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

June 7, 2022

Subject: Character Fire Salvage Environmental Assessment

Dear Dan Scaife:

I am writing on behalf of the Idaho Conservation League (ICL) to comment on the Environmental Assessment (EA) for the Character Fire Salvage Project. ICL has been protecting Idaho's environment since 1973. We represent over 35,000 members and supporters who care about Idaho's land, water, air, fish and wildlife. ICL protects these values through public education, outreach, advocacy and policy development.

Although ICL does not favor post-fire salvage logging operations, we appreciate the fact that the Forest Service does not propose to log burned trees in areas with high burn severity, south-facing slopes, steep slopes, roadless areas or riparian areas. If post-fire salvage logging is to occur anywhere, then it should be limited to areas identified for commercial timber production in the Forest Plan. With the exception of the units located in the eligible wild and scenic river corridor, it appears that all of the other salvage units are located in areas identified as suitable for commercial timber production.

As discussed in the EA (page 25), Beaver Creek, Prichard Creek, and the lower North Fork Coeur d'Alene River are listed as impaired under the Clean Water Act (CWA) due to sediment. While the Forest Service's analysis suggests that there will be a long-term reduction in sediment in the project area (EA, pages 29-30), we are concerned about the significant concentration of proposed units, haul routes and temporary road construction in the northern portion of the project area on the face above the river. There are several contiguous units that when combined, represent a massive area of regeneration harvest. The proposed haul routes and temporary roads appear to cross at least five small tributaries of the North Fork numerous times. This concentration of units, roads and stream crossings raises a red flag for water quality and fisheries. We highly encourage the Forest Service to scale back the amount of harvest, road construction and haul routes in this area.

Additionally, the analysis and the conclusions presented in the EA rely heavily on monitoring of best management practices used for "green" timber sales. It is unclear if those results can be extrapolated

or applied to salvage sales. In any case, we believe that it is imperative to develop and implement a monitoring plan so that agency can apply any lessons or observations learned from implementation of the Character Fire Salvage Project to any future post-fire salvage logging proposals on the IPNF. Monitoring of erosion and sediment delivery to streams is particularly important in determining if standard best management practices and riparian buffers are sufficient to protect water quality and fisheries. A description of the monitoring plan should be included in the final EA and Decision Notice.

Sincerely,

A handwritten signature in green ink, appearing to read "Brad Smith".

Brad Smith
North Idaho Director