February 12, 2022
[redacted]

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, Montana 59804

Subject: Dead Laundry Objection

Dear Sir,

The following paragraphs detail my objection to the Dead Laundry project on the Nez Perce – Clearwater National Forests. I have submitted previous comments regarding these concerns and those concerns have largely been ignored by the Nez Perce Clearwater National Forest.

Objection 1 – Overstated Purpose and Need for Action

The Nez Perce Clearwater National Forest suggests that the primary purpose and need for the project is to reduce hazardous fuel loadings adjacent to private inholdings, to harvest wood products and to improve forest health. They suggest "large fires that occurred in 1910 and 1919 and the introduction of white pine blister rust have created a homogeneous age class and species composition which has become highly susceptible to insect and disease change agents" (EA Page 5). This characterization is highly inaccurate and does not reflect the actual history of the project area.

At least half of the project area was previously owned by a private timber company and was exchanged to the Forest Service in the mid-1990s. Most of the currently roaded area was extensively harvested by both Diamond International and the Forest Service in the 1960's and 1970's and it is not the homogenous age class described in the Environmental Assessment.

The existing road density is very high on most lands previously owned by Diamond International, and most of the proposed treatments are concentrated in areas that experienced past timber harvest and road development. The effects of 1910 and 1919 wildfires are generally concentrated in surrounding roadless areas, and the description that the area has large build-ups of fuel due to the lack of recent wildfire is highly inaccurate. The cedar habitat types which are found in the project area often go long intervals (150-300 years) without stand replacement

wildfire. Most of the areas that the Nez Perce - Clearwater Forest plans to regenerate occur in older leave strips that are adjacent to the younger stands created by previous logging.

The Nez Perce Clearwater NF also overstates concerns regarding private inholdings which only amount to a few hundred acres of old historical mining claims and associated mining cabins. The cabins are largely used by miners with mineral claims in the Moose Creek drainage during the summer and in the fall as hunting cabins. There are no roads maintained during the winter and all winter access is by snowmobile over several miles of difficult terrain. It is hardly an area where one would set up a permanent residence or a location that should be considered as a Wildland Urban Interface. There are much more appropriate and higher risk areas for the expenditure fuel treatment dollars than this location.

The Environmental Assessment has also significantly misrepresented the Forest Plan Direction outlined in the current Clearwater Forest Plan and I believe this is also influencing the large amount of proposed timber harvest. The 440-million board feet figure and other numbers cited in the EA (Page 5), such as an expected increase in the amount of immature forest to 70% following plan implementation, are projections of what could possibly happen if current Forest Plan direction were to be continued for fifty years. A scenario "that is not likely to occur" according to information presented on Page II-18 of the Forest Plan. This number is based a long-term sustained yield that was calculated based on the highly questionable FORPLAN model that did not accurately consider other resource values across the entire Forest.

The actual annual allowable sale quantity listed in the Clearwater Forest Plan is 173 million board feet, with 100 million projected to come from the existing roaded areas and 73 million to come from the roadless areas (Forest Plan Page II-6). These numbers reflect all of the components that were incorporated into the Forest Plan such as wilderness, roadless protection, old growth and aquatic habitat protection. Many critics of the 1987 Forest Plan felt even these numbers were too high, and filed a lawsuit that resulted in the 1993 Stipulation Agreement between the Wilderness Society, Nez Perce Tribe and other environment groups. The current annual allowable sale quantity is 80-million board feet based on the results of that lawsuit.

Objection 2 - Overstated Risk of Wildfire and Negative Condition of the Forest Vegetation

The idea that fuels have been building up for decades since the 1910 fires and that the species composition is not appropriate for the existing habitat types is questionable. While some stands on the edge of the project area are the result of the 1910 and 1934 wildfires, most of the stands in the roaded portion of the project area are the result of more recent timber management. Stands that are dominated by grand fir, Douglas fir and western red cedar occur largely because of the moist habitat types found in the project area and the impact of white pine blister rust. Fire suppression over the last 50 years, has only had minor impacts on species composition and most stands are largely the result of competition between the trees that established themselves following the 1910 and 1934 fires or are a result of planting and other activities associated with timber harvest.

Most of the project area is composed of moist western red cedar habitat types and grand fir habitat types on drier southerly aspects (Cooper et al. 1991). Western red cedar habitat types are generally the most productive in Northern Idaho and support a mosaic of tree species including western white pine. Drier grand fir habitat types generally have higher proportion of Douglas fir and ponderosa pine.

According to Cooper et al. (1991), the major seral species in the cedar/queencup beadlily habitat type are Douglas fir, grand fir and western larch. They also indicate that white pine and ponderosa pine will do well in this habitat and that western red cedar is the climax species. In the grand fir/queencup beadlily habitat type Cooper et al. (1991) indicate that grand fir "in addition to being the climax dominant, is a major and most consistent dominate of seral stages, even following clearcutting or severe wildfire." While I agree there would have likely been more white pine without blister rust, having stands with a high proportion of grand fir, Douglas-fir and western red cedar is the normal condition for project area habitat types.

