

Mike Medberry
Secesh Wildlands



USDA Forest Service
Keith Lannom, Supervisor
Payette National Forest
500 North Misson St. Bldg 2
McCall, Idaho 83638

April 5, 2016

Dear Keith:

Please accept the following comments from Mike Medberry with Secesh Wildlands, (and add Ron Mitchell and the Alliance for the Wild Rockies as interested parties) on the Middle Fork Weiser River Landscape Restoration Project. I will focus on the Proposed Alternative #2 although I believe that the array of alternatives is inadequate because they fail to vary much from one another in a number of potentially significant effects. (For example there are potentially significant, unmitigated effects of timber harvest on riparian and wildlife areas from the proposal and the use of aerial harvesting techniques and winter harvesting requires further development.)

My comments on Alt #2 follow

NIDGs Habitat

The mitigation measures that are being applied to the Northern Idaho Ground Squirrel are logical, proven, required, and therefore likely to protect this threatened species. Thank you for including these measures over this timber sale (DEIS p.93).

Northern Goshawk

Goshawks typically use thick forested landscapes and there are 9 goshawk Post Fledging Areas protecting a 30 acre area around the nests according to the DEIS. No analysis suggests that this is adequate to provide food and safety for the nesting birds. In addition, the guidelines are for the southwestern region of the country and may not be directly applicable (DEIS p. 47). The Wildlife Biologist will identify a Post Fledging Area of 600 acres and a foraging area of 6,000 acres if additional goshawks are seen (DEIS p. 94). The reasons for these large PFAs and foraging areas is not explained. This difference of 30 acres to 600 and 6,000 acres seems remarkable and inconsistent with the 30 acre defined protected areas; it should be explained at the very least. The goshawks may find themselves in a region of significant logging that may shoo them away quickly and I don't think that is what any of us expect or would favor. Of course the management requirement to "...identify alternate or replacement (of goshawk) nest stands during project-level planning when it is determined that the proposed activity is likely to degrade nest stand habitat. (USFS Forest Service 203a, p III-11, WIST05)" (DEIS p. 87) may supersede

this protection and lead the USFS to make a decision that will lead these raptors to a more precarious position. All of these seem unclear to me and should be clarified.

Great Gray Owls

Great Grey Owls might have been an indicator species for the forest because they need big trees, snags, and meadows (or other open areas) and that is exactly what the west side of the Payette offers. The DEIS reports 6 nests were seen in 2012 but none in 2014 (DEIS p. 237). These birds are glorious, very visible, rare, and need protection. Their nests tend to be in old growth trees and snags, which are a good measure of forest conditions, and they forage in more closed cover. If you don't count for retaining Great Grey Owls you have lost a great deal. Please retain a large area around their nests and learn to reveal them. As a very loved animal, the PNF could've gained much by showing off good management of the Great Grey Owls.

Canada Lynx

Thirty percent elimination of lynx habitat is too much to accept. The management requirements for lynx seem clear (see DEIS p. 87) and the most recent challenge by the Alliance for the Wild Rockies should be taken as a template for future actions. The presence of snowshoe hare and wooded habitat in drainages might be highly indicative for the presence of lynx and the connectivity of areas from the northern Rockies shouldn't be lost. Please study and then enhance the occurrence of snowshoe hare within this timber sale area.

Wolverine

The Court has reversed the decision on wolverine in the northern Rockies, deciding that these animals must be protected as a threatened species. What will you do to respond to this decision? Wolverine cover enormous home ranges: for females it is roughly 100 square miles and for males it is nearly 600 square miles. If you could maintain the Council Mountain IRA for potential wolverine and lynx habitat, I would appreciate that and it could go a long way to support the rest of the Payette's programs. The IRA could certainly be the core area for wolverine and act as a connector for other higher elevations. We can only surmise that these carnivores use the project area for their wide peregrinations but as habitat in other portions of the Forest are used-up, the Council Mountain IRA seems a shoe-in for protection.

Deer, bighorn sheep, and elk all require safety areas for their own protection in certain seasons and the Council Mountain and Poison Creek IRAs are the logical areas to provide it.

Riparian Areas (RCAs)

Eliminate the 2,933 acres of proposed vegetation treatments within riparian areas (RCAs) and strictly maintain the RCA definition. The cause of regaining aspen clones seems appropriate as long as the conifer encroachment is not caused by grazing practices. The grazing practices should be considered in this whole EIS area as they may cause problems that are often unseen or overlooked. Grazing has been overlooked in the DEIS. Regardless, 3,000 acres of riparian area treatment seems extreme and inappropriate. It may also be expensive, but if it allows a greater number of rare species to survive, well then it could be acceptable. The effects on species like wolverine, lynx, fisher, wolves, and others should be considered based on the effects of disrupting wildlife corridors that lead across the Payette National Forest, private, and state land.

