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Dan Scaife
District Ranger
Coeur d'Alene River Ranger District
2502 East Sherman Avenue
Coeur d'Alene, ID 83814

December 6, 2021

Dear Mr. Scaife:

I am writing on behalf of the Idaho Conservation League (ICL) to comment on the Character Fire Salvage Project. ICL has been Idaho's leading voice for conservation since 1973. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting human health and the environment. ICL works to protect these values through public education, outreach, advocacy and policy development.

Although ICL does not generally favor salvage logging operations, we appreciate the fact that the Forest Service has established some limits on locations where salvage logging will occur within the Character Fire Complex in order to minimize environmental harm. It is particularly important to avoid areas that were severely burned and the organic matter protecting the soil was consumed. Other filters of note include southerly aspects where removal of the overstory will limit or impede regeneration, roadless areas, and old growth stands.

Additional considerations are included in the enclosed comments. I have also enclosed a review of some of the available literature regarding the natural effects of forest fires, effects of salvage logging, and the efficacy of fire rehabilitation practices for your consideration.

Because this is likely going to be the only opportunity to comment on this project, and the objection process will likely also be waived, I would appreciate your active engagement of interested members of the public as your team refines the proposed action and conducts its environmental review. Active engagement of concerned stakeholders could help improve the potential for successful implementation of this project.

Sincerely,

Brad Smith
North Idaho Director

Character Fire Salvage Project

Course filters

In addition to the course filters listed on pages 6 and 7 of the scoping notice, the Forest Service should also consider limiting salvage logging operations on slopes that are too steep to log without causing significant erosion, triggering landslides, or severely compacting the soil. Although the Forest Service should review the best available scientific information before setting a limit, we believe that an appropriate ball park recommendation is to avoid salvage logging operations on slopes greater than 35 percent.

Additionally, a soil scientist should visit all proposed salvage logging units and document the soil types and landslide potential of each. Units with friable soil types or high landslide potential should not only be avoided but buffered.

The Forest Service should also apply larger riparian buffers to salvage logging units where the riparian area was burned unless the agency has monitoring data showing that the buffers applied to “green” timber sales are also effective at preventing sediment delivery to streams in burned areas. Otherwise, it may not be safe to conclude that the same riparian buffers applied to green timber sales are sufficient when applied to salvage logging operations.

Salvage would also ideally be limited to locations accessible by the existing road system. If the Forest Service does build any temporary roads, they should be limited to ridge tops or other hydrologically inert locations. Temporary roads should not be constructed through burned riparian areas where the potential for erosion and sediment delivery is high. No new stream crossings should be constructed due to the sensitivity of soils in post-fire environments.

Water quality and fish

According to the Idaho Department of Environmental Quality’s latest integrated report, several streams in the project area are listed as impaired due to sediment, including the North Fork Coeur d’Alene River, Beaver Creek, Prichard Creek, and Eagle Creek. The Forest Service should estimate the sediment that will be generated from existing and proposed temporary roads, trails and salvage units. Estimates should be used to determine if the proposed action will degrade water quality in these streams.

Traditional sediment models should be adjusted to reflect post-fire conditions as opposed to the conditions in a “green” timber sale area.

Depending on the results, some units or proposed temporary roads may need to be dropped in order to comply with the Clean Water Act. The Forest Service may also need to increase the width of riparian buffers so that they are larger than the buffers normally applied to green timber sale units. The Inland Native Fish Strategy buffers applied to green timber sale units may be insufficient to protect streams from sediment delivery in salvage sales, particularly where the riparian zone burned.

If the standard buffers are applied, the Forest Service should use any available PACFISH/INFISH Biological Opinion (PIBO) monitoring data from previous salvage sales to determine if the standard

INFISH buffers are sufficient to protect water quality in locations where riparian areas burned. If PIBO monitoring data from burned areas shows that standard buffers are insufficient when applied to salvage sales, then larger buffers should be applied.

The Forest Service should also consider limiting logging operations to periods of time when the soil is dry, frozen, or covered with snow. The use of slash matts might also reduce soil erosion and compaction.

Wildlife

The Forest Service must analyze the effects of the proposed action to any sensitive, threatened and endangered species that are known to occur or that may be present in the project area. The analysis should consider the fact that for some species, the fire may have changed the suitability of the habitat. For some species, stands that were burned by the fire may no longer be suitable. Conversely, fire-dependent or fire-associated species may now find habitat that was not present in the project area before the fire.

