

Objection against the Proposed Lost Creek-Boulder Creek Landscape Restoration Project

**Submitted by certified mail to Objection Reviewing Officer,
Intermountain Region USDS, 324 25th Street, Ogden, Utah 84401 on
May 23, 2014.**

Objectors Name and Addresses:

Lead Objector Sara Johnson, Director, Native Ecosystems Council,
P.O. Box 125, Willow Creek, MT. Phone: 406-285-3611

Objector Mike Garrity, Director, Alliance for the Wild Rockies, P.O.
Box 505, Helena, MT. Phone: 406-459-5936.

Name of Project:

Lost Creek-Boulder Creek Landscape Restoration Project, New
Meadows Ranger District of the Payette National Forest

Responsible Official:

Keith Lannom, Forest Supervisor, Payette National Forest, 800 W.
Lakeside Avenue, McCall, ID 83638-3602

This objection contains on appendix, Appendix A. The portions of various reports cited in the objection that are not available in the references cited in the FEIS are provided in this appendix.

Narrative Description of Objections to the Proposed Project

I. The agency will violate the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), the Administrative Procedures Act (APA), and the Endangered Species Act (ESA) by implementing the proposed project as defined in the draft Record of Decision, and the Final Environmental Impact Statement.

A. The agency has misrepresented the purpose and the environmental effects of the project; the claimed purpose to log and burn to promote wildlife habitat is clearly false; this is demonstrated by at least 3 factors: the claimed benefits to the white-headed woodpecker are never The agency has mislead the public in regards to both the supported with any evidence; the claims that habitat for many other sensitive wildlife species will be maintained is false; and the claimed benefits of prescribed burning to big game are never supported with any analysis. In addition, the agency is misleading the public in regards to a stated purpose to increase the amount of large tree forest structure as noted in the draft ROD at 34.

The draft ROD at page 1 defines one purpose of the project is to restore dry forest conditions, which will improve habitat for the white-headed woodpecker. The draft ROD at 32 identifies purpose and need "1a" to improve habitat for the white-headed woodpecker while maintaining habitat for other sensitive and listed species. The draft ROD at 33 notes that the prescribed fire will improve the nutritional value of winter range and foraging areas near calving habitat. The draft ROD at 34 notes that the project area is currently lacking in large tree forest structure, and the project

will both maintain and increase large tree structure development over time. Further description of these misleading/false claims are provided below.

1. The agency's claim that extensive logging will improve habitat for the sensitive species (SS) and management indicator species (MIS) the white-headed woodpecker was never demonstrated with any science or monitoring; existing science contradicts this claim.

The agency failed to cite any research that documented that logging increased populations of the white-headed woodpecker. No science was cited as well where logging is even recommended to manage for the white-headed woodpecker. The agency has based this claim on the mere fact that logging will reduce canopy cover of forests. Logging will reduce existing canopy cover (unknown) down to 10-45%, depending on the unit (FEIS at 45). The agency claims that the white-headed woodpecker is threatened because forests have grown too dense due to a lack of fire. Again, no data was ever provided to support this claim. The "hypothesis" that forests will continue to increase in density if they are not thinned by fire is fiction; forest densities are largely controlled by site conditions, including availability of water. This fiction is merely a cover for logging, which is where the absurd label for logging as "restoration."

It is highly unlikely that logging will promote habitat for the white-headed woodpecker, even if the canopy is opened up. We reviewed the habitat characteristics used by this species as per research by Dixon (1995) in Oregon, and older research by Ligon (1973) in western Idaho. Dixon (1995) clearly identifies the white-headed woodpecker as an old growth species (e.g., see abstract, pages 1, 18, 20, 55, 95). The density of this species is tied to old growth habitat availability. Id. Dixon (1995) at 95-96, including Table 20, ranked habitat quality for the white-headed woodpecker, with old forest (stable) receiving the highest ranking (also at 108). Dixon (1998) noted at page 3 that old growth forests in the Northern Rockies is one of the most imperiled forest types. The loss of old growth forests due to logging is likely the primary reason for the decline of the white-headed woodpecker (Dixon 1998, Dixon 1995). Dixon (1995) at page 62 and 116 recommends that white-headed woodpecker territories contain a minimum of 26% old growth, although 67% old growth is recommended with a mean canopy closure of 56%.

In spite of the recognized association of the white-headed woodpecker to old growth, especially which contains ponderosa pine trees, there is no analysis in the proposed project regarding old growth in the Project Area. The minimum levels of old growth recommended for this species is never identified. In addition, established old growth definitions developed for Region 4 of the Forest Service (USDA 1993), titled "Characteristics of old-growth forests in the Intermountain Region, prepared by R. Hamilton, is not even cited in the references for the Project. These criteria for old growth are standard for the various regions of the Forest Service. The criteria used in Region 1 of the Forest Service are similar to those used for the Intermountain Region, and are briefly summarized for key features in the Montana Partners in Flight (2000) document provided in the appendix for this objection. Instead of using the established criteria for old growth forests, the agency has replaced these with the term "old forest." There are no specific criteria for this old growth, except that they need to have a very low canopy cover in the overstory (30%) of large trees (DEIS for the Forest Plan Amendment proposed to facilitate implementation of the 2011 plan-scale wildlife conservation strategy, Phase 1: forested biological community, Appendix E at 25). The minimum age of the "large trees" is not defined, nor is there a minimum dbh for the "large trees." So these stands can be almost any logged stand, which appears to be the purposed of these vague criteria. As per this new definition, any forest old growth stand can be logged down to a few trees, and still meet the new definition of "old forest." As will be noted below, a few larger trees would not constitute suitable old growth for the white-headed woodpecker, or any other old growth species (to be addressed later). This dropping of the standard definition of old growth to a new definition of "old forest" (draft Wildlife Report at 13) is clearly being done to allow logging of old growth forests. This proposed management of old growth is being applied to this current project, even though it has not been finalized via public involvement (FEIS and ROD released for public comment).

The Forest Service's claim that logging will benefit the white-headed woodpecker by opening the forest canopy is directly contradicted by their association with old growth with moderate canopy closures (56%) (Dixon 1995 at 116). Even if canopy closure were the only habitat criteria needed by the white-headed woodpecker, which it is not, the agency failed to demonstrate that reducing canopy cover will benefit this species in the project, including down to 10-20% canopy closure. It was noted in the FEIS at 286 that research reported canopy closure at nesting areas for this

woodpecker as an average of 24%. However, this appears to be a mistake. Dixon (1995 at 38) actually reported that canopy cover at white-headed woodpecker nest sites average 41%, not 24%. And canopy closure at roost sites averaged 57% (Id. at 41). Also, Dixon (1995 at 130, 145) reported that stands used for foraging by this species had an average canopy closure of 65%. Canopy closure at telemetry sites for this woodpecker averaged 59% in continuous forest, and 53% in fragmented forest (Id. at 92). Also, the recommendation for 58% canopy cover in old growth (Id. at 116) also belies that this species requires open forest stands. These are “moderate” density stands. Managing for low versus moderate canopy closure for this species is clearly inconsistent with the current best science.

The strategy to manage for low canopy closure for the white-headed woodpecker appears to be based on the Forest’s planned substitution of standard old growth definitions by new “old forest” definitions (draft Wildlife Report at 13) requires only a canopy closure of 30% of larger trees (DEIS for the Forest Plan Amendment proposed to facilitate implementation of the 2011 plan-scale wildlife conservation strategy, Phase 1: forested biological community, Appendix E at 25). This canopy closure is far lower than that reported for use for nesting, roosting, and foraging by the white-headed woodpecker as previously noted by Dixon’s (1995) research. This inconsistency between reported habitat use by this woodpecker in regards to canopy closure, versus the proposed canopy closure for the project to improve woodpecker habitat, is never addressed in the analysis and is clearly a violation of the NEPA and APA.