Forests in cedar habitat types are generally competition-based systems that develop after large scale stand replacing fire. Stand density is usually not the driving factor in the initiation of these large-scale fires that generally occur at intervals of 250-300 years and under drought conditions such as those that occurred in 1910 and 1919. Green et al. (1992) report that the oldest trees, in the habitat group most appropriate for the project area (Type 4B), averaged 210 years with a range from 160 to 264 years. They report that "western red cedar may reach an age of 400-700 years".

The contention that stands in the project area are much denser than what occurred historically is also very questionable. The fact that these systems always had high densities of trees is well documented by Haig (1932) in his description of the white pine type years ago and long before the effects of fire suppression was considered a major issue. He reported that "The extremely rapid decrease in number of trees with increasing age is strikingly apparent. On good sites (site index 60) the total number of trees per acre drops from 4,700 at 20 years to 720 at 80 years, and to 390 at 120 years. The number of trees also decreases rapidly with increase in site index." On excellent sites (Site index 70) Haig found an average of 2,800 trees per acre over a diameter of 0.6 inches in diameter at 20 years of age, on fair sites (site index 50) Haig's tables show approximately 7,800 trees per acre over a diameter of 0.6 inches DBH at age 20 and on poor sites (Site Index 40) he found an 11,500 trees per acre at age 20.

In summary, I don't agree that there is a pressing need for this project based on the existing vegetation condition. The risk of a catastrophic wildfire and the potential for negative impacts to private land have been significantly overstated and will depend more on future weather patterns rather than age class diversity. A large percentage of the project area has already been harvested within past projects and the need for more harvest is not readily apparent.

Objection 3 -Fisheries and Water Quality

In my scoping comments I noted my concern about water quality and fisheries habitat with this large project. I noted that several streams in the area currently do not meet Forest Plan standards and that I was concerned about water yield, high road densities, sedimentation and cobble embeddedness. I noted that most steams that are currently not meeting Forest Plan standards occur in and around the area acquired by the Forest Service in the 1990 land exchange. The amount of past timber harvest, road construction and mining activity has been excessive in that area, and includes the Osier, China and Laundry Creek drainages. This is the exact same area targeted by the project proposal.

I noted in my scoping comments that Forest Service should be using Forest Plan drainages for their analysis of watershed conditions. Using the larger HUC 12 watersheds as the Nez Perce - Clearwater Forest has done for most of their analysis will tend to dilute the impact of proposed activities on drainages identified in the Forest Plan.

The project area contains 15 watersheds (Figure 1 and Table 1) identified in the Forest Plan. In a 1997 report, Jones and Murphy suggested that eight project area fisheries streams were not meeting Forest Objectives for cobble embeddedness (Table 1). The Nez Perce – Clearwater NF has not updated that report in the last 25-years, but did sample five streams in 2019 as part of this project. Resampling confirmed that conditions in Osier, China Creek and Moose Creek above Deadwood Creek have not changed significantly. China and Osier still remain well below objectives for cobble embeddedness, and Moose Creek above Deadwood Creek remains with relatively low levels of cobble embeddedness (Table 1). Moose Creek above Deadwood Creek is an unroaded drainage, as are most other streams in the project area meeting Forest Plan standards for cobble embeddedness.

Only Sugar Creek has improved significantly, but that drainage is still slightly above standard. Jones and Murphy did not report cobble embeddedness values for Deception Gulch, but sampling in 2019 suggested levels of cobble embeddedness where within objectives. It is unclear why cobble embeddedness was reported at 0% for Laundry Creek in the fisheries report, when Jones and Murphy (1997) reported this drainage as well over objective (Table 1).

Proposed projects in streams currently not meeting Forest Plan objectives for sedimentation are required to result in no measurable increase in stream sedimentation according to the Clearwater Forest Plan Lawsuit Settlement Agreement. The Nez Perce - Clearwater claims in both the watershed and fisheries reports that this will be the case due to PACFISH buffers and newer road construction practices. Modeling efforts assume that buffers and road management practices will be infallible in stopping any sedimentation from reaching streams. Modeling efforts also do not account for mass wasting events that are bound to occur with the amount of road construction and proposed logging. Any sedimentation that is predicted from modeling efforts is then applied to the large HUC-12 watersheds instead of to the Forest Plan drainages where the logging will actually occur. The Nez-Perce Clearwater then makes an assumption that sedimentation will not

be measurable at the larger HUC-12 scale. The same thing has been done in the calculation of road density and water yield.

For example, in the Elizabeth - North Fork Clearwater HUC-12 watershed there 38,556-acres and most of that acreage is located outside of the project area and currently roadless (Figure 2). Within the project area, there are only two small drainages with any fisheries standards (Comet Creek and Deception Gulch). All other drainages in the project area are steep face drainages that drain directly into the North Fork of the Clearwater River. No logging is planned Comet Creek or in the steep face drainages in the southern portion of the project area. Slopes are steep and rocky in these face drainages. There are two planned prescribed burns located within the southern face drainages.

