

KVRI – Forestry Subcommittee: Westside Restoration Project Updates

Comments Received: Draft EA

- 17 comment letters received within official 30-day period
 - Letters available at: <https://www.fs.usda.gov/project/?project=56888>
Westside Restoration Project website – look under ‘Project Documents’ and the ‘Supporting’ tab
- Summary of Comments
 - Recreation
 - Convert entire section of road 432 beyond junction with 2276 to non-motorized trail and if the new trail is not needed to access Myrtle Lake, still consider storing this section.
 - Take steps to curtail illegal OHV use on Apache Ridge.
 - Signs for parking areas on Snow Creek. Make parking areas large enough to accommodate 10 28-foot cargo trailers with tow vehicles. Install double vault toilets. Parking at 5.5 mile large enough for 10 vehicles with sled decks.
 - Analyze rec opportunities accessible for all individuals, such as increased miles of designated ADA motorized trail.
 - Please locate new trailhead for Snow Falls trail #189 west and not east of the Snow Creek road and 402A junction.
 - Wildlife
 - Warming hut and OSV parking lots violate Section 7 of ESA and effects to grizzly bears, caribou, wolverine are downplayed. Take no action until approved winter travel plan.
 - Consider a different location for hut where wolverines are not known to den.
 - Proposed Kootenai Trail should be closed to mountain bike during spring bear season (April 1-June 15).
 - Request the FS drop multi-story mature from proposed harvest and final decision.
 - Did not consider wolverine denning habitat expected to decline due to climate change.
 - Please use ½ mile or greater buffer around units for the helicopter logging units in Myrtle drainage.
 - The proposed location of Two Mouth trail reroute is close to a snowchute grizzly bear foraging area – reroute further away – 500 meters or more.
 - The proposed burn near lost creek is mountain caribou late winter habitat and could violate ESA.
 - Please map and quantify forage by species for the existing condition. Map huckleberry production and changes from logging in relation to grizzly bears.
 - Require non lead bullets on federal lands, as they cause lead poisoning in carnivores feeding on ungulate gut piles. Also implement an area closure on all trapping.
 - No logging in subalpine habitat - wildlife at risk from abrupt climate change.
 - The EA does not include trails that are obviously high use in the Roman Nose and Pack River area as impacting core as required by Access Amendment.
 - The FS is allowing mountain bikes and constructing new trails in the Myrtle BMU and Pack River BORZ in violation of NFMA, the ESA and the Forest Plan.
 - The FS is proposing to add a winter snowmobile hut at Roman Nose but not implement until the Winter Rec EIS is complete, this violates NEPA, the APA, ESA, Forest Plan and NFMA.
 - Analyze how project will impact fisher and fisher habitat.
 - Failed to cite evidence that managing for old growth habitat will improve old growth species habitat over the long or short term.
 - Disclose snag densities in project area and expected snag loss from safety concerns and proposed method of log removal.
 - NEPA
 - CFLRP does not allow any new permanent roads, including the 1/3 mile of 2667UB which is proposed to be added to the system and restricted to admin use to access the warming hut.
 - The FS should not approve the warming hut and OSV parking as they violate consultation provisions of the ESA. They should only be considered as part of a separate, comprehensive winter travel management planning process.

