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First name: Brad

Last name: Smith

Organization: Idaho Conservation League

Title: North Idaho Director

Comments: From: Brad Smith

To: FS-comments-northern-clearwater-north-fork

Subject: Dead Laundry Project Comments

Date: Thursday, April 9, 2020 11:04:22 AM

Attachments: Dead Laundry Scoping Comments.pdf

Dear Mr. Skowlund:

Attached, please find my comments on behalf of the Idaho Conservation League regarding the

Dead Laundry Project. Let me know if you have any questions about my comments. I look

forward to discussing this project with you in greater detail.

Sincerely,

Brad Smith

North Idaho Director

Idaho Conservation League

Idaho's leading voice for conservation

North Fork Ranger District

Attn: Andrew Skowlund

12740 US HWY 12

Orofino, ID 83544

April 9, 2020

Dear Mr. Skowlund:

The Idaho Conservation League has been Idaho's leading voice for conservation since 1973. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep

personal interest in protecting human health and the environment. The Idaho Conservation League works to these values through public education, outreach, advocacy and policy development.

I am writing on behalf of ICL to comment on the Dead Laundry Project. As discussed in the enclosed comments, we encourage the Forest Service to modify proposed regeneration prescriptions by applying concepts of ecological forestry as described by Johnson and Franklin (2009). Although their recommendations were piloted on moist sites on the west side of the Cascade Mountains, these concepts may also be applied on moist sites in North Idaho to accomplish similar resource objectives.

We also encourage the Forest Service to take this opportunity to identify, approve, and implement watershed restoration activities. The density of the road network is exceptionally high in many locations, particularly on lands acquired from industrial timber companies. The Forest Service should prepare a Travel Analysis Report that identifies opportunities to decommission roads that are no longer needed for management and public access but which may be contributing to degraded water quality and fish and wildlife habitat. Special attention should be given to the "Middle Black" and "Lake Creek" road systems, which are located on former industrial timber lands.

Finally, I believe that it is necessary to evaluate potential effects to grizzly bears. The Nez Perce-Clearwater National Forests have not performed detailed effects analysis for grizzly bear in the past because grizzly bears were extirpated from the forest in the 1940s. However, there are at least three confirmed occurrences of grizzly bears on the forest in the last thirteen years, and at least two of these bears traveled to or through the North Fork Ranger District. As such, it is no longer appropriate to suggest that a detailed effects analysis for grizzly bears is unwarranted.

I want to thank you for the opportunity to provide comments on this project. Please let me know if you have any questions about my comments. I look forward to the opportunity for further discussions regarding this project.

Sincerely,

Brad Smith

North Idaho Director

Silvicultural prescriptions

The scoping notice indicates that treatments would include a combination of intermediate and variable retention regeneration harvest (page 4). However, the scoping notice does not exactly describe what the Forest Service means by "variable retention". On page 5, the Forest Service seems to indicate that it will apply traditional silvicultural prescriptions to regeneration units, including clearcut with reserves (only five trees per acre retained), seed tree with reserves (only 8-12 trees per acre retained), and shelterwood (only 10-20 trees per acre retained). The phrase "variable retention" invokes concepts of ecological forestry as advocated by the likes of Johnson and Franklin (2009). Whatever variable retention means to the Forest Service, the agency should more clearly define what it means for the purposes of this project.

While regeneration harvest can be an important tool to alter forest composition and structure and achieve desired forest conditions on moist sites, regeneration harvest can also negatively affect wildlife habitat. Johnson and Franklin (2009) developed a set of recommendations to ameliorate these concerns, which we encourage the Forest Service to incorporate into this project. They advocate for the retention of pockets or "aggregates" within target treatment stands. In the treated areas between aggregates, Johnson and Franklin also recommend dispersed retention of individual leave trees, coarse woody debris, snags, and small clusters of trees. While the primary objective of their recommendations is to ensure that important structural components of wildlife habitat are retained following timber harvest, their recommendations may also satisfy visual quality objectives through

the creation of more natural looking openings.

Based on pilot projects implemented on the west slope of the Cascades, Johnson and Franklin recommend that foresters retain approximately 30% of the original stand in aggregates, varying in size from 0.5 to 5 acres. Larger aggregates are encouraged where unit size and yarding methods permit. Aggregates should be centered on mature or old growth trees, concentrations of coarse woody debris, snags, seeps, rock outcroppings, or other unique structural features. To the extent practical, aggregates should include an overall representation of the tree species that were present in the original stand.

Retained aggregates should be well distributed throughout the treatment unit. Johnson and Franklin suggest that it is okay to count riparian habitat conservation areas (RHCAs) toward as much as 30% of the retention target when RHCAs extend into harvest units. However, credit for riparian buffers should be minimized because RHCAs are spatially concentrated and tend not to be well distributed in treatment areas. Ecological forestry objectives are not met when large areas are created that lack in retention.