Several timber harvest units are located in the Deception Gulch watershed (2,859-acres) and the face drainages to the north near the Cedars Campground (Figure 3). These face drainages contain deeper soils and are more forested than their counterparts to the south. Sediment values are not presented for any of the watersheds identified in the Forest Plan or the face drainages to the north. All values are reported for the much larger HUC-12 watershed. Thus, most of the sediment is being produced in Deception Gulch or the face drainages to the north, but sediment production is being applied to the larger HUC-12 watershed which is mostly roadless and located outside of the project area. Road density and water yield have been calculated similarly.

All four of the HUC-12 watersheds used in the watershed report have large unroaded areas, and three of the HUC-12 watersheds contain large areas outside of the project area. The only HUC-12 watershed that occurs entirely in the project area is Deadwood/Moose and that watershed is mostly roadless (Figure 2). Harvest units in this HUC-12 drainage are generally located within or near the Independence drainage, which has had a great deal of active mining and past harvest. Independence Creek is immediately adjacent to Osier Creek where most other project activities are occurring. There are several prescribed burning units located in the roadless portion of this HUC-12 watershed, but no logging or road construction in that portion of the Deadwood/Moose HUC-12 watershed.

The watershed analysis needs to be redone to display potential impacts to the drainages listed in Appendix K of the Forest Plan. Realistic expectations need to be made regarding the likelihood of mass wasting events and some level of risk assessment needs to be made regarding the implementation of best management practices. Time and time again the Forest Service has projected that their activities will produce no measurable amounts of sediment and that best management practices will protect water quality only to have those practices not live up to expectations in actual practice. Monitoring efforts by Friends of the Clearwater and others have documented many instances where best management practices have failed to achieve Forest Service claims. Attached (Appendix A) are some photos I took on a visit to the Robo Elk project on the Palouse Ranger District. Similar photos could have been taken on most other projects on the Nez Perce – Clearwater NF.

Figure 1- Forest Plan Appendix K Waterheds

Table 1 - Forest Plan Drainages with Fisheries Standards

Stream Name	Acres	Forest Plan Objective (CE)	Jones & Murphy (1997)	Reach Survey Year	Cobble Embeddedness (%) – Fisheries Report
Deception Gulch	2859	40-45	N/D	2019	32.7
Comet Cr	2202	25-30	33	1995	37.3
Lake Cr	5411	30-35	22	1990	22.9
Moose Cr (Lower)	2999	30-35	28		
Osier Cr (Lower)	690	30-35	48	2019	58
Osier Ck (Above China)	1511	25-30	56		
WF Osier	1372	30-35	77		
Osier abv WF	1594	35-40	84		
China Cr	2764	25-30	57	2019	49.8
Laundry Cr	1953	25-30	56	1994	0 (????)
Sugar Cr	2360	30-35	64	2019	35.9
Independence	3534	40=45	34		
Moose (abv Independence)	1138	30-35	26		
Deadwood Cr	2033	30-35	25	2003	32.2
Moose (abv Deadwood)	4604	30-35	14	2019	17.5

Streams highlighted in yellow have cobble embeddedness levels that exceed Forest Plan Objectives

Objection 4 - Misapplication of the Sauder and Rachlow (2014) publication for the evaluation of fisher habitat

In my scoping comments I expressed concern for the fisher and suggested that the publication by Sauder and Rachlow (2014) be used for the analysis. I suggested that non-overlapping home ranges should be used for the analysis and that those home ranges should be approximately 12,200-acres which is the average size of a female home range.