Aside from a lack of documentation that reducing the canopy closure in existing stands will benefit the white-headed woodpecker, the agency failed to identify and discuss a number of reasons why logging old growth or older forest stands will degrade habitat for this species. Unavoidable adverse impacts, impacts that would have to be considered in balance with any hypothesized beneficial impacts, including a reduction in current and future snag habitat, and a reduction in both summer and winter food habitat for the white-headed woodpecker.

Snag Habitat:

The agency noted, albeit reluctantly, that the proposed logging will reduce snags. For example, the draft Wildlife Report at 32 notes that past timber harvest often included the selective removal of large

snags. Pages 77 and 110 of the draft Wildlife Report notes that snag numbers may fall in the short-term due to logging. This report at 14 notes that snags are currently low in the project area due to past logging.

The loss of snag habitat due to logging has been measured by Holloway and Malcolm (2006). Table 3 at page 1739 of this report shows that larger snags (over 10 inches dbh) declined from 11.1 in old forest to 4.7 per hectare in thinned forests. This is a reduction of 58% of snag habitat due to logging. In Dixon's (1995) thesis, she also measured snag densities by various habitats, including logged and unlogged forests.

Dixon (1995) measured snag densities in her study areas, and reported that for the Metolius Basin study area, the two uncut areas (F and G) had by far the greatest snag densities (page 44, also Table 3 at page 45).

The issue of low snag densities was addressed by Dixon (1995) at page 24, where she noted that current snag densities on the Deschutes National Forest are inadequate to support the white-headed woodpecker over time.

The average density of snags at woodpecker nesting sites was reported to be 1.93 per acre. The mean dbh of snags used for nesting in her study was 25 inches (Id. at 52).

Snags are also important as roost sites for this species. Survival in the winter depends on the availability of winter roost sites (Dixon 1995 at 56). These average 1.6 snags per acre at roost sites (Dixon 1995 at 44). Average dbh for roosting snags was 22 inches (Id. at 42).

The impact of the proposed logging on future snags in white-headed woodpecker habitat was never addressed in this habitat improvement program. Assuming over time tree mortality is related to the number of trees within a forest, few trees mean there will be a lower mortality rate. In addition, trees may have a lower mortality rate in thinned stands due to less competition with other trees, and because there will be fewer insect pests. One objective of the project is to increase forest health, by reducing insects and disease through forest thinning (Draft

Wildlife Report 4). This report also notes at 76 that logging will open up the forest and reduce mortality. This objective, including within areas to be logged to improve white-headed woodpecker habitat, is a contradiction for actual management of this species. The draft Wildlife Report at 32 noted that the reduction of large trees due to harvest will reduce recruitment of snags.

Forage Habitat

Dixon (1995 at iv) reported that the white-headed woodpecker preferred to forage on ponderosa pine trees 27 inches dbh. This foraging included pecking, gleaning and sapsucking. She noted (Id., 130, 145) that stands used for foraging by this species had an average canopy closure of 65%. The preference for stands with moderate canopy closure is likely related to the availability of foraging habitat in areas where there are more trees. All their foraging is associated with trees (Id.). 91% of the foraging activity occurred on live trees (Id. 140).

By fall, Dixon (1995 at 144) noted that the white-headed woodpecker began to feed heavily on pine seeds; winter survival may be highly dependent upon availability of ponderosa pine seeds. The impact of the proposed "habitat improvement" logging for the white-headed woodpecker in the FEIS did not address how forest thinning will affect the availability of this critical food resource for the white-headed woodpecker. As early as 1973, it was known that this species of woodpecker depends on ponderosa pine seeds as foraging habitat. Ligon (1973) reported extensive feeding on ponderosa pine seeds by this species in western Idaho. He also noted that the availability of seeds appeared to be limited by spring, due to high competition between various birds for these seeds.

Production of seeds by conifers is a huge driving force in ecosystems, and has to be considered in land management activities. Hagar (1960) noted that in northwestern California, seed production in Douglas fir trees can exceed 95,000 seeds per acre in a good year. Research on seed use by birds in the pinyon pine reported that a flock of pinyon jays stored an estimated 30,000 seeds per day (Ligon 1978). Forest thinning may drastically reduce the availability of conifer seeds and

thus significantly reduce the carrying capacity for associated species as well, including the white-headed woodpecker.

One objective of the project is to increase forest health, by reducing insects and disease through forest thinning (Draft Wildlife Report 4). This objective, including within areas to be logged to improve white-headed woodpecker habitat, is a contradiction for actual management of this species. Ligon (1973) reported that his surveys of food intake by this species included heavy use of bark beetles at some times. Dixon (1995 noted at page 107 that white-headed woodpeckers were noted to fly almost 4 miles in order to feed on western spruce budworm larvae. And of course, insects and disease will increase snag densities (draft Wildlife Report at 76).

It is also not clear that white-headed woodpecker habitat will benefit from understory thinning, as is proposed for the Project. Dixon (1995 at 41) reported that most woodpecker roost sites were three-layered stands. Similarly, the understory layers in nest sites were variable, with many containing three understory layers (Id. at 38). There is no science available to indicate that removal of the understory during and after logging is either needed, or will benefit this species, even though the Project will do just this in proposed "habitat improvement" areas for the white-headed woodpecker. Dixon (1995 at 130, 141) reported that stands used for foraging by this species were typically multi-storied).

B. The agency is failing to maintain habitat and viability of sensitive species and management indicator species (MIS) in the Project Area, as is required by the NFMA as well as by the Forest Plan; projected habitat losses in the draft Wildlife Report were not carried over to the FEIS as per transparency to the public; the past habitat losses to these species from logging was never disclosed, as well, in the FEIS; in combination with the proposed habitat losses for these species, habitat availability will be reduced to a small percentage of the landscape, making viability tenuous at best. The agency failed to provide any documentation that low levels of habitat

planned for sensitive and MIS species will maintain breeding populations within the Project Area.

1. Direct habitat losses

Direct habitat losses projected for sensitive and MIS species in the draft Wildlife Report were not carried over into the FIES. These losses are therefore not fully disclosed to the public, demonstrating a lack of transparency by the agency. The habitat losses that were identified in the draft Wildlife Report for sensitive and MIS species are summarized below. These losses are likely an underestimate, since forest thinning for large tree harvest is planned on approximately 14,000 acres, including 12,200 acres of commercial thinning, and 1800 acres of clearcuts (draft ROD at 49). This logging will eliminate habitat for almost all sensitive and MIS species, due to the loss of cone producing trees, the loss of current and future snags, and the loss of prey species. This 14,000 acres of large-tree harvest does not include other proposed activities on 26,100 acres of forest. This includes the 8100 acres of precommercial thinning of older plantations, and the 1700 acres of precommercial thinning of younger plantations (under 30 years and under 8 inches dbh) and the understory removal on another 16,300 acres. These create an additional huge habitat impact for many sensitive species by impacting availability of prey species and preferred habitat, such as multi-layered forests.

Flammulated Owl (Sensitive Species)

The draft Wildlife Report at 7 notes there will be an adverse impact on this species. This report at 95 notes that the project will reduce habitat by 45%. Potential home ranges will be reduced from an estimated 31 at present to 14 after logging. This species is known to be relative common in the Project Area. No nest locations have been identified. Nests could be destroyed with the project.

Three-toed Woodpecker (Sensitive Species)

The draft Wildlife Report at 101 notes that habitat for this species will be reduced by 37%. Potential home ranges will decline from 39 to 17, or by over half. Forest thinning to reduce tree mortality to stress and insects and disease will also adversely impact this species in the future. Research

in Montana in an area infested with mountain pine beetles found that the three-toed woodpecker preferred to nest in areas with over 70 larger snag per acre (Saab et al 2012). This type of habitat occurs with pine beetle infestations.