In the treated areas between aggregates, additional retention should also occur as individual leave trees, coarse woody debris, snags, and small clusters of trees. Large or mature trees are ideal candidates. Retention of individual trees is intended to aid in the recruitment of snags, nesting habitat and coarse woody debris.

Following harvest, treated areas should be broadcast burned. Aggregates should remain unburned. The mortality of some individual leave trees or clusters of trees is acceptable as this will serve to create snags for species that are associated with or benefit from these structural features.

Finally, the edges of treatment units should be irregularly thinned. Sharp unit edges result in a phenomenon known as the "edge effect", which is not only visually unappealing, but sharp edges are also not ideal for wildlife.

Live tree retention

While the retention of entire stands of old growth trees is important for ecological reasons, so is the retention of individual mature trees within stands or portions of stands that are targeted for silvicultural treatments. The Forest Service understandably intends to focus on the retention of any long-lived early seral species that occur in treatment areas. However, retention of large, mature, shade tolerant species may also be desirable from a wildlife standpoint. Large, mature trees can provide habitat for nesting and aid in the recruitment of snags, coarse woody debris, and other beneficial structural components.

This objective is typically accomplished by setting a limit on the diameter of trees that may be cut and harvested. However, age limits are also gaining traction in the scientific literature (e.g. Johnson and Franklin 2009). While no single diameter or age can define these biological legacies, diameter and age limits can help facilitate the conservation of the most desirable leave trees in forest stands that are slated for treatment.

In the forests of north Idaho, diameter and age limits are probably most appropriately derived from Green et al. (2011), who use a minimum age of 150 years in their definition of old growth trees (Lodgepole pine is a notable exception, with a minimum age of 120 years.). Some foresters reject age limits as a practical matter. However, Johnson and Franklin (2009) describe how to make age limits work (see pages 26 and 27).

If the application of an age limit remains problematic, then we suggest using species-specific diameter limits for live tree retention. We suggest using the following diameter limits, which come from the old growth criteria for the North Idaho Zone described by Green et al. (2011):

[bull] Retain all ponderosa pine, Douglas-fir, grand fir, western hemlock, white pine, and western larch that are 21 inches dbh or greater.

[bull] Retain all western red cedar that are 25 inches dbh or greater.

[bull] Retain all lodgepole pine that are 13 inches dbh or greater.

[bull] Retain all subalpine fir, Engelmann spruce and mountain hemlock that are 17 inches dbh or greater.

Snags

Where dead trees or snags exist, they should be retained for wildlife benefit. In this instance, age thresholds and diameter limits should not be applied. While several sources (Thomas 1979, Raphael and White 1984, Zarnowitz and Manuwal 1985, Morrison and Raphael 1993) provide recommendations for the number of snags to retain in unburned forests, why not retain all snags unless they pose a safety risk? Dead trees tend to provide little or no economic value, but they are of great benefit to wildlife.

Coarse woody debris

The retention of on-site, coarse woody debris is important for a variety of reasons. There are a number of species that benefit from logs, trees, boles, and other large pieces of wood lying on the ground. Coarse wood debris also reduces erosion by trapping sediment and run-off and helps maintain soil nutrient capital. The microclimates created by coarse woody debris are often critical to the regeneration of desired trees and vegetation because the removal of overstory trees during logging operations increases solar radiation and reduces soil moisture. We recommend retention of the following amounts of coarse woody debris:

(see table in attachment)

Old growth

We generally do not support silvicultural practices on moist old growth sites. However, we do believe that the Forest Service has made a compelling case for the proposed old growth enhancement treatments (page 7). We also encourage the Forest Service to identify and conserve recruitment old growth given that the amount and distribution of old growth forest types are generally underrepresented on the Nez Perce-Clearwater National Forests compared to historical conditions.

Landscape burning

We support the proposed landscape burns. Prescribed fire is an important tool for achieving desired forest conditions, particularly in roadless areas. Fire not only reduces fuel loads, but it also helps promote desired species composition and structure and creates early seral habitat for species that depend on it. Prescribe fire also more closely mimics natural disturbance patterns than mechanical treatments, and prescribed fire may be applied without building additional roads. Roads can negatively affect water quality and fish and wildlife. The Forest Service might consider planting desired species (particularly white pine and larch) in appropriate units slated for landscape burns. Burning and planting in roadless areas could help achieve desired species composition in areas where road construction is not ecologically or socially desirable.

Riparian habitat conservation areas

It is unclear whether or not any of the proposed treatments would occur in riparian habitat conservation areas ("RHCAs"). While the scoping notice does not explicitly state that any treatments are proposed in RHCAs, the

documents states on page 5 that site preparation could include "[h]and work in areas over 35% [slope] or within an RHCA." The Forest Service must clarify whether or not any treatments are proposed in RHCAs. We generally oppose mechanical treatments in RHCAs unless the Forest Service can (1) justify the proposed treatments with supporting scientific information, and (2) achieved desired riparian management objectives as stated in the Forest Plan.