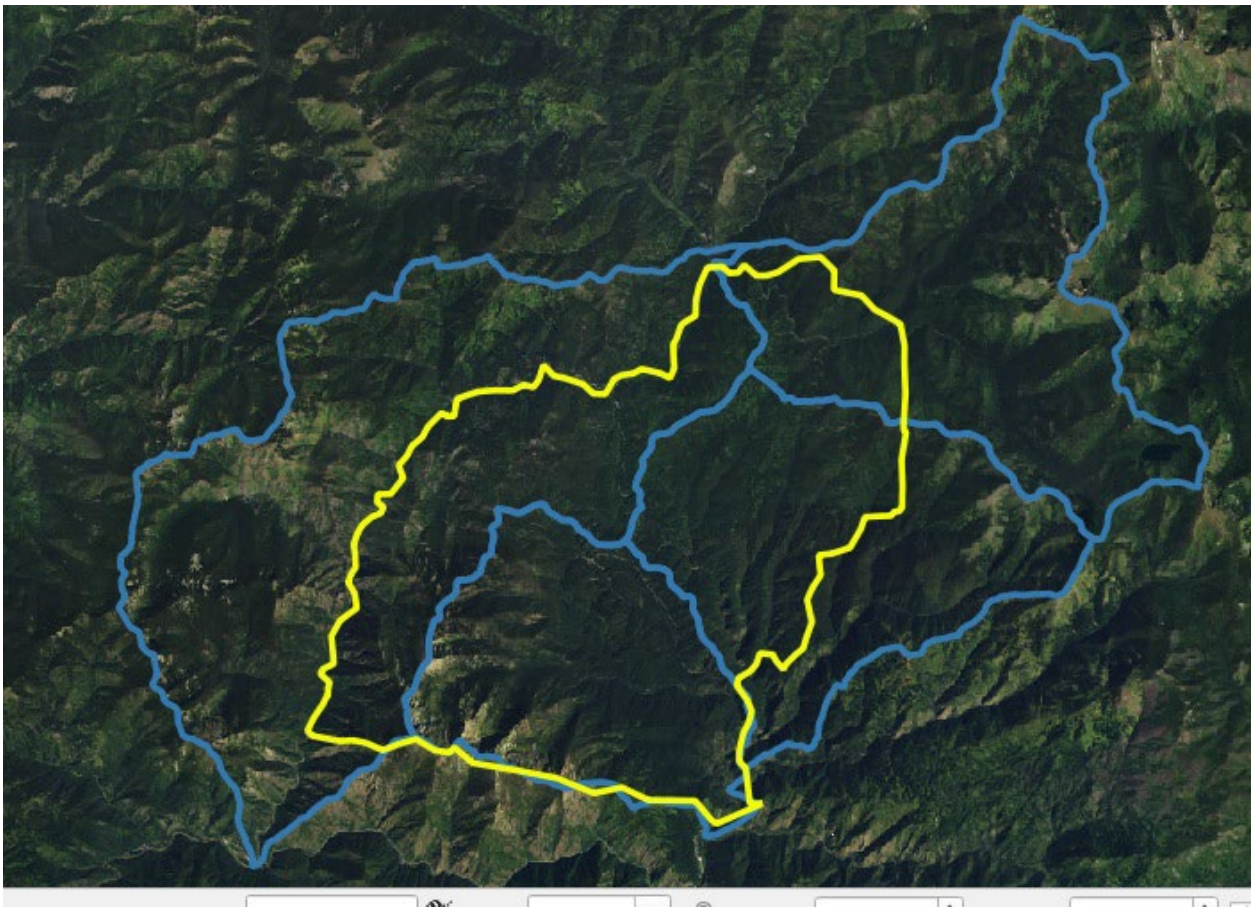
The wildlife report did utilize the Sauder and Rachlow (2014) publication as the "best available science" for this species, but it failed to accurately utilize this information to evaluate habitat conditions for this species. As indicated above, Sauder and Rachlow (2014) report the average home range size is approximately 12,200-acres for a female fisher and 24,300 acres for a male fisher. Home ranges generally do not overlap greatly for the individual sexes (21.3% for females and 15.3% for males), but male home ranges can overlap female home ranges.

Since female fishers are largely responsible for reproduction, most habitat analysis for this species utilize the home range size of the female fisher to evaluate habitat conditions. It is assumed if habitat conditions remain similar to those utilized by radio tracked fishers, then the area being evaluated will also be suitable for fisher use. Sauder and Rachlow (2014) found that

"fishers selected landscapes for home ranges with larger, more contiguous patches of mature forest and reduced amounts of open areas. 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.". They suggest that an "increase of open area from 5% to 10% reduces the probability of occupation by fishers by 39%" and that home ranges with more than 25% open habitat will likely not be utilized. Sauder and Rachlow (2014) reported that the median amount of open area within radio-monitored fisher home ranges was 5.4%.

The Environmental Assessment utilizes the project area (40,565-acres) and four HUC-12 (Hydrologic Unit Code) drainages (Elizabeth/North Fork – 38,556-acres, Lake Creek – 22,061-acres, Osier Creek - 19,830-acres and Deadwood/Moose Creek -14,307-acres) for the analysis of fisher habitat (Figure 2). With the exception of the Deadwood/Moose Creek, the evaluation areas are much too large to properly evaluate the impact of the proposal on fisher habitat. When the analysis is done over very large areas there is a tendency to dilute the actual impacts of the proposal on individual home ranges.

Figure 2 – HUC-12 drainages used in both the Watershed and Fisher Analysis



The 40,565-acre project area would likely support three female fishers, but when the analysis is done over the entire project area or includes large unroaded areas within or outside of the project area (Figure 2) there is a tendency to dilute the actual impacts within the three potential home ranges that will be impacted by the proposal. For example, most of the proposed project activity is being proposed in the Osier Creek HUC 12 watershed which is listed as 19,829-acres. This rather large analysis area includes the Swamp Creek drainage (6,486-acres) which is largely unroaded and three other drainages (Osier, China and Laundry Creeks = 13.343-acres) that have been extensively roaded. Almost all of the proposed harvest units occur in Osier, China and Laundry Creeks (Figure 3). Calculations of mature forest and open habitat that are made for this larger area tend to underestimate the actual impact to fisher habitat

The Environmental Assessment introduces the concept of "probable habitat" which appears to be related to the presence of closed canopy mesic forests. Using a "two-step" process that is not identified in the Sauder and Rachlow (2014) publication, the Forest Service analysis first identifies probable habitat in each analysis area and then makes calculations of the amount of open habitat and mature forest in each analysis area as suggested by the Sauder and Rachlow (2014). Many open areas appear to have been eliminated upfront as non-probable habitat before calculations of the amount of opening and mature forest are determined (Table 2). This "two-step" process tends to underestimate the amount of opening in the landscape since many openings have been excluded prior to the analysis.

