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Bonniers Ferry Ranger District
Attn: Jennifer Anderson
6286 Main Street
Bonniers Ferry, ID 83805

Comments sent via email to: comments-northern-idpanhandle-bonniers-ferry@usda.gov

January 29, 2020

Subject: Westside Restoration Project

Dear Mrs. Anderson:

I am writing on behalf of the Idaho Conservation League to comment on the proposed Action for the Westside Restoration Project. 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.

At this time the Idaho Conservation League does not support this project. On several occasions we have expressed concern about the two proposed snowmobile parking areas in Snow Creek and the proposed warming hut near Roman Nose. We believe that there are already too many recreational pressures on the wildlife on the west side. Mountain caribou have already been lost—likely forever. It is important that we not let that happen to the other wildlife. We also believe that it is inappropriate to be approving additional over-snow vehicle infrastructure when the IPNF has yet to complete a winter travel management plan for the North Zone of the forest as required by the 2007 court order. We have similar concerns about the proposed non-motorized trail to Kootenai Point.

The scale and magnitude of activities proposed is also a source of concern. Although the Washington Office has instructed line officers not to prepare environmental impact

statements, we believe that an EIS is warranted given the scale of this project and potential effects to threatened and endangered wildlife, roadless areas, and other resources.

More detailed comments are attached. I look forward to further discussions about what can be done to address these concerns so that ICL can support the project.

Sincerely,

A handwritten signature in dark ink, appearing to read "Brad Smith", is positioned above the typed name.

Brad Smith
North Idaho Director

Westside Restoration Project Comments

National Environmental Policy Act

The Forest Service should prepare an environmental impact statement to document the effects of this project as required by the National Environmental Policy Act (NEPA). The Idaho Conservation League is aware that the Washington Office via the region has instructed interdisciplinary teams to limit effects analyses to environmental assessments. Environmental impact statements will only be allowed by regional forester approval. This direction stifles the discretion and expertise of interdisciplinary team members, rangers, and even forest supervisors. This is counter to the intent of NEPA, which requires federal agencies to consider both the context and intensity of a proposed action to determine whether or not significant environmental impacts will result and consequently, whether or not an environmental assessment will suffice. ICL is concerned that the administration is sacrificing public involvement and environmental review for the sake of expediency.

It is difficult to imagine that this project should not be documented in an environmental impact statement. For context, the Forest Service should consider that the project area contains habitat for a number of candidate, threatened and endangered species, including grizzly bear, wolverine, lynx, caribou, and bull trout. The proposed action, when taken with other past, present, and reasonably foreseeable actions in the Selkirks cumulatively puts these species at further risk.

With regard to intensity, the proposed action includes approximately 9,500 acres of commercial timber harvest and another 3,000 acres of precommercial silvicultural treatments. The Idaho Panhandle National Forests traditionally prepared environmental impact statements for timber sales on the order of 3,000 acres or larger. In many cases, past environmental impact statements were prepared for project areas containing no roadless or no habitats for candidate, threatened, or endangered species.

Given these considerations, we encourage the Forest Service to either prepare an environmental impact statement or eliminate project components that will result in a significant environmental effects.

Over-Snow Vehicle Recreation Project Components

Among other things, the Forest Service proposes to construct two new snowmobile parking areas in Snow Creek and a Warming hut near Roman Nose Peak. The Idaho

Conservation League does not support these project components. The Selkirk Mountains are something of a last bastion for candidate, threatened, and endangered species in North Idaho. Further increasing recreational pressures in the Selkirks will relegate grizzly bears, wolverines and lynx to the same fate as mountain caribou. Additional recreation opportunities should be focused in areas outside of recovery zones.

The amount of over-snow vehicle use at Roman Nose is already cause for concern. It is reported that clubs and retailers are organizing events at Roman Nose without the requisite special use permits. There is also a concern that over-snow vehicle use clips the tops of subalpine larch and white bark pines near Roman Nose.

Furthermore, we believe that it is inappropriate to build new infrastructure for over-snow vehicle use in this area when the Forest Service has yet to complete a winter travel management plan for the North Zone of the IPNF as required by the 2007 court order (*Defenders of Wildlife et al. v. Susan Martin et al.*) and the terms and conditions spelled out in the biological opinion for the 2015 IPNF Forest Plan. Snowmobile use is enjoined across a significant portion of the project area as a result of the 2007 order.

Activities associated with over-snow vehicle use on the North Zone must be cumulatively assessed at that scale in order to comply with the court order, the terms and conditions of the biological opinion for the Forest Plan, and NEPA. While the Forest Service has made a request to the Fish and Wildlife Service to reinstate consultation on the Forest Plan, the Forest Service will also have to consult with the Fish and Wildlife Service on this project.

Kootenai Point Non-Motorized Trail

The Selkirk and Cabinet-Yaak grizzly bear populations were listed as 'threatened' in 1975. The Grizzly Bear Recovery Plan (1993) identifies adequate effective habitat as the most important element in grizzly bear recovery. Effective habitat is a reflection of an area's ability to support grizzly bears based on the quality of the habitat and the type/amount of human disturbance imposed on it. Security habitat allows for sufficient space for grizzly bears to roam and effectively use available habitats. By definition, security habitat is an area or space outside or beyond the influence of high levels of human activity. Open roads, vegetation and fuel projects, and high-use recreational areas such as trails or campgrounds are examples of activities that reduce the amount of secure habitat that is available and may result in displacement of bears.

