Issue objected.

LeClerc grizzly bear unit is impacted by logging and road building from the Swxuytn logging project, illegal core designation, and core fragments. All impacting core habitat violating CNF Forest Plan Standards, NEPA and the ESA. Current "negotiated" core standard of 27% core renders the LeClerc GBMU completely dysfunctional. Waakinin and Kawsorm state that

> *"On average, 55 percent of a female home range was comprised of Core habitat (i.e., roadless area or areas with barriered roads) . USFWS BIOP Grizzly Bears 2020 p 29.*

Current LeClerc GBMU gis data was received after dEA comments and this objection reflects analysis of the current situation. The current USFS version of CEA for the LeClerc GBMU shows the following and updated metrics that reflect the reality of the fragmented GBMU:

Table 1.

LeClerc GBMU	Acres	Percent		Cumulative Core deficit	
Total GBMU	77780	1.0000			
Existing Core from 2021FOIA	21602.2	0.2777	8.00%	**8.00%**	surplus
Core Fragments <= 2500 (24)	5251.5	**0.2431**	**24.31%**	**24.31%**	deficit
Road Displacement from Swxuytn	153	**0.0020**	24.11%	**24.11%**	deficit
Unit+Road Displacement from Swxuytn	328.1	**0.0042**	23.89%	**23.89%**	deficit
Core with private and DNR Lands Buffered as done in the Bog Creek EIS and Priest BORZ.	17207.2	0.2212	5.65%	**22.12%**	
Loss of core fragment from Trail 162-T (From USFWS 2020 BO, Appendix. Secure Habitat in [Priest] (BORZ)	17.8	0.0002		**22.10%**	deficit using updated core analysis based on USFWS BIOP*
* Core re-analysis is further diminished by the road and unit activity of Swxuytn					

Table 1 shows existing core habitat based on faulty USFS analysis of the current condition at approximately 27.7% (55% core is a lower limit). The existing core analysis shows that there are 24 core fragments <= 2500 acres. Core less than 2500 acres is not functional core and should not be considered in a core analysis. There are 5,251 ac of dysfunctional core fragments. The Swxuytn logging project impacts another core fragment resulting in a decrease of 0.2% from the roads and 0.42% from road construction and logging activity adjacent to the GBMU.

The USFWS Biop 2020 for the IPNF, including the Priest Borz states that non USFS ownerships in that BORZ should be buffered 500 meters because roads can be constructed at any time along the edges of the property, affecting Core habitat:

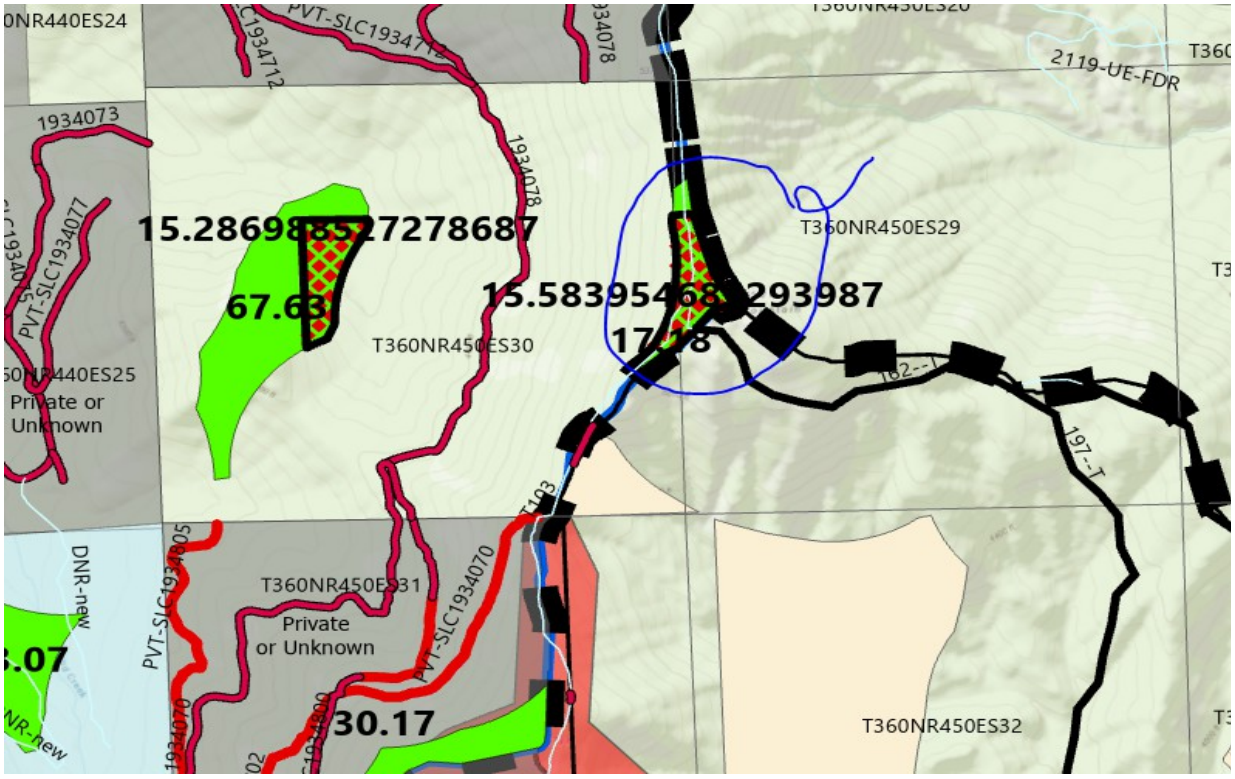
> "Notes: The reasoning for the 500 meter buffer around all non-FS lands is that

there is no rule preventing the building of motorized routes on those ownerships right up to the BORZ boundary. Similarly, for those lands on the KNF that are outside of both the BORZ and the BMUs, roads could be built right up to the edge of the BORZ. Also, data on motorized routes is incomplete outside of the BMUs and BORZ, as well as on non-FS ownerships." (Secure Habitat in the BORZ – Mapping Rules, Biop 2020 IPNF),

