the wildlife biologist did not bother to search for, try using ebird. I am not going to do the work for the wildlife biologist. This type of superficial analysis is why our species are declining.
- In addition, the distribution of the pygmy nuthatch does not follow the distribution of ponderosa pines in this area. This is not accurate and dated information. They (the

nuthatch) are primarily found in low elevation habitats and not at higher elevation dry site habitats. Why has a pygmy nuthatch survey not been completed?

Relief requested:

- Conduct a detailed, professionally designed surveys for all sensitive species and raptors in the project area.
- Disclose a complete list of all species that occur in the project area.
- Sponsor a bioblitz using iNaturalist for the data storage source.

The amount of old growth is not sufficient in the area. There is logging proposed old growth recruitment stands.

Relief requested:

- Designate 30% of the project area for old growth and recruitment.
- Implement proforestation techniques to allow old forests to increase.

Forest habitat will be fragmented severely.

Relief Requested:

- Please use *species specific* fragmentation statistics to analyze forest habitat fragmentation.

Unroaded areas both adjacent to and not contiguous to roadless areas areas have not been identified as requested.

Relief Requested:

- Identify and do not enter these areas for roadbuilding and logging.

Lack of objectivity in the fisher habitat analysis and Wildlife Report.
Both Weir and Corbould (2010 and Sauder and Rachlow (2014) state that:

> "Weir and Corbould concluded that "landscapes with previous widespread and intensive forest harvesting may lose their ability to support fishers until these harvested areas regenerate sufficiently". Their conclusions are backed up by another study on fisher occupancy from northwest Idaho, where Sauder and Rachlow found that fishers also select home ranges with ≤5% open areas2. In addition, that study found that fisher selected landscapes with ≥50% of the area in mature connected forests"

and importantly, Weir and Corbuld (2010) state for BC:

"They estimated that a 5% increase in the area of wetlands or recent logging decreased the relative probability of fisher occupancy by 50% (Figure 1). At a 25% increase in the amount of open area within a home range area, the relative probability of a fisher occupying the landscape falls to almost nil"

Citations:
Weir, R and F. Corbould. 2010. Factors affecting landscape occupancy by fishers in North-Central British Columbia. Journal of Wildlife Management 74(3): 405-410. 2 Sauder, J. and J. Rachlow. 2014. Both forest composition and configuration influence landscape-scale habitat selection by fishers (Pekania pennanti) in mixed coniferous forests of the Northern Rock Mountains. Forest Ecology and Management 314(2014):75-84.

see probability graph below:

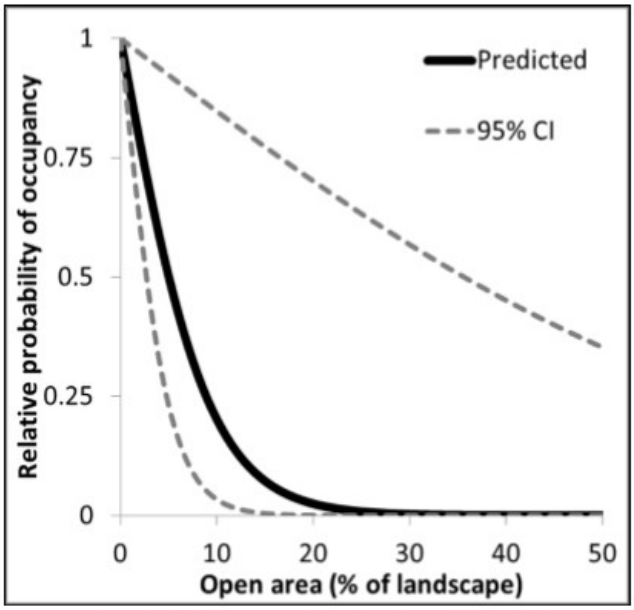
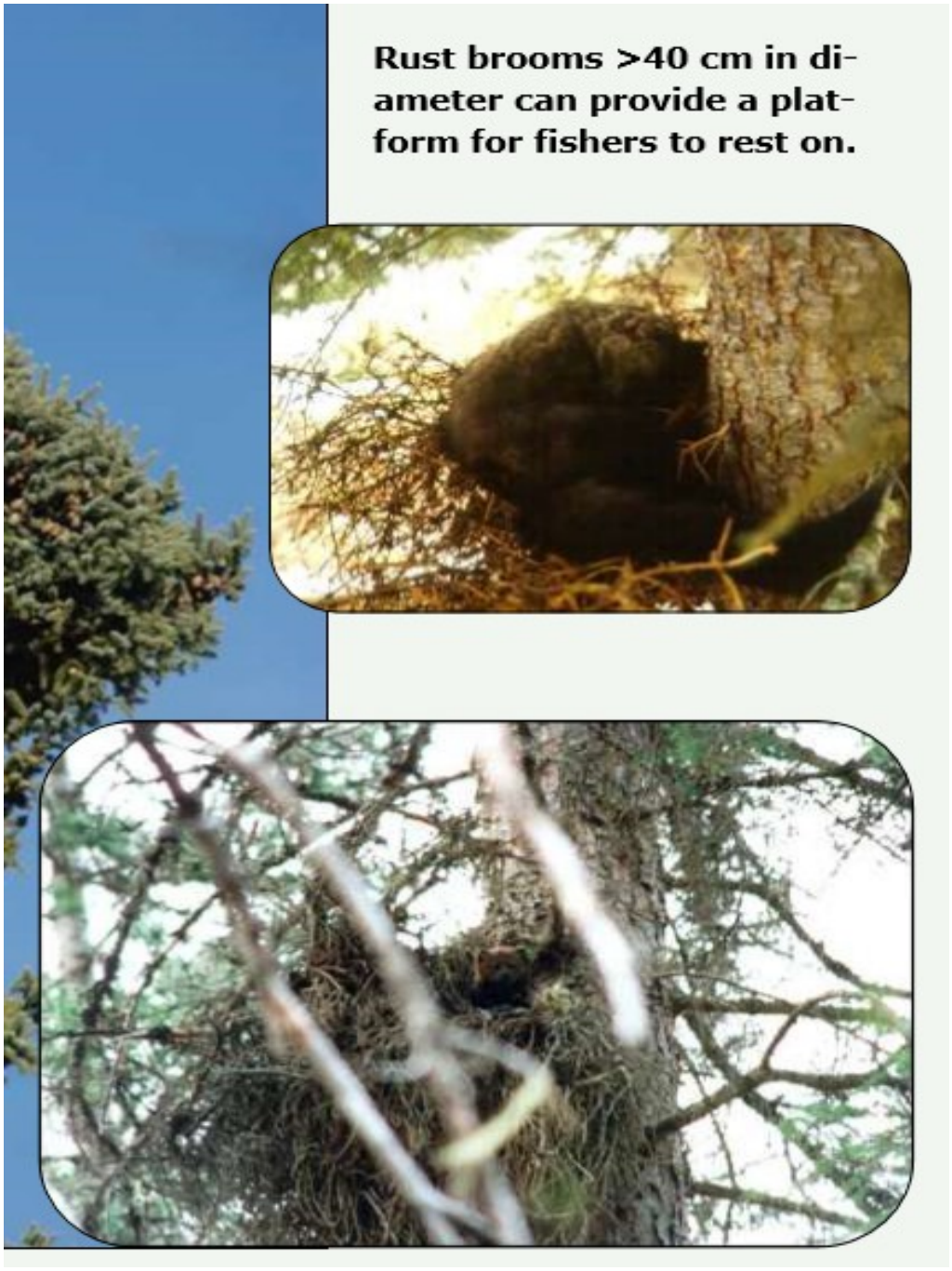


