


Paul R. Sieracki



1-29-2020

Scoping Notice Comments: Westside “Restoration”, Bonners Ferry Ranger District, Idaho Panhandle National Forests.

District Ranger Kevin Knauth,

I am dismayed at this project because it has been developed through collaboration. The collaborators do not represent the diversity of opinions that the public has. They represent a small pro logging cabal trying to take control of our National Forests. This must stop. I am also dismayed that the Scoping Notice did not even mention abrupt climate change and the biodiversity crisis the earth is in. Logging and roadbuilding do not constitute restoration, please rename and reconsider the objectives for this project. This project violates the ESA, NFMA and NEPA.

This planet is in a climate change emergency and is in a period called the 6th great extinction, because of this complete emphasis must be placed on restoring healthy and resilient populations of wildlife in the context of combating climate change and biodiversity loss. Eleven thousand scientists in 153 countries including myself, have declared a climate emergency. The USFS needs to do such and act on it (<https://www.independent.co.uk/topic/climate-emergency>). Logging should be eliminated from National Forests as it causes a carbon deficit. Dr. Rees, professor of human ecology and ecological economics states that “Humans are Blind to Imminent Environmental Collapse” and that governments are dismissing scientists warning to humanity.

“Bottom line? The world seems in denial of looming disaster; the “C” word remains unvoiced. Governments everywhere dismissed the 1992 scientists’ [Warning to Humanity](#) that “...a great change in our stewardship of the Earth and the life on it is required, if vast human misery is to be avoided” and will similarly ignore the scientists’ “[second notice](#).” (Published on Nov. 13, this warning states that most negative trends identified 25 years earlier “are getting far worse.”)”
<https://thetyee.ca/Opinion/2017/11/16/humans-blind-imminent-environmental-collapse/>

Edward O. Wilson is a professor emeritus at Harvard University and a two-time Pulitzer Prize winner supports the half earth concept, expanding the existing system of biological reserves.

“Only by committing half of the planet's surface to nature can we hope to save the immensity of life-forms that compose it. Unless humanity learns a great deal more about global biodiversity and moves quickly to protect it, we will soon lose most of the species composing life on Earth. The Half-Earth proposal offers a first, emergency solution commensurate with the magnitude of the problem: By setting aside half the planet in reserve, we can save the living part of the environment and achieve the stabilization required for our own survival.

Why one-half? Why not one-quarter or one-third? Because large plots, whether they already stand or can be created from corridors connecting smaller plots, harbor many more ecosystems and the species composing them at a sustainable level. As reserves grow in size, the diversity of life surviving within them also grows. As reserves are reduced in area, the diversity within them declines to a mathematically predictable degree swiftly—often immediately and, for a large fraction, forever.” E. O. Wilson

Federal Lands are an important component providing large landscapes for biodiversity maintenance and carbon storage. This sale is not ecosystem restoration as touted, but an ecological disaster in the making. Conservation legislation like NOREPA help conserve biodiversity. **Conserving biodiversity and carbon must be the first and foremost mission of the USFS. Please rewild at least half of this project area.**

Issue: This project is not carbon neutral or carbon negative.

Please include the large distances logging trucks have to travel to the mills in carbon budget calculations. Only allow electric logging trucks and equipment to work in the area during true restoration activity. Depro et al (2008) found that a no harvest (logging) scenario on public lands retained the greatest carbon sequestration potential.