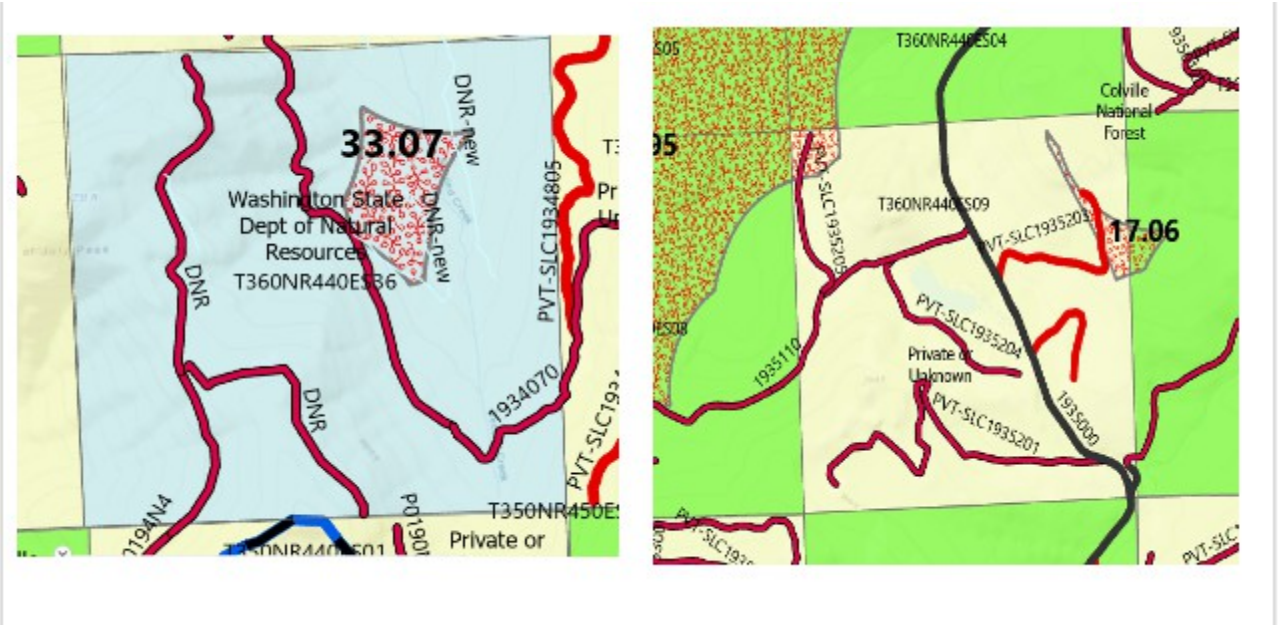
Since GBMU's are more restrictive than BORZ, these rules should apply to non USFS lands in the GBMU's. Buffering non USFS lands in the LeClerc GBMU and incorporating open road buffers decreases available core to 22.12%, well below the 27% standard that is inadequate to begin with.

There are three instances of questionable designation of core, all being fragments.

There is a loss of a 17.2 acre core fragment from trail 162-T. Indicated as having motorized use in the IPNF BIOP gis security habitat map shown below as Map 1.



There are two instances of insecure core on private and WDNR lands consisting of about 50 acres acres of illegal Core Fragments. These core fragments are on WDNR and Stimson properties and are not secure.



In summary, the poorly analyzed GBMU is actually well below Colville Forest Plan Standards for core habitat by almost 5% in addition to not even being close to the 55% core area utilized by an average female bear for her home range . The Swxuytn logging project further impacts core habitat from logging and roadbuilding adjacent to the GBMU. Improperly calculated core habitat is illustrated in Map 1 in the Appendix.

Remedy

1. Initiate Formal Consultation with the USFWS on the LeClerc GBMU.
2. Recalculate the CEA for all three metrics of the LeClerc GBMU.
3. Initiate Habitat Conservation Plan development for non USFS lands in the LeClerc GBMU.
4. Prepare an EIS. There are significant impacts to the threatened grizzly bear that have not been addressed.
5. Add the existing roadless expanse, including the unroaded portions of the adjacent Swxuytn logging project and adjacent roadless areas on the IPNF and in the Priest BORZ. Below is an excerpt from our dEA comments covering this ignored request.
6. Coordinate and analyze cumulative effects with the adjacent Kaniku CFR Logging project on the IPNF just to the east of Swxuytn.

> *"**Proposed additions to the LeClerc and Kalispel-Granite GBMU's.***
>
> *To assist with grizzly bear recovery and provide additional core habitat, we propose to add the roadless section in the NE portion of the Swxuytn project area and the NW roadless portion of the Priest BORZ to their respective GBMU's. This would add about 8 square miles to the Bear Units. There are grizzly sightings throughout the area which are not*

disclosed to protect the great bear. These areas would not be opened up by roads or used to increase non core habitat but core percentages would be adjusted (increased) to maintain or increase the core extent.

The map below (Illustration 6) shows just how lacking in core habitat the southern portion of the LeClerc GBMU is. The Priest BORZ and Kaniksu CFR EA are adjacent to the east of Swxutyn and cumulative effects should be considered. Not putting in roads and not logging these areas would help compensate for the mixed ownership issues in the LeClerc GBMU.

The Priest BORZ is under litigation along with the Hanna Flats Timber Sale.

Relief Requested:

Enter into Formal Consultation with the USFWS on the project and GBMU and the proposed additions to the LeClerc and Kalispel-Granite GBMU. For both Bear Units, the additions would not be put in place to allow opening more roads especially for the Kalispel-Granite Bear Unit. The Percent Core habitat would be increased proportionally.

Create a BORZ west of and adjacent to the Priest BORZ that has sufficient security habitat and a road density of less than 1 mile per square mile to allow bears to utilize the Tower Fire area.

Remove all roads accessing the Tower fire as the area is becoming excellent bear habitat, attracting bears to an area that is highly roaded with resultant increased mortality risk.""

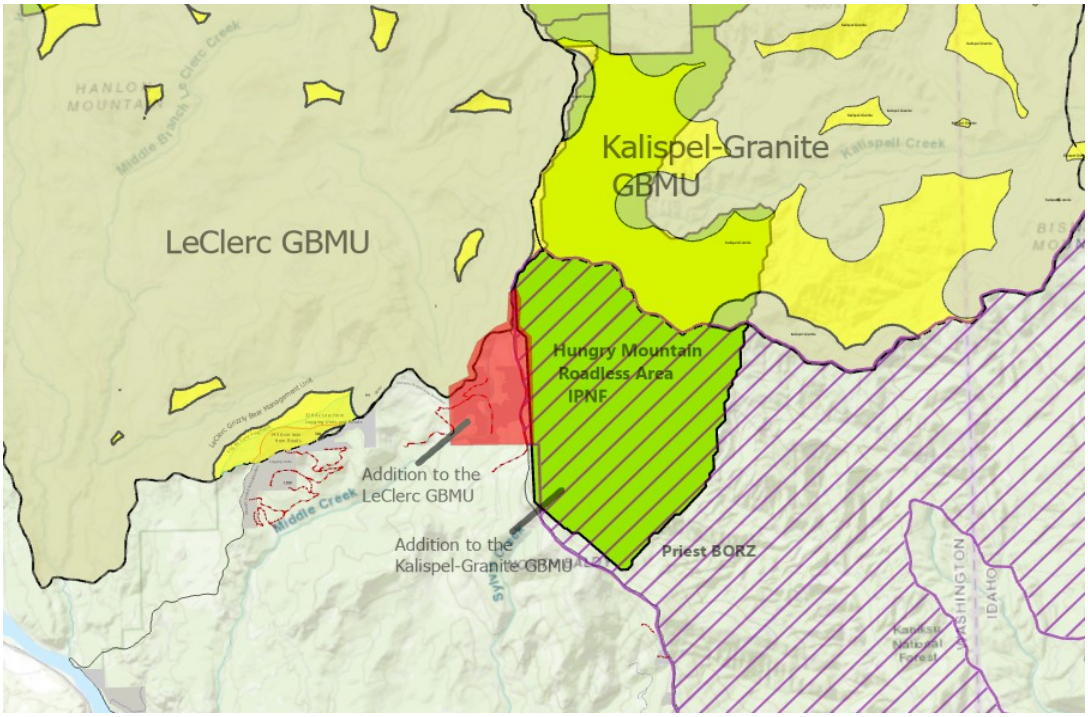


Illustration 1: Proposed additions to the LeClerc and Kalispel-Granite GBMU's, also showing the depauperate core habitat (yellow) of the southern portion of LeClerc GBMU.

