

Homestead EA – Idaho Panhandle National Forest

Objection Responses – Friends of the Clearwater

Issue: NEPA

Contention 2: Cumulative Effects

An objector contends that the responsible official failed to adequately analyze cumulative effects in violation of NEPA.

Response: Objectors state that “The EA failed to adequately analyze cumulative effects of past, ongoing, and reasonably foreseeable actions. As discussed in other sections of this objection, the problem is evident in the analyses of most resources supposedly analyzed in the EA.” The objector suggests the responsible official “Prepare an EIS which fully analyzes and discloses the direct, indirect, and cumulative impacts associated with the Homestead project.”

The responsible official responded to comments submitted by the objector during the comment period on the lack of cumulative effects analysis for various resources in the Homestead Project Response to Draft Environmental Assessment Comments (Homestead Response to Comments, project file). Responses disclose where and how cumulative effects were addressed or rationale for why there were none. See Homestead Response to Comments on cumulative effects (Vegetation, pp. 11-12; Soils, p. 22; Invasive weeds, pp. 24 -25; wildlife, p. 31; motorized use, p. 36; Fisher, p. 38; wolverine, p. 40).

Objectors also suggest that the Forest Plan EIS should be supplemented so that a “hard look” may be taken at the cumulative effects of fire suppression activities. The Idaho Panhandle Forest Plan (2015) is not under review in this process (36 CFR 218.8(c)).

A review of the Environmental Assessment (EA), draft Decision Notice and FONSI, and project record indicates cumulative effects were appropriately addressed for those resource areas potentially impacted by the proposed action. I find the responsible official complied with NEPA by adequately addressing cumulative effects.

Issue: Wildlife General

Contention 6: Elk Security

An objector contends that the responsible official did not disclose why the acreage of elk security decreased from 1,394 to 1,365 acres, nor did he analyze the implications of reduced elk security, in violation of Forest Plan Guidelines FW-GDL-WL-13, FW-DC-WL-17. The objector further contends that the responsible official failed to address FS-GDL-WL-14 in order to minimize disturbance to native ungulates during the birthing/partition period.

Response: The change in elk security acres is noted in Table 18 (p. 47) of the EA and is based on a correction due to identifying a portion of road, Little Daveggio ID 1914. Given that no activities will occur in elk security areas, as mapped (Wildlife Report, p. D-1), forest plan guideline (FW-GDL-WL-13) and desired condition (FW-DC-WL-17) will be met. Elk security is to be increased from proposed activities by 144 acres (Wildlife Report, p. C-13). The responsible official consulted with the Idaho Fish and Game Department (IDFGD) on birthing and partition (Project file, email from L. Wolf Re: Homestead Project Birthing/Partition Areas) and concluded that ungulate populations and herds will not be negatively affected by the proposed actions, which addresses forest plan Guideline FS-GDL-WL-14.

I conclude that the responsible official disclosed the rationale for changes in elk security and complied with the Idaho Panhandle National Forest Plan regarding elk.

Contention 7: Pileated Woodpecker

An objector claims the responsible official failed to address the impacts of the proposed activities on pileated woodpecker, in violation of NEPA.

Response: The responsible official responded to a comment on pileated woodpecker during scoping of the draft EA. The response noted that given the habitat present (Vegetation Report, pp. 25, 45) there would be no impacts to pileated woodpecker viability. The pileated woodpecker is not considered a federally listed Species, Forest Service Sensitive Species or other species identified in Forest Service manual direction 2672.42, therefore there are no additional analysis requirements if no impacts are identified.

I conclude the responsible official complied with NEPA regarding pileated woodpecker.

Issue: Aquatics

Contention 8: Boreal Toad

An objector claims that the responsible official failed to ensure a proper cumulative effects analysis on boreal toad viability in the project area in violation of NEPA.

Response: Table 1-B (p. 11) and Appendix C of the Wildlife Report (p. C-9) state that there would be no effect to boreal toads due to forest plan direction, the Inland Native Fish Strategy (INFISH) direction and implementation of Best Management Practices. Table O-A discloses which activities contribute to cumulative effects on wildlife and page C-11 of the Wildlife Specialist Report discloses cumulative effects to boreal toads. I find the responsible official considered cumulative effects on boreal toads in compliance with NEPA.

Issue: Grizzly Bear

Contention 9: Grizzly Bear Determination

An objector alleges that the responsible official inaccurately claimed "no effect" on grizzly bears because they are known to exist on the St. Joe Ranger District.

Response: Table 1-B (p. 9) in the Wildlife Specialist Report and Table 18 (p. 45) in the EA provide rationale for the no effect determination. They state, "The species is not known on the St. Joe Ranger District. There have been a few transient individuals that have traveled through the Ranger District. None known or suspected within the project area" and cite an email from the U.S. Fish and Wildlife Service that maps a grizzly bear den (at 10 miles) and grizzly bear movement (at 18 miles) from the project area. In addition the IPaC- Information, Planning, and Consultation System- at <https://www.fws.gov/ipac/> (8/2020) did not list grizzly bear as being present in the project location (2672.42 (1)). Further rationale is also included in the Wildlife Specialist Report (Appendix C, pp. C-2 to C-3).

I conclude the responsible official adequately addressed effects on grizzly bears and that the no effect determination is accurate.

Issue: Canada Lynx

Contention 10: Canada Lynx

An objector contends that the responsible official inaccurately assumes that lynx does not exist in the project area, while the Idaho Fish and Game Department acknowledge sightings in the area.

