

Paul Sieracki


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District Ranger Jesse Berner, Sandpoint Ranger District, IPNF.

Scoping Notice Comments for the Scattered Lands HFRA from Paul Sieracki and the Alliance for the Wild Rockies.

Issue: Scattered Lands violates Title 1 HFRA Sec 104(f) which states:

The USFS is violating the HFRA by not collaborating with interested persons outside of the Panhandle Forest Collaborative.

Requirements

HFRA EA/EIS: Title 1, Section 104(f) – “PUBLIC COLLABORATION - In order to encourage meaningful public participation during preparation of authorized hazardous fuel reduction projects, the Secretary shall **facilitate collaboration among State and local governments and Indian tribes, and participation of interested persons**, during the preparation of each authorized fuel reduction project in a manner consistent with the Implementation Plan.”

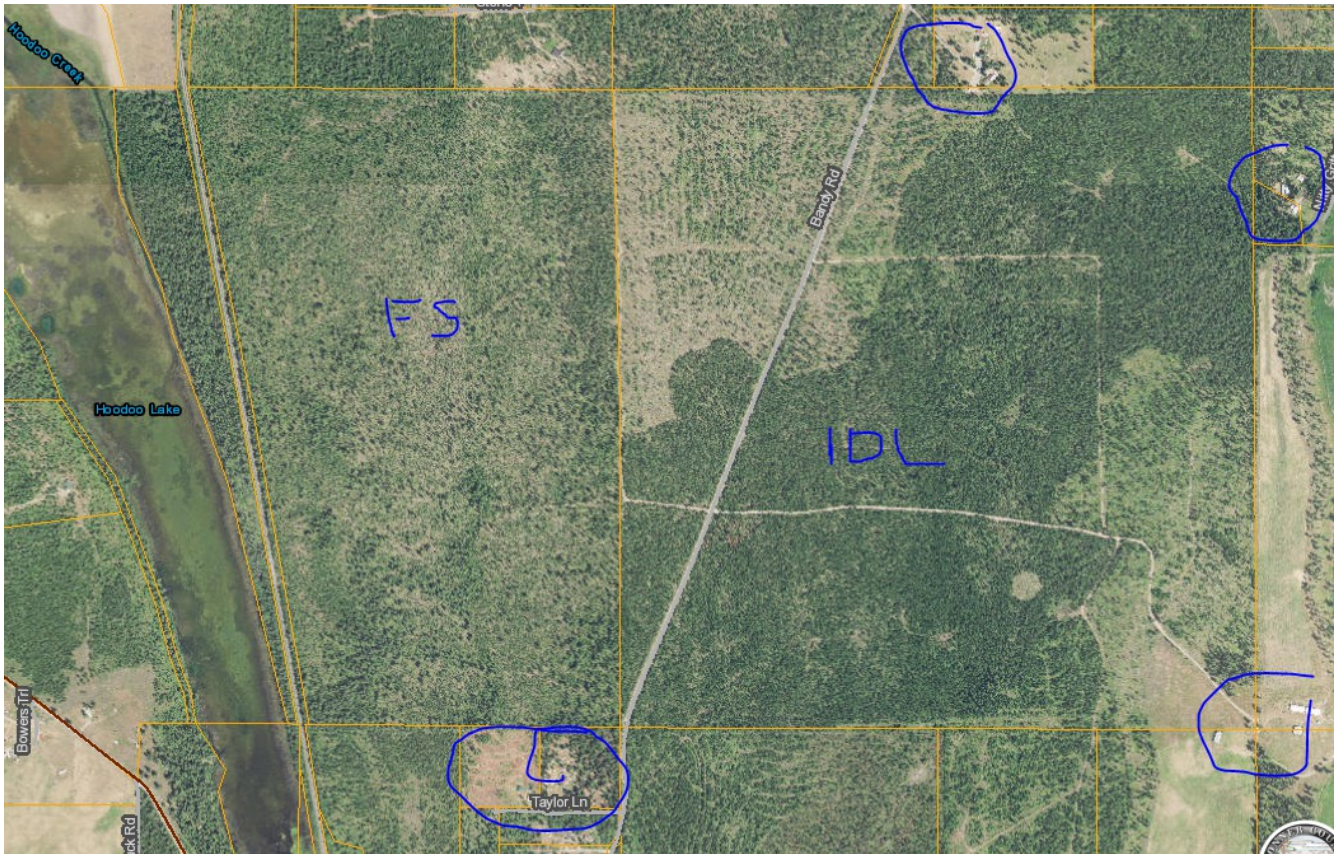
The USFS and IDL have only collaborated with the enabling Panhandle Forest Collaborative (PFC) and have not tried to initiate collaboration with other interested parties. One public meeting on Zoom is not collaborative involvement that facilitates participation of interested individuals.