Figure 1. Open areas (logging 0-12 years old and wetlands) affect the relative probability of a home range being occupied by fishers in the Williston region of BC (Figure 1. from Weir and Corbould 2010).

Relief Requested:

- Provide and implement action items that will trend fisher towards abundance and increase its distribution to the point of removal from the sensitive species list.
- Provide for large tree structures that are normally found in old growth communities *in actual old growth stands which are part of fisher habitat.*
- Use the analysis guidelines in *Fisher Open Area Analysis V. 25 April 2019,* found at: https://www.bcfisherhabitat.ca/wp-content/uploads/Fisher-Open-Area-Analysis-25.04.2019.pdf

- Provide for abundant resting areas including mistletoed western larch and other species. These are favored by fisher, which are partially *aboreal*. Photos below are from the fisher habitat photo guide on the BC fisher habitat site.
- Use the same precommercial thinning standards as required for Canada lynx to provide abundant snowshoe hare prey for all predators.
- Remember that multi-story old growth stands also have high snowshoe hare densities. Please allow for 30% of the area in old growth and recruitment stands.
- Provide unburnt piles of large diameter logging slash for resting sites also.



Failure to evaluate cumulative effects of all the ongoing timber sales in fisher habitat on the IPNF that have a "may affect individuals etc" determination.

Relief Requested:

- Analyze the cumulative effects of all timber sales on the IPNF with the "may affect individuals" determination for fisher.

Please incorporate supplemental comments submitted by Sieracki for the SN, located at the end of the document.

Previously submitted SN comments follow.

District Ranger,

This planet is in a climate change emergency and is in a period called the 6th great extinction, because of this complete emphasis must be placed on restoring healthy and resilient populations of wildlife in the context of combating climate change and biodiversity loss. Logging should be eliminated from National Forests as it causes a carbon deficit. Dr. Rees, professor of human ecology and ecological economics states that "Humans are Blind to Imminent Environmental Collapse" and that governments are dismissing scientists warning to humanity.
"Bottom line? The world seems in denial of looming disaster; the "C" word remains unvoiced. Governments everywhere dismissed the 1992 scientists' Warning to Humanity *that "...a great change in our stewardship of the Earth and the life on it is required, if vast human misery is to be avoided" and will similarly ignore the scientists' "*second notice*." (Published on Nov. 13, this warning states that most negative trends identified 25 years earlier "are getting far worse.")" https://thetyee.ca/Opinion/2017/11/16/humans-blind-imminent-environmental-collapse/*

Edward O. Wilson is a professor emeritus at Harvard University and a two-time Pulitzer Prize winner supports the half earth concept, expanding the existing system of biological reserves.

"Only by committing half of the planet's surface to nature can we hope to save the immensity of life-forms that compose it. Unless humanity learns a great deal more about global biodiversity and moves quickly to protect it, we will soon lose most of the species composing life on Earth. The Half-Earth proposal offers a first, emergency solution commensurate with the magnitude of the problem: By setting aside half the planet in reserve, we can save the living part of the environment and achieve the stabilization required for our own survival.