Response: Table 1-B (p. 9) in the Wildlife Specialist Report and Table 18 (p. 46) in the EA provide rationale for the no effect determination which states "Project does not occur within an LAU (Lynx Analysis Unit) and no suitable habitat in project area" and cites available maps in the project record. In addition the IPaC- Information, Planning, and Consultation System- at <https://www.fws.gov/ipac/> (8/2020) did not list lynx as being present in the project location (2672.42 (1)). Further rationale is also included in the Wildlife Specialist Report (Appendix, C pp. C-1 to C-2). Forest Service corporate data from IDFG was used to determine the absence of lynx in the area. The reference provided by the objector is for spatially buffered data and does not represent project level information.

I conclude that the responsible official carefully considered the presence of lynx in the project area.

Issue: Old Growth/Vegetation Ecology

Contention 11: Old Growth

An objector contends that potential old growth would be logged without the EA saying how much and failing to analyze the impacts to wildlife which are associated with old growth in violation of NEPA.

Response: The EA, draft Decision Notice/Finding of No Significant Impact, and the Homestead Project Forest Vegetation Analysis Report in the project record state that no proposed project activities would occur in stands that currently meet the minimum old growth criteria. This is in accordance with Forest Plan Standard FW-STD-VEG-01 which states, “Within old growth stands, timber harvest or other vegetation management activities shall not be authorized if the activities would likely modify the characteristics of the stand to the extent that the stand would no longer meet the definition of old growth” (p. 19). Areas identified as “potential old growth” that currently meet the minimum old growth criteria would not be treated as part of the proposed action. The areas of potential old growth are disclosed in the Homestead Potential Old Growth document (Project file).

The Homestead Old Growth Verification document (Project file) provides detailed field notes from surveys of areas of potential old growth which were included in prior versions of the proposed action. No areas currently meeting the minimum old growth criteria would be proposed for treatment and based upon spatial datasets (GIS data), less than 2 acres of the 2,161 acres identified as potential old growth would be treated under the proposed action. This is due to these areas not meeting old growth criteria as described in the Homestead Old Growth Field Verification document.

There would be no direct impact to old growth because there are no proposed treatments within old growth areas, therefore there is no need for an analysis of wildlife related to old growth.

I conclude the responsible official adequately addressed old growth effects in compliance with NEPA.

Issue: Transportation Management

Contention 12: Confusion on Mileage of Road Decommissioning

An objector claims there is confusion regarding the number of road miles to be decommissioned: This is also inexplicable in the context of the most recent version of the EA proposing (albeit based on uncertain funding) to decommission about eight more miles of undetermined roads than the original EA. Can someone do the math here, considering newly added system roads and road decommissioning? Where did these 15 + 8 miles of previously unacknowledged roads come from? The updated EA also proposes to maintain six fewer miles of road.

Response: The objector points out discrepancies in road mileages between the Draft and Final EA. In the final EA, a footnote was added (p. 12) that discloses the different sources of data used to calculate road miles. This review verified there are some errors in road mileages. The project file will be updated to address discrepancies in road mileage between the Draft and Final EA. Table B-9 in the Final EA reflects the correct total for all roads undergoing decommissioning work at 34.4 miles.

Regarding the change in miles of road to be maintained between the Draft EA and the Final EA, there was an error in the Draft EA (Table B-6) in the total miles of Forest Service Road (FSR) 1213 to be maintained. FSR 1213 would have maintenance work in the proposed action from milepost 0 to 1.32 totaling 1.32 miles. This sum was displayed as 7.10 miles in the Draft EA (Table B-6, p. B-6) but corrected to 1.32 miles in the Final EA (p. B-6), hence the roughly six fewer miles of total road maintenance.

The responsible official will correct the road mile errors and clarify these changes in the Decision Notice.

Issue: Roadless

Contention 13: Roadless Expanse Areas

An objector claims that some units (e.g. 28, 29) are within a Roadless Expanse, and the FS provides no analysis of the issue, which is inconsistent with the Region 1 policy found in USDA Forest Service, 2010e.

Response: There are four areas (Areas A, B, C, and D) within the Homestead project area that contain unroaded lands contiguous to the Grandmother Mountain IRA (Project file, Roadless Expanse Determination document). The proposed action for the Homestead project does not include any activities within the roadless expanse.

Units 28 and 29 are located in Area A which does not contribute to the natural integrity, undeveloped character, and opportunities of the Grandmother Mountain IRA and is more like the surrounding roaded areas. Therefore, Area A is not considered part of the roadless expanse (see Roadless Expanse Determination – Homestead Project File at RA-002).

I find the responsible official considered and disclosed the effects of the proposed action on the roadless expanse in compliance with Region 1 guidance.

Issue: Socio-Economics

Contention 14: Economics

The objector claims that the responsible official failed to provide a full and detailed accounting of the costs to those who would pay for these never-ending “fuels” manipulation cycles—the American public in violation of NEPA.

Response: The economic analysis for the proposed action provides a present net value (PNV) calculation for both timber related activities, and all other non-timber related project activities,

including fuel treatments referred to by the objector. The PNV calculation shows that the project as planned, would provide a net positive financial benefit. Individual costs are identified and categorized in the *Homestead Economics Analysis Spreadsheet Financial Efficiency and Economic Impacts*, in the project file. This spreadsheet is the record that discloses the financial efficiency analysis for the entire project and is the tool that calculates the PNV values used in the Homestead Economic Report. The cost of fuel treatment activities is included in the calculation of the PNV, specifically in the bottom row of Table 18 in the EA (p. 39).

I conclude the responsible official complied with NEPA.