- Using timber harvest as a measure of magnitude (as compared to other projects), and with regard to 'intensity' factors seven and nine, the FS should prepare an EIS for the Westside project.
 - We support the needed work in roadless but are disappointed commercial acres have been reduced... needed management will not get done.
 - The collaborators do not represent the diversity of opinions. The current alternative did not take into account the entire population just a limited few who support logging and roadbuilding. Toss the existing alternative for an ecological conservation alternative using proforestry practices to preserve intact forest.
 - Request for disclosure for numerous 'typical' items associated with analysis and NEPA process – disclosing comments received, cumulative effects, monitoring of past projects, results of all resources field surveys, compliance with BMPs, etc.
- Fire/Fuels
 - Mosaic fire from summer/fall burns has great benefits for wildlife
 - There is no explanation why the FS doesn't manage consistently with FP direction to accept natural processes and fire's ecological function which would do the job of 'promoting early seral tree species', if the FS wasn't continually suppressing fire and other natural processes.
 - Disclose actions on adjacent private land to reduce fuels and efficacy of proposed activities to reduce wildfire risk and severity in the future.
 - Disappointed Alt 2 was scaled back, district will not be meeting purpose and need to a high degree. So much of the project area is in the WUI and the district should be treating more acres to reduce threat of crown fire.
 - Veg
 - Remove more of conifer overstory to expand hardwoods
 - Minimize operating restrictions to increase feasibility
 - Do not enter old growth and recruitment old growth as identified in the old forest plan. Complete OG stand exams. Do not enter moist site stands that are mature. Please assign old growth stands to at least 30% in Snow Creek which is deficient in old growth. Conduct only gentle treatments in dry site old growth – hand thinning and underburning.
 - PCT will impact snowshoe hare habitat, a primary food source for sensitive fisher and endangered Canada lynx.
 - The EA doesn't demonstrate insect and disease or fire activity in the project area is unusual or uncharacteristic for this ecosystem. The FS doesn't disclose the metrics it uses to measure resiliency so that objective measures can be applied to the Westside project by others now or in the future.
 - Commenter shared research related to logging and insects and disease, also for various outcomes of fire and fuels management scenarios ('forests with higher levels of protection had lower severity values even though they are generally identified as having the highest overall levels of biomass and fuel loading').
 - The EA fails to provide explanation of the alleged need to conduct logging with "treatments... consistent with the patch size and pattern" that would naturally occur.
 - In the face of climate risk, impacts of wildfire and insect activity, and scientific research the FS must disclose the trend in post-fire regeneration failure, which the EA does not do.
 - Please reserve 25-50' buffer along private boundary which occurs between 402A road and Snow Creek Road.
 - The EA doesn't explain the criteria used for designation of 'recruitment potential old growth'. The EA does not identify the old growth type for each stand the FS would log and how much would be left of the logged old growth. Disclose current and historic levels of mature and old growth forest and method to quantify, and how much will remain after project.
 - Asked we disclose best available science for whitebark pine.
 - Roads
 - Commenter opposes all new permanent roads and temporary roads be returned to natural state immediately after project.
 - Road densities must be reduced for habitat restoration, road system to a level where it can be maintained within expected budgets. There should be an alternative that does not construct roads, including temporary, and that is in compliance with the Travel Management Rule.