Why one-half? Why not one-quarter or one-third? Because large plots, whether they already stand or can be created from corridors connecting smaller plots, harbor many more ecosystems

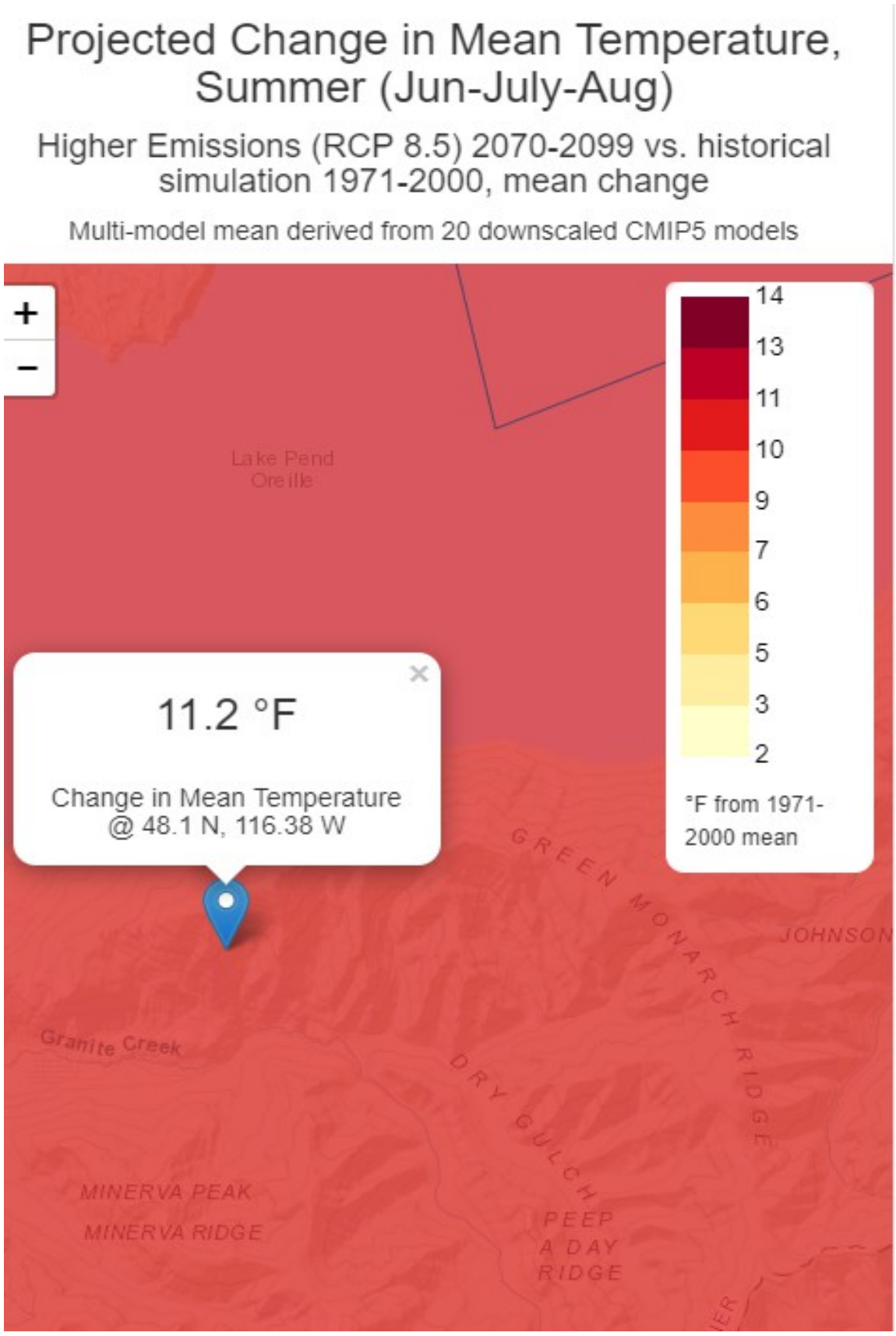
and the species composing them at a sustainable level. As reserves grow in size, the diversity of life surviving within them also grows. As reserves are reduced in area, the diversity within them declines to a mathematically predictable degree swiftly—often immediately and, for a large fraction, forever." E. O. Wilson

Federal Lands are an important component providing large landscapes for biodiversity maintenance and carbon storage. This sale is not ecosystem restoration as touted, but an ecological disaster in the making. Conservation legislation like NOREPA help conserve biodiversity. ***Conserving biodiversity and carbon must be the first and foremost mission of the USFS.***

Local Climate Change

Predictive modeling indicates that Buckskin-Saddle area will have: hotter summers, warmer wetter winters and more variability; novel climates may emerge. Predictions based on RPC 8.5 for the Granite Ck. drainage indicates that summer temperatures are going to spike, summer precipitation may decrease, winter precipitation will increase and stress caused by summer evaportranspiration w**ill increase (Appendix B, Climate Projections, source https://climatetoolbox.org/tool/Future-ClimateLocation: 48.36o N, 117.50o W). Selecting a more southerly aspect shows even more change in extremes values. RPC 8.5 is widely regarded as the minimum or more likely climate c**hange trajectory than more moderate projections given the current lack of urgency to reduce CO2 and Methane emissions. For example a south aspect on Granite Creek's mean daily temperature for the last 90 days (June/July/August, 2019) is 62.2F. Climate Toolbox projects an 11.2 degrees F Temperature increase by 2100 assuming a rpc 8.5 pathway. The planet is currently following this pathway and the blue ocean event is approaching rapidly.

See image on the next page.


Projected Change in Mean Temperature, Summer (Jun-July-Aug)
Higher Emissions (RCP 8.5) 2070-2099 vs. historical simulation 1971-2000, mean change
Multi-model mean derived from 20 downscaled CMIP5 models
+
−
14
13
11
10
9
7
6
5
3
2
°F from 1971-2000 mean
11.2 °F
Change in Mean Temperature @ 48.1 N, 116.38 W
Lake Pend Oreille
GREEN MONARCH RIDGE
JOHNSON
Granite Creek
DRY GULCH
MINERVA PEAK
MINERVA RIDGE
PEEP A DAY RIDGE

Local climate changes (as projected) will negatively affect migratory songbird species. Boyle and Martin (2015) found that high elevation habitats are very important for migratory birds in British Columbia. Logging must be eliminated in high elevation habitats (subalpine) to provide natural habitats for songbirds and to reduce increased stress from un-natural design-a-stand approaches.