Boreal Owl (Sensitive Species)

The draft Wildlife Report at 109 notes that the Project will remove boreal owl habitat by 19%. Approximately one of the potential 4 home ranges in the Project Area would be eliminated, which would be a reduction of the current potential population by 25%. The Forest Service has no population data for this species due to a lack of monitoring. No boreal owl nests have been located in the Project Area. Nest sites could be destroyed with the project.

Fisher (Sensitive Species)

The fisher is known to be present in the Project Area. The draft Wildlife Report at 117 notes that the Project will reduce fisher habitat by 32% (5625 acres). This seems to be a significant underestimate, since logging of large tree habitat will actually remove/degrade 14,000 acres of fisher habitat, reducing it by 78%. The 16,100 acres of understory removal will additionally degrade habitat for this species, a species that requires multi-layered habitat (Jones 1991). It seems what remains of fisher habitat in this landscape will be eliminated with the project. The population status and trend for this sensitive species on the Forest was not reported in the project analysis.

Northern Goshawk (Sensitive Species)

The draft Wildlife Report at 87 failed to clearly define project impacts on this species. Almost no habitat loss was projected. The acreage of goshawk habitat in this report (23,990 acres) was significantly lower than that reported in the FEIS at 301 (34,729), and the reason for this difference is unknown. The logging of 14,000 acres of large tree habitat will severely impact habitat quality. This habitat loss would reduce existing large tree habitat reported in the draft Wildlife Report by 58%. Just based on habitat availability, this would reduce the potential goshawk home ranges (6,000 acres as per Reynolds et al. 1991) from 4 down to 2, or by half. This is an actual underestimate of project impacts,

since understory thinning on 16,100 acres and precommercial thinning on 1700 and 8100 acres will reduce goshawk prey species, including snowshoe hares and red squirrels. The Forest Service has no information on goshawk population trend on the Forest. The Project Area appears to be occupied, but there is no information provided on reproductive success, which is the best measure of habitat quality.

Great Gray Owl (Sensitive Species)

The draft Wildlife Report at 125 estimates the Project Area has the potential for 4 great gray owl home ranges. This species is known to occur in the Project Area. No nesting areas have been located. Nest sites could be destroyed with the Project. This report estimates only a small impact on this species, which is false. This species is associated with large tree habitat, of which 14,000 acres will be largely removed. The current estimated owl habitat of 23,474 acres will be reduced by 14,000 acres, or by approximately 60%. There is no provision for old growth habitat in the Project Area, even though this species is highly dependent upon old growth habitat for nesting (Bull and Henjum 1988).

Pileated Woodpecker (MIS)

The draft Wildlife Report at 85 notes that habitat for this MIS will be reduced by 50% with project implementation. The current estimate for potential home ranges of 44 will be reduced to 22 after project implementation. The Forest has no monitoring data for this species, either in the Project Area or on the Forest.

2. Cumulative Habitat Losses

Although there was no analysis for the Project in regards to cumulative impacts of logging on sensitive species and MIS, these appear to be severe. There are 64,578 acres of forested lands in the project area (draft Wildlife Report at 16). Only 25,286 acres of large tree habitat remain (draft Wildlife Report at 16). Much of this large tree habitat has been lost due to timber harvest on 34,700 acres. The planned removal of wildlife habitat just for the large tree harvest, when added to past logging impacts, will result in the majority of wildlife habitat for sensitive and MIS species being eliminated from this landscape.

Pileated Woodpecker (MIS)

The draft Wildlife Report notes there are only 20,071 acres currently suitable for this MIS. This is 31% of the forests in this landscape. After project implementation, remaining pileated woodpecker habitat on this landscape will be approximately 15%, or 9,960 acres. There was no analysis as to whether this very low level of habitat for this MIS in this 80,000 acre analysis area is sufficient to provide a locally reproducing population, or for the 25% of other forest birds dependent upon snag habitat (Bull et al. 1997). There was no minimum habitat density level identified as necessary for persistence of this MIS in this landscape.

Flammulated Owl (Sensitive Species)

The current estimated habitat for this species in the Project Area is 23,273 acres, which is 36% of the forests in this landscape. After project implementation, there will be only 10,368 acres of estimated habitat for this species, which is only 16% of the landscape. The agency did not address whether this is enough habitat within this landscape to ensure a locally-viable population of flammulated owls. No minimum level of habitat density was cited as required for local viability.

Great Gray Owl (Sensitive Species)

The draft Wildlife Report estimates that the project area currently contains 23,474 acres of habitat for this species. This would be 36% of the forests in this landscape. With the logging of 14,000 acres of large tree habitat, great gray owl habitat will be reduced to roughly 9474 acres, which would be 15% of the landscape. The agency did not provide any analysis as to what the minimum amount of habitat density is required on a landscape to ensure local persistence of this sensitive species.

Fisher (Sensitive Species)

The draft Wildlife Report estimated the project area contains 18,050 acres of fisher habitat. This is only 30% of the forested landscape in the project area. After project implementation, removal of 14,000 acres of large tree habitat due to logging will reduce fisher habitat to 4050 acres, or 6% of the landscape. This estimate does not include all the understory removal (16,100 acres) and precommercial thinning that is planned. The Project has

a high probability of eliminating fisher from this landscape due to ongoing habitat loss.

Boreal Owl (Sensitive Species)

The draft Wildlife Report estimates there are 12,407 acres of potential boreal owl habitat in the Project Area. This would be 19% of the forested areas of the project area. The project will remove at least 2,394 acres of boreal owl habitat, reducing it to 10,013 acres. This would be 16% of the landscape. The agency did not demonstrate that this small level of habitat in the Project Area can sustain local breeding populations of boreal owls.

Three-toed Woodpecker (Sensitive Species)

The draft Wildlife Report estimates the project area contains 16,079 acres of three-toed woodpecker habitat. This would be 25% of the forested areas of this landscape. With project implementation, this habitat would be reduced to 10,079 acres as per the draft Wildlife Report. This would reduce the habitat to 16% of the landscape. Again, the agency did not provide any criteria for concluding this level of habitat will maintain this species in the Project Area.

Northern Goshawk (Sensitive Species)

The draft Wildlife Report estimates the Project Area contains 23,990 acres of goshawk habitat. This is considerably lower than the amount reported in the FEIS at 301. Using the more conservative estimate in the draft Wildlife Report, the current level of goshawk habitat in this landscape would be 36%. After project implementation, goshawk habitat would be minimally reduced by logging of 14,000 acres of large tree habitat. This would reduce goshawk habitat to 9474 acres, or 15% of the landscape. Additional impacts can be expected from the precommercial thinning of 8100 acres of older plantations, and 1700 acres of younger plantations, and understory removal on another 16,100 acres.

C. The agency is failing to ensure a diversity of wildlife will be maintained in the project area, and that the current best

science is being used to manage wildlife, because old growth habitat and snag habitats are not being managed.

Old Growth Management

There is no analysis of old growth habitat in the project area as per the old growth definitions developed by Hamilton (1993). This document summarizes the old growth characteristics of 12 different forest types, from warmer, drier forest types at lower elevations to the high elevation forests. These definitions provide the overall characteristics that were inventoried in old growth forests across the Intermountain Region of the Forest Service. One old growth type that likely represents the lower elevation forests in the Project Area is Old Growth Code 237. This was never addressed in the Project record, so this is our best estimate of a typical old growth type in the project area. The purpose of this discussion is to identify that valid criteria exist for the Payette National Forest to inventory old growth forests.

Old Growth Code 237 is defined in Hamilton (1993) as a subalpine fir cover type, interior ponderosa pine (see Objection appendix for this reference). This old growth type occurs on the Payette, and ponderosa pine can be either a climax or seral species. This old growth type requires at least 10 trees per acre over 24 inches dbh if ponderosa pine is seral, and only 5 trees per acre over 24 inches dbh if it is climax. Trees would be at least 200 years in age. Seral sites have 2 canopy layers, while climax site would have only 1 canopy layer. The former has up to 1 snag per acre over 20 inches dbh, while for the latter, snag densities are variable and defined as infrequent.