- Project violates NEPA, NFMA and the Forest Plan because of recurring road closure violations. The EA does not demonstrate consistency with Road Management Objectives, Travel Management Regulations, or disclose long-term financial liabilities or impacts due to inadequate maintenance funding.
- Weeds
 - Analyze how weed population trends are and will affect the forage the FS claims to be improved by the project. Will the project exacerbate existing noxious weed infestations and start new ones?
- Botany
 - Request for FS to close off the 3 Roman Nose lakes to off-trail snowmobiling because of resource damage – subalpine larch, whitebark pine, subalpine fir, spruce. Conduct field investigations to determine damage to whitebark pine, subalpine larch, spruce and fir in project area. Do not impact the forested ridgeline on the trail to Burton Peak with burning. Establish new whitebark pine populations in suitable habitat.
 - Comments to suggest this project will impact thousands of acres of whitebark pine – damage from equipment, cutting, trampling, scorch from burning, and that ‘hundreds of acres of wbp habitat manipulation is proposed’ and no discussion of success of natural regeneration of wbp or success rate of planting, including mention of the long-term study “Restoring Whitebark Pine Ecosystems”.
- Soils
 - Disclose existing and expected detrimental disturbance for each logging unit and after any proposed mitigation, and data to support.
- Aquatics
 - Buffer all streams, especially Myrtle Creek, and avoid aerial application when treating non-native invasive plants
 - Asked to review literature cited regarding benefits of thinning and other management in riparian areas.
 - Recommend conservative design features in riparian habitats that may include expanding INFISH buffers.
 - All activities be compliant with Idaho DEQ and recommends BMPs be implemented
 - Disclose effectiveness of proposed BMPs in preventing sediment from reaching streams and BMP failures notes for past projects with similar landtypes.
- Roadless
 - FS did not consider potential effects to IRA’s and their wilderness attributes as a result of OSV use.
 - Do not log or road existing roadless, it destroys their roadless quality. Controlled burning is acceptable in some cases.
 - The FS must analyze and disclose impacts on the Roadless Characteristics and Wilderness Attributes of the roadless expanse. The project would cause irreversible and irretrievable impacts on the suitability for future consideration for Recommended Wilderness or Wilderness designation under forest planning.
- Climate
 - Asked FS review literature related to carbon sequestration and forest management.
 - Scoping notice did not mention abrupt climate change.
 - Please develop a max carbon sequestration alternative – no harvest alternative
 - Quantify all human-caused CO2 emissions for project activities and carbon sequestration for each alternative. Disclose how climate change has affected ecological conditions in the project area and under climate change scenarios.
 - The EA fails to consider the effects of climate change on the project are and how realistic desired conditions are in the context of rapidly changing climate.