> *"Most species exhibited strong temporal variation in patterns of abundance that were related to migratory behavior. From an extensive literature-based survey, we found that ~35% of North America's breeding bird species use high elevations, and that all primary high elevation habitats are important for full life-cycle conservation of this avifauna. Our findings highlight the importance of high elevation habitats to migrating birds from wide-ranging breeding distributions for at least three months of the year, a period equivalent to the length of the breeding season for most species. These results emphasize the need for effective conservation of fragile alpine and other high elevation habitats that are increasingly threatened by local, regional, and global anthropogenic disturbance." (Boyle, W. A. and Martin, K., 2015. The conservation value of high elevation habitats to North American migrant birds. Biological Conservation 192 (2015) 461–476. http://dx.doi.org/10.1016/j.biocon.2015.10.008)*

They found that 25 species using high elevation habitats were of concern:

> *"Over 26% of the species (n = 25) detected on our surveys were birds listed by North American and local conservation planning and management agencies including five Red-listed and eight Blue-listed species or subspecies"*

The movements of non migratory birds are much more complex than previously thought

Cambell et al. (1997 in Boyle and Martin, 2015) found that chestnut-backed chickadees, which occur in the project area, exhibit attitudinal migration, breeding at low elevations, moving upslope in late summer, then winter at lower elevations. These complex patterns of elevational and distance migratory behaviors that many bird species have need to be addressed to maintain these species over the long-term especially with increasing climate change stressors.

Both above examples show the dangers of assigning logging units in random locations instead of completing a credible analysis using credible science and credible data.

This project is not carbon neutral or carbon negative.
Please include the large distances logging trucks have to travel to the mills in carbon budget calculations. Only allow electric logging trucks and equipment to work in the area during true restoration activity. Depro et al (2008) found that a no harvest (logging) scenario on public lands retained the greatest carbon sequestration potential.

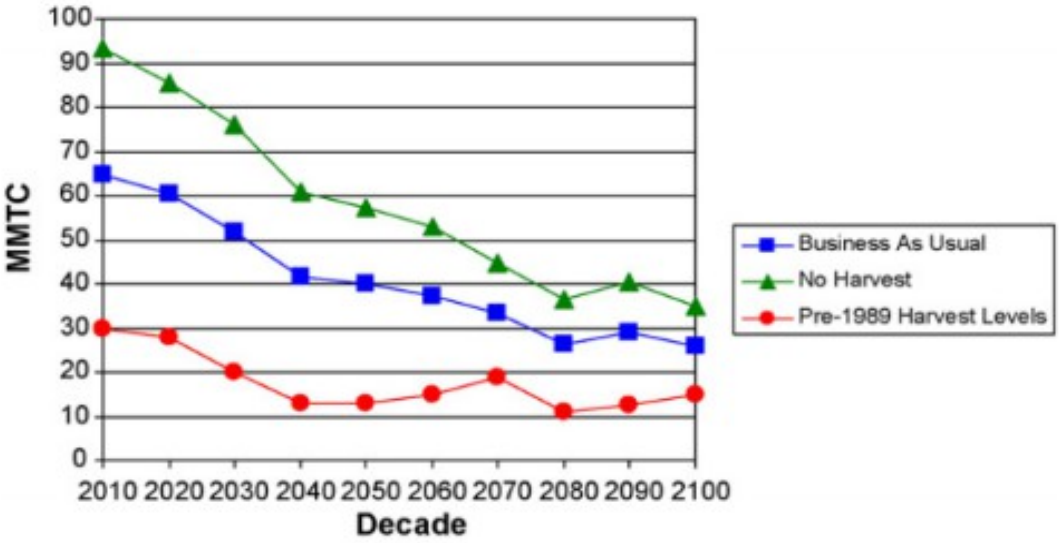


Fig. 6. Annual carbon sequestration in all public lands by scenario.

Please develop a max carbon sequestation alternative for the project areas. Please actually do the science and provide an on-the-ground alternative, not just put it in the "alternatives considered but not analyzed" category.

We, the Public do not know what is out there.
The information presented in the Scoping Notice and proposed action is insufficient to prepare substantive comments. The scoping notice does not portray the existing condition of the various topics required to be addressed in the NEPA document, especially wildlife and old growth. There was little data presented on the occurrence of sensitive threatened and endangered species based on fresh wildlife surveys. There was only a cursory goshawk survey in a very small portion of the project area.

Participation in public process
The commentor has attended "collaboration" meetings with the Panhandle Forest Collaborative as an observer and a field trip to the project area. Despite claims to the contrary, the public was NOT involved in the alternative development process. The collaborative only represents logging interests and those groups that support it. There are other viewpoints of the public that must be considered however the USFS has already decided on the outcome as the proposed actions are almost never significantly modified after the Scoping Notice is put out.