I could not find a map of probable fisher habitat on the Nez Perce – Clearwater website, and while I agree that it is unlikely that fishers will utilize large expanses of open habitat like that currently found just to the south of the project area along Kelly Creek, I don't think it is appropriate to remove interspersed openings upfront as the Forest Service has apparently done in their analysis. Most of the project area and most of the area that is proposed for logging by the Forest service appears to be suitable fisher habitat. This is pretty much confirmed by 42 recorded observations of fishers within project area (Wildlife Report – Page 12).

Probable habitat appears to have been determined by the work of (Sauder 2014) at the regional scale and some modifications at the project level using Forest Service Vmap. The (Sauder 2014) analysis at the regional scale is a broad-brush approach using remotely sensed data that is trying to identify probable habitat availability at a scale of several million acres. The Sauder (2014) analysis does not consider the impact of habitat fragmentation which is a critical component of habitat use at the home range scale. Both the fisher and pine marten are known to avoid highly fragmented landscapes despite the fact that some older forests may still be present. Any natural open area or recent timber harvest area that is included in the regional coverages will not be displayed as probable habitat in the computer-based queries that generate these maps. Such maps do not actually reflect the on the ground dilemmas that fishers face when using the landscape. While they can avoid large open areas like some of the open slopes along the North Fork of the Clearwater River and Kelly Creek, they cannot fly from one habitat patch to another in their selected home range.

To demonstrate how much potential habitat the Forest Service has eliminated from the project area upfront and how many new openings will be created by the proposal, I have summarized information from the Forest Service analysis for the project area. I did not bother to calculate additional areas outside of the project area as these are not being impacted by the proposal and only serve to dilute impacts of the project. I have only included the impacts from timber harvest and fuel treatments, but as indicated in the Forest Service analysis there will be additional impacts from old growth manipulation.

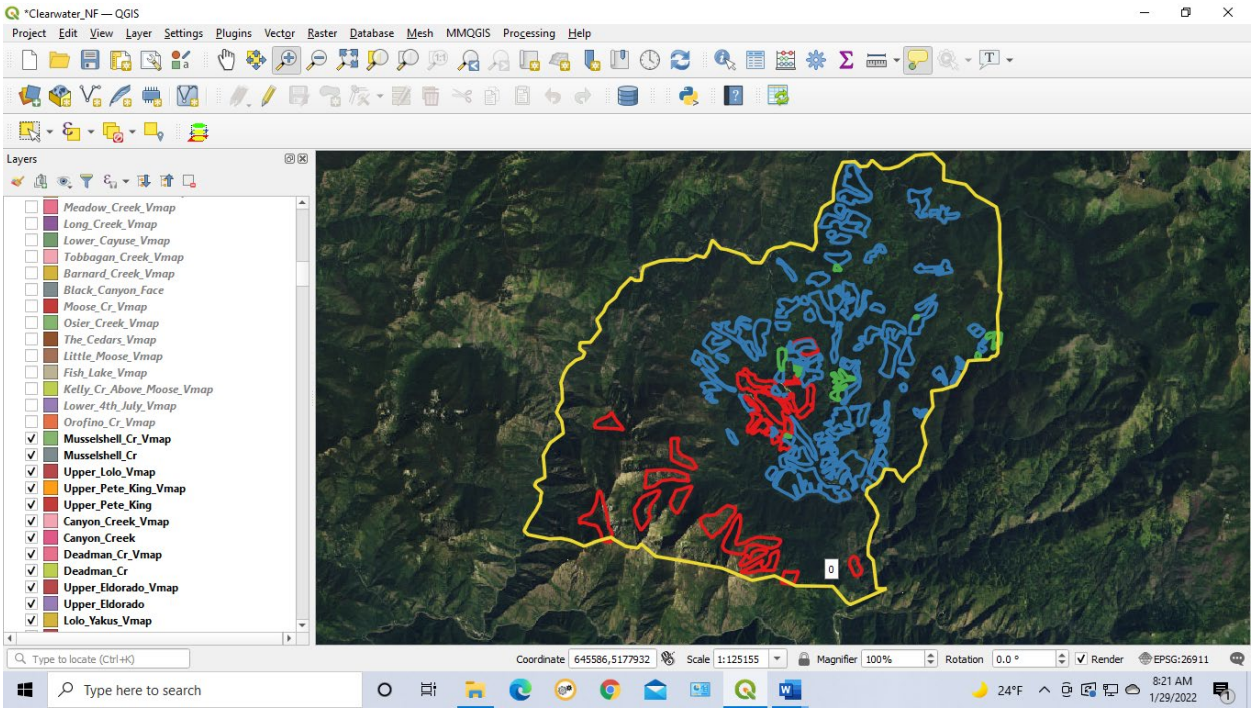
Over 20% of the project area is considered unsuitable by the Forest Service and only 21% of the project area is considered mature forest. Despite the fact that Sauder and Rachlow (2014) suggest 50% of fisher home range should be maintained as mature forest, the Nez Perce - Clearwater still proposes to harvest approximately 1,300-acres of mature forest in a concentrated area (Figure 3). This activity along with treatment of over 3,150-acres of younger forest stands will create multiple openings in this same concentrated area. This activity could displace fishers to outlying locations where they will come in conflict with the existing residents. More likely, the overall habitat quality will be reduced so that the existing home ranges of one or two fishers would be eliminated. According to the Forest Service analysis 34.8% of the project area would be in openings or an unsuitable condition that likely supports more interspersed opening. Looking at just the roaded portion of the project area where harvest is concentrated (Figure 3) numbers would be much higher.