Forest Plans for the Kootenai and Idaho Panhandle National Forests contain plan components designed to aid in the recovery of grizzly bears in the Selkirk and Cabinet-

Yaak Ecosystems. These plan components consist of standards for grizzly bear core habitat, open motorized route density, and total motorized route density. Each of the recovery zones are divided into bear management units (BMUs) that are approximately the same size as an average home range for a female grizzly bear, and the standards for each BMU must be achieved no later than 2019.

Although these plan components focus primarily on motorized access, they are not silent on the issue of non-motorized access. 'High use' non-motorized trails are also deducted from grizzly bear core habitat:

*An area of secure habitat within a BMU that contains no motorized travel routes or **high use nonmotorized trails** during the non-denning season [non-denning season includes the dates 4/1-11/15 (SRZ) or 4/1-11/30 (CYRZ), inclusive] and is more than 0.3 miles (500 meters) from a drivable road. Core areas do not include any gated roads but may contain roads that are impassible due to vegetation or constructed barriers. Core areas strive to contain the full range of seasonal habitats that are available in the BMU.*

(Emphasis added).

'High use' non-motorized trails include any non-motorized trail that is used by an average of twenty or more parties per week during the active bear season. High use non-motorized trails are treated the same way as motorized routes by the Forest Plans. An area extending 500 meters on both sides of 'high use' trails is subtracted from grizzly bear core habitat calculations.

The Idaho Conservation League cannot support the proposed non-motorized trail from the Kootenai National Wildlife Refuge to Kootenai Point. The proposed trail would likely be popular due to its close proximity to Bonners Ferry and the ability of the public to access the trailhead for a substantial portion of the year. Use in excess of the 'high use' non-motorized trail definition would result in a loss of grizzly bear core habitat in the Myrtle BMU and the adjacent BORZ area. A loss of core habitat may require other roads or trails to be closed to meet Forest Plan requirements and continue the path to recovery.

We will also note that the recreation program budget for the Idaho Panhandle National Forests is dismal. We question the idea of building more trails when the forest is struggling to maintain the current trail system.

Harrison Lake, Two Mouth Lake, and Myrtle Lake Trails

The Idaho Conservation League supports the proposal to convert road 2409 to a trail and create a new trailhead near road 633. This will effectively increase the length of trail 217. Road 2409 has suffered from a lack of maintenance. The road has eroded, and sediment from the roadway may be ending up in streams. Converting the road to a trail will reduce erosion and road maintenance obligations.

ICL also supports rerouting the Tow Mouth Lakes Trail to a new trailhead on Myrtle Creek Road. As the Forest Service is aware, the current trail originates on private land. Three years ago the company that owns the land logged that section and converted the old trail to a logging road. Not only did this reduce the enjoyment of the trail, but the Forest Service does not have an easement across the private land. Therefore, the best alternative is to reroute the trail as proposed.

Similarly, we regret the need to reroute the Myrtle Lake Trail, which also originates on corporate timber company land. Although the current trail prism provides magnificent views, we understand that the Forest Service does not have an easement across the private land, and the timber company could close access to the trail at any time. Constructing a new trail in Ball Creek is the next best alternative. Under the proposed action, two miles of new trail would be constructed down to the end of the current Ball Creek Road. About one mile at the end of the road would be stored, creating a three-mile hike to Myrtle Lake.

We encourage the Forest Service to increase the amount of road storage at the end of the Ball Creek Road for two reasons. First, the vast majority of the mountain lakes in the Selkirks require only a one to four-mile hike. This results in high use levels that detract from a feeling of solitude. The high use at many mountain lakes in the Selkirks also affects wildlife security and habitat. Storing a longer section of the Ball Creek Road would effectively increase the distance of the hike to Myrtle Lake, provide a greater opportunity for solitude. This would also increase wildlife habitat effectiveness. We recommend storing three miles at the end of the Ball Creek Road so that the total hike to Myrtle Lake is five miles.

Illegal Four-Wheeler Access to Roman Nose

Illegal four-wheeler access to Roman Nose is occurring via state lands in the Fall Creek drainage. The Forest Service should take steps to curtail this illegal use. This is important to protect this fragile environment as well as to ensure compliance with forest plan components for grizzly bear habitat security.

Temporary Roads

Temporary road construction should be limited to ridge tops and other locations where stream crossings are not required. Road construction in riparian zones can result in increased sediment loading of streams, particularly where roads cross stream channels. We identified the following proposed temporary roads and associated stream crossings. We encourage the Forest Service to eliminate harvest units or portions of harvest units that require temporary road construction across stream channels. Alternatively, the Forest Service could consider helicopter yarding in these units.

Stream Name	Temp Road	Unit
Mack Creek	21	64
Curve Creek	18	50
Two unnamed streams	15	30

Multi-Story Mature Lynx Habitat

It is unclear whether or not the Forest Service has inventoried multi-story mature lynx habitat within the project area. If not, field reconnaissance should occur during summer 2020 to inspect stands targeted for treatment that may fall into this category. Any verified multi-story mature lynx habitat should be protected from timber harvest.

Watershed Effects

The environmental analysis should describe the effects of the project to watershed resources. For example, we recommend consideration of potential increases in sediment and associated impacts to aquatic habitat. The Forest Service should also consider the timing and magnitude of peak flows. An equivalent-clear-cut area (ECA) analysis should be undertaken that includes all ownerships within project-area watersheds. The available literature suggests that ECAs in excess of 20 percent may result in measurable differences in both the timing and magnitude of peak flows.