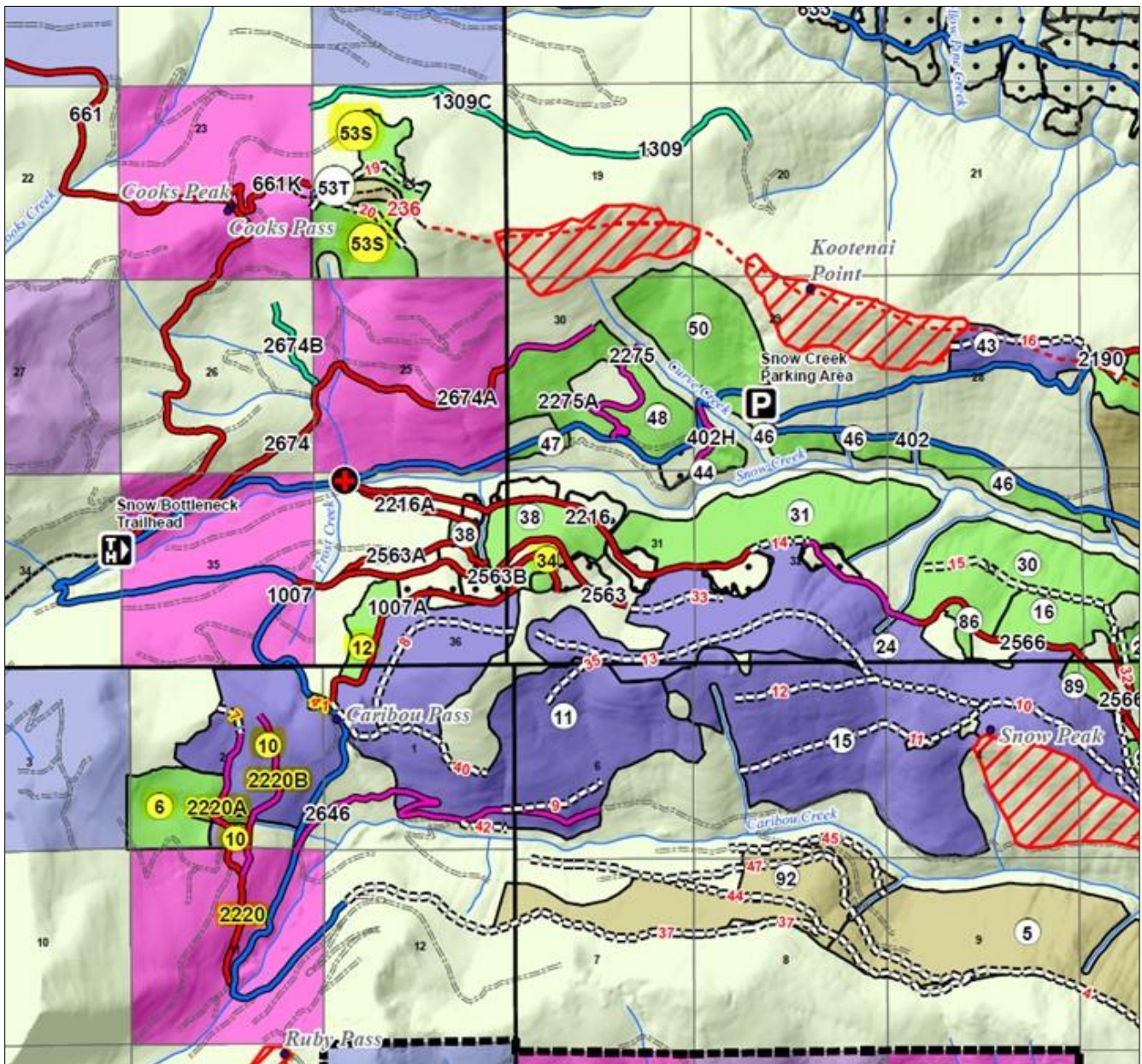
Proposed Action Updates

- **Reduced Timber Harvest**
 - Dropped all of harvest units 6, 10, 12, and 34
 - Dropped 140 acres of Unit 53S – 31 acres remaining and will be ground-based (previously cable). Now called Unit 53.
 - **Total harvest acres dropped from proposed action = 647 acres**
 - **Final proposed harvest**

Commercial Harvest Treatment	Proposed Action Acres
Intermediate Harvest	1,995
Intermediate VDT Harvest	2,368
Regeneration Harvest	2,954
Total Proposed Acres Commercial	7,317

- **Reduced Temporary Road Segments/Miles:** Dropped 2 temporary roads (no longer needed) and 0.32 miles – Temp Roads 7 and 41
- **Reduced Road Reconstruction:** 2.4 miles less proposed road reconstruction needed – Road 2220
- **Reduced Road Storage:** 1.6 miles less proposed storage – Roads 2220A and 2220B

Highlighted Roadwork and Units Dropped from Final Proposal Following Comment Period on Draft EA



Final Proposed Action

- Harvest: 7,317 acres
- Rx Burn Only: 2,538 acres
- Precommercial Thin: 1,730
- **Total Veg Treatments: 11,585 acres**

- Proposed Road Activities:

Road Treatments	Miles
Reconstruction and Maintenance	76
Temporary road construction	28
Non-System roads to be added to the NFS, Reconstructed, and Restricted to Administrative Use	0.3
System Roads Restricted to Administrative Use Reconstructed for Implementation	2.7
Storage of Open or Seasonally Open System Roads	11
Stored roads to be reconstructed, used for project, then placed back into storage	3
Non-System Roads Not Needed for Current or Future Management	22
System Road Decommissioning	1.5

- Treatment of Non-Native, Invasive Plants, 1 proposed AOP, and Recreation Opportunities – same as in Draft EA

Draft Decision

- All proposed activities anticipated to be included in Draft Decision, **except**:
 1. BLM will issue a separate decision for activities on BLM lands – activities proposed on BLM land will not be included in FS decision.
 2. Warming Hut at Roman Nose
 3. 2667UB to access warming hut (add to system, restrict to admin use)
 4. 2 Parking Areas on Snow Creek Road

Defer decision on items 2-4 until after completion of Winter Travel Plan **or** included as part of that decision.

Project Status and Timelines

- Formal Consultation USFWS: Initiated April 7, 2021
- Revised EA and Draft Decision: June 11, 2021
- Objection Period: June 11 – July 26, 2021
- Final Decision: September 24, 2021