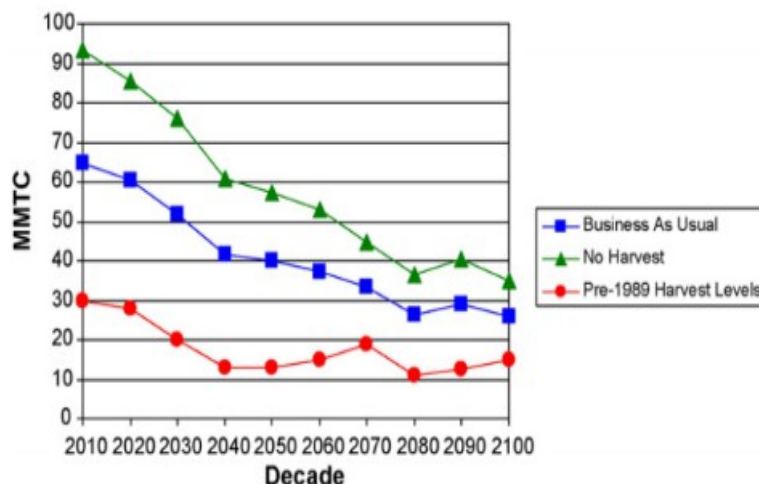


Fig. 6. Annual carbon sequestration in all public lands by scenario.

Requested action (in relation to the proposed alternative):

- Please develop a max carbon sequestration alternative for the project areas. Please actually do the science and provide an on-the-ground alternative, not just put it in the “alternatives considered but not analyzed” category.

Issue: Grizzly Bear, BORZ Violations.

There are three segments of BORZ violations that show up as trails open to motorized use in the Pack River Drainage and are supposed to be closed according to the BorzAll Geospatial dataset.

Requested action (in relation to the proposed alternative):

- Close these motorized use trails, which are really old roads, to comply with the Access Amendment, Attachment 1.

Issue: Grizzly Bear, BORZ, Pack River Bridge proposal on Road 222.

The USFS is proposing a motorized access bridge across Pack River, a proposed Wild and Scenic River, Bull Trout Critical Habitat and with sensitive Westslope Cutthroat Trout. This will result in increased illegal access to trail (road 222) which is supposed to be closed according to the Access Amendment. Locations of the transgressions are mapped in Appendix #1.

Requested action:

- Change the trail to hiking only and build a crossing for non motorized use only.
- Immediately close the crossing to motorized traffic as there may be impacts to sediment and taking of bull trout redds/eggs and fry. (also of westslope cutthroat trout).
- If a hiking bridge is built, please include a predator safe nesting sites (structures) for the American Dipper, a species that is projected to decline with ongoing abrupt climate change.

Issue: Grizzly Bear, early exiting grizzly bears may be harassed by snowmobilers, on purpose or inadvertently.

Requested action:

- Change the termination date for snowmobile use in grizzly habitat from April 1 to March 15 to account for earlier den exiting from global heating and to protect taking of males which tend to exit before females in dens. Tim Layser, retired USFS biologist, Priest Lake RD, supports an earlier termination date for snomobilers.

Issue: Grizzly Bear, Helicopter Logging.

Helicopter Logging can displace grizzly bears out of their habitat.

Requested action:

- Please use at least a ½ mile buffer around the unit(s) and flight path for the helicopter logging unit in the Myrtle Creek drainage.

Issue: Grizzly Bear, Trail westward of Burton Peak in grizzly habitat.

This project will result in an increase of recreation, logging and roadbuilding activities in grizzly habitat. Does every ridge need a trail? People can have a natural experience and just walk the ridge. The addition of even more trails may be a violation of the ESA. The subtle yet significant increase in activity is how grizzlies and other species get displaced without noticing the change.

Requested action:

- Defer to the needs of endangered wildlife and do not construct this trail.

Issue: Grizzly Bear, Two Mouth trail reroute.

The proposed location, shown during a KVRl Forestry Committee meeting last fall, showed the trail rerouted dangerously close to a snowchute grizzly bear foraging area. This new trail would increase the risk of human – grizzly conflict.

Requested action:

- Reroute the trail as far away as possible from the snowchute, greater than 500 meters if possible.

Issue: Snowmobile Damage to Subalpine Larch, Whitebark Pine (USFS sensitive and USFWS candidate), Subalpine Fir and Engelman Spruce in the Roman Nose area.