Connection between prior specific written comments and this objection item

Comments addressing the GBMU are located on page 6-10 of the "Comments for the Swxuytn Logging and Roadbuilding EA from AWR, UCSC and Sieracki. "

> **"The Swxuytn Logging and Roadbuilding EA impacts LeClerc GBMU Core Habitat and therefore violates core habitat standards for the SMGBE and the ESA.**
>
> Logging and road building will impact the already marginal core habitat in the LeClerc GBMU.
> Using disturbance buffers from roads alone would eliminate 143 acres from the core fragment (down to 373 acres of core) shown in the map below. Using the more ecologically sound.. combined impacts from roads and logging activity, the project would eliminate 328 acres of core habitat, leaving only 143 acres of core habitat fragment remaining."

Issue objected to:
Labeling or implying that "security habitat" within the Swxuytn project area is grizzly core is misleading or outright lying to the the public violating ethical principals, the public trust

doctrine, NEPA, and the ESA.

> ""The Public Trust Doctrine states:
>
> *The principle that certain natural and cultural resources are preserved for public use, and that the government owns and must protect and maintain these resources for the public's use.*
>
> We note that in his 2018 State of the Union on January 30, President Trump invoked the public trust responsibilities of the agencies.
>
> *All Americans deserve accountability and respect -- and that is what we are giving them. So tonight, I call on the Congress to empower every Cabinet Secretary with the authority to reward good workers -- and to remove Federal employees who undermine the public trust or fail the American people."""" Comments, Cottonwood EA, (Carter et al, 2018).*

The continual undermining of trust and professionalism is evident by the sloppy analysis of the LeClerc GBMU, old growth, biodiversity and carbon storage/climate resulting in a gross overestimation of core habitat in the case of the bear unit.

.

> *"In the end, either the people charged with managing our public lands don't know the science, don't know and recognize the damage, and certainly regarding livestock, have abandoned range science. Or, they know these things and refuse to act. In which case they are engaging in willful blindness. In either case the Public Trust, principles of Scientific Integrity and Ethics are compromised." Comments, Cottonwood EA, (Carter et al, 2018).*

The commentor has reserved the right to object to this because the *CNF would not provide the road density and security habitat data requested by FOIA until after the comment period was closed.*

The issue is that the wildlife biologist is calling "seclusion" habitat that is outside the designated recovery zone "core" in the Grizzly Bear portion of the BA/BE and is using the following incomplete definition of core and even using the term "core" in a table. This is deceptive.

> -" Core habitat for grizzly bears is defined as areas lying further than 500 meters from open and Seclusion restricted (gated) roads and motorized trails (USDA 2019). and state that it is core habitat in a table."

The CNF is trying to avoid designating the area a BORZ. This low level of security habitat is attained *only after the 20 year long logging project is finished.*

Table 16. Seclusion habitat indicators and measures for the existing condition

Resource Element	Resource Indicator	Measure (Quantify if possible)	Existing Condition
seclusion	motorized access	Open route miles	305 miles
		Open route density	2.1 miles per square mile
		Drivable (open and restricted) route miles	572 miles
		Drivable route density	4 miles per square mile
seclusion	core habitat	Acres further than 500 meters from open and restricted roads	11,548 acres

Relief Requested

1. Initiate Formal Consultation with the USFWS on BORZ designation.
2. Reduce OMRD to 0.5 miles per square mile or below.
3. Designate the Swxuytn project area as a BORZ.
4. Change BORZ standards to GBMU standards or stricter in order to allow the bears to fully utilize the area and reduce mortality risk.
5. Create a Swxuytn BORZ (to honor the Kalispel Tribe) adjacent to the existing Priest

Illustration 2: Western White Pine snag with pileated woodpecker sized cavity. This cavity provides habitat for secondary cavity nesters and if large enough inside, for a fisher den.

BORZ on the IPNF.

Connection between prior specific written comments and this objection item

> ***"Road density and forest plan standards***
>
> *The wildlife analysis states that there are few options for road closures. This is erroneous.*
> *Please provide a detailed analysis of roads that can be potentially closed to decrease road density and a detailed analysis of barrier effectiveness on State, Private and Federal lands. The Colville NF has not responded to a FOIA for the road density and security habitat calculations for the EA. The commentors reserve the right to bring the results from a reanalysis of road density forward to the objection period." Comments from the Swxuytn comment EA, AWR, Sierra Club and Sieracki. p 10*

Issue objected.
Failure to develop HRV for Old Growth Forests, Wildlife, Roads, development, Rare Plants and parasitic Fungi.

Despite repeated requests over many sales and years, the CNF has failed to recognize and map old growth forests. The past District Ranger promised in a public meeting to develop HRV for old growth and then reneged. Old growth forests provide the highest quality habitat for many species, store carbon and ameliorate local climate extremes, provide the best stream edge habitat, including the tallest trees that shade streams for bull and cutthroat trout and large lasting woody debris to form pools and complex stream structures. There is old Growth at Browns Lake, Skookum Lake just across the road from the NE corner of Geophysical (confirmed by the CNF Wildlife Biologist and myself for one of the Geophysical sales), Half Moon Creek and Bead Lake. There is more that has not been verified as of yet. All these areas are proposed for logging by the Kalispel's and CNF.

We request that at least 25% of the project area be designated as old growth if it meets the criteria or as old growth recruitment stands. The 25% area must include private lands. Any additional old growth must not be logged or have roads punched through it. The USFS is not considering private lands for HRV calculations, this is bad science. Incorporating private lands would decrease the volume removed from Federal lands because most DNR, Stimson and other private landholdings are cut over and in an early successional plantation stage. Please see detailed old growth discussion in the referenced SN comments.

The oEA states that:

"Old trees of fire intolerant species became more common as fire frequency decreased and in wet microsites (Hessburg et al. 2015). The area south of Browns Lake is an example of this, with stands comprised of older western hemlock"

The comment EA states that there is no detailed fire history. Please provide a detailed fire history of the area showing that the old growth is areas south of Brown's Lake and Skookum Lake are there because of lack of fire and not because they are located in fire refugia. *Otherwise withdraw this speculative and opinionated statement about the Browns Lake old growth stand*. Both Brown's Lake and Skookum Lakes area have numerous fire scarred western red cedars. These trees survived the fires of the 1930's to this day and are indicative of a fire refugia. The old growth stand south of Browns and Skookum Lakes has been compromised by logging western white pine and western larch, leaving mostly western hemlock old growth, giving a false impression that fire suppression caused old growth hemlock to dominate the area. Gutting old growth stands of white pine and larch was commonplace historically. The photo shows one of many fire scarred cedar in the refugia. Please see the letter and map of the Skookum Lake old growth complex.