Roadless areas

Any unauthorized use of motorized vehicles in roadless areas should remain forbidden until the roadless area has been considered by Congress as designated wilderness. The Council Mountain and Poison Creek IRAs should probably be released from wilderness protection but the USFS has no desire to shake that tree.

Roads

Recommending that 135.5 miles of roads be “maintained” may not seem an unusual action (DEIS p. 61) in any National Forest District with its income declining. However, supporting 9.7 miles of new roads and 34.8 miles of “existing unauthorized roads” is rather odd. And the additional “incidental temporary roads” seems to be another fabricated title for a new category of roads. This is in the Council District which seems fond of forgetting where it has built roads. Perhaps they should have kept maps of this landscape. Eighty and seven tenths miles of these roads will be closed after they have served their purpose, which includes 16.1 miles of National Forest Service roads and 64.6 miles of unauthorized routes. Twenty four and six tenths miles of these roads are within RCAs and would be decommissioned. It is inappropriate for any of these “not-currently-in-existence-roads” to remain open to cattle grazing while being closed to the public (DEIS p. 63). The most redeeming factor in reworking the network of roads, is that 17.8 miles of roads that were in RCAs or contributing to sediment delivery will be closed and a pair of culverts will be replaced, as long as timber is left standing.

Please indicate the number of miles of all roads (of any kind) per square mile of land in the Middle Fork Weiser timber sale in each alternative. Please minimize the potential for landslides that may be due to timber cutting in combination with heavy rain or snow events over the life of the project. Maintain all water quality standards, especially meeting the TMDL guidelines for the State of Idaho in the Weiser and Snake Rivers. Assess the potential for increased water flows and increased sediment deposits due to reduced timber and disturbed soil from timber sale activities. Please do not divert live streams that have fish in them for any purpose, regardless of your intended mitigation practices. Also please recontour and recover all sites disturbed by heavy equipment that have run in slopes over 30% and cast slash over the land. My point in all of these arcane requests is to be careful of this landscape (it is mine as well as yours) so that it will recover and be productive for wildlife sooner rather than later.

Please also report in the FEIS the type of DNA analysis, the timing of the study, and the results that has led the Forest to declare that bull trout were not present in much of the study area. And please keep in mind that bull trout are often migratory and may not be present at certain times of the year and that not finding them may not present the whole truth. Moreover, the existing condition of all habitat is a moving target and I assert that the USFS must consider the increasing trend for improving this habitat from past actions is the reasonably foreseeable future. Ultimately, I think that choosing the no action alternative would provide much better habitat (eg. for deer and elk, northern goshawk, bull trout and lynx among them) than the action alternatives and it should be intensively studied as a real alternative.

A request for trees

Whitebark pine should be left intact within the few high elevation subalpine fir vegetation group and all trees at or above 20” DBH within the sale area should be retained to support old growth

dependent wildlife in this vast and beautiful Middle Fork Weiser River drainage. Please protect all TES plants where they are found and maintain a reasonable number of snags over the landscape.

Trail Improvements

The illegal (but apparently sanctioned) use of motorized vehicles on trail 198 should not be encouraged, as doing so will send a message that illegal use will eventually become legal. That is not a sensible way to make decisions on public lands. Instead, a separate trail use map should be developed with public comment including a chance to appeal, challenge, or acquiesce in the decision. The USFS has never chosen to maintain the roadless character of IRAs in the Payette NF but I will ask you again to please maintain the roadless area's wild characteristics in the Council Mountain IRA. With the major timber sales surrounding Council Mountain, this IRA will only become more important as a refuge for wildlife. Please keep this in mind as you plan additional recreational development.

Wildlife

The EIS states that white-headed woodpecker, three-toed woodpecker, black-backed woodpecker, flammulated owl, great gray owl, northern goshawk, pileated woodpecker, mountain quail, gray wolf, Rocky Mountain elk, bald eagle, Columbia spotted frog are the main species documented in the project area. (EIS p. 209). Please define how you will maintain their habitat and which species may be sacrificed to timber sales. I think you may have done that by deferring the issue, but please be specific.

A slight apology

Unfortunately, my comments on the DEIS are only telegraphic and woefully incomplete, but I have the gist of the proposal. If the USFS, or your consultants, would set up a brief meeting time in Boise, or after hours in McCall, to discuss the relevant concerns, I would appreciate that. I think that this major timber sale (Alt #2) would have serious and negative impacts on wildlife in the area and the surrounding region as it is designed. That is a doggone shame and one that should, and could, be realistically mitigated.

Sincerely,

Mike Medberry
Sesesh Wildlands