I cannot emphasize how much damage is occurring to the above listed tree species in just the Roman Nose area. Attachment #2 shows pages of impacts to saplings in the Roman Nose area from videos posted by off trail snowmobilers. Please review these videos. There are many bent over saplings that are either damaged by snowload or impacted by snowmobiles. Damaging trees is illegal and totally unacceptable in a very stressed subalpine habitat due to abrupt climate change. Low resolution videos make tree species identification difficult however the photo below is probably a subalpine larch that has been impacted (there are subalpine larches in the background).



Requested Actions:

- Close off the three Roman Nose Lakes to off-trail snowmobiling because of resource damage. The boundary to be determined by field investigations. The boundary should include the southerly aspects of Roman Nose in Whitebark Pine Habitat. This area is also grizzly denning habitat and wolverine denning and foraging habitat.
- Conduct field investigations to determine the extent of damage to whitebark pine, subalpine larch, spruce and fir as the videos show extensive damage to saplings.
- Do not use a minimum snow depth as a guideline for allowing snowmobiling in whitebark pine habitat as tops of larger trees could be buried just under the snow and impacted, and there is a significant percentage of off trail snowmobilers who just do not care about damaging trees.

Issue: Subalpine Larch could be extirpated from the US Selkirks.

There are two populations of Subalpine Larch in the US Selkirks, at Roman Nose and a much smaller population at Parker Lake. The Idaho State record subalpine larch is supposedly in the Roman Nose Lake area. The size reported needs to be confirmed.

"Curiously, the list of Idaho Big Trees also mentions the state's biggest Subalpine Larch, 13 feet around and 157 feet high, as being located near Upper Roman Nose Lake in what the official list says is "Bonner County," even though Roman Nose Mountain and all the Roman Nose Lakes are located well within Boundary

County. We are going to assume what they really meant was Boundary County. That tree was declared the Idaho champion Subalpine Larch 45 years ago in 1970. " source <http://www.newsbf.com/news/201511/24bigtreesprn.html>. I have not seen this tree and it seems exaggerated.

With only two small populations, the risk of extirpation is fairly high from natural events and continual impacting of saplings in the Roman Nose grove by snowmobiles.

Requested actions:

- While not a sensitive species, the USFS could show at least a minimal ecological ethic and protect these locally rare trees with a snowmobile exclusion zone as stated above.
- Establish new populations in the project area in suitable habitat. For example in the proposed burn on the ridge along Burton Peak and the proposed burn on the ridge north of Lost Creek..
- Please do not impact the forested portion of the ridgeline on the trail to Burton Peak by controlled burning.
- Please evaluate the proposed fire on the high elevation ridge by lost creek as this is mountain caribou late winter habitat and would be a violation of the ESA and perhaps some other method could be used to restore both whitebark pine and subalpine larch to that ridgeline.

Issue: Hut and access must be deferred to the Winter Rec EIS.

With an ongoing Winter Rec EIS, of which Paul Sieracki attended the 4 "collaboration" meetings it seems illogical and at worst an attempt to circumvent the Winter Recreation EIS process through this proposed project.

Requested actions:

- The hut and access must be deferred to the Winter Rec EIS process.

Issue: Grizzly and ungulates and declining "forage"

The project scoping document claims without quantitative data that "forage" of some unidentified combination of species is declining. This is a grand excuse to justify logging and roadbuilding..

Requested actions:

- Please map and quantify "forage" by species for the existing condition and project change from logging activities (logging is not restoration).
- Please map huckleberry locations and quantify huckleberry production and changes from the logging activity in relation to the grizzly bear.

Issue: Grizzly Bear (and other predators). The use of lead bullets can cause lead poisoning in carnivores feeding on ungulate gut piles.

Requested actions:

- Require non lead non toxic bullets on Federal Lands to prevent resource damage.
- Also implement an area closure on all trapping.

Issue: Previously mapped old growth is being left, recruitment stands are being logged by this proposal and stands that have recently aged to old growth have not been identified.