In any case, the environmental analysis should provide estimates of the amount of available habitat for these species. The Forest Service should also discuss how many acres will be impacted (negatively or positively) by the proposed action.

Simply tiering to the Forest Plan will not suffice for analysis purposes because the Forest Plan did not analyze the number of acres of logging (salvage or otherwise) that would occur in the project area nor the timing of these activities.

Prior to marking and logging units, a qualified wildlife biologist should survey each of the proposed units for sensitive, threatened and endangered species and apply appropriate protective buffers or timing restrictions to protect these species from disturbance. In some cases, the Forest Plan specifies the buffers that should be applied depending on the species (e.g. raptors).

Tree planting

The scoping notice indicates that the Forest Service intends to plant desirable species in both logged and unlogged areas. Presumably all of the salvage units will be replanted. However, the agency did not disclose how many acres of unlogged areas within the burn perimeters would be planted.

There is likely good reason to plant western white pine and larch in some of the unlogged areas within the burn perimeter. In fact, we encourage the Forest Service to consider planting under-represented species in portions of roadless areas affected by the fire since future mechanical treatments are unlikely to occur there.

The need for planting desirable or under-represented species must also be balanced against the lack of early successional habitats on the Coeur d'Alene River Ranger District. The history of fire suppression on the national forest system has reduced the extent of early successional habitats and wildlife forage compared to what would have been expected to occur naturally.

Reforestation can truncate the biologically rich stages of early succession that follow forest fires. Because there is so little early successional habitat and wildlife forage on the Coeur d'Alene River Ranger

District, the Forest Service must figure out how to reconcile the competing need for more early successional habitat and the need to plant under-represented tree species.

Where tree planting does occur, the Forest Service should describe not only the species mix but also the stocking rates. High stocking rates will likely require future reentries, thinning, and in the case of white pine, pruning. Agency plans for tree-planting and the need for future stand-tending activities should be described in the environmental analysis.

Wildland urban interface (WUI)

One of the stated purposes of the project is to reduce hazards threatening human health and safety including hazard trees that might fall on open roadways and fuel loads within the WUI. The Forest Service commonly references county wildfire mitigation plans when referring to the size and extent of the WUI. There are large discrepancies in the criteria used by counties to define their WUI areas.

For example, in some cases WUI areas are delineated by applying a uniform buffer around all private property boundaries regardless of whether or not homes, structures, roads, powerlines, utilities, or other “improvements” are present. And of course, the distance or extent of WUI buffers also varies. In other examples, counties have used roads, corridors, ridgelines, or natural fuel breaks to set the boundaries of the WUI areas.

Whatever the case may be, the Forest Service must describe the parameters used by the county to define the WUI in the environmental analysis because reducing hazards threatening human health and safety is one of the stated purposes of and need for the project. The WUI boundary should also be displayed on a map with and overlay of proposed fuel reduction units.

WUI boundaries that extend well beyond the areas where fuel reduction activities are truly needed to protect a community should not be used to justify fuel reduction units that do not appreciably reduce the threat of fire to a community. As stated by Judge Bush regarding the Hanna Flats Project in *Alliance for the Wild Rockies v. Higgins* (F. Supp. 3d (2021)), “simply saying that the [p]roject is within the wildland-urban interface...does not make it so.” Liberal WUI boundaries have frequently been used to justify logging in areas in the name of fire protection where little or no additional community protection was gained.

Hopefully the county used the best available scientific information, including an appropriate fire behavior model, to delineate its WUI areas. The Forest Service should certainly use the best available science and an appropriate fire behavior model to determine where fuel reduction is needed within the project area to protect human health and safety and to distinguish such units from those that are for other purposes such as commercial timber production.

Finally, if the Forest Service intends to utilize provisions of the Healthy Forest Restoration Act, the Farm Bill, or other legal authorities intended to “streamline” projects in the WUI, then legal definitions of WUI may also apply. To the extent that the agency chooses to use one of these authorities, then the Forest Service should demonstrate how the project is consistent with the applicable authority in the environmental analysis.

Eligible wild and scenic river corridor

The environmental analysis should describe the outstandingly remarkable values of the North Fork Coeur d'Alene River, which was found eligible for protection under the Wild and Scenic Rivers Act during the revision of the Forest Plan. The Forest Service should demonstrate in the analysis how the proposed action is consistent with both the Forest Plan and the Wild and Scenic Rivers Act. Units that are incompatible with the river's outstandingly remarkable values or the Forest Plan should be dropped.