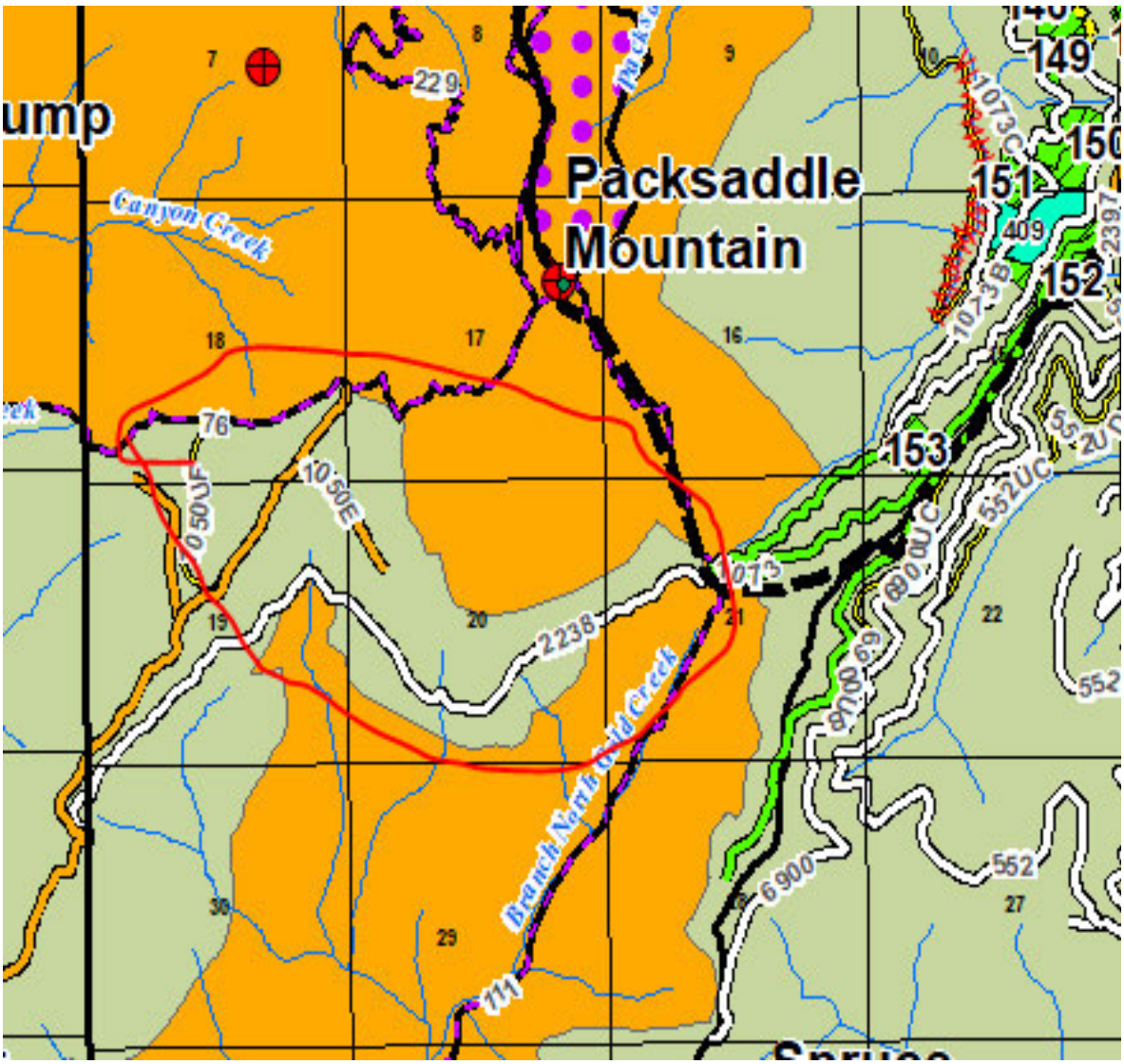
Twenty Years
Stretching this timber sale for 20 years is longer than the time frame for Forest Plan reviews and unprecedented on the IPNF. It is an absurd length of time considering the rapid changing of the local climate during that time and is not in the best interest of the local population in terms of fire protection to draw the logging out for a long time frame. Nor is it in the best interest in supporting flammulated owl habitat management.

Adjacent sales to the south and north.
The IPNF is working on two sales adjacent and to the southwest of Buckskin-Saddle. Chloride Gold and to the south and adjacent to the Honey-Badger. These all have the potential to affect wide aging wildlife such as elk, grizzly and black bear, mountain lions, mountain goats, deer. Since the sales will be overlapping during implementation, they should be combined in an EIS. The time frame of Chloride Gold and Honey – Badger are not known, if it is 20 years there will be a long-term ecosystem wide degradation of wildlife security. This amounts to one massive drawn out timber sale. Clearly an EIS must be prepared incorporating all 3 sales and the Strong-Hope WUI sale also in order to effectively analyze cumulative effects.

Roadless additions not evaluated.
The commentor has attended the PFC logging collaborative both as a participant and an observer. During that time an evaluation of existing unroaded areas was requested by the commentor. There are ample opportunities to increase the size of the existing roadless areas through road rehabilitation and restoration of vegetation. These are important for habitat conservation through NOREPA.

NREPA – Northern Rockies Ecosystem Protection Act.
The project area lies within areas that should be rewilded based on the science in NREPA. This includes NREPA new wilderness, NREPA Biological Corridors and NREPA Recovery Areas.
This is the alternative that should be presented, not the 20 year long logging and roadbuilding project that the USFS and the logging collaboratives want. Please include an alternative modeling NREPA that is NOT under the "considered but not analyzed" category.
(https://allianceforthewildrockies.org/nrepa/#map).

Unlogged areas not displayed.



The commentor also requested that areas outside of the roadless areas that have not been logged or roaded be mapped and not entered. This was not accomplished. Unlogged and unroaded areas of any size serve as important biological reserves.

Connect and increase the size of existing roadless areas through rewilding.

As stated above please map potential roadless additions and remove roads to provide roadless connectivity between identified roadless areas. One such area is the the roaded corridor splitting the two roadless areas named Packsaddle. Road 2238 (above image) should be removed along with a host of smaller roads to the NW. The area is outlined in red in the above image. This should be a first step towards a large scale rewilding project following the science in NREPA.

Insect and disease thresholds for logging.