There is proposed logging in near to old growth in the Half Moon Creek riparian buffer it is called an undefined term: "Limited Harvest" in order to minimize the red flags that logging in riparian old growth fisher habitat would bring up. Finally, a Nov1, 2020 field review of old growth on the east side of Bead Lake, an incredible virgin (no sign of logging) old growth stand was located, dominated by 30-40" western redcedar with large grand fir and some scattered large western white pine should be designated as a potential ancient cedar grove. This is at least 50 acres in size. What is unique about this area also is the fire scaring on the majority of the trees in the stand formed from low intensity ground fire, possibly during the 1030's fires. Of interest, a large 40" dbh fire scarred live western white pine was located and a dead white pine with an old pilieated woodpecker nest cavity. Large old white pines are ecologically valuable and rare on the landscape (see photos below). This is an intact old growth forest in a virgin setting that needs to be mapped and conserved. The USFS has this stand and other old growth stands scheduled for roading and logging. Not recognized old growth violates NEPA in that the best available science is not utilized. The proposal will result in the reduction (or elimination) of species that are most abundant or require old forests as part of their home range or territory and a reduction in carbon storage.

"Old-growth tropical rainforests and old-growth temperate forests also store

considerable irrecoverable carbon (just under 100 Mg C ha-1 on average). "

Remedy

1. The CNF must recognize the existence of old growth by amending the Forest Plan.
2. Develop old growth and recruitment old growth standards based on Green et al. 1992 or stricter.
3. Recognize that salvage logging of moist site old growth is detrimental to the stand and life forms that inhabit it.
4. Designate old growth recruitment stands.
5. Map and eliminate all logging in moist site old growth, near old growth or recruitment stands in the Swxuytn logging project. Three areas of with old growth characteristics are located in the appendix. There is additional old growth south of Browns Lake and potentially more that has not been mapped.

Issue objected.

The purpose and need in both the dEA and oEA have not changed. The state that in the oEA, part of the purpose is

"increasing biodiversity" Sxwuytn oEA p.4

and yet only mentions this term once in the oEA, and provides no definition, actions taken and metrics to measure biodiversity of the existing condition and effects of all alternatives including those that the USFS refused to analyze on "biodiversity." This is a violation of NEPA and the ESA.

The commentors requested in the dEA that the CNF disclose the following:

Please disclose the following:

1, A complete species list of flora and fauna including fungi and bacteria.

2. What metrics are being used to assess the increase in biodiversity

3. How will this be monitored?

The CNF failed to respond to comments by modifying their alternative or the ones proposed by the commenting and objecting groups. In fact many of the actions take will decrease the ability of the analysis area to sustain wildlife, fungi and vegetation. Including habitat fragmentation from roads and logging units. Parking out large ares of forests which will decimate low and ground nesting songbird populations. Thinning mature and old growth forests, reducing surface areas for insects and substrate for lichen propagules to attach on.

The Kalispel Tribe and USFS claim that this is an ecosystem restoration project. Please list the wildlife species that will be restored?

We can think of two species that could be potentially reintroduced. The fisher and the white-headed woodpecker. A word search of the oEA and Wildlife Report had no mention of the fisher. The oEA was not responsive to our requests about the fisher. There may be more species that can be reintrodued that would be revealed by a complete biodiversity analysis. The fisher, extirpated by the logging old growth and trapping on the CNF prefers forested home ranges with and abundance of late successional moist site species. It is not even mentioned in the comment EA. The Kalispel Tribe claims to be studying fishers and yet there is no discussion of the Tribe's interest in this species.

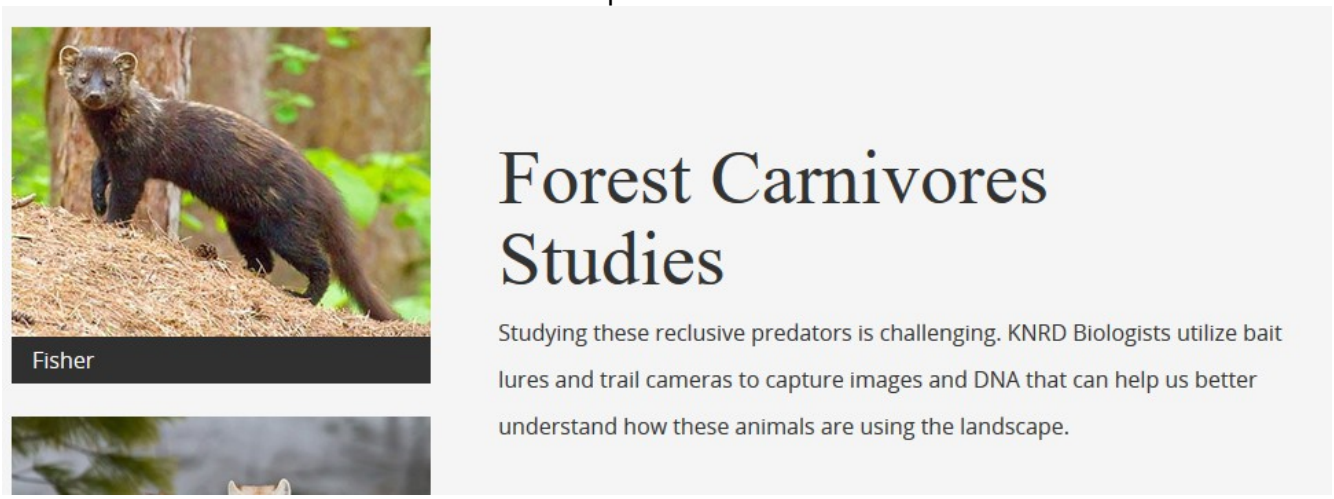


Illustration 3: https://knrd.org/our-wildlife/

The White Headed Woodpecker (WHWO) does best in mature to late successional dry site habitats such as along south and west facing breaks north and east of the Pend Oreille River. They have been extirpated from the Pend Oreille Valley and North Idaho. These are two opportunities for increasing vertebrate biodiversity that the CNF is ignoring.

Past actions on the CNF have extirpated the fisher populations. There is no mention of the fisher in the oEA and Wildlife Analysis and yet the project area has fisher habitat, is located adjacent to the Selkirk portion of the IPNF where fishers are present and rapidly declining.

Local extirpation or close to it is verified by Lucid et al (2019) who states that fishers are in serious trouble in the Selkirks:

> "Selkirk and Purcell extirpation
> Although hair snare surveys reliably detected small numbers of fisher in the Selkirks and Purcells in the first decade of the 2000's (McCall et al. 2006; Cushman et al. 2008; Knet ter) No additional observations have occurred in the Selkirks, which had first been observed during the previous surveys in 2005 (K. Pilgrim, U.S. Forest Service, personal communication)"

Fishers may enter the project area from the IPNF where they are listed as a sensitive species. By ignoring extirpated species and not considering the cumulative effects of the adjacent Kaniksu logging project on the IPNF, the CNF is violating NEPA and NFMA.