Table 2 - Forest Service Fisher Analysis (Project Area)

HUC-12 Watershed	Total Acres	Mature Forest	Suitable	Open	Unsuitable
Existing Habitat Project Area (Table 13 – Wildlife Report)	40,565	8,608	22,294	1,167	8,486
(Existing) % of Project Area		21.2 %	55.0 %	2.9 %	20.9 %
Acres in Harvest Units (Table 13 – Wildlife Report)		-1,269	-2,566	+3,835	8,486
Acres in Fuels Treatments		-30	-592	+622	
Acres in Old Growth Manipulation		95	82		
Acres After Project Implementation	40,565	7,339	19,136	5,624	8,486
Percent After Project Implementation		18.0%	47.2%	13.9%	20.9%

The Nez Perce - Clearwater Forest Service needs to redo their fisher analysis to appropriately sized home ranges and eliminate their "two-step" process for evaluating the amount of opening and mature forest in each potential home range. Because of the extensive amount of proposed timber harvest that is concentrated in previously harvested portions of the project area (Figure 3), it can be expected that fisher use will likely be eliminated in most of the roaded portion of the project area. The percentage of openings in the roaded portion of the project area will be well over 30% after project completion, which Sauder and Rachlow (2014) suggest has zero percent probability of occupancy by fishers. This is not a proactive approach to protecting habitat for this regionally sensitive species.

Figure 3 – Approximate Location of the proposed Dead Laundry Harvest and Fuel Treatments (Forest Service GIS coverages were unavailable to me)



Yellow – Project Area Boundary, Blue=Timber Harvest Units, Green=Old Growth Treatments, Red=Fuel Treatments

Objection 5 - Goshawk nesting habitat mitigation

Limiting the protection of goshawk nesting habitat and post-fledgling areas to the active nesting season is inadequate to protect nesting the following year. If there is extensive logging following the nesting season in the fall or winter, it is likely that the nest area will be abandoned in the following year (Moser and Garton 2009). Habitat recommendations as outlined in Reynolds et al. (1992) need to be implemented in all known nesting areas.

Objection 6 - Regeneration Harvest and the Size of Proposed Harvest Units

The Nez Perce – Clearwater NF suggests that 3,838-acres will be harvested with regeneration harvest prescriptions. Treatment units are very large and many units are immediately adjacent to each other. There are 27-openings greater than 40-acres in size and eight of those units exceed 100-acres in size. Incredibly, the combination of Unit 30 and Unit 70 exceeds 460-acres and it is only separated from 24-acre Unit 78 by a PACFISH buffer. There are two other units that also exceed 200-acres in size according to the environmental analysis. Similar practices have been documented by the Friends of the Clearwater across Region 1 (Friends of the Clearwater – 2021)

PACFISH buffers are all that separate most of these regeneration units. Numerous wildlife species such as the fisher and pine marten and known to avoid large openings. Most big game species generally avoid open areas that are greater than 500-feet from forest cover that is at least 800-feet wide (Servheen et al. 1997). PACFISH buffers generally do not provide sufficient cover for most big game species

Please have the Nez Perce – Clearwater NF modify their proposal to assure that all harvest areas are bordered by adequate amounts of forest cover. Harvest unit sizes, particularly those over 100-acres, need to be reduced and the Region should not be "rubber-stamping" similar requests across the Region.

Objection 7 – Inordinate Amount of Prescribed Burning

The Nez Perce Clearwater intends to treat 1,350-acres with prescribed burning with this project. Much of the proposed burning appears to be planned in the south-western portion of the project area within the Moose Mountain roadless area. These units are immediately adjacent to other burn units that are being considered in the East Saddle project. There are also treatment units in the North Fork Ponderosa Pine Restoration Project that will occur on the western edge of the project area. Most of the Ponderosa Pine Restoration treatments are located within the Mallard Larkins roadless area just to west of the Dead Laundry project area and the North Fork of the Clearwater River (Black Canyon).

Is more roadless burning really necessary on the district, given all of the treatments currently proposed on East Saddle (4,000-acres), North Fork Ponderosa Pine Restoration (2,185-acres),

Smith Ridge (498-acres), North Fork Aspen Regeneration (150-acres), North Fork Aspen Two (324-acres), Lost Toboggan (16,500-28,000- acres) and Black Skull (28,000-42,000- acres)? The Nez Perce Clearwater should be evaluating the cumulative impact of all of this prescribed burning and other activity. They should be paying particular attention to adjacent projects such as East Saddle and the North Fork Ponderosa Pine Restoration.

