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Organization:

Title:

Comments: From: Harry Jageman

To: FS-comments-northern-clearwater-north-fork

Subject: Dead Laundry Project

Date: Tuesday, March 24, 2020 7:14:37 AM

Attachments: Dead_Laundry_Scoping.docx

Attached are my comments on the Dead Laundry Project

Harry Jageman

Andrew Skowlund

District Ranger

North Fork Ranger District

12730 Highway 12

Orofino, ID 838544

Subject: Dead Laundry Project

Dear Andrew,

I am writing in regard to your recently proposed Dead Laundry proposal located in tributaries of Moose Creek and the North Fork of the Clearwater drainages. This is the tenth project to be released during the 120-day Forest Plan comment period and the fourth one (Previous Black Skull, Lost Toboggan and East Saddle) released on your Ranger District in that timeframe. Allowing only 120 days for review of the Draft Forest plan which the Forest released over the Christmas holidays and then releasing ten projects within the same time frame, suggests that the Forest really doesn't want meaningful comment on any of these proposals.

Personally, I have only been able to comment on most of these projects because I am retired. I could have never responded to all of these proposals when I was working and doubt most other members public have the time to keep up with your barrage of proposals. Please withdraw your request for scoping comments on this project until after Forest Plan comment period is concluded. This would actually give others time to respond to your proposal.

Purpose and Need

You state that the primary purpose and need for the project is to reduce hazardous fuel loadings, to protect private inholdings, to harvest timber and improve forest health. You fail to mention that at least half of the project area was previously owned by Diamond International Corporation and the fact most of the area was extensively harvested by both Diamond International and the Forest Service in the 1960's and 1970's. While the fires of 1910 and 1934 may have created some of the previously harvested stands, most of the existing stands in the project area are the result of more recent timber harvest.

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You also overstate concerns regarding private inholdings which only amount to a few hundred acres of old historical mining claims. 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.

Vegetation

Your 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 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 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 1934. 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".

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Your 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.

Fisheries and Water Quality

The extensive amount of past timber harvest, road construction and mining activity in the project area has left many of the existing streams in the project area in poor condition and several streams do not meet existing Forest Plan standards. There are also several more tributary streams in both Moose Creek and the North Fork of the Clearwater that have Forest Plan standards for maintaining water quality. Your watershed and fisheries analysis need to address impacts to these individual drainages and should not be limited to the HUC 12 drainages you have identified in your scoping document. Using the larger HUC 12 watersheds will tend to dilute the impact of your proposed activities on drainages identified in the Forest Plan. The watershed/fisheries analysis should incorporate existing stream survey data such as cobble embeddedness and fish species abundance. Existing ECA (equivalent clearcut acres), road density and estimates of sediment production should also be included for all streams identified in the Forest Plan.

Wildlife

The environmental assessment needs to document potential impacts to all threatened and endangered, sensitive and management indicator species found in the project area. The analysis needs to utilize the latest scientific information and be responsive to the habitat requirements of all of these species. Database queries of suitable habitat with a tabulation of the number of acres that will be lost due to project activities are insufficient to determine the impact on most wildlife species.

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Schultz (2010) outlined problems with database queries in a critique of Forest Service wildlife analysis. Schultz found that the Forest Service often relies on stand exam or Vmap queries to determine acres of suitable habitat, but then makes no interpretation as to what that loss of habitat means to the species. The Forest Service fails to set meaningful thresholds and assumes that habitat losses are insignificant. Schultz (2010) concludes that "the lack of management thresholds allows small portions of habitat to be eliminated incrementally without any signal when the loss of habitat might constitute a significant cumulative impact."

Several sensitive and management indicator species such as the goshawk, pileated woodpecker, pine marten and fisher are territorial species that can be eliminated from their territories if there is extensive timber harvest or habitat fragmentation. For example, numerous studies have found that the pine marten is particularly vulnerable to habitat fragmentation (Webb and Boyce 2009, Hargis et al. 1999, Moriarty et al. 2011, Potvin et al. 2000, Wasserman et al. 2012). Hargis et al. (1999) reported that "Martens were nearly absent from landscapes having >25% non-forest cover, even though forest connectivity was still present."

You should be identifying potential non-overlapping territories for all of these species and displaying in the analysis how your project will impact these territories. For example, Sauder and Rachlow (2014) report the average home range size is approximately 12,200-acres for a female fisher. 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%.

Other species like the goshawk and pileated woodpecker have studies that suggest management practices and territory sizes that should be managed for these species. Moser (2007) reported had successfully nesting female goshawks had an average home range size of 6,600 acres in Northern Idaho. Studies in other areas have reported smaller home range sizes in the neighborhood of 5,000-6,000 acres (Reynolds et al. 1992). Pileated woodpeckers are reported to have home range sizes of approximately 1005 acres (Bull et al. 1992).

Reynolds et al. (1992) suggest that at least 180 acres of suitable nesting habitat be maintained in each goshawk home range. This nesting habitat should be maintained in uncut blocks of at least 30-acres in size and that at least three suitable nesting areas should be maintained in each home range. Clough (2000) suggests the amount of nesting habitat should be increased to at least 240-acres and uncut nesting areas be increased to 40-acres. Reynolds et al. (1992) recommended maintaining 420-acre post-fledging areas of at least 60% older forests around the uncut nest stands. Moser and Garton (2009) suggested that the amount of mature forest in the post-fledgling area could potentially be reduced to 39%, but this will likely place greater risk on the species (Clough 2000).