Another way to preserve biodiversity is to adopt the alternatives for Bead Lake ecosystem reserve, the half earth alternative and map and not log moist site mature to old growth stands and do not enter the unroaded section of land adjacent to the Roadless area on the IPNF.

Remedy

1. Introduce fisher to the area after old growth and recruitment stands are mapped and protected. Lucid et al (2019) states:
   " Our study suggests the genetic connectivity of northern Rockies fisher populations without human intervention, and successful recovery will be dependent on future management and augmentation. "
2. Develop a fisher habitat management plan based on the best available current information. (Olson et al, 2013, Miller 2015).
3. Add fisher back on the CNF sensitive species list.
4. Do not precommercial thin any regeneration logging to provide food and cover for snowshoe hares, and porcupines, both primary foods for fisher and other predators.
5. White-headed woodpeckers have recent presence in the Pend Oreille Valley, and North Idaho where they occasionally occur now.
6. Develop a WHWO management plan including, surveys, habitat assessments and re-introductions. Parking out dry site stands is not a valid option for establishing WHWO's. A complete plan must be developed including their needs for younger stands at different seasons.
7. There are many science based measures of biodiversity of when none were utilized for this logging and roadbuilding project. LAKIĆEVIĆ and SRĐEVIĆ (2018). Show how to measure biodiversity at the stand level using R for example. Of course, measuring it requires extensive field surveys by qualified personnel.
8. Analyze in detail the Bead Lake Reserve and half earth alternatives presented in the dEA comments by the objectors.
9. Revisit the political decision to "de list" the fisher from the Colville National Forests through a NEPA analysis and the Interagency Special Status /Sensitive Species Program (ISSSSP).

Connection between prior specific written comments and this objection item

The excerpt above is from our dEA comments (Comments for the Swxuytn Logging and Roadbuilding EA from AWR, UCSC and Sieracki. 12 - 12).

Issue objected.
The comment EA does not have detailed logging prescriptions, they are yet to be developed.

> *"Planned silvicultural and fuels reduction methods (e.g. commercial thinning, regeneration harvests and prescribed fire) may change as a result of silvicultural and other specialist reconnaissance and during the development of stand-level silvicultural prescriptions"*

Because of the lack of site specificity for logging prescriptions and unit boundaries, the commentors cannot make substantive inputs to the proposal without that information, either by commenting on the proposed prescription or field checking it.

The oEA provides little additional information on where openings are, the location of old growth, recruitment stands, and buffers. The oEA is programmatic in that they want to log whenever and wherever for the next 20 years with no public oversite of their activities. This is a violation of NEPA, NFMA and the ESA.

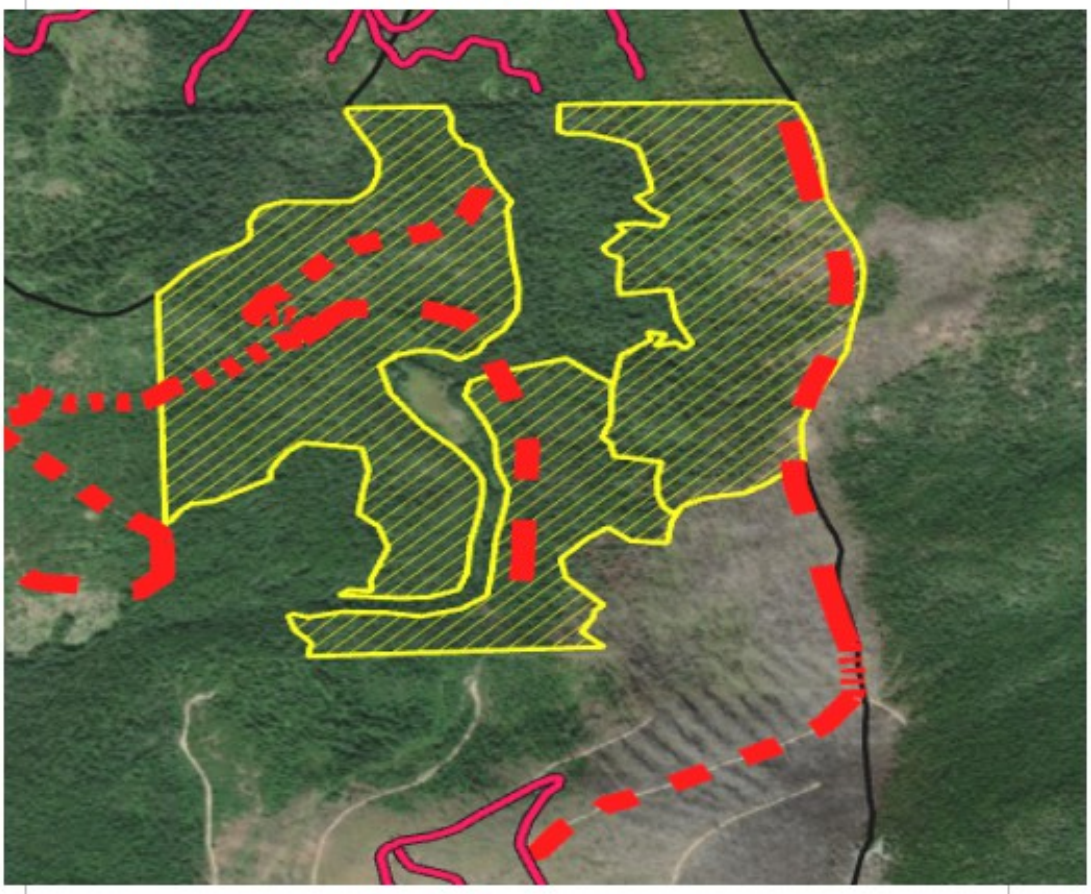
Remedy

1. Withdraw the programmatic objection EA until site specific prescriptions and unit boundaries are firmed up, then reissue a comment EIS with appropriate prescriptions.

Connection between prior specific written comments and this objection item
This issue is brought up on page 15 of the comments from AWR, Sierra Club and Sieracki.

Issue objected.
The CNF, WDNR and Kalispel Tribe are proposing an unacceptable incursion into the roadless expanse located at T35NR45ESec06 which is adjacent to the Hungry Mountain Roadless Area on the IPNF. This section is critically important to keep secure and unroaded because of it's location adjacent to the LeClerc GMBU, Priest BORZ, Lynx Analysis Units, the Tower Fire (providing grizzly bear habitat components) and a presence of a wetland. Logging and roadbuilding will negatively affect grizzly bears, Canada lynx, wolverine, fisher and ungulates requiring security habitat. Roadless areas contribute positively to carbon storage (Moomaw et al, 2019) and extensive forests mitigate local temperature variability.