Water quality and aquatic habitat

The Forest Service should take this opportunity to implement activities that will improve water quality and aquatic habitat. According to the Watershed Condition Framework (USDA, 2011), the Osier Creek watershed is "functioning at risk" and water quality is "poor". The transportation network is likely the most significant contributing factor to poor water quality. The Forest Service should assess roads and trails within the project area and decommission or relocate any roads that are contributing significant amounts of sediment to project area streams. Desired forest conditions desired conditions for water quality and aquatic habitat should be given equal consideration. It is not clear when the Forest Service will be doing work in this area again. Therefore, it is important to look at all resource needs even if funding for implementing watershed restoration work is uncertain. At the very least, the Forest Service will have approved the NEPA for watershed restoration activities and will be ready to implement them if and when funding is made available.

We appreciate the fact that none of the new proposed temporary roads involve stream crossings. The existing road network, however, crosses numerous intermittent and perennial streams. Additionally, the density of the existing road network is exceptionally high, particularly on lands that were acquired from industrial timber companies. The Forest Service should evaluate all of the system and non-system roads in the planning area and complete a Travel Analysis Report as required under the Travel Management Rule. The report should detail opportunities to decommission roads that are no longer needed for management purposes and public access, especially if they are contributing to the degradation of water quality and fish and wildlife habitat. In particular, the Forest Service should look at roads that are part of the "Lake Creek" or "Middle Black" road systems as identified in the GIS data that agency provided to ICL.

Wildlife

The effects analysis should describe the amount, types, and distribution of lynx habitat in the project area. The analysis should also identify any lynx habitat that would be modified by the proposed treatments. All mature multi-story lynx habitat should be retained. The document should also describe how the project is consistent with the Northern Rockies Lynx Management Direction.

The Forest Service should similarly describe the amount, types, and distribution of fisher habitat and any modifications of fisher habitat that would result from the proposed treatments. Available information suggests that a native haplotype exists within the fisher population on the Nez Perce-Clearwater National Forests (Schwartz 2007). It is therefore important to conserve this population. We recommend that the Forest Service utilize recent recommendations developed by Joel Sauder of the Idaho Department of Fish and Game. In fact, the staff working on Forest Plan revision have developed some draft forest plan components related to the management of fisher habitat. Although a revised plan has yet to be approved, the draft components utilize the latest available science with respect to the management of fisher habitat.

We also encourage the Forest Service to complete an effects analysis for grizzly bear. Understandably, the Nez Perce-Clearwater National Forests have not considered effects to grizzly bear in detail in the past due to the fact that grizzly bears were extirpated from the forest in the 1940s. However, we are aware of at least three confirmed occurrences of grizzly bears on the forest in the last 13 years. Therefore, it is no longer valid to suggest that the Nez Perce-Clearwater National Forests should not describe the effects of project activities to grizzly bears.

The Forest Service should also consider installing bear-resistant food storage lockers and placing bear-resistant sanitation dumpsters at campgrounds within the project area. As grizzly bears begin to recolonize the Nez Perce-Clearwater National Forests, steps must be taken to reduce potential conflicts between bears and people and to promote coexistence and safety. Although beyond the scope of this project, we also encourage the Nez Perce-Clearwater National Forests to adopt rules requiring the proper storage of attractants.

References

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Coarse woody debris

The retention of on-site, coarse woody debris is important for a variety of reasons. There are a number of species that benefit from logs, trees, boles, and other large pieces of wood lying on the ground. Coarse wood debris also reduces erosion by trapping sediment and run-off and helps maintain soil nutrient capital. The microclimates created by coarse woody debris are often critical to the regeneration of desired trees and vegetation because the removal of overstory trees during logging operations increases solar radiation and reduces soil moisture. We recommend retention of the following amounts of coarse woody debris: Biophysical Setting Tons/acre (TA) >3" in diameter Log numbers and sizes to retain where they occur

Number of pieces/acre (PA) Minimum diameter Average length (feet)

Warm/Dry(VRUs 1-3)VRUs 1-2: 7-12 TAVRU 3: 10-20 TA6-14 PA10 in. with at least 2 pieces greater than 20 in.20 ft. - with minimum 12 ft.

Warm/Moist (VRUs 4-6)17-33 TA20-30 PA12 in. with at least 10 pieces greater than 20 in.35 ft. - with minimum 12 ft.

Subalpine(VRUs 7-11)VRUs 7-8: 12-25 TAVRUs 7: 20-30 PAVRUs 8-11: 15-20 PAVRU 7: 12 in. with at least 10 pieces greater than 20 in.VRU 8-11: 10 in.VRU 7: 35 ft. with minimum 12 ft.VRUs 8-11: 30 ft. with minimum 12 ft.