Relief Requested

Invite public participation to seriously collaborate with logging sale design and other issues, including selecting recruitment old growth stands, wildlife, water quality, wetlands, peat lands, etc. The USFS already has selected units and habitat manipulation methods for stands including logging, hand and mechanical thinning which have excluded participation by individuals outside the enabling PFC.

Issue: This logging project is not integrative with private and IDL forest lands

Let IDL tend to its own lands and exit the collaboration. History shows that IDL lands are terribly managed. Here is one example, IDL foresters on the project are proposing to mechanically thin the open USFS section next to Hoodoo lake (unit 13a and possibly b), which is currently an open stand of young ponderosa pine with patches of immature mixed species. A field visit reveals that there is no need for mechanical treatment. Most of the stand is open with the small patches of higher stem density providing hiding cover for the elk that utilize the area. While the USFS and IDL are wasting time and money to mechanically treat that section, they leave the highest risk stands on IDL lands, consisting of sapling to pole size trees with high stem density and high risk of wild fire affecting adjacent homes, circled in blue.



It is important to eliminate the State of Idaho's involvement on this project. These foresters are noted for butchering and over-managing the land, the checkerboard, South of Priest Lake, is known worldwide as a bad example of management because it is seen by satellite by all.

Relief Requested:

Develop an integrative plan that allows for protecting areas only immediately adjacent to residences on IDL, private and Public USFS lands.

Issue: Building temp roads and reconstructing roads is unacceptable.

FS lands provide needed security habitat, albeit inadequate for this rural area. Additional roads of any type will negatively impact security habitat, allow access for trappers and firewood gatherers, all having a negative impact on local biodiversity.

Relief Requested.

Develop an alternative that does not involve road opening or construction.

Issue: Logging old growth to meet minimum requirements for old growth is unacceptable.

The SN Preliminary Effects Analysis states:

"Old Growth & Large Tree Retention: For Healthy Forest Restoration Act Title I Section 102(a) projects (except those projects on National Forest System lands with wind-throw or

blowdown, ice storm damage or the existence of an epidemic of disease or insects). There are no known old growth stands that are proposed for treatment under the Scattered Lands Project. Should any be encountered during analysis or project implementation, those stands will either be deferred from treatment or silvicultural prescriptions will be modified so that following treatment, stands structures will still meet minimum old growth definitions from Green et. al. (2011). All large trees will be retained unless they do not contribute to future stand health and resistance agents of disturbance. Some potential scenarios are leaving mistletoe infected large trees in regeneration harvest to re-infect the new cohort underneath (unless they are different species) or large diameter later seral species that are susceptible to root disease in areas with high levels of root disease."

Then they make this specious statement:

"The project:

Fully maintains, or contributes toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth condition characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health, and retaining the large trees contributing to old growth structure."

If there is no old growth in the area, then the statement is meaningless. Logging old growth stands of any type is an unacceptable and unnatural disturbance. Logging moist site types to old growth minimum stem densities will impact the character of old growth, removing stem and leaf surface area, impacting the ability of the stand to support native songbirds and other wildlife. It NEVER contributes to restoration of structure and function as claimed above. If a stand is logged to the minimum, any additional mortality will make the stand fall out of the old growth classification. Logging and roadbuilding are not natural disturbance events and will disturb soil, plants, wildlife, fungi and trees. Logging is not contributing to the function of old growth stands.

Relief Requested.

1. Do not log any moist site old growth. Use fire in drier sites to gradually restore the fire regime on drier sites. The flat grounds used to be home to huge 5 and 6 ft diameter ponderosa pines.
2. Large mistletoed trees are very valuable to wildlife, for nesting, roosting, sleeping and for a myriad of smaller species. It is unacceptable to log them. If in a proposed plantation, leave a buffer of the existing forest around the trees or plant white pine out to a distance farther than the dispersal distance of dwarf mistletoe.
3. Log no large trees, large trees with root rot will die and provide nesting and feeding sites for birds and when fallen, will provide lacking large woody debris.
4. Designation of recruitment stands like dry site unit 13a which are currently capable dry site sensitive species habitat.

Issue: Spreading mis-information about the USFS sensitive Black-Backed Woodpecker.

Again, the USFS provides illegitimate information about this species stating that in the effects analysis stated that there is no impact, p 4.