Conserving old growth forests was not mentioned in the Scoping Notice, documenting the lack of environmental ethics of the USFS. It appears that the USFS is not proposing to log in old growth that was mapped in the 1080's and early 1990's (determined by using GIS). However the District is proposing to log previously identified recruitment old growth stands. They were assigned in the old Forest Plan to allow an intact forest to follow natural succession processes to make up for areas lacking in sufficient old growth. To my knowledge no quantitative assessment of recruitment stands and stands that have now achieved old growth status has occurred.

Requested actions:

- Do not enter old growth and *recruitment old growth* stands in the project area as identified in the old forest plan. *Recruitment old growth* is being proposed for logging.
- Complete old growth stand exams in *properly stratified* forest stands to determine which stands have followed natural succession and entered the old growth state.
- Do not enter moist site stands that area mature, recruitment old growth or close to becoming old growth.
- For the Snow Creek watershed, which is deficient in old growth, please assign old growth recruitment stands to at least the 30% level and do not log any mature stands. This is needed to because some areas will be lost to disturbances.
- Conduct the gentlest restoration activities on dry site old growth.. hand thinning and underburning for example.
- If the USFS needs a pattern to assign old growth recruitment stands, use Long Canyon as an example for location.

Issue: USFS Sensitive animals and plants locations and habitats are not disclosed in the Scoping Notice, handicapping honest attempts at substantive commenting.

Requested actions:

- Complete a biodiversity survey for the project area, possibly using a bioblitz and iNaturalist.

- Map all sensitive species habitats, provide for the landscape and micro dynamics to allow these species to increase in number.
- Do not lump species into guilds, please discuss each species life history and effects in detail.
- Follow the guidance on rare plants and animals in attachment #3 which was developed for Buckskin-Saddle and applied to this proposed sale.
- Re-Scope the project with sufficient information for substantive commenting.

Issue: Logging is proposed in subalpine fir habitat types.

Subalpine habitat and their wildlife are at risk from abrupt climate change that we are witnessing. Actions such as logging, roadbuilding and snowmobiling are ecologically damaging in stressed habitats.

Requested action:

No logging in subalpine habitats.

Issue: Develop and implement a proforestry alternative.

The current alternative did not take into account the desires of the entire population, just a limited few that support logging and roadbuilding. The "Max logging and roadbuilding" alternative proposed by the Hootenanny Tribe, USFS and KVRI is unacceptable.

Requested action:

- Develop a ecological and biodiversity conservation alternative using proforestry practices to preserve intact forests.
- Toss the existing destructive alternative and replace it with the new one.

Issue: Roadless Areas are proposed for roading and logging.

Despite the Idaho Roadless Rule, logging in roadless areas destroys their roadless quality, these areas are important for wildlife, areas where natural processes can occur and genetic resistance to disturbance events may occur.

Requested action:

- Do not log or road existing roadless areas.
- A controlled burn is acceptable in some instances.

Issue: NREPA – Northern Rockies Ecosystem Protection Act needs to prevail.

The project area overlaps areas that should be rewilded based on the science in NREPA. This includes NREPA new wilderness, NREPA Biological Corridors and NREPA Recovery Areas.

Requested action:

- A pro-forestation alternative incorporating NREPA areas should be presented, not this

logging and roadbuilding project that the USFS and the logging collaborative want. Please include an alternative modeling NREPA that is NOT under the “considered but not analyzed” category. (<https://allianceforthewildrockies.org/nrepa/#map>).

Issue: Pre commercial thinning units will impact prey species for the sensitive fisher and other mustelids, other carnivores, and forest raptors.

Precommercial thinning will impact snowshoe hare habitat, a primary food source for the sensitive fisher and endangered Canada lynx.

Requested action:

- For fisher: provide for sufficient snowshoe hare populations at lower elevations. Please map and quantify the existing condition and proposed action (also applies to other predators).
- Please discuss what sufficient prey population levels are in the project area.
- Also do not fragment mature forest as it is detrimental to fisher.
- For Canada lynx: follow lynx management guidelines for snowshoe hare habitat.