Management prescriptions need to consider that many of the areas being considered for prescribed burning are very steep and have shallow rocky soils. Past experience with burning on these areas has not given desirable results for big game browse production and has increased the risk of landslides. It should also be remembered that the proposed burning on the East Saddle project is just over the hill from the proposed burning on this project. The south facings slopes above Kelly Creek that are part of the East Saddle Project are already very open and it is highly debatable how successful these burning operations are going to be. Some of the project area prescribed burn locations have more northerly aspects and support higher densities of forest, but much of the area still has steep topography and thin shallow soiled areas that don't support much forest growth. Prescribed burning is unlikely to stimulate the expected browse response in these areas.

Objection 8 - Unnecessary Expenditure of Scare Fuel Treatment Funds on Non-Commercial Mechanical Treatment

The Nez Perce – Clearwater NF proposes 640-acres of hand and mechanical treatment (mastication). The mechanical treatments appear to be occurring primarily around private lands in Independence Creek and near Deception Saddle. Presumably, most of this treatment is occurring to decrease fire risk around the private inholdings found in that area. It is likely that a significant expenditure will be required for this work since most of these treatments are being accomplished non-commercially. Given the high risks that exist to residential property in other areas like California and Arizona, are these expenditures really the highest priority.

The current situation has existed for several decades and most of the area around the existing inholdings has been extensively logged in recent years. There no permanent residences and the area is completely inaccessible in the winter except by snowmobile over several miles of primitive road. Most structures are mining cabins or out buildings that are only used during the summer and fall hunting season.

Objection 9 – Misguided Enthusiasm for Improving Old-Growth by Logging

The Nez Perce - Clearwater NF proposes to log between 140 and 196-acres (numbers in the Final EA and Draft Decision Notice do not agree) of old-growth cedar groves (with large diameter trees over 36 + inches) to remove understory grand fir and Douglas fir. Not only is this a terrible idea, but it is also a violation of the Clearwater Forest Plan since the Forest's own analysis of the amount of old growth suggests that there is less than 10% old growth on the Forest. The Forest

Plan requires that at least 10% of Forest be maintained as old growth before any logging of this resource is permitted.

Please direct the Nez Perce – Clearwater to stay out of these stands with their proposed treatments which are unnecessary and propose great risk to this important resource. The last thing that is needed in these stands is logging activity that will create skid trails, remove snags and downed logs, harvest small diameter trees, and destroy understory vegetation that likely includes sensitive plant populations. Understory trees are a normal component of late successional old-growth stands (Green et al. 1992, Cooper et al. 1991 and the Clearwater Forest Plan) and don't need to be removed to reduce the exaggerated fire risk that Nez Perce – Clearwater NF claims in its environmental assessment. Please review the document Management of Old Growth in the U.S. Northern Rocky Mountains (Juel 2021) for an extensive review of old growth management in the Northern Region and reasons why logging to improve old growth is such a terrible idea.

Objection 10 - Road construction and reopening of previously decommission roads

The Nez Perce Clearwater NF is proposing to build a considerable amount of temporary (54-miles) and system road (14-miles) with this proposal. They also plan to reconstruct 99-miles of existing road and maintain another 51-miles. The Forest Service claims all of this work can be accomplished without any measurable increase in stream sediment as required in the Forest Plan lawsuit settlement in streams currently not meeting Forest Plan standards. Despite Nez Perce - Clearwater modeling efforts, this claim seems very unlikely given the past history of landslides within the project area. Modeling efforts generally do not include the impact landslides. For example, both the Deception Creek Road (255) and the Black Canyon Road (250) were only recently reopened after landslides occurred on both of these roads (USDA Forest Service 2021). These are the main access roads to the project area.

Beyond Roads 250 and 255, many of the other proposed roads and harvest units appear to occur on steep slopes and high-risk landtypes. The Forest should consider not building roads and harvesting timber in these high-risk areas. The new system and temporary road in into unit 30 and 70 appears very risky as does the proposed harvest treatment of 430-acres in Unit 30 and 29-acres in adjacent Unit 70. There are also several new temporary roads that appear to be very closely spaced to existing road templates. Sixty-eight miles of new and temporary road construction seems pretty excessive given all the existing roads in the project area and the amount of timber to be removed.

The Nez Perce Clearwater also appears to be planning to open roads that were previously decommissioned and allowing them to be converted to system roads? Shouldn't the decision if these roads were needed as part of the transportation system have been made prior to their decommissioning?

Why are several existing roads shown as trails on the "harvest unit maps" and then displayed as existing roads on the "roads" map? I know many of the existing roads are grown over and untravellable. It is still unclear how many of the roads that the Forest Service plans to reconstruct or reopen as a temporary or system road are currently grown over or decommissioned?

Objection 11 - Timber Harvest Adjacent to the Existing Hoodoo Roadless Area

The Hoodoo Roadless area is one of three areas recommended for wilderness protection in the current Clearwater Forest Plan, and its integrity needs to be maintained until Congress moves forward with any wilderness proposal. The environmental assessment estimates that 59-acres of unroaded land adjacent to the existing Hoodoo Roadless area will be logged as a result of the project? These unroaded areas were likely not included in the Hoodoo Roadless area due to the fact that these acres were in private ownership when roadless inventory was completed. Once the land exchange was finalized, boundary adjustments should have been completed to appropriately identify the boundary of the Hoodoo roadless area.