Species	Determination	Rationale
Black-backed Woodpecker	No Impact	No immediate post-fire habitat or areas of extensive insect infestation proposed for treatment

The area has an endemic population of black backed woodpeckers. One was seen in unit 13a by the author (May 2019) and documented in the Inland NW Birders FB page.



<https://www.facebook.com/groups/inland.nw.birders/permalink/10156963586415726>

Relief Requested.

1. Leaver large patches of dense timber to provide for a continual supply of bark beetles for the BBWO.
2. Designate recruitment dry site old growth stands using underburning as a restoration technique.
3. Designate moist site recruitment old growth stands where natural succession is allowed.
4. Designate at least 25% of the area including State and private lands (cumulative effects) as old growth recruitment stands.

Issue: Spreading mis-information about the USFS sensitive Pygmy Nuthatch, Flammulated Owl and White-headed Woodpeckers (extirpated)

The issues are the same as with the black-backed woodpeckers, the Flammulated Owl, Pygmy

Nuthatch, and White-headed Woodpeckers utilize dry site habitats. There are dry site habitats present and historic habitats that maintained large ponderosa pines with fire in the project area. For example Unit 13a should be managed for Flammulated Owls and the extirpated white headed woodpecker as it is capable habitat now and possibly marginally suitable.

The statement (table below, p4) that no suitable habitat exists for the pygmy nuthatch is erroneous at best and fraudulent (purposeful intent to deceive) at worst. Ignorance about wildlife and their habitat will not be tolerated. These statements makes the author wonder if biologists even went to the field.

Flammulated owl	No Impact	No suitable habitat (dry forest types with large ponderosa pine) would be affected by the project.
Harlequin Duck	No Impact	There are no known potential breeding areas within or adjacent to any proposed treatment areas.
Pygmy Nuthatch	No Impact	No suitable habitat (timbered dry forest types) would be affected by the project.

Relief Requested

1. Field surveys of all potential sensitive species in the area (and raptors).
2. Identification of suitable and capable habitats for each.
3. An integrated management plan to allow these species to utilize the area.

Issue: Western Toad (USFS sensitive) effects have not been adequately addressed.

The Preliminary Effects Analysis states (p4)

Western Toad	May Impact Individuals or Habitat, but Will Not Likely Contribute To A Trend Towards Federal Listing Or Loss Of Viability To The Population Or Species	Species may be affected by ground-disturbing activities, but no effects to breeding habitat.
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The analysis presents no survey data, no location of breeding areas and no discussion stating that amphibians everywhere are declining. The statement that it "May impact individuals but will not likely contribute to a trend towards Federal Listing or viability loss" is not supported by field work and population projections. Local extirpation of isolated toad populations is unacceptable.

Relief Requested.

1. Field surveys locating western toad breeding habitat (spring is arriving shortly).
2. A population estimate.
3. Designation of corridors and possibly toad underpasses under roads.
4. If an area is to be logged, trained individuals must be present to find and relocate any western toads found in the unit.

Issue: Impacts to Peatlands/wetlands.

Peatlands are very valuable for rare plants and other habitat, the Forest Plan states:

The forest plan specified peatland buffer of 660 feet (FW- GDL-VEG-09) would be implemented

surrounding documented peatlands in the project area (including portions of the perimeters adjacent to Hoodoo Lake, Granite Lake, and Kelso Lake).

The project proposed a "risk matrix" that of course allows habitat manipulation including salvage logging or thinning in the buffer and parking out smaller diameter trees. These are damaging and unacceptable activity in the peatland buffer zones which also serve as wetland/water forest edge and are very valuable to neotropical songbirds, some of which require understory shrubs and trees for nesting and feeding habitat.. This is a violation of the IPNF Forest Plan Guideline and NFMA and the Migratory Bird Treaty.

Relief Requested.

1. Do not log in the peatland buffers.
2. Please discuss how excess nutrients from thinning, burning and logging will affect the peatlands.
3. Please use site specific measurements of existing nutrients and the effect of adding additional nutrients to the peatland system from logging.
4. Please identify and buffer "near-peat lands", which have a peat depth below the peatland designation peat depth.

Raptors

Please identify all nesting sites of raptors that in habitat the project area including owls and hawks. The happenstance method utilized now (just report it if one finds one) is unacceptable.

Relief Requested.

1. Conduct a survey of raptor nests territories and nest sites.
2. Protect those sites as required in the IPNF Forest Plan.

Sincerely,

Paul Sieracki
Geospatial Analyst/Wildlife Biologist

and for

Mike Garrity, Executive Director