Illustration 1: Propose roading of an unroaded section and intact forest adjacent to a roadless area. T35NR45ES06



Remedy

1. A forest plan amendment incorporating this section into the Hungry Mountain Roadless Area.
2. Formal Consultation with the USFS incorporating the section into the LeClerc GBMU (see above discussion).
3. No roadbuilding or logging in that section.
4. Prepare an EIS.

Connection between prior specific written comments and this objection item
This issue is brought up on page 15 of the comments from AWR, Sierra Club and Sieracki.

Issue objected

Logging and roadbuilding are falsely claimed to benefit the climate and carbon storage. The Swxuytn Climate Report is infused with errors and ignores local contributions to CO2 and methane production. The Swxuytn Climate Change Report, page 1 states that:

> **"***This forest health project is not considered a major source of GHC emissions"*

Considered by who? This is an opinion of the author, who is not a climate scientist and not qualified to write a document on CO2 contributions. NEPA requires the use of science not speculation or opinion. The discussion is not even qualitative or site specific and is written so that the USFS can state that they addressed the climate change issue and cover their tracks. **We request a quantitative analysis.** This non climatologist author apparently knows more than than the cumulative knowledge of 200 scientists on climate change.

On 13 May, 2020 a letter signed by 200 scientists to Congress states the following:

> *"We find no scientific evidence to support increased logging to store more carbon in wood products, such as dimensional lumber or cross-laminated timber (CLT) for tall buildings, as a natural climate solution."*

> *"Furthermore, the scientific evidence does not support the burning of wood in place of fossil fuels as a climate solution. Current science finds that burning trees for energy produces even more CO2 than burning coal, for equal electricity produced (Sterman et al. 2018)."*

The discussion on climate and CO2 does not quantify CO2 production from the hundreds (thousands?) of logging truck loads and from CO2 emitted from production and wood waste. The concept of CO2 storage by wood products in not viable.

The climate report does not discuss the role of old growth in local climate moderation and carbon storage or the assignment of recruitment stands focusing on fire refugia for moist sites (the USFS is refusing to map and analyze fire refugia),

The climate report does not separate the different fire regimes in the project area.

> *"By reducing the threat of high-severity wildfire, the proposed action would create conditions more advantageous for supporting forest health in a changing climate and reducing GHG emissions over the long term."*

Forest Health is an anthropomorphic term. Forests are neither healthy or unhealthy. The use of this term removes objectivity and biases the analysis towards logging.

In fact tree mortality is caused by thinning stands and additional mortality is caused from underburning after the fact. Because "root rot" or fungi in a parasite/host relationship with susceptible trees increases when trees are logged, additional mortality would be caused by logging. The climate report does not separate tons of CO2 produced by broadcast burning from non fire slash treatment methods. Or the CO2 produced from mechanized slash treatments, or the increased fire risk produced by drying out areas from thinning and clearcutting.

200 Scientists state:

> *"Importantly, mechanical thinning results in a substantial net loss of forest carbon storage, and a net increase in carbon emissions that can substantially exceed those of wildfire emissions (Hudiburg et al. 2013, Campbell et al. 2012). Reduced forest protections and increased logging tend to make wildland fires burn more intensely (Bradley et al. 2016). This can also occur with commercial thinning, where mature trees are removed (Cruz et al. 2008, Cruz et al. 2014). As an example, logging in U.S. forests emits 10 times more carbon than fire and native insects combined (Harris et al. 2016). And, unlike logging, fire cycles nutrients and helps increase new forest growth." Climate letter*

The overriding problems with this climate analysis is that is is not site specific or quantitative, relying on generalities that may or may not apply to the project area and lacks objectivity.

200 Scientists support the following statement:

> *"We are hopeful that a new and more scientifically sound direction will be considered by Members that emphasizes increased forest protections, and a shift away from consumption of wood products and forest biomass energy, to help mitigate the climate crisis."*

Remedy

1. The proposed action will have a significant impact on climate and C02 storage. An EIS is required.
2. Please re-analyze the climate "report" using objective science, not hand picked papers supporting logging and timber industry's position.
3. Please make the analysis site specific and the project carbon positive.

Connection between prior specific written comments and this objection item

This is discussed on page 36 of the dEA comments by AWR, UCSC and Sieracki.