Another old growth type, Code 218, that may occur in the Project Area is defined as subalpine fir cover type – lodgepole pine. This old growth type includes not only lodgepole pine, but Douglas-fir, Engelmann spruce, grand fir and subalpine fir. This type would have 11 or more large trees at least 25 inches dbh, and at least 140 years in age, with 2 tree canopy layers, and 5 snags per acre over 11 inches dbh.

Another old growth type, Code 210, contains Douglas-fir. As with the other types, there is a minimum number of large trees per acre (10-15 trees per acre over 24 inches dbh), minimum age (over 200 years) and identified canopy layers (equal to or over 2) for this old growth type.

Instead of using the established definitions for old growth as per the Intermountain Region of the Forest Service, the Forest Service for the Lost Creek-Boulder Creek project only address "old forest." There are no specific criteria for forests that qualify as old forest, including age, number of large trees, dbh of large trees, snags, or canopy layers. Almost any older forest stand can qualify as old forest, including after most of the trees have been removed with logging.

In addition to the agency's substitution of established old growth criteria with nondescript forests that can be heavily logged, they made no connection between old forest habitats and wildlife habitat values. The most critical factor for managing for old forest rather than old growth forests is that the former can be logged. There is no science that was provided to demonstrate that logging will maintain values for wildlife. This lack of data regarding logging impacts on wildlife make the application of the old forest definition biologically invalid.

The best science makes it clear that logging old growth forests will degrade/eliminate their values to wildlife. As previously noted, Dixon (1995) recommends that old growth forests for the old growth species, white-headed woodpecker, have a mean canopy cover of 56%, and 9 trees per acre over 25 inches dbh. Nest areas had almost 2 large snags per acre. These conditions would be hard to maintain with logging, including future snag recruitment.

Logging old growth forests will also degrade/eliminate foraging habitat for the northern goshawk. Forest thinning is known to reduce red squirrel habitat as well as populations (Vahle and Patton 1983, Holloway and Malcolm 2006, and Herbers and Klenner 2007). The red squirrel is known to be a "key" prey species for the goshawk (Salafsky et al. 2005, Salafsky et al. 2009). Reproductive success of the goshawk is believed to be driven by prey density (Salafsky et al. 2005, Salafsky et al. 2009, Reynolds et al. 2006). These impacts on prey is likely why logging has been identified as an important factor regarding goshawk population trends. Patla (2005) reported that in the Greater Yellowstone Ecosystem that reoccupancy of goshawk territories average 45% in unlogged areas, and only 22% in logged habitat. On the heavily-logged Black Hills National Forest, a 2003 survey of 72 historic goshawk nests found only 8 of them occupied (Fauna West Wildlife Consultants 2003).

Logging of old growth forests will degrade this habitat for the pileated woodpecker, an MIS for the Payette National Forest. Bull and Holthausen (1993) recommended that old growth habitats for this species have at least a 60% canopy closure, or be relatively dense. They reported that this species preferred uncut forests, which is why they recommended that at least 40% of a pileated woodpecker territory be unlogged. The sensitivity of this old growth species to logging has been verified by 2 long-term monitoring programs, one for 15 years and one for 30 years, on this species. Bull et al (2007) found that their reproductive success was correlated with the amount of forest that was unlogged; in a heavily logged area, woodpecker breeding pairs declined from 5 to 1, while in the other areas that was relatively unlogged, breeding pairs remained consistent over time. Based on bird inventories in Montana, Hutto (1995) identified the pileated woodpecker as one of 13 species that require relatively uncut forest for breeding.

Logging old growth forests will degrade habitat for many forest birds as well. As previously noted, snag habitat was significantly reduced with partial logging (58% loss) (Holloway and Malcom 2006). And Dixon's (1995) white-headed woodpecker study noted that old unlogged forests contained the most snags. Bull et al. (1997) reported that 25% of forest birds are dependent upon snags. Research on bird habitat use in Montana identified 13 species of birds that require relatively uncut, older forests, and 6 of these are cavity nesters.

Logging old growth forests will also reduce forest pests, such as mistletoe. Bennetts et al. (1996) reported that not only were the number of snags and mistletoe trees positively correlated (mistletoe promotes the creation of snags), but also that the number of forest birds and species richness was also positively correlated with the level of mistletoe in the stand. The draft Wildlife Report noted that both the great gray owl and the goshawk will use mistletoe areas as nests. Insect pests in forests also provide valuable food for birds. As was noted in Dixon (1995), the white-headed woodpecker was known to fly 4 miles to feed on spruce budworm larvae. Budworms can also provide high value, readily available food resources to songbirds in the summer (McMartin et al. 2002). Other forest pests, bark beetles for pine and Douglas-fir, do best in more dense forest stands, which is one reason cited for forest thinning, to reduce the incidence of these pests in the stands. Bull et al. (2007) noted that the pileated woodpecker foraged on pine beetles in her study area, and was unaffected by forest mortality due to this pest. The three-toed woodpecker has been reported to strongly benefit from bark

beetle infestations (Saab et al. 2012). Goggans et al. (1988) recommends that no logging occur within areas managed for this species.

Logging of old growth forests will also degrade songbird habitat (also red squirrel habitat) due to the reduction in conifer seed production. Smith and Balda (1970) identified many songbird that feed heavily on conifer seeds, including 14 species that occur in the Lost Creek-Boulder Creek project area. Conifer seed production reaches maximum potential when forest stands reach and exceed maturity (Reynolds et al. 1991). As noted previously, Hagar (1960) reported that in California, conifer seed production can exceed 95,000 seeds in a good year. Davis and Williams (1964) reported that that several species of pine trees can produce up to 263,440 seeds per acre in a good year. A number of birds of conservation concern are highly associated with conifer seed crops, including the Clark's nutcracker. Id. This species has a high preference for ponderosa pine seeds, due to their large size; preservation of the white-barked pine trees may be tied to Clark's nutcrackers and ponderosa pine trees as use of white-barked pine seeds is only incidental to the availability of other tree species, especially ponderosa pine (USDA 2011). Pinyon jays are also highly associated with conifer seeds for both breeding and overwintering success (Ligon 1978). A variety of species of crossbills are highly dependent upon abundant conifer seed sources, and travel around the landscape to locate suitable areas (Benkman 1993). Conserving this suite of species is tied to management of abundant cone crops across the landscape (Id., Wilcove 1992).

There are also a number of songbirds in the northern Rocky Mountains that require relatively undisturbed older forest habitat (Hutto 1995). One of these species is the brown creeper. This is a near-obligate of old growth forests (Wiggins 2005). The brown creeper is also a "sort of" cavity nester; it nests in between old bark and the tree trunk.

All of the above adverse impacts are likely the reason why Hutto et al. (1992) reported during an extensive literature survey of logging impacts on songbirds in the northern Rocky Mountains that almost 30 species showed negative responses to partial logging, while 33 species showed negative responses to clearcutting.

The agency's failure to identify a valid, scientifically-sound management program for old growth means that a host of wildlife species are threatened with severe population declines in the Lost Creek-Boulder Creek Project

Area. The loss of old growth forests and recruitment old growth forests will be irretrievable for most wildlife species either associated with or benefited by these habitats. The Montana Partners in Flight 2000 conservation program recommends from 20-25% old growth forests for songbirds, with old growth being defined by standard criteria for Region 1 of the Forest Service (similar to that described for old growth for the Intermountain Region by Hamilton 1993). Dixon (1995) recommends 67% old growth for the white-headed woodpecker habitat. Bull and Holthausen (1993) recommend 25% old growth for the pileated woodpecker. Reynolds et al. (1991) recommend 20% old growth for the goshawk. Without planning for old growth, it cannot be maintained. Nor can all the species benefited by, or associated with old growth, be maintained as well. This is because the current best science indicates that management of old growth species requires setting aside large blocks of habitat where natural processes that create forage and nesting sites for associated species are provided. For the pileated woodpecker, these "woodpecker management areas" are recommended to be 910 acres in size (Bull and Holthausen 1993). For the three-toed woodpecker, these are recommended to be 528 acres (Goggans et al. 1988). For the brown creeper, blocks of old growth are recommended to be at least 250 acres in size (Wiggins 2005).

