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Comments, Character Fire dEA

To: District Ranger Daniel Scaife and Acting Project Leader Jasmine Drapeau.

The use of an Emergency Declaration is inappropriate for the reasons discussed below. Our planet is in abrupt climate change. Logging burnt trees removes stored carbon. Transportation and milling produces CO₂ and consumes fossil fuels. The real ESD should be to preserve the snag forest for carbon storage, water quality, endangered and sensitive fish species (bull and cutthroat trout) and many wildlife values. The project violates the ESA in relation to bull trout and also NEPA.

Snag forests store carbon. Harmon et. Al (2022) found that, for Sierra Nevada, CA forests, the majority of woody biomass is not combusted and that:

"If dead trees are allowed to remain in place, the natural decomposition process could take many decades to centuries to release fire-killed carbon [39]. In contrast, if logged and removed for biomass energy, much of this carbon could be released relatively quickly [40]." (Harmon, M.E.; Hanson, C.T.; DellaSala, D.A. Combustion of Above ground Wood from Live Trees in Megafires, CA, USA. Forests 2022,13, 391. <https://doi.org/10.3390/f13030391>)

Logging snag forests is detrimental to species such as the sensitive Black-Backed Woodpecker (IPNF sensitive) and other burn associated species.

Logging burned Old Growth and Recruitment stands removes the *best habitat* for burn or snag forest associated species, containing the largest and longest lasting snags with the highest retained biomass and therefore the most carbon from the site.

Construction of 7 miles of roads will cause high project road densities, even from "temporary" roads. These will displace elk and both bear species.

Road construction and logging will not only produce additional CO₂ but will add sediment and increase surface water runoff to several streams in the project area which are 303D listed as not supporting aquatic biota, leading to the possible release of heavy metals, sedimentation, higher temperatures and further destabilization of the flow regime. Any additional impacts to the streams that do not support cold water biota would be an impact to bull trout and a violation of the ESA and the CWA and likewise would impact cutthroat trout, an IPNF sensitive species. See Table 1, showing IDEQ's Scoping Notice Comments and the Maps section at the end of this letter. IDEQ has expressed concerns about some of the units.

The wildlife analysis again makes specious statements indicating the glaring lack of field work and obfuscation of possible impacts to species. The best available science is not being used. Using the Gray Wolf in the Wildlife Report, as an example, the report states:

"The proposed action would not affect any known denning or rendezvous site or interrupt any known linkages or connections between habitats. "

Of course the project would not affect any "known denning or rendezvous" sites because no surveys have or will be done to locate dens, rendezvous sites, nests, bird territories, bat roosts. Etc.

Please conduct intensive biological surveys for all TES, big game, keystone and controversial species. It would also go a long way to recapture lost credibility and professionalism by not making statements such as the quote above.

Besides CO2 production from building roads, the high cost of diesel fuel and resultant production of CO2 from transportation to the mill, milling, moving to retail stores, and transportation to the work site by consumers will produce even more CO2.

In conclusion. Due to potential impacts to 303D listed streams, Bull and Cutthroat Trout, logging of old growth snag forests, loss of stored carbon, and a glaring discounting of possible effects to TES and other species from the lack of surveys, logging and roadbuilding in the Character Fire Burn should not occur.

Because of the impacts listed above an ESD should not be applied for.