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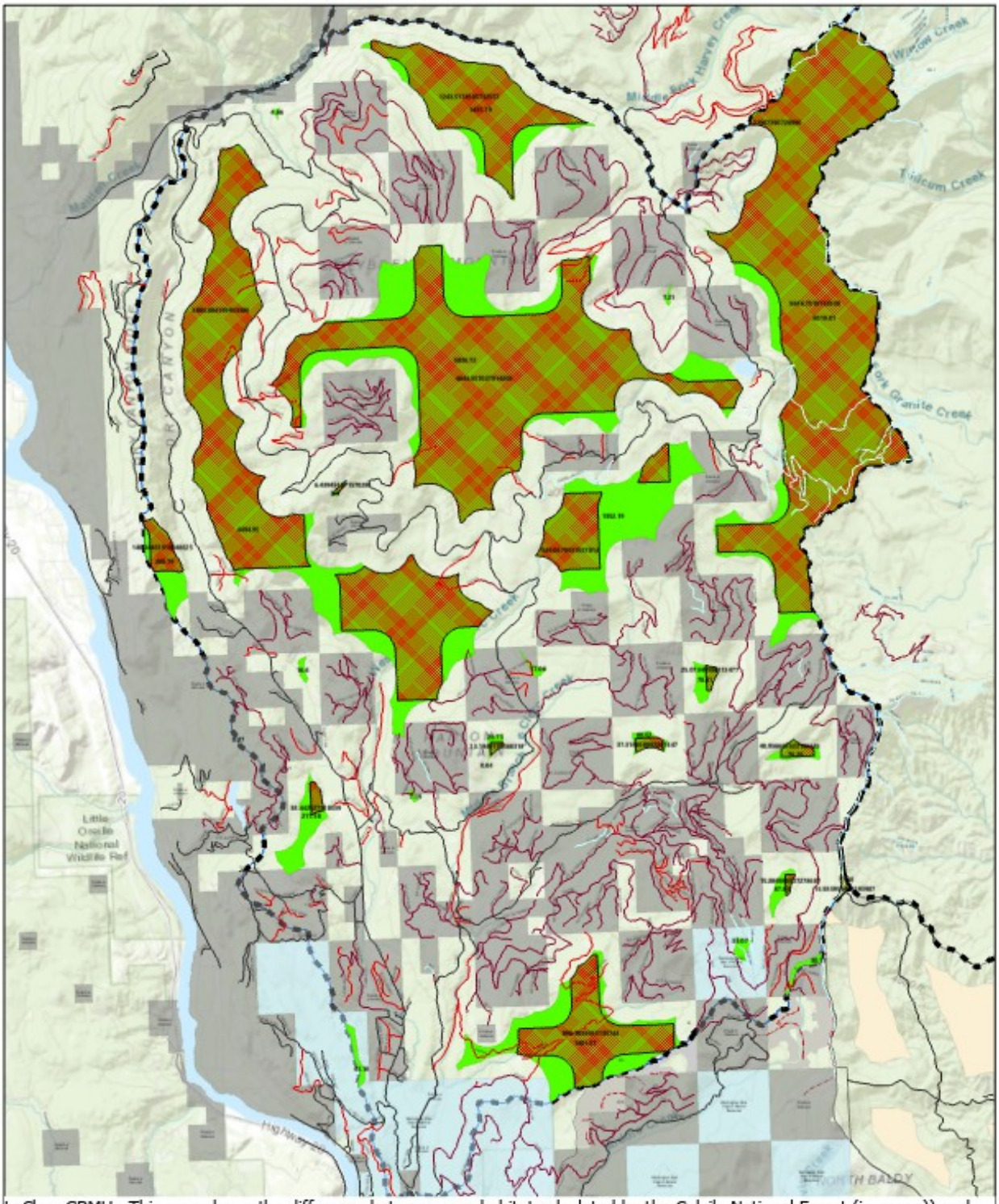
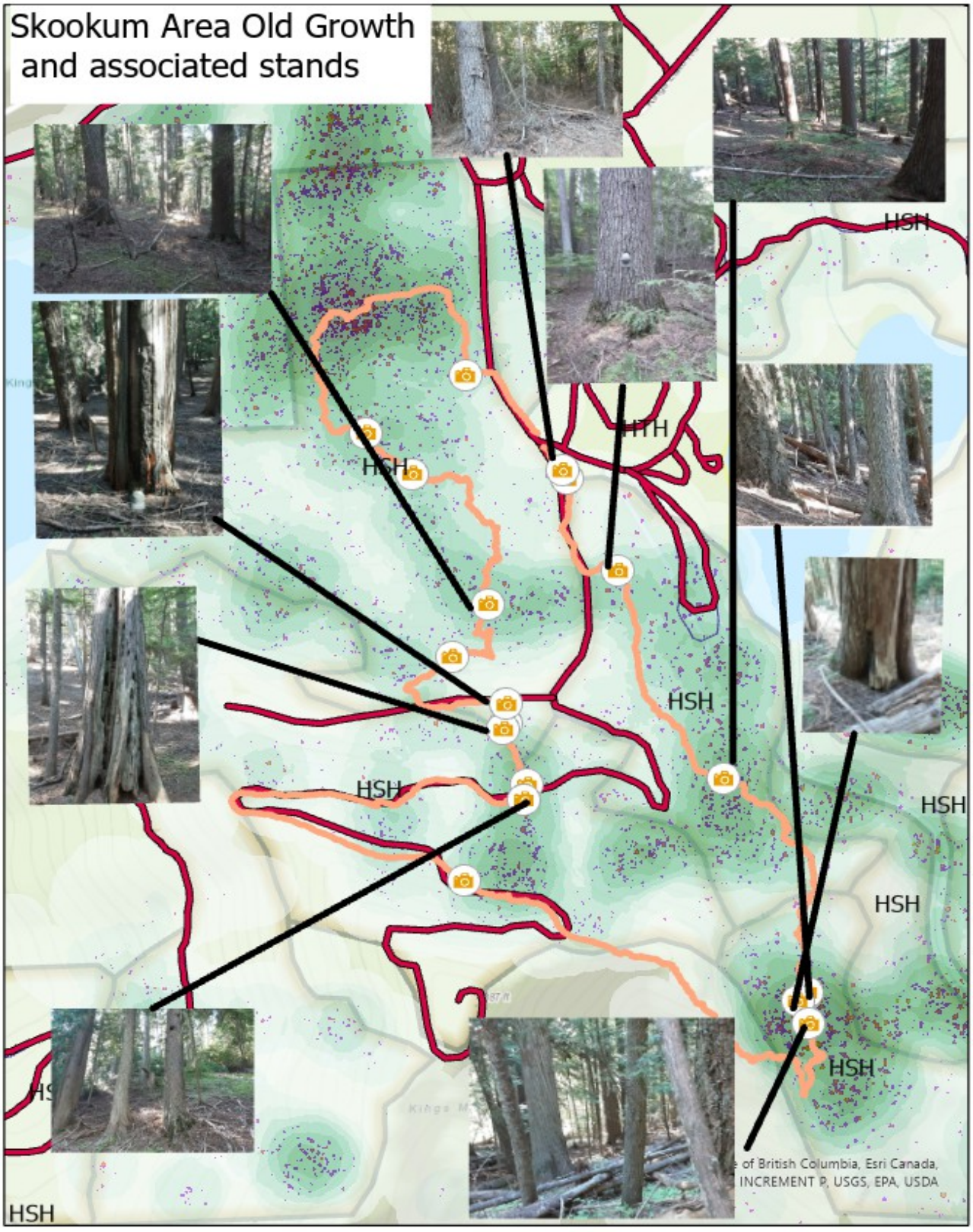
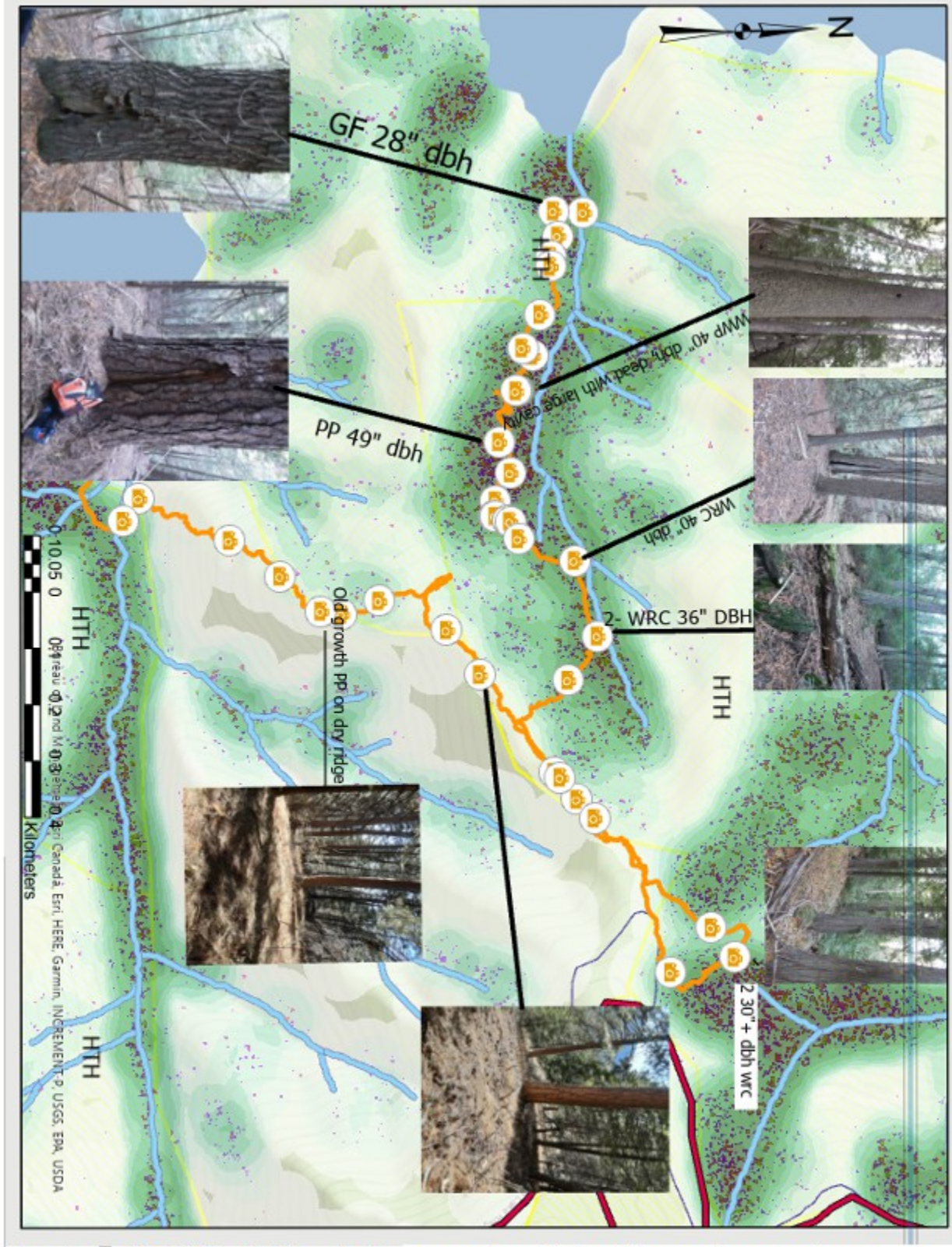
Appendix