Please proved a spatially explicit map showing the location of all the insect and disease that the USFS is claiming is occurring in the area using the criteria below. "Our threshold value for mapping risk is defined as the expectation that, without remediation, at least 25% of standing live basal area greater than one inch in diameter will die over a 15- year time frame (2013 to 2027) due to insects and diseases.
https://www.fs.fed.us/foresthealth/technology/pdfs/2012_RiskMap_Report_web.pdf

Old Growth and recruitment stands.
Utilizing the same process with, current and statistically valid data for vegetation modeling, fsveg or or another appropriate model. **Please show all stands in the analysis area that would meet the minimum requirements for old growth as defined by Green et al, projected to 150 years and also the stands that meet the large tree portion of the guidelines only (8 or 10 stems per acre gt 150 years) and allocate these stands to old growth recruitment (proforestatation). Please allow additional public input on recruitment stand area and location. Please locate fire refugia and allocate recruitment stands to those areas.**

Implement Proforestation.
Proforesation is defined as *"growing existing forests intact to their ecological potential it is a more effective, immediate,and low-cost approach that could be mobilized across suitable forests of all types."* *Moomaw et al (2019).* Logging forests and converting them to plantations is not the most rapid way to sequester carbon. The young plantations take years to begin to sequester carbon, while growing existing forests to an old growth state, proforestation will increase the carbon reserve potential of the project area especially when coupled with implementing frequent underburns in strategic dry sites which are located based on simulating extreme fire behavior (not flammap).

> *"Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement, water and air quality, flood and erosion control, public health benefits, low impact recreation, and scenic beauty." Moomaw et al (2019.*

In addition letting these stands grow will provide additional values including temperature buffering, less evapotranspiration than younger fast growing stands thereby contributing to a more stable groundwater supply to streams, and there is an increase in songbird populations associated with proximity to old growth stands along with differential genetic diversity in different areas of the same old tree. The value of proforestation utilizing existing stands that can grow to old growth status outweighs the need to create larch and white pine plantations for future logging. The IPNF has created literally thousands of acres of these young plantations already. Logging to HRV is now irrelevant because of the rapid climate change trajectories that are happening.

Flammulated owls, a sensitive species are often loosely colonial. Please trend an area with potential and suitable habitat that is large enough for the occupancy of multiple pairs of owls, the ridge on the NW of the analysis area seems a likely place for to initiate real restoration by utilizing multiple controlled burns to start trending stands toward old growth *carefully!* The highest probably models for climate change show an increase in temperature and drought, making a large underburned area not only suitable flammulated owl habitat but a semi natural firebreak.

Please develop a detailed plan for the flammulated owl colony in Granite Creek.
-Have nests been located?
-How many nests are there?
-How will random partial logging and underburning affect the owls and their habitat? Please use science and just do not state that burning is "beneficial" it might not be in stands currently used.
-How much habitat disturbance can flams take before abandoning nesting territories?
-How and when will the population be monitored?
-Is the population going to increase or decrease from the random underburing?
-By how many territories?
-What insects are they preying on in Granite Creek?
-Is this population a source or sink (being maintained by recruitment from other areas)?
-There are several scientists that have expressed caution about randomly burning in owl habitat. Please proceed with care and the use of science.

Identify population trends and map locations for all sensitive species present in the area, including surveys and potential mitigation and re-introductions.

Wild Turkey Federation, please restore powerline vegetation in this sale area.

There are one or two members of the WTF on the PFC logging collaborative group. In other areas the WTF has restored vegetation along power line and gas pipeline ROW's. This EA intends to "soften" the impact of the powerlines and the USFS botanist has expressed concern that the adjacent logging to powerlines will result in noxious weed spread. This would be a good opportunity for the WTF to assist the USFS, preventing the spread of noxious weeds and increase early seral stage pollinator habitat.

> "Enable Midstream cooperated with the NWTF and a variety of other conservation partners to make a pollinator preservation project possible along its natural gas pipeline rights of way. Staff, which included wildlife experts and botanists, managed invasive vegetation with herbicide, stimulated plant growth and reduced risk of catastrophic fire with controlled burns, and planted pollinator-friendly vegetation on these sites. Enable Midstream won the NWTF Energy for Wildlife

Award this year for this program. https://www.nwtf.org/about/state-news/energy-wildlife-43rd-annual-nwtf-convention-sport-show "

The Packsaddle area is of high importance to IDFG for elk hunting, according to Laura Wolf, IDFG biologist.

Please change the priority level from medium to high. Please let the public know that the reason the IPNF chose medium importance was to bow to timber industry. The IPNF describes the Packsaddle Mountain area as a quality hunting area and a unique feature to the Pend Oreille Geographic Area. "Packsaddle Mountain Elk Quality Hunt Area" IPNF FP p88.

> "FW-GDL-WL-13. Elk. Management activities in elk management units should maintain existing levels of elk security (see glossary). Where possible, management activities in high and medium priority elk management units (determined in cooperation with Idaho Department of Fish and Game; see FW-DC-WL-17) should improve elk security. "
>
> "FW-DC-WL-17. Habitat for native ungulates (elk, deer, moose, and mountain goat) is managed in coordination with state agencies. Cover is managed according to FW-DC-VEG-01, FW-DC-VEG-02, FW-DC-VEG-04, FW-DC-VEG-05 and FW-DC-VEG-11."
>
> "FW-OBJ-WL-02. Elk. Over the life of the Plan, increase by 3 the number of high or medium priority elk management units (determined in cooperation with Idaho Department of Fish and Game; see FWDC-WL-17) that provide >30 percent elk security (see glossary). "

The IPNF should consider this popular hunting area a high priority area.

Elk Calving areas need to be identified in the project areas of this and adjacent logging projects.

Please follow IPNF Forest Plan Guidelines and identify critical elk areas for the project adhering to the guidelines in

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

These include elk calving and wintering concentration areas, just where are they on a map?

The following are basic requirements for management of the area:

- Map all old growth stands in the area.
- Do not log in moist site old growth stands.
- Use fire or very light thinning of younger trees for dry site old growth stands.