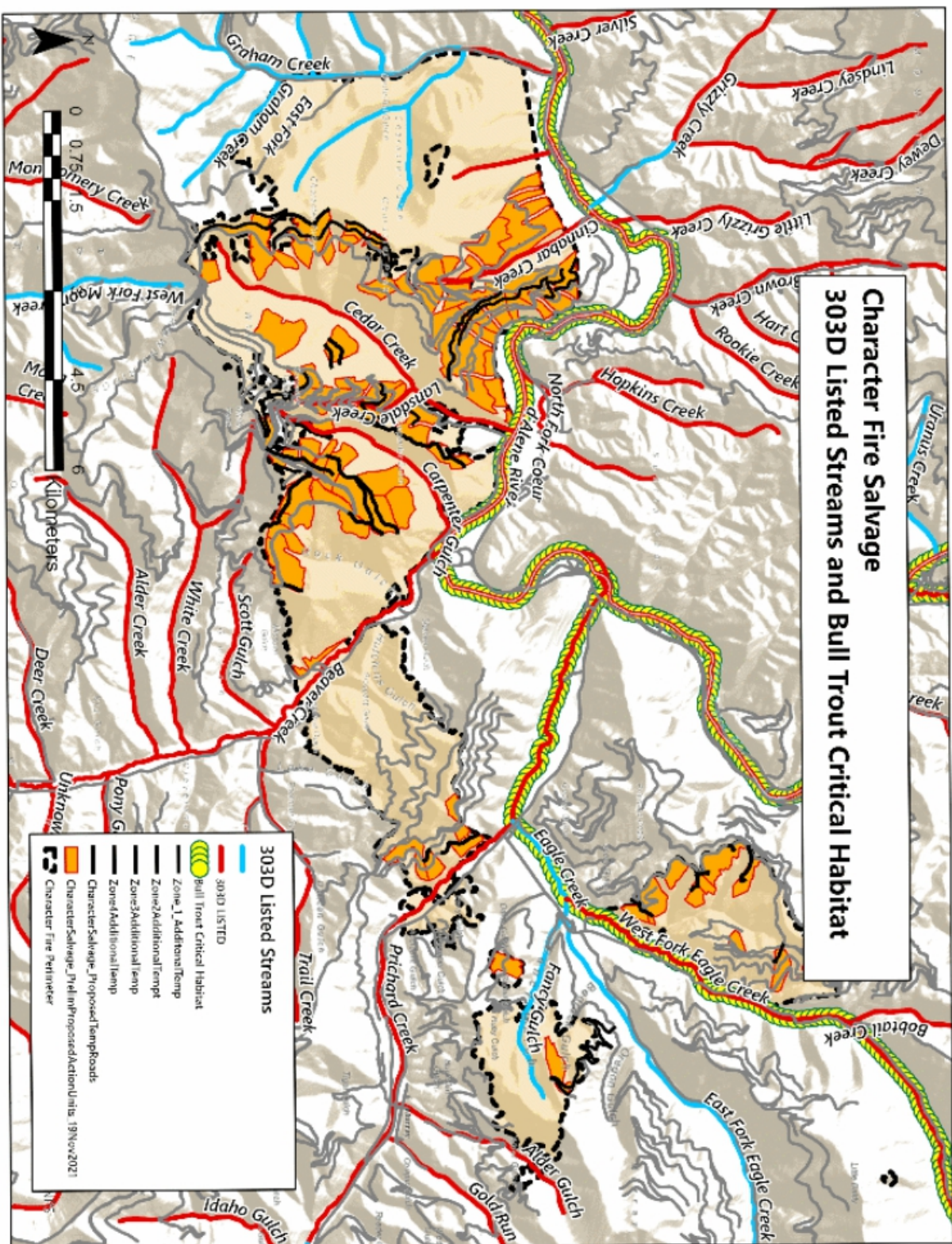
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Table 1. Status of water bodies within the Project area that do not support the Cold Water Aquatic Life beneficial use, listed east to west.

Water Body Name	Assessment Unit	Pollutant(s) causing impairment	TMDL
West Fork Eagle Cr.	ID17010301PN008_02	Temperature	Temperature
Eagle Cr.	ID17010301PN007_03	Sediment	Sediment
Prichard Cr.	ID17010301PN004_04	Cadmium, Lead, Zinc, Sediment, Temperature	Sediment, Temperature
North Fork Coeur d'Alene R.	ID17010301PN001_05	Flow regime modification, Physical substrate habitat alterations, Sediment, Temperature	Sediment, Temperature
Beaver Cr.	ID17010301PN003_03	Cadmium, Lead, Zinc, Sediment, Temperature	Sediment, Temperature
Carpenter Cr.	ID17010301PN003_02	Cadmium, Zinc, Sediment, Temperature	Sediment, Temperature
Cedar Cr.	ID17010301PN001_02	Temperature	Temperature
Cinnabar Cr.	ID17010301PN001_02	Temperature	Temperature

Character Fire Salvage 303D Listed Streams and Bull Trout Critical Habitat



Character Fire Salvage Units in Old Growth and Recruitment Snag Forests