The project area has been identified as suitable lynx habitat at higher elevations. The lynx is clearly a dependent old growth species. Squires et al. (2010) has identified that lynx depend upon older multistoried forests as winter habitat. This is in contrast to lynx populations in Alaska and Canada where lynx can use young forests in the winter. Squires et al. (2010) noted that management of this species requires providing "abundant" older, multistoried habitat to maintain lynx during the critical winter period when starvation is most likely; recruitment of lynx winter habitat is also identified as a key factor. The level of old growth forests required for lynx winter survival has not been identified, other than the recommendation that it be "abundant" (Id.). The project as proposed will violate the ESA by failing to promote the conservation and recovery of the lynx in this landscape.

Due to the failure of the agency to evaluate old growth habitat in the project area as per Hamilton (1993), for any alternative, the NEPA analysis has failed to identify a significant difference between alternatives, especially between the no action and action alternatives. This is a NEPA violation, as NEPA requires that all alternatives be fully assessed as per impacts on the environment. Such an analysis would disclose to the public the impact of

alternatives on old growth habitat and recruitment of old growth in the future.

There is no plausible management strategy for old growth species in the current Forest Plan. The Plan therefore does not meet the requirements of the NFMA, to maintain a diversity of wildlife on the landscape. The Forest Plan needs to be amended so that the requirements of the NFMA are met.

Snag Habitat Management

There is no snag habitat management program for the Lost Creek-Boulder Creek Project Area. There is no identified required number of snags per acre, by size, identified for this project. The existing Forest Plan is clearly incapable of maintaining a diversity of wildlife, including those associated with snags. This Plan needs to be amended so that the requirements of the NFMA are met.

The agency failed to define what the current status of snag habitat and thus associated species (25% of the forest bird species) is for the analysis area. Snag densities from another landscape were cited as possibly indicative of snags in the project area. Since the project area is heavily logged, with over 34,000 acres of old logging units (over half the total forest), and has massive amounts of roads which opens up areas to firewood harvest, it is imperative that the agency address the impact of past logging on snags. This has to be done at the forest stand level, since snag habitat needs to be provided every 5-25 acres for wildlife (Bull et al. 1997). Snag habitat cannot be averaged out across the landscape, as this assumes that birds will occur in areas where there are actually no snags.

The current and expected snags within each of the proposed treatment units was never identified. The public cannot determine how the project will impact snags. This information needs to be provided to meet the requirements of the NEPA. NEPA requires that all alternatives, including the no action, provide adequate information so that the public can compare outcomes per alternative. This was not done for snag habitat, for any of the alternatives, including the no action alternative.

And there is the key issue of "snag recruitment." The availability of insects, disease, etc., and number of larger trees that can contribute to the snag pool due to mortality, was totally ignored by the agency. There is no analysis of

how many snags, and their sizes, are expected to be created given current stand conditions (no action alternative) and proposed alternatives. Thus the agency has failed to provide a valid analysis of all alternatives. Snag recruitment may be “irretrievable” on treated sites due to logging, and this needs to be disclosed to the public, especially as it is likely the expected resource conditions after project implementation.

It is likely that there is a severe shortage of snags in the Project Area, a problem that was never disclosed by the agency, in violation of the NEPA. Given that the purpose of the project is claimed to be “restoration,” the agency needs, in order to avoid being arbitrary, to look at all habitat factors that need restoration. Snag habitat is likely one of the greatest needs.

The current best science indicates that on average, bird habitat needs to provide 4 larger snags per acre (a minimum of 10 inches dbh) over time (Bull et al. 1997). The agency needs to provide a valid inventory of snag availability across the project area, and identify the location, size, and total acreage of habitats that meet the minimum requirement of 4 snags per acre for wildlife viability. These snags also have to be located in suitable habitat for snag-associated species so that they will be used. The percentage of the landscape that provide adequate snag habitat can then be identified to the public, and as assessment of viability of associated species can be made based on how much habitat is available on the landscape.

The cumulative effects of past logging also needs to be identified for snag habitat in the Project Area. Failure to do this is a violation of the NEPA. Since more logging is proposed to remove large trees on 14,000 acres, the agency needs to make a connection between past impacts on snag habitat and impacts of the proposed action. Only then can the public understand how the proposed actions were planned.

D. The analysis of impacts to big game is both deficient and misleading to the public.

Even though elk is an MIS for the Payette National Forest, there is no valid analysis of existing conditions or planned impacts of the project on this species, in violation of the NEPA and the NFMA. Analysis of MIS is required to demonstrate that habitat for other species “indicated” by the MIS are also being maintained.

Hiding Cover

There is no analysis of current or planned levels of big game hiding cover in the project area. The impacts of the project are thus never identified for big game species in relation to cover. Hiding cover is noted to be an important factor in both deer and elk habitat, and a minimum of 40% is recommended (Black et al. 1976).

Big Game Security

The agency falsely defined the Hillis et al (1991) methodology for measuring big game security. This methodology identifies a minimum of 250 acres of contiguous forest cover at least 0.5 miles from an open motorized route. Although the agency “implied” to the public that they were using this method, they in fact altered this method by deleting the hiding cover requirement. All security is measured solely by its distance from open motorized routes. The cumulative impact of past logging on security, as well as planned reductions in security, are therefore being masked by the agency by using a deficient measurement. By dropping the requirement for hiding cover in security areas, the agency can claim that logging will have no impact on elk security, which is clearly false. Their false definition of security thus allows them to conceal project impacts on this feature. This is a direct NEPA violation by providing false analysis information and conclusions to the public.

The agency has provided inflated values for big game security in the project area, which is a NEPA violation. They report 19% security, but hiding cover was not required. If hiding cover were required, as per Hillis et al. (1991) it is likely that current security would be much lower.

Habitat Effectiveness

The agency failed to identify either the current or proposed elk habitat effectiveness levels for the project within the different watersheds. Habitat effectiveness is a standard measure of summer habitat quality for elk, and addressed the impact of elk being displaced from open roads (Christensen et al. 1993). A minimum of 50% habitat effectiveness, or less than 2 miles per section, is identified for elk management. Id. It appears that almost the entire project area exceeds this open road density measure, and in some cases,

exceeds it several times over. The failure of the agency to identify elk habitat effectiveness masks the impact of past as well as planned action. Although some concern was expressed for the existing high road densities, including many miles of unauthorized roads, the agency failed to address this severe habitat problem in restoration needs. Instead of identifying roads as a severe existing problem, the agency needs to use many of these roads to log forest habitats, which is likely why the impact of roads on wildlife was never adequately measured.

Management of Big Game Winter Range and Calving Habitat

There is no analysis in the FEIS as to why burning big game winter range and big game calving/fawning habitat will improve it. No science was provided to verify this claim. No past monitoring was also provided to demonstrate that such management impacts increased big game populations on this forest in the past. There was also no information as to why removal of understory habitat, and logging on big game winter range and calving habitat would benefit big game. In effect, there is no analysis provided on the massive burning program planned. At a minimum, the habitat objectives for big game winter range and calving habitat should be provided, and a comparison provided between existing and planned conditions, including forage, hiding cover, and thermal cover. The public has no idea of what existing problems are for big game winter range and calving habitat, and therefore by "treatment" via logging and burning is required.

E. The proposed management of the Northern Idaho Ground Squirrel is misleading and fails to address significant problems.