Issue: Forest Songbird composition will be impacted at a landscape level and understory nesting forest bird populations will be devastated.

Western Forest bird populations have declined about 30% since 1970. There are many factors involved including commercial thinning. Commercial thinning of forested habitats will negatively impact the vertical and horizontal structure of the stand being thinned. This is a 13,000 plus acre project. Impacts by this project will produce significant changes to species composition and numbers, especially to understory nesting birds; varied thrush, hermit thrush, swainson's thrush etc.

Requested action:

- Quantitatively analyze the existing condition of songbirds that inhabit forest understory and all avian species that occur in the area.
- Quantitatively illustrate the changes from existing condition for the proposed and the requested proforestry and rewilding alternative.

Issue: Fisher habitat requirements will not not be met.

The fisher population is declining rapidly in the US Selkirks. The species may be extirpated. The USFS unprofessionally ignores current science in its analysis of effects to fisher habitat. Recent openings greater than 5% in a fisher home range may cause abandonment. From Sauder & Rachlow 2014:

“Landscapes that had >50% mature forest arranged in connected, complex shapes with few isolated patches, and open areas comprising

<5% of the landscape characterized a forest pattern selected by fishers in our study.”

Rather than managing for a persistent fisher population, the USFS calls areas they want to log “travel habitat” and dismisses the need to keep a significant number of mature and old growth trees on the landscape (eg Jasper Mountain CE). This is true for this project and the upcoming Buckskin-Saddle EA. The USFS BE's invariably state that “this project may impact individuals but not the population. This is done for hundreds of square miles of fisher habitat making fisher habitat unsuitable at a large landscape scale. Just where will fisher habitat be maintained?

Requested action:

- Incorporate current science on fisher habitat into all alternatives.
- Have the Kootenai and Kalispel Tribes work on augmenting fisher to the diminishing or extirpated Selkirk population.
- Conduct monitoring for fishers in the project area.