- Develop additional dry site stands to allow for a large proportion of the dry site habitats to become suitable for dry site bird species.. white-headed woodpecker, flammulated owl (nests in dry sites over 4000' in elevation), pygmy and white-breasted nuthatches, etc.
- Recruit additional stands for up to 30% of the project area as potential old growth. This is important for fisher habitat and all the other species that may occur in the area.
- Select enough capable habitat for fisher to live and breed in the area, when they are reintroduced. (Capable habitat means stands that would grow into suitable fisher habitat). The roadless areas should not be included in the assignment of recruitment stands or in the project area.
- Reintroduce fisher to the area if habitat is deemed suitable presently.
- For regenerated plantations in potential (capable) fisher habitat, manage the young stand to provide for snowshoe hare prey, similar to the lynx management plan.
- Implement an area closure on trapping all animals (this has been done by the USFS) to allow for repopulation of the area by fisher and other furbearers and to reduce the risk of harm to wolves.
- Do not log in subalpine series habitats as it is under pressure from global warming.
- Identify fire refuga through modeling.
- Allocate recruitment stands for moist site old growth in these areas.
- Construct no roads or skid trails through recruitment or existing old growth.
- Eliminate any allotments in the area. Cattle and other livestock have the most biomass of terrestrial mammals on the planet. This is alarming and incredibly destructive to the environment and our climate.
- Do not do “feel good” logging in RHCA's, or disguise logging as means for achieving a conservation objective.
- Analyze in detail the existing and alternative conditions to surrogate and sensitive species.
- Map existing beaver colonies including bank denning beavers.
- Incorporate an area closure for trapping beaver. Yes the USFS can and is doing this in other areas for other species, despite the denial of this.
- Reduce total road density to as close or below 0.5 miles per square mile, measured on a drainage basis, to provide functional large carnivore habitat. The proposed action, developed through a logging collaborative does not reflect the guidance of other interested groups.
- This area provides a corridor between grizzly bear recovery areas, please provide connectivity to a possible wildlife overpass over route 90 to the south. There has been documented use of the area by grizzly bears.
- The use of the Packsaddle Roadess areas by motorized recreation is precluding use by grizzly bears as bear-year and denning habitat and interfering with connectivity.

Providing secure areas in a corridor is essential because of the way female grizzlies set up territories adjacent to their mother.

> "FW-GDL-WL-17. Connectivity. In wildlife linkage areas identified through interagency coordination, federal ownership should be maintained. "

- Allowing motorized use in these roadless areas is counter to the IPNF Forest Plan Desired condition

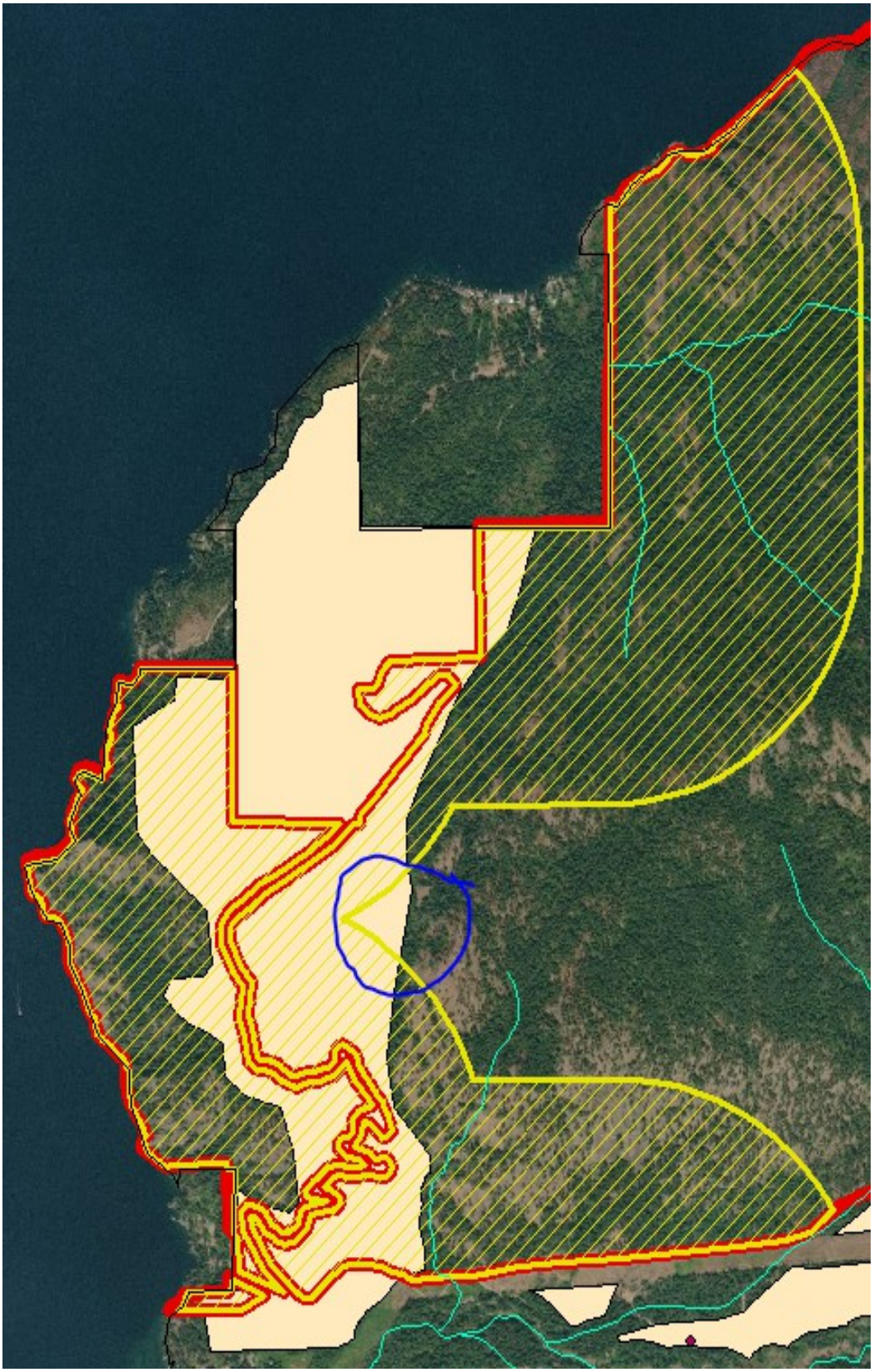
> "FW-DC-WL-02. A forestwide system of large remote areas is available to accommodate species requiring large home ranges and low disturbances, such as some wide-ranging carnivores (e.g., grizzly bear). "