The Northern Idaho Ground Squirrel (NIDGS) is an endangered species and appears to occur in the project area. Logging and burning is proposed to restore habitat for this species. It is not clear why logging will benefit this sagebrush/grassland species. It is also not clear why burning will benefit this endangered species. There was no science cited to indicate how this was determined. There was no information as to specifically how burning will benefit this species. It is not clear what plant species will increase, and what will decrease to the benefit of this species. One concern is burning of sagebrush, which would be detrimental for this species. There was no information as to how livestock grazing is affecting these squirrels, as well.

Why was grazing left out of the proposed management issues? The draft Wildlife Report notes that this species feeds on grass seeds, which would in turn be reduced directly by livestock grazing, and cumulatively by overgrazing degradation.

The FEIS indicates that logging/burning treatments have been successful in the past, but specific details were not provided. This is a grassland species, and it would seem to be implausible to log forests to create habitat. The validity of this measure is questionable at best. The biggest concern we have, however, is why logging is proposed to create more habitat when existing problems will be exacerbated and/or ignored. These problems include recreational shooting and road mortality. There is no discussion of how serious these problems are. There are no measures suggested to correct these problems. Direct mortality of existing animals would seem to be a more significant pressing problem than creating more habitat that may or may not be suitable.

The agency failed to demonstrate with data what the most pressing problems are for this species, or that they will be addressed by the proposed action. We have a concern that the existing habitat problem is due to the lack of fire in this ecosystem. There is no current science that indicates that fire cycles have been impacted by suppression activities within any given landscape, including the Lost Creek-Boulder Creek landscape. The assumption is that ground squirrel habitat will eventually be lost due to conifer encroachment, but no actual data was provided on this.

In summer, it is not clear that any effective management is being done for the conservation of this species, and that in fact the proposed actions are being implemented to promote logging and livestock grazing, not the ground squirrel. We believe treatments for this ground squirrel are a violation of both the NFMA and the ESA.

F. The agency has failed to meet a number of management requirements which result in violations of the NEPA, the NFMA, the Migratory Bird Treaty Act, the Memorandum of Understanding for migratory birds between the Forest Service and the FWS.

Migratory Bird Treaty Act

As is noted above, all aspects of the project, with the exception of road management, will adversely impact migratory birds. These adverse impacts are not adequately disclosed. There is no valid analysis of impacts on neotropical migratory birds as per alternative, including the no action alternative. The severe adverse, and past adverse cumulative impacts, of this large suite of wildlife are never adequately disclosed in the FEIS or draft ROD, in violation of the NEPA. The agency also failed to define any actual conservation strategy that is being employed for this large suite of species. Without a scientific conservation strategy for these species, they cannot be preserved in the face of relentless logging of a forested landscape. The lack of any conservation strategy for these species demonstrates the Forest Service is violating the NFMA, as a diversity of wildlife is not been ensured.

Memorandum of Understanding

The Forest Service failed to evaluate the impact of past and planned logging and burning on neotropical migratory birds, in violation of the MOU between the Forest Service and FWS regarding management of neotropical migratory birds. Also, the MOU directs the agency to avoid jeopardizing populations of these species on the Forest. These species are not being managed in the project area, in violation of the MOU. They are also not being managed elsewhere on the Payette National Forest, due to a lack of any requirement for conservation measures in the Forest Plan. The Forest Plan needs to be amended to include management direction for this broad suite of species while there are still some habitat options left.

Lack of Transparency in Regard to Mitigation

There are many proposed mitigation measures for the Project that are never actually defined. One of these significant failures of disclosure is the proposed management of 7 goshawk postfledging areas (PFAs). There is no information as to how these will be managed for logging, understory removal, and burning. The public is expected to trust the agency to correctly apply the Reynolds et al. (1991) recommendations for PFAs. The public has no idea as to how these recommendations will be applied, or if they will actually resemble Reynolds et al. (1991). This is a NEPA violation.

The agency also contends that adequate surveys will be conducted for sensitive species in the project area, such as for flammulated owls and great gray owls. Again, the public is expected to believe that all owl nests will be located prior to logging, understory treatments, and burning. We believe that these mitigation measures as per surveys are required prior to implementation of a project, with the treatment of identified nesting areas clearly identified in the ROD and FEIS. Otherwise, how can the agency claim they know what the impacts will be to these owl species? Protection of nesting habitat is critical to ensuring reproduction occurs. Both species are known to be in the Project Area. We are concerned that valid surveys will never be done once a decision is made. There are no specific survey protocols identified in the Project File to demonstrate serious planning is ongoing for these species.

It is not clear that any proposed treatments of identified owl nesting areas will be effective. AS was noted previously, the great gray owl requires old growth forests as nesting habitat, with a canopy cover of at least 60%. The flammulated owl requires dense thickets of trees next to the nesting tree, cover that would be removed in understory treatments. Both species require snags for nesting, and snags will be removed during logging. The potential for severe habitat degradation, as well as disruption of nesting activity and failure to reproduce, are clearly a potential for this project, and these concerns need to be fully addressed by the agency, including specific mitigation measures.

The location of any nesting areas for the MIS pileated woodpecker in the project area is also unknown. It is therefore highly unlikely that nesting areas will be protected from logging and understory treatments. There was no information provided in the FEIS/draft ROD as to how pileated woodpecker nesting areas would even be managed, or no conservation strategy identified for this species as per the current best science for "woodpecker management areas." There is no reason for the public to believe that the viability of this species will be maintained in the project area, or across the Forest.

Failure to Monitor MIS

There is no monitoring data available for the MIS pileated woodpecker, either in the Project Area or on the Forest. Yet the agency is planning to remove vast amounts of pileated woodpecker habitat in a heavily logged

landscape. This is a violation of the NFMA to remove habitat for MIS without knowing the current population trend on the Forest. The agency cannot at this time demonstrate they are maintaining viable populations of this MIS on the Forest.

Description of the No Action Alternative

The draft Wildlife Report notes repeatedly that the no action alternative will be a crown fire that destroys the entire project area. Wild fire is not eminent within the time frame of the project, including the next 30 years. Nor is there any evidence that wild fires will destroy wildlife habitat. There is no actual valid analysis of impacts of the no action alternative in the FEIS.

Range of Alternatives

There was no action alternative that would restore wildlife habitat for snags, old growth, sensitive species, the MIS pileated woodpecker, and big game. Thus there was an inadequate range of alternatives, given that the public identified wildlife habitat management as a concern during scoping and comments on the DEIS. Just because the agency defined logging, understory removal, and burning as habitat restoration for wildlife, this will not actually occur with any of the proposed action alternatives. Instead, all action alternatives will remove habitat for these wildlife species. Thus there is no alternative that would actually restore habitat for wildlife while reducing roads.

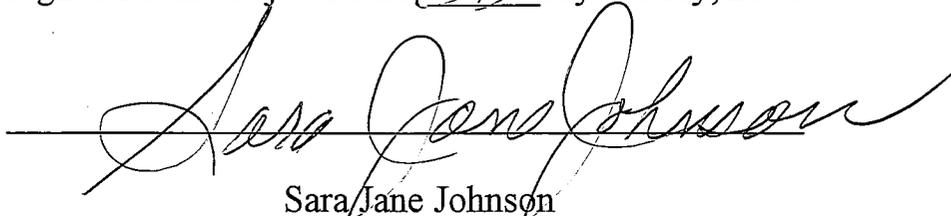
Large Complicated Documents

The analysis of the proposed project is extremely difficult for any public to understand, let alone to read. The jargon is endless, and all the analyses for wildlife are unnecessarily complicated. As a result, the actual impacts of this hugely destructive project are well concealed from the public. This appears to be the reason for such a large document, to imply to the public that good land management is occurring. This document could be shortened by 80%, with only important, valid information provided. This document is a clear NEPA violation by making impacts of the project completely hidden to the public since few will take the time to try and understand it.

