



SELKIRK CONSERVATION ALLIANCE

KEEPING THE WILD IN THE SELKIRK ECOSYSTEM

March 13, 2017

Ms. Michelle Paduanai
Supervisory Environmental Coordinator/Interdisciplinary Team Leader East Zone
Colville National Forest, Newport - Sullivan Lake Ranger Districts
315 North Warren Avenue
Newport, Washington 99156
Via Email: michellelpaduanai@fs.fed.us; comments-pacificnorthwest-colville-newport@fs.fed.us

RE: Limestone/Silver Vegetation Management Project, File Code 1950
Scoping Notice Dated February 15, 2017

Dear Ms. Paduanai,

The Selkirk Conservation Alliance (SCA) has reviewed the scoping notice for this project after receiving a copy from a concerned member. We would appreciate being added to all future notices for this and other projects occurring within the Newport and Sullivan Lake Range Districts of the Colville National Forest. Our email address for future scoping and environmental project impact notices is SCA@SCAWILD.ORG.

We find the scoping notice is clear on the authorizations governing the US Forest Service's (USFS) plans to undergo these treatments, but find it does not provide the data or links to the data on your website that support the notice assertion that the "observed existing conditions," and "other data sources" warrant these treatments without additional biological and stream surveys. In fact the cited act of 2014 (i.e., the Agricultural Act of 2014) requires the USFS to consider the "best available scientific information." We find it difficult to confirm your agencies findings without access to the scientific data referenced in your scoping notice. We would therefore request that the USFS proceed with preparation of at least a basic National Environmental Policy Act (NEPA) Environmental Assessment (EA) document or biological assessment report to be shared with the public; a requirement of reaching a conclusion that the use of a categorical exclusion (CE) is appropriate.

Some of the statements we would like the data to support include:

- "Forest stands within the project boundary have departed from historic conditions and are more densely forested now than in the past." As the state project boundary includes 53,600 acres, and the proposed treatment areas include 3,000 acres, a map showing the correlation of the acres which are more densely forested now than in the past and their relationship to the proposed treatment areas seems appropriate. It is possible that the figure provided on the last page of the notice includes some of these data, but it was not prepared at a PDF resolution high enough to clearly view the legend (even at a 400% zoom) so it is impossible to interpret with confidence.

- The same figure implies new roads will be built while the notice indicates a significant amount of the ~53,000 acre project area falls within designated roadless area. Again, it is not clear if the roadless area boundary is shown on your attached figure, because the legend is nearly impossible to make out. Therefore we cannot conclude that new roads are not being proposed in areas which are supposed to be protected from them. We do not support the construction of new roads in any roadless designated areas.
- We agree with the Scoping Notices stated need to “maximize old-growth and large trees” - but again find it impossible to evaluate if the proposed action does so, as no mapping of old growth and/or large trees is clear on the attached figure in the scoping notice.
- We would request that impacts to the following species be provided in the NEPA compliant document to be prepared (including evidence that existing guidelines for their management on the Colville National Forest or any US public lands are being followed):
 1. Pileated Woodpecker
 2. Northern Three-toed Woodpecker
 3. Lewis Woodpecker
 4. White-headed Woodpecker
 5. Owl Surveys, including the Great Grey Owl.
 6. Franklin’s Grouse
 7. Dusky Grouse
 8. Northern Goshawk (including the nesting stand analysis of Paul Sieracki included in his comment letter)
 9. Pine Marten
 10. Pacific Fisher
 11. Wolverine
 12. Canada Lynx
 13. Gray Wolf
 14. Grizzly Bear (including compliance with the road/habitat fragmentation guidelines)
 15. Mountain Goats
 16. Beaver
 17. Bull Trout (including analysis of fish passage culverts on all project roads)
 18. Westslope Cutthroat Trout (including analysis of fish passage culverts on all project roads).

Please see the comment letter of Mr. Paul Sieracki for additional evaluation needs on a species by species basis.

- Impacts to wetlands, riparian areas, and other waters of the United States should be carefully evaluated and all practical efforts to avoid, minimize and mitigate such impacts be taken. This should include a soil hazard and suitability analysis, to prevent mass wasting events which could impact waters of the United States within the project area, particularly along the proposed skid paths. Further, all new and existing road crossings should utilize appropriate fish passage culverts unless field surveys are completed to confirm no fish are present.

We continue to be concerned that as the current administration denies the impacts of climate change, agencies like the USFS are simultaneously using the argument of climate change advancing the risk of wildfire and insects to warrant emergency timber harvests and sales like this one. We would submit that the federal government can’t have it both ways; supporting climate science when

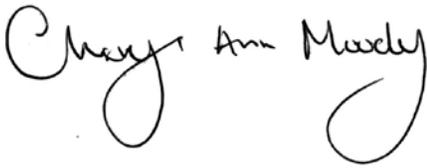
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it benefits their project goals and denying it when it does not. Regardless of their position, their analysis and decision making documents should always be supported by defensibly collected data. Presumably you have collected data for this project, but for expediency reasons are not sharing at this time with the public. Again, such a lack of transparency is not consistent with the requirements of NEPA, even for CEs.

We look forward to commenting again upon receipt of your draft NEPA document, and hope to be able to support the project after finding it fully complies with existing regulations, best management practices, and the species management guidelines within your approved forest plan.

Sincerely,

A handwritten signature in black ink that reads "Cheryl Ann Moody". The signature is written in a cursive style with a large, looping initial 'C'.

Cheryl Moody, Executive Director
Selkirk Conservation Alliance

cc: 2017 Project Comment File
Paul Sieracki