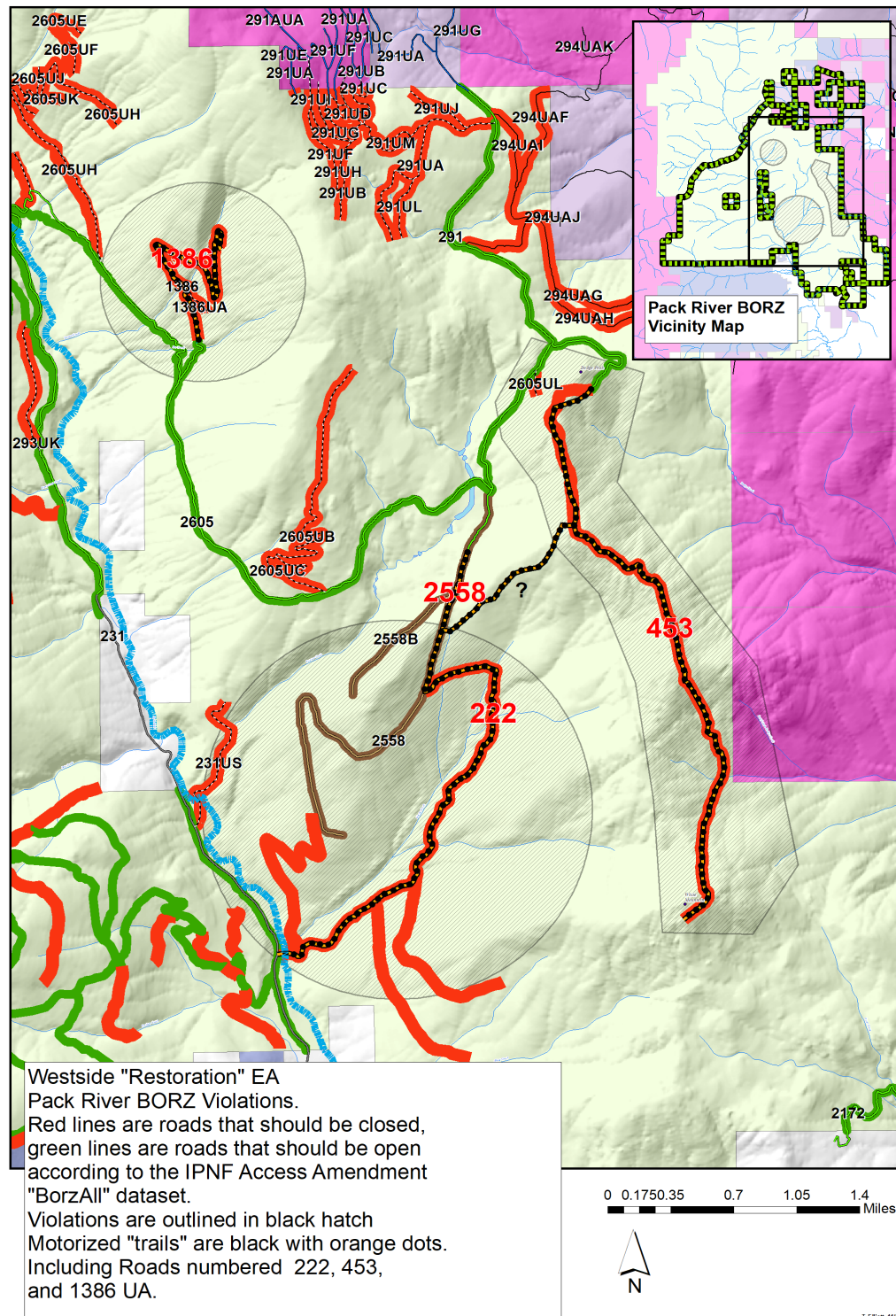
Issue: Objections to the IPNF Forest Plan by AWR, FOC, SCA, myself and others have not been satisfied.

Requested action:

- Please incorporate the issues and science from that Forest Plan Objection into this document. It will be uploaded separately
(IPNFForestPlan_ObjectionLetter_stelprdb5442224.pdf)

Respectfully Submitted,
Paul Sieracki, MS.
Geospatial Analyst and Wildlife Biologist.

Attachment #1



Attachment #2

Screenshots of videos of people snowmobiling and causing resource damage at Roman Nose Lakes.



3 or 4 subalpine fir impacted, the snowmobiler later runs over the two saplings on the right that have been impacted.

From: Roman nose snowmobiling Marck 10, 2013

<https://youtu.be/LGSQ7mB8j7o?t=140> about 2:20



at 3:52, from video above.



at 3:55 from video above at 4:28, from video above.



at 4:34, from video above.



at 4:40, from video above.

at 4:54



at 4:58, from video above.



at 5:29, from video above.



at 5:57, from video above.



Likely young whitebark pine @6:05 a USFS sensitive species, from video above.





@ 6:29, from video above.

From: <https://youtu.be/LGSQ7mB8j7o>, Snowmobiling North Idaho, Roman Nose



@3:25



@4:06



@4:28 subalpine larch based on elevation and location not hit.



@8:32 damaged whitebark pine, no evidence of tracks but it documents whitebark pine presence and

damage.

From Roman Nose 2013 <https://youtu.be/q2HbGoG4yzw>



Subalpine Larch, Roman Nose from <https://youtu.be/q2HbGoG4yzw>



@1:37 Possible subalpine larch impact, the probable identification is based on poor quality video.



roman nose 2013



MORE VIDEOS



2:36 / 8:38



@3:05 multiple impacts to subalpine fir in progress, the saplings in the center right of the image were hit after the ones under the machine.



