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Comments: Conservation Congress appreciates the opportunity to provide scoping comments on the proposed project. Please consider them in the development of the project and prior to making a decision.

We have some questions and concerns about this project and seek clarification.

First, this project is very similar in scope and prescriptions to the Trinity Post Fire Salvage Project. Is any of the proposed project within the TPFS project area? Both projects propose to log alongside roads; remove hazard trees; do not have diameter limits; and are in spotted owl habitat (CH/LSR). They also include HVWS stands developed for the TPFS project and arbitrary LOPs that can be lifted. This project is 4,000 acres (in the proposed action, but 3,500 acres are stated in scoping document) and TPFS is 8,000 acres. Both projects enter nesting/roosting habitat. The cumulative impacts of just these two projects to owl habitat will likely be significant. We encourage the FS to conduct an EIS for this project.

There is conflicting information that we request be corrected in the draft environmental document. The scoping notice states the healthiest mixed conifer trees that have a high canopy capacity with the highest needle or leaf cover and provide the most shade to the forest floor will be retained. However, the proposed action in the proposal includes Table 1A that includes thinning objectives with significantly reduced basal areas, individual trees between 15 to 26 + feet apart without canopies touching that will result in increased canopy spacing, disconnected ladder fuels and retention of "fire resistant" trees. "Roadside safety corridors are characterized by little canopy closure, and discontinuous ladder fuels and surface fuels." This is in direct contradiction of retaining the largest healthiest trees of all species with the highest canopy cover that will provide the most shade to the forest floor. One prescription conserves more owl habitat and the other may significantly degrade habitat by opening up the canopy, allowing more solar radiation into the stands, affecting thermal cover, prey species, and suitable habitat for owls.

In one area of the proposal it states LSR habitat will be improved to more quickly achieve late successional characteristics and in another it states maintenance activities will occur between 3 to 7 years to maintain the fuel breaks. That would never allow the suitable habitat to become high quality suitable owl habitat.

Why are activities proposed in riparian areas that are not along roads? These areas should be dropped from the proposal. Construction of temporary stream crossings should also not be a part of this project. Many of the road measures appear to be in riparian areas and if they were dropped these measures would not be needed. We also don't support thinning in natural stands not previously managed and encourage the FS to limit the pilot project to plantations. We also don't support activities in administratively withdrawn areas, particularly those in unroaded areas. There should not be roads in these areas and if they are present, they should be allowed to grow in. We also don't support the removal of co-dominant trees that are likely large, fire resistant, and on their way to old growth status. These trees should not be removed from CH/LSR.

How many NSO Activity Centers are in this project area, as well as within the analysis area? Please disclose all of them and the amount of N/R/F/D habitat in each, and break down the amounts of habitat in the core areas and home ranges. We do not support thinning nesting/roosting habitat. Has the FS conducted protocol surveys? Assuming occupancy will not ensure the protection of owls because of the presence of barred owls, as well as the fact NSO are using suitable habitat outside known ACs. The LRMP Standards and Guidelines state "Survey and evaluate habitat for TES species at the project level in coordination with USFWS (page 4-30)". In the case of the NSO, habitat cannot act as a proxy for the species due to the presence of Barred owls. If the STNF refuses to conduct protocol surveys for NSO we request a substantive rationale as to why.

The proposal states LOPs may be lifted if NSO are not resident in the area. Please explain how owls will be determined as resident or non-resident, and who will make the determination? There are numerous exceptions for lifting LOPs. We don't support this since the entire project is in suitable NSO habitat, and protocol surveys likely haven't been done. In LSR/CH, LOPs (Feb 15 - Sept 15) should be enforced through the life of the project. Without protocol surveys the FS simply has no idea where NSO actually exist on the forest.

Please provide information on the status of Pacific fisher, Northern goshawk, American marten, bat species, Bald eagles, Peregrine falcons and any other TES and MIS species using the project area. Are the HVWS stands being relied upon to provide the majority of habitat for these species? If so, the analysis must look at competition for resources by the various species. Please provide additional information on the anadromous fish species present and any designated critical habitat they have in the project area.

The proposal states all plant populations requiring protection from proposed treatments will be flagged on the ground, and refers to known populations. Will surveys be conducted prior to project implementation by a botanist? The document also states if any newly listed or unknown occurrences of special status botanical species are found within the analysis area during project activities, work will stop in the area and the biologist will be contacted. Who is expected to make these identifications? Are loggers and forest workers expected to identify these plants throughout the project area?

Please provide information on any species in water bodies where water drafting would be allowed to remove 75% of the water. How will these species be affected with potentially only 25% of the water remaining?

We are very concerned about cumulative effects, particularly in critical habitat and LSR habitat. The scoping notice mentions the Westside Plantation Project and the Middle Hayfork Pre-commercial Thin project "near the project area" and units omitted in those projects are being included in this one. We have mentioned the TPFS project, and there have been numerous other commercial timber sales in this area over the years. We request the FS work with the FWS to establish a current and accurate Environmental Baseline as well as a record of how much critical habitat has been, is proposed, or is being planned for thinning in the critical habitat sub-unit.

We also request information on the habitat in the South Fork LSR and how much logging it has received since the inception of the LRMP. What is the relationship of the South Fork LSR to the Chanchellula LSR? The scoping document states activity design criteria 3, 4, and 7 in chapter 4 of the LSR will be used in the development and implementation of this project. They state:

3. Thinning in young plantations and young natural early successional (seedling/sapling) stands: These treatments are consistent with the exemption letter that exempts specific silvicultural activities from REO review, dated April 20, 1995, except as noted.

4. Thinning in early successional pole and mid-successional stands - Hazard Related: These treatments are consistent with the exemption letters that exempt specific silvicultural activities from REO review, dated July 9, 1996 and updated on September 30, 1996, except as noted.

7. Fuel reduction (primarily dead and down).

The proposed project does not appear to comply with these design criteria. There are no diameter limits proposed so if these three design criteria are to be followed then diameter limits should be included. We suggest a diameter limit of 18" DBH.

How will this project comply with the NWFP for the NSO and ACSO?

The proposal states all snags >19" DBH will be retained. We recommend this be reduced to 15" DBH per management direction in the LRMP.

We recommend any new landings be placed outside the LSR; and CH if possible. Matrix lands should be used to the maximum extent possible.

Finally, we recommend this project be pared down to address the plantations only. If the FS proposes to pursue the natural stands a diameter limit of 18" should be implemented. The current proposal needs to be analyzed in an EIS, and the FS must consult with the USFWS as well as the NMFS.

Please keep us on the mailing list for this project,