

March 4, 2016

**Certified Mail # 7015 0640 0004 4231 7783**

Payette National Forest  
Keith Lannom, Forest Supervisor  
500 North Mission Street Building 2  
McCall, Idaho 83638

**RE:COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED MIDDLE FORK WEISER RIVER LANDSCAPE RESTORATION PROJECT, COUNCIL RANGER DISTRICT**

Hello,

Native Ecosystems Council (NEC) and the Alliance for the Wild Rockies (AWR) would like to provide the following comments and questions regarding the Draft Environmental Impact Statement for the proposed Middle Fork Weiser River Landscape Restoration Project on the Council Ranger District, Payette National Forest.

**At this time, NEC would also like to request a “hard copy” of the DEIS and its maps and appendices.**

Our issues and concerns with the DEIS include the following:

1. This project is being illegally tiered to the Wildlife Conservation Strategy Forest Plan amendment which has never been completed. This amendment cannot therefore be implemented for this Weiser River Landscape Restoration Project.
2. The DEIS is violating the NEPA because the analysis of project impacts to wildlife is being illegally tiered to the DEIS for the Wildlife Conservation Strategy Forest Plan Amendment, which has not completed the required National Environmental Policy Act (NEPA) public involvement process. All evaluations for wildlife impacts will have to be directly assessed for this project.
3. Managing for “old forest habitat” is outside of the current Forest Plan direction, and is therefore illegal.

4. The management area designations provided for in the Wildlife Conservation Strategy Forest Plan amendment cannot be applied to this project, as this amendment has never been completed.
5. The purpose of this project, to restore wildlife habitat, is a violation of the NEPA and the NFMA because the DEIS does not cite any scientific evidence that any wildlife species will be “restored” with the proposed logging and burning.
6. The DEIS is completely lacking in addressing the vast body of science that demonstrates that the proposed actions will be highly detrimental to wildlife, including management indicator species the white-headed and pileated woodpeckers, and sensitive species as the flammulated and boreal owls, the goshawk and great gray owl, the three-toed woodpecker, and the fisher. The project will also be detrimental to all old growth forest songbirds, and songbirds that require dense, undisturbed forest habitats. The project will also be detrimental to over 25% of forest birds that require snag habitat for nesting and foraging. All these severe adverse impacts have been completely ignored in the DEIS, in violation of the NEPA and the NFMA. It is not clear why the agency expects the public to provide this information.
7. The agency needs to include a valid alternative that would actually meet one purpose of the project, to restore wildlife habitat. This would involve just eliminating roads, firewood harvest, as well as addressing and correcting all water quality and fisheries issues.
8. The DEIS does not demonstrate specifically why the illegal definition of old growth forests as “old forest habitat” will meet habitat needs for wildlife. If this is going to be called “restoration logging” the wildlife species that will now use this logged forest need to be identified based on the current best science. Unless there is published, peer-reviewed science that shows that thinned, logged old forest is needed for certain wildlife species, these claims should not be made in the DEIS.
9. There is a considerable body of published science, and/or established wildlife management recommendations developed by researchers, that indicate moderate to extensive degradation of older forest habitat with thinning. There is no mention of any of this science in the DEIS. How can this provide the public with a reasonable assessment of project impacts when no information is provided on expected detrimental impacts?
10. What current management recommendations developed by wildlife researchers are being applied for the proposed restoration projects?

This information was never provided in the DEIS. For example, habitat needs of the white-headed woodpecker are available, but were not used in the DEIS. There are habitat recommendations as well for the goshawk, northern flying squirrel, fisher, pine marten, lynx, three-toed woodpecker, pileated woodpecker, cavity nesting birds, birds associated with older, undisturbed forest habitat, elk habitat effectiveness, and elk security. Why isn't this information used for the analysis of project impacts and effectiveness of project design on wildlife?