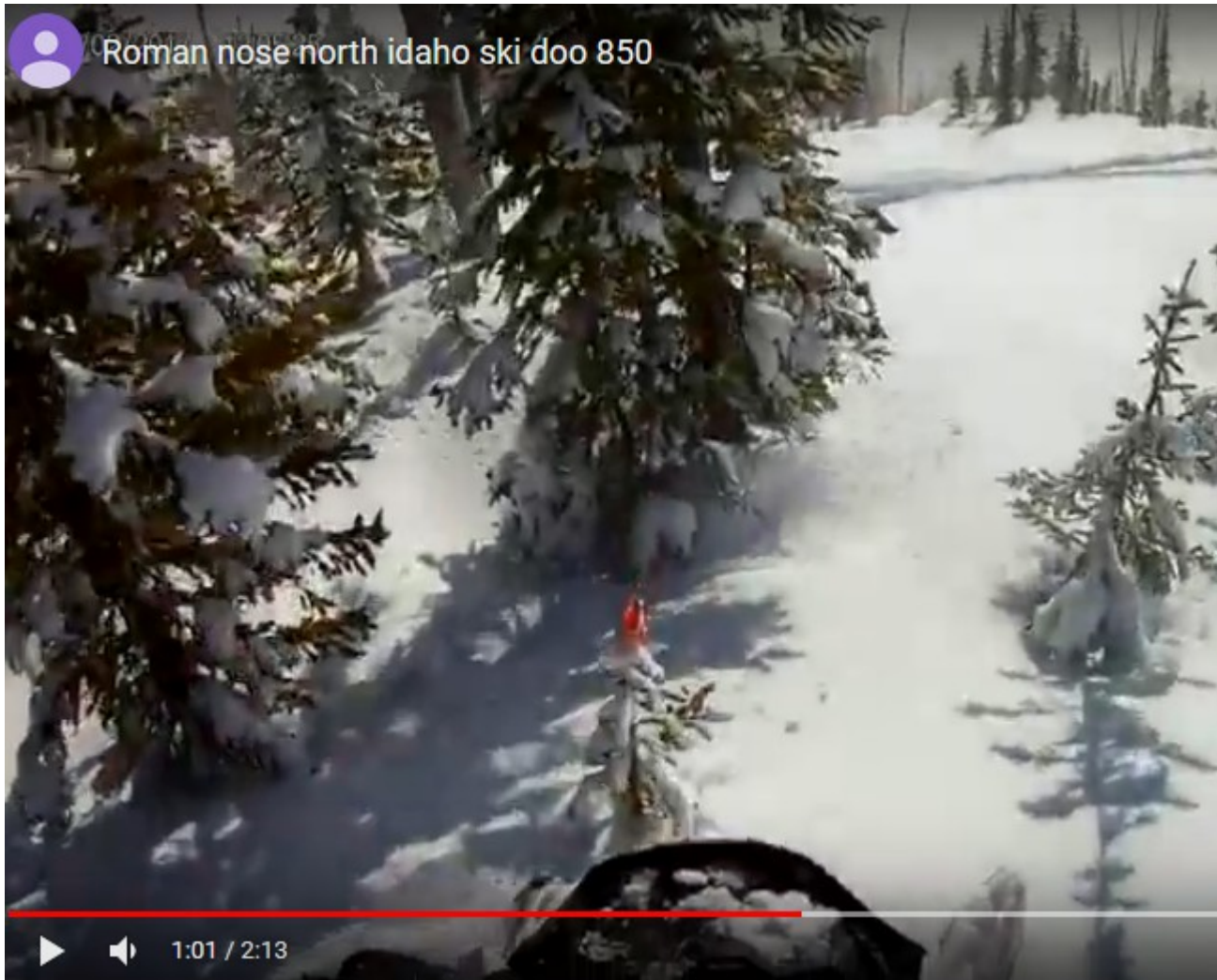
@5:25 likely impacted subalpine larch



@5:15 in a subalpine larch grove.