Bull and Holthausen (1993) recommend that approximately 25% of pileated woodpecker home ranges be old growth and 50% be mature forest. They suggested that 50% of the area should

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have stands with greater than 60% canopy closure and at least 40% should remain unlogged (any type of logging). Follow up work (Bull et al. 2007) found that pileated woodpecker density did not change in 30 years (despite major infestations of spruce budworm) in home ranges meeting these guidelines, unless extensive regeneration harvesting (like that proposed on the Dead Laundry project) had occurred in the home range. They defined extensive regeneration harvest as 25% of the area. They also examined nesting success and found that birds that successfully produced young had on average 85% of their home range unlogged and 15% unlogged (any type of logging including fuel reductions). Whereas unsuccessful nesters had 62% of the home range unlogged and 38% logged (Bull et al. 2007).

Elk habitat needs to be evaluated according the Servheen et al. (1997) guidelines as required by the Forest Plan. The elk habitat analysis is supposed to be conducted in an area of approximately 3,800-5,000-acres, which is thought to be the size of a female elk's home range. Elk evaluation areas are similar to the non-overlapping potential home ranges that I am suggest for other species.

Sensitive Plants and Heritage Resources

I am wondering if treatment units have been examined for cultural resources and sensitive plant species? Asking loggers and sale administrators to identify and protect these locations is appropriate, but most are probably not going to be able to recognize sensitive plants or archeological sites. Has an inventory been completed and how will archeological sites and sensitive plant populations be protected?

Regeneration Harvest

You suggest that 3,957-acres will be harvested with various harvest prescriptions, but have not identified the acreage and units where each of the prescriptions are planned. You suggest there may be some intermediate treatment, but all treatments displayed in Figure 2 suggest that they will be conducted with regeneration harvest. Please clarify the prescription for individual harvest units in the environmental assessment.

Treatment units are very large and many units are immediately adjacent to each other. PACFISH buffers are the only thing that separates these units. For, example Unit 30 is 430-acres and it is immediately adjacent to 29-acre Unit 70 and only separated from 24-acre Unit 78 by a PACFISH buffer. Unit 26 is 318-acres and is only separated from Unit 24 (111-acres), Unit 25 (39- acres) and Unit 28 (No acreage listed) by PACFISH buffers. Several other harvest and fuel treatments are immediately adjacent to each other and concentrated together. PACFISH buffers are all that separate most of these 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.

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Prescribed Burning

You indicate that you intend to treat 1,332-acres with prescribed burning. 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 in 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 you are proposing 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). Please evaluate the cumulative impact of all of this prescribed burning and other activity. You should pay 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 you are considering 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.

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. It is very difficult to see exactly where you intend to conduct your prescribed burning operations from the included maps. An overlay of all treatment units over an aerial photograph or Goggle Earth would be very helpful in consideration of the impacts of your proposal. Is your intention to burn areas that are currently forested or are you targeting the existing open thin soiled slopes like you are doing on the East Saddle project?

Non-Commercial Mechanical Treatment

You propose 864-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 all of these treatments are being accomplished non-commercially. Given the high risks that exist to residential property in other areas like California and Arizona,

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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.

Old-growth

You suggest you will be entering 300-acres of old-growth cedar groves (with large diameter trees over 36 + inches) to remove understory grand fir and Douglas fir. Please stay out of these stands with your 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 Forest Plan) and don't need to be removed to reduce the exaggerated fire risk that you claim in your scoping document.

What is the actual amount of old growth that meets the current Forest Plan definition of old growth in the project area? Please include a summary of old growth condition in your environmental analysis and a map that displays existing old growth evaluation areas and all stands currently being managed for old growth.

Roads

You are building a considerable amount of temporary (54-miles) and system road (14-miles) with this proposal. You will also reconstruct 99-miles of existing road and maintain another 51-miles. Given the existing stream condition and the fact that the Forest Plan lawsuit settlement directs you not to create measurable amounts of sediment in streams not meeting Forest Plan standards, it is likely that need scale back your plans for road construction.

Why are you 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?

Many of the proposed roads and harvest units appear to occur on steep slopes and high risk landtypes. 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.

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

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untravellable. 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?

Sugar Creek and Swamp Ridge

Is it really necessary to encroach on the Mallard Larkins Roadless area with your proposed harvest units on Swamp Ridge and within the Sugar Creek drainage? Units 88, 89 and 90 are existing old growth stands that should not be treated at all. These three units and units 44, 45, 58 and 87 will all require a considerable amount of road reconstruction and new temporary road. Please drop these units from your proposal.

Design Features and Mitigation Measures

Aquatics

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.

Soils

Why are you allowing ten years to obliterate temporary roads? Temporary roads need to be obliterated shortly after the logging operations and preferably before winter and spring runoff.

Wildlife

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.

Sincerely,

Harry R. Jageman

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