Proposed Remedies

Due to the violation of the NEPA, the NFMA, the APA, and the ESA, we believe the project as proposed, with the exception of road management, should be withdrawn and terminated. This area is heavily degraded from past logging, and the project will further reduce wildlife habitat to levels that may prevent local viability. The Payette Forest Plan is clearly inadequate to ensure that a diversity of wildlife can be maintained across the Forest, or that populations of wildlife will be managed at viable levels, due to a lack of valid conservation strategies for old growth, snags, songbirds, sensitive species, the MIS pileated woodpecker, the Canada lynx, woodpecker management areas, big game hiding cover, big game security, big game winter range, and big game calving range. Habitat restoration is needed for these wildlife species, not habitat removal, as will occur with the Project. We do support the management of roads to reduce their extremely high density on the landscape, which would improve wildlife habitat for big game species, as well as reduce the loss of snags to firewood cutters. Road restoration without the proposed logging would also eliminate the needs to use and upgrade many of the existing roads for logging activities. Road restoration could be coordinated with the restoration of habitat for sensitive wildlife species, MIS species such as pileated woodpeckers and elk. As a remedy, we propose that the Forest Plan be amended to include scientifically-based conservation strategies for sensitive species, MIS species, old growth habitat, snag habitat, big game species, and neotropical migratory birds. Until that time, no vegetation management actions should occur since options for maintaining viable wildlife populations will be further eroded over existing marginal conditions, with potentially irretrievable impacts. This potential is clearly demonstrated by the paucity of wildlife habitat in the Lost Creek-Boulder Creek landscape.

Signed for the Objectors this 23rd day of May, 2014


Sara Jane Johnson

Statement Demonstrating the Connection between Prior Specific Written Comments and Content of the Objection

Objectors provided written comments on the DEIS for the proposed Lost Creek-Boulder Creek Landscape Restoration Project on December 5, 2013 as well as on December 16, 2013. Both sets of comments were very extensive. Those comments addressed in this Objection deal largely with the management of wildlife habitat, and we will generally only address how our concerns previously identified are connected to this objection.

We questioned the validity of the old growth management strategy being applied to the Project via the Wildlife Conservation Strategy, a proposed Forest Plan Amendment that has yet to be completed. We had not reviewed this strategy at the time of our comments, but upon receiving a copy of the proposed amendments, we have grave concerns about not only its application to this current project, but for wildlife management in general. The Wildlife Conservation Strategy eliminates any requirements for old growth forests, and instead substitutes this with logged forests. This is directly contradictory to the purpose of old growth habitat. We provide extensive discussion in this objection, based on science, as to why logging will not maintain old growth values for wildlife.

We questioned the lack of any cumulative effects analysis in our comments, and this concern was never addressed in the FEIS. The amount of past logging in this landscape was never clearly identified, or the effects evaluated on wildlife species, including management indicator species (pileated woodpecker and elk), as well as numerous sensitive wildlife species. We used information provided in the draft Wildlife Report for this project to make general estimates of the amount of habitat for sensitive and MIS species that will be removed with this project, and also tabulated the amount of cumulative habitat loss that this project will trigger due to past logging. The agency failed to identify the massive removals of habitat for sensitive and MIS wildlife species that will be cumulatively triggered by the proposed project in the FEIS, so we brought this concern forward in our objection.

We raised a concern in our DEIS comments regarding the claim that logging would benefit the white-headed woodpecker. After considerable review of information on this species, that the Forest Service provided to NEC as a result of a Freedom of Information Act request, we determined that there is no actual data available to demonstrate that logging will improve habitat for this sensitive species. We brought this issue forward into our objection.

We expressed concerns about the high density of motorized routes in the Project Area as discussed in the DEIS. We are not objecting to the proposed improvement in open and total road densities that would be part of this decision.

We expressed concerns about the lack of any description of hiding and thermal cover for big game species, including existing levels, and how these levels would be changed with project implementation on both summer and winter ranges (thermal cover). We were also concerned about the lack of any clear analysis of roading impacts on big game, as defined by "habitat effectiveness." There are scientific measures for habitat effectiveness, and we believe these criteria should be used to define roading impacts on big game to the public. The FEIS did not address this concern, so we brought it forward into our objection.

We also were concerned about the failure of the agency to correctly apply the established definition of big game security. The modified definition of the Hillis et al. (1991) method allows the agency to provide misleading information to the public. The alteration of this methodology allows the agency to falsely claim that logging will have no impact on big game security based on a loss of hiding cover, because hiding cover is not included in the definition.

We expressed concerns about the management of big game winter ranges and calving areas. In particular, the logging and proposed burning were never shown with any monitoring data or published science to be beneficial to either elk or deer. Hiding cover is very important in elk/deer calving/fawning habitat, and the agency did not demonstrate what objectives even are for hiding cover on these key areas for big game. These issues were not addressed in the FEIS, so we brought it forward into our Objection.

We expressed a concern in our DEIS comments about the lack of any wildlife surveys, either for sensitive species or the management indicator

species the pileated woodpecker. It is impossible to protect important habitats for these species, especially nesting areas, without surveys. This issue was not addressed in the FEIS. In fact, the agency continued to claim that surveys would be "ongoing." We don't believe that the agency can do surveys after a project is implemented. First, there is no guarantee these surveys will actually be done. Second, there is no specific information in the FEIS as to how occupied owl/woodpecker areas will be protected from management activities. The agency has failed to provide adequate information on this important issue regarding management of sensitive species and MIS in the project area, so we carried this concern over into our objection.

We also raised a concern in our DEIS comments about the lack of any population monitoring for sensitive or MIS species. It is required for the MIS pileated woodpecker. It is also a reasonable management strategy for sensitive species, even if habitat is used as a proxy for population health. There is was no information provided in the DEIS to demonstrate that the agency is maintaining viable populations of either MIS or sensitive wildlife species. This issue was not addressed again in the FEIS, so we brought it forward into our objection.

We have grave concerns about the lack of any snag monitoring, either for snag densities within the project area, or within past harvest units. The agency has no data to define existing snag levels in the project area. The agency also failed to define how many snags would be left in harvest units, or how snag recruitment would be achieved. The management of the 25% of forest birds associated with snag habitat appears to be nonexistent in the project area, as well as on the Payette National Forest. We brought this concern forward into our objection.

There was also no old growth inventory for the project area. There are established criteria as per Hamilton (1993) to measure old growth. The agency failed to use these established criteria, and claimed there is no old growth in the project area. The actual availability of old growth is unclear due to a lack of analysis. If old growth habitats are lacking, then old growth needs to be recruited. This would be a valid "restoration" program in the project area, one that was never considered by the agency. We brought this issue forward into our objection, along with considerable documentation that logging will destroy old growth values for wildlife. Any old growth or

developing old growth forests that will be logged in this project will have irretrievable impacts for old growth associated species.

We expressed a concern about “averaging out” snag habitat across a landscape in the DEIS. This is illogical as per measuring snag habitat for wildlife. This method assumes that wildlife will be in areas even if there are no snags, by averaging out snags. Snag habitat has to be measured for every 5-25 acres as per current science. This is the expected home range size for most cavity-nesting species, so the area managed for these species has to be appropriate for their home range size. This issue was not addressed in the FEIS, so we brought it forward into our Objection.

We expressed a concern regarding the agency’s failure to address a key ingredient for woodpecker and songbird habitat values, which is the production of conifer seeds. Many, many species depend upon conifer seeds, not only for summer reproduction, but especially for overwinter survival. Forest thinning will greatly diminish this food resource for wildlife, and reduce the carrying capacity for a considerable number of bird and small mammal species, as well as the red squirrel. The FEIS did not address this issue, so we carried it forward into our objection.

We also expressed a concern about “averaging” out habitat for the MIS pileated woodpecker, but other sensitive species would be applicable as well. These species cannot use small patches of habitat spread across a huge landscape. Habitat, including for the goshawk, has to be concentrated at some minimum density level for viability. This has been demonstrated with current science for woodpecker and the goshawk. Woodpecker management areas have been recommended in order to ensure that enough local habitat is available to ensure viability of pileated and three-toed woodpeckers, for example. This is also important for old growth species, such as the goshawk and brown creeper. Averaging out habitat across the landscape is relatively meaningless as a proxy for associated species. This issue was not addressed in the FEIS, so we carried it forward into our objection.