Map 1. Illegal Core calculations in the LeClerc GBMU.

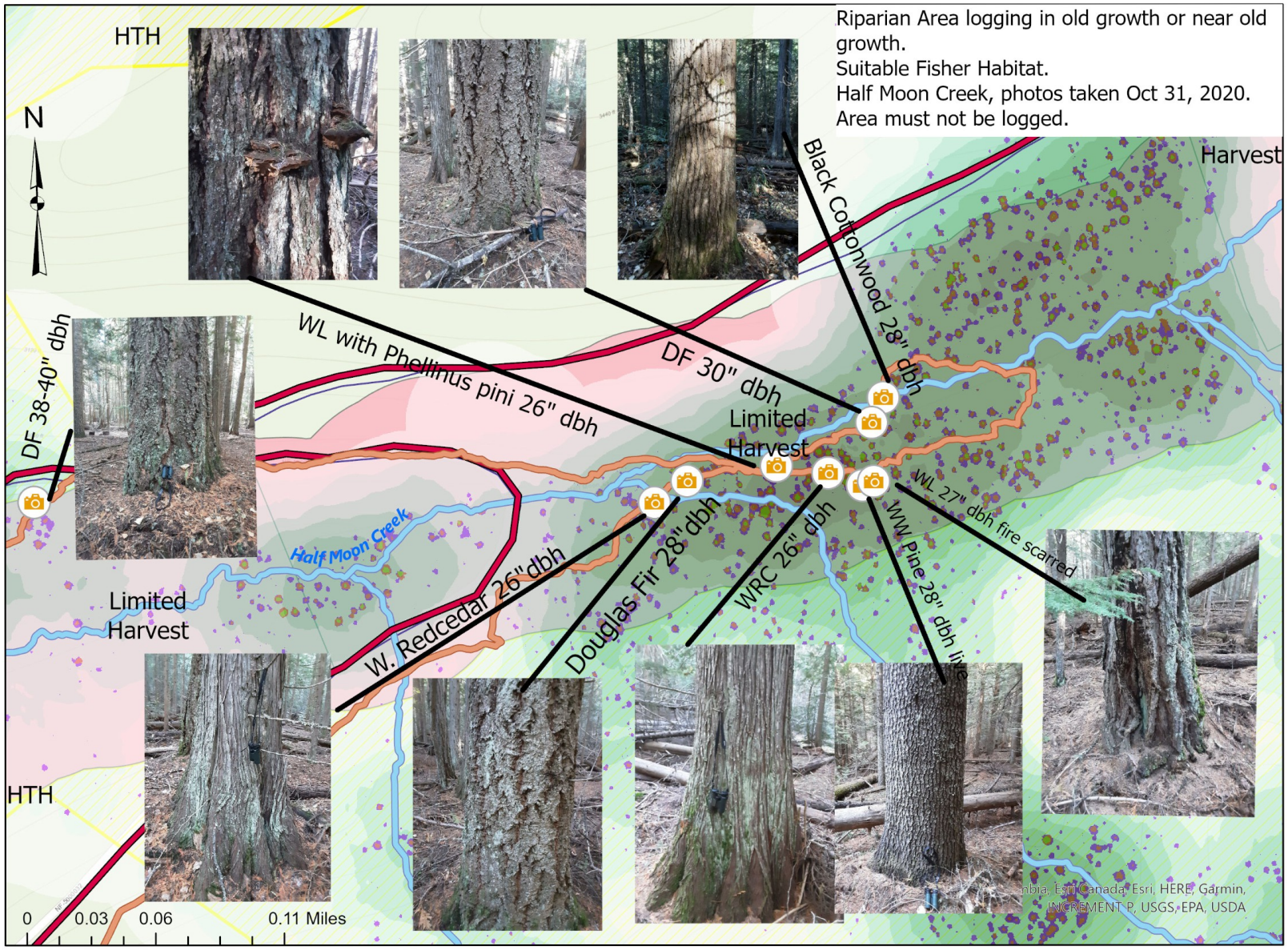


LeClerc GBMU. This map shows the difference between core habitat calculated by the Colvile National Forest (in green)) and Core Calculated using the Guidlines in the USFWS BIOP for grizzly bears on the IPNF (2020) in reddish hatch. It also shows the unacceptable condition this GBMU is in.


Skookum Area Old Growth
and associated stands
HSH
HSH
HTH
HSH
HSH
HSH
HSH
HSH
HSH
of British Columbia, Esri Canada,
INCREMENT P, USGS, EPA, USDA



Drawing 1: Bead Lake Old Growth Ecosystem, the majority of photo points are of trees much larger that the 21" diameter minimum for North Idaho moist site old growth including the 24" minimum diameter for western red cedar.


Riparian Area logging in old growth or near old growth.
Suitable Fisher Habitat.
Half Moon Creek, photos taken Oct 31, 2020.
Area must not be logged.
HTH
N
Harvest
Black Cottonwood 28" dbh
WL with Phellinus pini 26" dbh
DF 30" dbh
Limited Harvest
DF 38-40" dbh
Half Moon Creek
WL 27" dbh fire scarred
WW Pine 28" dbh live
WRC 26" dbh
Douglas Fir 28" dbh
W. Redcedar 26"dbh
Limited Harvest
HTH
0
0.03
0.06
0.11 Miles
nbia, Esri Canada, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, USDA