11. The DEIS failed to include an action alternative that implements the current Forest Plan for old growth.
12. There is no valid survey for old growth in the DEIS, or identification of "recruitment old growth."
13. Please address how restoration of wildlife habitat and control of insects and disease can be included as the same purpose and need for this project. Insects and disease are critical ecosystem functions for almost all wildlife species, either in providing direct habitat, or creating prey for other species. Restoring wildlife habitat and controlling insects and disease cannot be included in the same project, so the agency needs to define the purpose and need as one or the other, not both. The purpose/need contradicts each other.
14. The DEIS does not identify what the current level of snag habitat and size is within all proposed treatment units. How can snag management occur without any snag surveys?
15. The DEIS does not apply the current best science for cavity-nesting wildlife and woodpeckers. This science demonstrates that simply providing snags in harvest units will not maintain these species. They require high snag densities within forested habitat where the canopy cover is quite high. Use of outdated science as mitigation for wildlife is a NEPA violation, because the agency cannot demonstrate that the snag strategy has worked in the past (no woodpecker surveys) or that it will work in the future. No monitoring results for woodpeckers was ever provided in regard to past management actions.
16. The DEIS also completely ignored an analysis as to how forest thinning will maintain snag densities through time. The DEIS in fact fails to identify a severe impact of forest thinning and/or forest regeneration, that snag habitat will generally be severely reduce and/or eliminated for 100 plus years. This failure of a huge NEPA and NMFA violation, as the agency has failed to take a "hard look" as

- well as to disclose to the public the actual known impacts of the project on wildlife dependent upon snags.
17. There is no analysis of how all the proposed prescribed burning will impact large logs. Why is removal of significant amounts of this coarse woody debris needed for wildlife? The DEIS needs to come clean with the public and explain that this burning is being done to remove logging slash (no benefit to wildlife) and to create a seed bed for the regeneration of a new crop of trees.
  18. The DEIS does not clearly explain how prescribed burning is expected to impact snags. What type of monitoring information is available on past burning and measurements of snag and downed log losses? If this information is not provided, the DEIS is merely “speculating” on burning impacts. Also, the DEIS suggests that burning will increase snags, but this is misleading, as almost all the snags to be created are very small and of no value to wildlife. This problem is never addressed in the DEIS – burning will not compensate for a loss of snags from logging.
  19. Please define specifically how the unfinished Wildlife Conservation Strategy changes the management area direction for the project area, and how these changes are related to the proposed action.
  20. The DEIS does not correctly identify habitat characteristics for elk during project activities, including habitat effectiveness and security by the current best science. This information needs to be provided to the public.
  21. The DEIS is misleading in regards to the Federal Travel Management Rule. The minimum road system (MRS) is identified for the project, not for the Forest Plan. And it does not address how the MRS included an analysis of impacts on wildlife, including elk and snag-associated wildlife, as well as fragmentation of old growth. These are forest resources that have to be included in development of a MRS. It appears that the various MRSs identified in the DEIS are based solely on timber management, not forest resources in general.
  22. The DEIS does not identify that the NEPA public involvement process has been completed for development of the Forest’s MRS. The Travel Analysis Report for the Forest was never cited as well. It therefore is unclear as to how the Forest’s MRS applies to this specific project area. Instead, it appears that the project is the basis for the MRS, instead of the Forest Plan.
  23. The level of decommissioning of roads in the DEIS needs to clarify what level of decommissioning will actually occur. These levels will

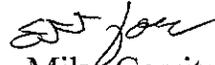
determine if future road use is planned or not. Without this information, the public is being misled about the decommissioning process, and many of these roads will likely be put in "cold storage" for future logging activity.

24. The DEIS did not identify any valid wildlife surveys for MIS or sensitive species. If key breeding/nesting areas are unknown, how can they be protected? The claims that they would be located prior to logging is a violation of the NEPA, because the public has no actual assurances that adequate surveys will be done, including survey methodologies.
25. The proposed treatments in Riparian Conservation Areas (RCAs) lacks any actual scientific documentation that these treatments will promote riparian ecosystem function, including habitat values for both fish and wildlife. For example, what wildlife species will benefit from these thinning actions? What bull trout management guidelines recommends forest thinning in RCAs?
26. What science clearly demonstrates that shaded fuel breaks will protect RCAs from future fire? What is the probability that a high intensity fire will actually burn across the proposed treatment area? Is this a reasonable probability to degrade the RCA with thinning? Why is it important to protect RCAs from fire, as well? This is never actually addressed in the DEIS.
27. The Payette National Forest has yet to reinitiate consultation with the U.S. Fish and Wildlife Service (USFWS) on bull trout critical habitat. As such, critical habitat cannot be impacted by management activities, including for the Middle Fork Weiser River Landscape Project.

Regards,



Sara Johnson, NEC  
PO Box 125  
Willow Creek, MT 59760



Mike Garrity, AWR  
PO Box 505  
Helena, MT 59624