In our DEIS comments, we expressed a concern regarding the lack of any conservation strategy for neotropical migratory birds, and forest songbirds in general. There was not a single conservation strategy proposed for this large suite of species in the DEIS, and there was none identified in the FEIS. It will be impossible to provide for forest birds without long range planning, as many require relatively undisturbed older forest habitat, high levels of snags,

high canopy cover, and abundant conifer seed production. Many also benefit from the hiding and thermal cover provided by understory vegetation, vegetation that is planned for extensive removal with the project. There is clearly no management program for these species in the FEIS, so we carried it forward into our objection.

We requested in our DEIS comments that the conditions planned for goshawk postfledging areas, as per Reynolds et al. (1991) be provided to the public. This was not done in the FEIS, so we carried this concern forward into our objection. We also expressed concerns about the impact of logging on goshawk foraging habitat. Forest thinning will reduce a key prey species for the goshawk, the red squirrel. And precommercial thinning will also reduce another important prey species, the snowshoe hare. The FEIS failed to demonstrate that any valid management will be done for this sensitive species, and we carried this concern forward into our objection.

We expressed concerns about project impacts on suitable lynx habitat. This is a verified old growth species, and depends upon older, multistoried forest habitat for winter survival. Many aspects of the project will degrade lynx habitat, with both overstory and understory thinning, as well as prescribed burning that reduces travel cover. There does not appear to be any conservation strategy being applied to lynx in this landscape, even though lynx analysis units and lynx habitat has been identified. The actual historical potential for lynx in this landscape is unclear. We brought this issue forward into our objection.

Finally, we expressed the huge size and unnecessary complexity of the DEIS, and of course, and the FEIS. These documents are full of agency jargon that has no valid meaning to the public. These documents are extremely difficult to read even for folks that have been doing a lot of this, such as NEC and AWR. We believe that these documents are purposely complicated and filled with jargon to give the public the impression that good land management is being done. The agency needs instead to provide simple, understandable language and analysis, instead of concealing severe environmental impacts by massive, confusing documents.

Literature Cited:

References provided in the FEIS are not repeated in this list.

Benkman, C. 1993. Logging, conifers and the conservation of crossbills. *Conservation Biology* 7:473-479.

Bennetts, R., G. White, F. Hawksworth, and S. Severs. 1996. The influence of dwarf mistletoe on bird communities in Colorado ponderosa pine forests. *Ecological Applications* 6:899-909.

Black, H., R. Scherzinger, and J. Thomas. 1976. Relationships of Rocky Mountain elk and Rocky Mountain mule deer habitat to timber management in the Blue Mountains of Oregon and Washington. Pages 11-30 in *Proceedings of the Elk-logging-roads symposium*.

Bull, E., and R. Holthausen. 1993. Habitat use and management of pileated woodpeckers in northeastern Oregon. *Journal of Wildlife Management* 57:335-345.

Bull, E., N. Nielsen-Pincus, B. Wales, and J. Hayes. 2007. The influence of disturbance events on pileated woodpeckers in northeastern Oregon. *Forest Ecology and Management* 243:320-329.

Christensen, A., L. Lyon, and J. Unsworth. 1993. Elk management in the Northern Region: considerations in forest plan updates or revisions. USDA Forest Service, General Technical Report INT-303.

Davis, J. and L. Williams. 1964. The 1961 irruption of the Clarks' nutcracker in California. *Wilson Bulletin* 76:10-18.

Fauna West Wildlife Consultants. 2003. 2003 survey results form small forest owls, the Northern Goshawk, and other raptors of interest in the Black Hills, South Dakota. Prepared for South Dakota Game, Fish and Parks, Pierre, SD.

Goggans, R., R. Dixon, and L. Siminara. 1988. Habitat use by three-toed and black-backed woodpeckers, Deschutes National Forest, Oregon. Nongame Project Number 87-3-02, Oregon Department of Fish and Wildlife, USDA Deschutes National Forest.

Hagar, D. 1960. The interrelationships of logging, burds, and timber regeneration in the Douglas-fir region of northwestern California. *Ecology* 41:116-125.

Hamilton, R. 1993. Characteristics of old-growth forests in the Intermountain Region. USDA, Forest Service.

- Herbers, J., and W. Klenner. 2007. Effects of logging pattern and intensity on squirrel demography. *Journal of Wildlife Management* 71:2655-2663.
- Holloway, G. and J. Malcom. 2006. Sciurid habitat relationships in forests managed under selection and shelterwood silviculture in Ontario. *Journal of Wildlife Management* 70:1735-1745.
- Hutto, R., S. Hejl, C. Preston, and D. Finch. 1992. Effects of silvicultural treatments on forest birds in the Rocky Mountains: implications and management recommendations. Pages 386-391 in *Proceedings of a symposium, Status and Management of Neotropical Migratory Birds*. USDA, Forest Service General Technical Report RM-329.
- Hutto, R. 1995. USFS Northern Region songbird monitoring program: distribution and habitat relationships. USDA Forest Service Contract #R1-95-05, Second Report.
- Ligon, J. 1973. Foraging behavior of the white-headed woodpecker in Idaho. *The Auk* 90:862-869.
- Ligon, J. 1978. Reproductive interdependence of Pinon Jays and Pinon pines. *Ecological Applications* 48:111-126.
- McMartin, M., I. Bellocq, and S. Smith. 2002. Patterns of consumption and diet differentiation for three breeding warbler species during a spruce budworm outbreak. *The Auk* 119:216-220.
- Montana Partners in Flight. 2000. Montana bird conservation plan, January 2000.
- Patla, S. 2005. Monitoring results of Northern Goshawk nesting areas in the Greater Yellowstone Ecosystem: is decline in occupancy related to habitat change? *Journal of Raptor Research* 39:324-334.
- Reynolds, R., J. Wiens, and S. Salafsky. 2006. A review and evaluations of factors limiting Northern Goshawk populations. *Studies in Avian Biology* No. 31:260-273.
- Saab, V., J. Dudley, and M. Dresser. 2012. Habitat characteristics at woodpecker nest locations and at non-nest random locations in the Elkhorn Mt, Helena National Forest before (2002-2006) and after a mountain pine beetle outbreak (2009-2011): Progress report. Rocky Mountain Research Stations and Montana State University. Submitted to the Helena National Forest.
- Salafsky, S., R. Reynolds, and B. Noon. 2005. Patterns of temporal variation in goshawk reproduction and prey resources. *Journal of Raptor Research* 39:237-246.
- Salafsky, S., R. Reynolds, B. Noon, and J. Wiens. 2009. Reproductive responses of Northern Goshawks to variable prey populations. *Journal of Wildlife Management* 71:2274-2283.

Smith, C., and R. Balda. 1979. Competition among insects, birds and mammals for conifer seeds. *American Zoologist* 19:1065-1083.

Squires, J., N. DeCesare, J. Kolbe, and L. Ruggiero. 2010. Seasonal resource selection of Canada lynx in managed forests of the northern Rocky Mountains. *Journal of Wildlife Management* 74:1648-1660.

USDA. 2011. Clark's nutcracker and whitebark pine: can the birds help the embattled high-country pine survive? *Science Findings* February 2011. Pacific Northwest Research Station. USDA, Forest Service.

Vahle, J., and D. Patton. 1983. Red squirrel cover requirements in Arizona mixed conifer forests. *Journal of Forestry* 81:15-15, 22.

Wiggins, D. 2005. Brown creeper (*Certhia americana*): a technical conservation assessment. Prepared for the USDA Forest Service, Rocky Mountain Region, Species Conservation Project.

Wilcove, D. 1993. Crossbills and clearcuts: modern forestry practices may drive some crossbill types to extinction. *Living Bird*, Autumn 1993:34-35.