Currently there are only localize areas slated to provide for wide ranging carnivores such as the grizzly bear, wolf or mountain lion.

- Do not log in existing roadless areas or previously virgin (unlogged) areas of the project to protect biodiversity.
- Identify and map opportunities for additions to the roadless areas.
- Consider controlled burning in the roadless areas, avoiding areas with old growth.
- Provide for recent burn forest habitat in areas allocated for timber production. Either burn an area or log 1/3 or the crown and torch the rest. (proportions are admittedly guesses).
- Please burn the slope on adjacent to Pend Oreille Lake on the north edge of the project area regardless of a temporary visual impact to residents who do not appreciate burns.
- Seed trees and shelterwood cuts are not co equivalents of burn habitats.
- Eliminate the use of logging collaboratives. These groups are offensive and have a resource extraction bias. Logging is NOT a tool for moist site restoration.
- Please involve all interested public's in the IDT discussions for alternative development, not just the logging collaborative.
- Please use all science, not just biased USFS science supportive of logging, and complete analysis in a spatially explicit and quantitative manner. The use of terms like"plenty" of habitat as a substitute for quantitative analysis is unprofessional.
- Under no circumstances poison ground squirrels or other species to assist with tree regeneration. These poisons biologically magnify and cause mortality to carnivores further up the food chain.
- It is important to maintain early stages of natural succession to provide for insect and songbird habitat.
- Please seed roadsides with fireweed and other local native species to provide pollinator and other habitat. Try not to include bear foods on roads that are permanently open.
- Request an exemption from the plantation planting time limits to allow for some semblance of mature brushfields to persist. This would be in accordance with "FW-OBJ-WL-03. Landbird assemblage (insectivores). The outcome is the management of planned ignitions on 1,000 to 5,000 acres annually to provide habitat for olive-sided flycatchers, hairy woodpeckers, chipping sparrows, and Hammond's and dusky

flycatchers. (Also see FW-OBJ-FIRE02, which provides additional habitat for these species). "

- I need not mention the drastic effects that global heating and subsequent climate chaos that is about to overtake even the somewhat protected inland temperate rainforest that the project area is in. This will occur just after the first blue ocean event and sooner than later. Be scared.
- Please do not log any standing dead trees. If there is an OSHA conflict, leave the live trees near the snag for recruitment and to promote structural diversity.
- Another option is to top hazard snags and trees using mechanical equipment. See the example of the ponderosa pine on the Sandpoint Ranger district Grounds.
- Large tree retention. Please permanently exclude from logging any trees with a diameter greater than 21 inches.
- Do not log mistletoe larch.
- Please work hard to restore population of bull trout and cutthroat trout as there is critical habitat for bull trout in the analysis area.
- American dippers are projected to decline with global heating. Please install dipper nest structures under all bridges on appropriate streams.
- Please pass controlled burns through riparian areas to encourage broadleaf trees, shrubs and forbs such as black cottonwood, aspen, red-osier dogwood etc. in areas that would not negatively affect water quality. This would provide riparian habitat for songbirds and food for beavers.
- Eliminate motorized recreation in the roadless areas. This is a CO2 producing activity that is not needed and displacing wildlife.
- Please do not allow use of electric bicycles on non motorized trails.
- Please remap the WUI according to ecological features based on fire ecology and not false arbitrary boundaries parroting that of Bonner County.
- Carving out a Community Protection Zone out of the Schafer Peak Roadless Area such as around the communities shown in the map below, is changing how the roadless area is managed. The creation of this zone requires an IPNF Forest Plan amendment. Also, driven by legislation, the community protection zone boundaries are not based on ecology, or fire safety and modeling but are administrative, arbitrary and capricious. There is also an overlap of a shelterwood unit with a portion out of the protection zone entering the roadless area (see blue drawn circle). In the image below the red boundary is the roadless area, the yellow hatch is the proposed community protection zone and the tan-yellow color is a shelterwood unit.



Community Protection Zone in the Schafer Peak Roadless Area.

- **Eliminate the State of Idaho's involvement on this project.** These foresters are noted for butchering the land, the checkerboard is known worldwide as a bad example of management because it is seen by satellite. Their strip clearcuts are unacceptable. Sale names cam be construed as anti - wildlife, whether intentional or not eg. "Caribou Flatten". Almost EVERY major stream on Priest Lake State Forest (IDL property) is violating beneficial uses for temperature by not meeting shading requirements (IDEQ Priest Lake TMDL Addendum, 2016). This is not even considering the effects of climate change to those streams. These "foresters" should not be allowed on Federal Lands.

Violations to the NFMA and Forest Plan Guidelines are numerous, by not providing for identified corridors for the grizzly bear, the IPNF is violating the ESA.

Respectfully Submitted,

Paul Sieracki
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Geospatial Analyst/Wildlife Biologist

References

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Moomaw WR, Masino SA and Faison EK (2019) Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. Front. For. Glob. Change 2:27. doi: 10.3389/ffgc.2019.00027

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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