While I had great difficulty in reading the provided project area maps and may have incorrectly identified some unit numbers, I believe adjacent cutting units 88, 89, 90 and 90B are existing old growth stands that should not treated at all. Other adjacent units such as 33C, 33E, 34B, 43, 44. 45, 58, 63 and 81 will all require a considerable amount of road reconstruction and new temporary road. Please instruct the Nez Perce Clearwater Forest to drop all areas that would currently qualify as existing roadless if the Hoodoo Roadless were to be appropriately remapped. Further compromising the Hoodoo Roadless area with new roads and timber harvest is not appropriate.

Objection 12 – Burning in Riparian Areas or Landslide Prone

Burning should not be permitted in riparian areas or landslide prone locations, and all ignitions should occur outside of these areas. Burning prescriptions should be designed to have minimal impact and no areas within the riparian zone or landslide prone areas should be allowed to burn at high intensities. The focus of the prescriptions should be maintaining all riparian vegetation and not just mature trees.

Objection 13 – Detrimental Soil Disturbance Exceeding Regional Standards

The soils report suggests that there are currently no harvest units with Detrimental Soil Disturbance (DSD) over the regional standard of 15%, but that several harvest units will be allowed to exceed the regional standard during project implementation. According to the soils report, there are at least seven harvest units that will exceed the 15% Detrimental Soil Disturbance during project implementation and three other units that would move to 15%.

It is very unclear why the Nez Perce – Clearwater is permitting this level of Detrimental Soil Disturbance in these 10-harvest units. The Regional standard is designed to prevent such

disturbance before it occurs and/or to correct situations that have occurred prior to the adoption of the regional standard. Please advise the Nez Perce – Clearwater to drop or redesign all harvest units exceeding the regional standard.

Sincerely,

Harry R. Jageman

Literature Cited

Cooper, S. V., K. E. Neiman, and D.W. Roberts. 1991. Forest habitat types of northern Idaho: a second approximation. U.S. Forest Service, Intermountain Research Station, General Technical Report INT-236.

Friends of the Clearwater. 2021. Supersized-Clearcut Report. https://www.friendsoftheclearwater.org/supersized-clearcut-report/

Green, P., J. Joy, D. Sirucek, W. Hann, A. Zack, and B. Naumann. 1992. Old-growth Forest types of the Northern Region. U.S. Forest Service, Northern Region R1, Missoula, MT.

Haig, I.T. 1932. Second growth yield, stand and volume tables for the western white pine type. Technical Bulletin 323. United States Department of Agriculture, Washington, D.C.

Hargis, C. D., J. A. Bissonette, and D. L. Turner. 1999. The influence of forest fragmentation and landscape pattern on American martens. Journal of Applied Ecology 36: 157-172.

Juel, J. 2021. Management of Old Growth in the U.S. Northern Rocky Mountains. Friends of the Clearwater Staff Report. https://www.friendsoftheclearwater.org/wp-content/uploads/2021/11/Juel_2021-Old-Growth.pdf

Moser, B.W., and E.O. Garton. 2009. Short-term effects of timber harvest and weather on Northern

Reynolds, R.T., R.T. Graham, M.H. Reiser, R.L. Bassett, P.L. Kennedy, D.A. Boyce, G. Goodwin, R. Smith, and E.L. Fisher. 1992. Management recommendations for the Northern Goshawk in the southwestern United States. USDA Forest Service General Technical Report RM-217, Fort Collins, CO U.S.A.

Sauder, J.D, and J.L. Rachlow. 2014. Both Forest composition and configuration influence landscape scale habitat selection by fishers (*Pekania pennanti*) in mixed coniferous forests of the Northern Rocky Mountains. Forest Ecology and Management. 314:75-84.

Servheen, G., S. Blair, D. Davis, M. Gratson, K. Leidenfrost, B. Stotts, J. White, and J. Bell. 1997. Interagency Guidelines for Evaluating and Managing Elk Habitats and Populations in Central Idaho. Wildlife Bulletin No. 11, Idaho Dept. of Fish and Game. 75p.

USDA Forest Service 2021. Road closures on the North Fork District. https://www.fs.usda.gov/detail/nezperceclearwater/news-events/?cid=FSEPRD953452

Appendix A - Robo Elk BMPs

Robo Elk Unit – UTM 559657 5189590 – Just past the Morris Cedar Grove Trailhead

Same Robo Elk Unit

Skid trail to road – Log deck is to right of this photo

Same Unit - Side-cast dirt from tractor logging within riparian area

Tractor Unit on Road 1969D (Different unit than above) – UTM 559097, 5189599

Same Unit (better angle of the Road)

Temporary Road (Existing Template) – UTM 560501 5187968 – Near Morris Creek

Culvert Replacement (Just beyond this road junction)

Same culvert (cutbank side)

Road (Reopened Road – UTM 560333, 5188566)

Culvert on reopened road (Road photo is taken from at a point just below this crossing)

Cut-bank side (same culvert)

Upper Basin - Unit 6 and Road 1965 – UTM 0560501 5187968