@5:53 impacting a subalpine larch sapling.



https://youtu.be/yuhZTmZ0V_E?t=61 just about to hit this tree with litter on top of it..

Attachment #3 – Recommendations from Buckskin-Saddle that apply to the Westside “Restoration” EA.

Paul R. Sieracki



Sept. 6, 2019

Re: Additional Comments on the Buckskin-Saddle Scoping Notice from Sieracki.

Dear Scoping Notice Comment Reviewers,

This is a request for this and all following timber sales for pre-logging reviews of the unit and the appropriate area around the cutting units.

- These unit specific reviews should be completed at the appropriate time and time of day and year before the unit or area is to be logged out in order to detect TES or other species such as raptors. Eg, March for most owls and early summer for flammulated owls.
- Unit field surveys should be conducted by the appropriate specialist for the discipline, eg. wildlife biologist, botanist.
- For some species, for example, the western toad, an IPNF sensitive species should have units scoured for toads during the logging operation, possibly at night. Individuals found should be moved to a safe area.
- The public should be notified of the date of these surveys and the results.
- If a species is found, action should be taken to protect that species.. eg wolf and sensitive species dens, raptor nests, woodpecker nests, rare plants or lichens.
- These actions would help preserve biodiversity at the local level and would assist the Forest in implementing the following standards and guidelines.
- When possible, a member of the public should be taken along to assist and monitor the effectiveness of the survey.
- These activities could be easily paid for by adding to a minimum bid price for the sale.

These actions would help the IPNF follow the guidelines below.

For Elk:

FW-GDL-WL-14. Big Game. Management activities should avoid or minimize disturbance to native ungulates during the birthing/parturition period.

For Raptors:

FW-GDL-WL-20. Raptors. Management activities on NFS lands should avoid/minimize disturbance at known active raptor nests, including owls. Timing restrictions and distance

buffers should be based on the best available information, as well as site-specific factors (e.g., topography, available habitat, etc.). Birds that establish nests near pre-existing human activities are assumed to be tolerant of that level of activity.

For Wolves:

FW-GDL-WL-22. Wolf. Management activities should avoid or minimize disturbance to wolves near den and rendezvous sites during the times those sites are in use based on the best available information

For Bats:

FW-GDL-WL-21. Townsend's Big-eared Bat and Fringed Myotis Bat. Avoid or minimize disturbance at known active roosts and hibernacula in caves, abandoned mines, or rock outcrops using the best available information.

For Harlequin Duck:

FW-GDL-WL-23. Harlequin Duck. Management activities should avoid or minimize disturbance near known active nesting and rearing areas based on the best available information.

For Common Loon:

FW-GDL-WL-24. Common Loon. Management activities should avoid or minimize disturbance near known active nests based on the best available information.

For other TES species:

FW-GDL-WL-25. Management activities on NFS lands should avoid/minimize disturbance at known active nesting or denning sites for other sensitive, threatened, or endangered species not covered under other forestwide guidelines. Use the best available information to set a timeframe and a distance buffer around active nests or dens. Individual animals that establish nests and den sites near areas of pre-existing human use, inconsistent with the timeframes and distances in the other forestwide wildlife guidelines or in the best available information, are assumed to be accepting of that existing higher level of human use at the time the animals established occupancy. In those instances, as long as the individual animals continue to use the site, the higher intensity, duration, and extent of disturbance could continue but would not be increased beyond the level existing at the time the animals established occupancy.

Non Sensitive Woodpeckers:

These guidelines should also apply to non sensitive woodpeckers such as the pileated woodpecker which provided cavities for secondary cavity nesters.

Migratory Bird Treaty Species:

Also please do not schedule logging during nesting season for neotropical and non-migratory songbirds. Bird populations are declining everywhere and any direct impact to these birds can and should be avoided. Having a take permit to kill species protected by the MBTA during logging and roading operations is unacceptable.

Respectfully Submitted,
Paul Sieracki Geospatial Analyst/Wildlife Biologist