

Mary Farnsworth
Responsible Official
Forest Supervisor
Idaho Panhandle National Forests
3815 Schreiber Way
Coeur d'Alene, ID 83815

July 19, 2013

Dear Ms. Farnsworth:

The following comments concern the Beaver Creek Draft Environmental Impact Statement (DEIS). KEA submitted an 8-page comment letter on November 3, 2012 in response to the Beaver Creek timber project scoping notice. A number of issues were identified in our letter; in particular NEPA cumulative effects regulations and best available science.

The legal notice was published in the Coeur d'Alene Press on June 11, 2013. The notice indicated the Forest Supervisor is the Responsible Official. The NOA was published on June 7, 2013. The 45 day comment period for the DEIS ends July 22, 2013.

These comments are being submitted electronically to comments-northern-idpanhandle-coeur-dalene@fs.fed.us

NEPA cumulative effects issues:

The IPNF Wallace and Fernan Ranger Districts on April 21, 1997 released the Watershed Rehabilitation Environmental Assessment (EA). Chapter 1 on page one in the purpose and need section described three flood events that occurred between November 1995 and March 1996 in the Coeur d'Alene River Basin. The following sentences are found on page one. *“The need to initiate a trend towards improvement of stream bank stability is related to the need for improvement of fisheries habitat and water quality. As a result of stream bank instability and loss of channel complexity, fisheries habitat is continuing to decline, and is not expected to improve without the implementation of the flood rehabilitation activities.”*

Carpenter Gulch is listed on page eight as one of the 12 site areas included in the Flood Rehabilitation Project Area. The discussion on page eight begins with the following sentence. *“Carpenter Gulch is a severely-degraded stream that is delivering **tremendous sediment loads** to high quality aquatic habitat of the North Fork Coeur d'Alene River.”* (Emphasis added)

On page 11 of Chapter III the following sentences are found. *“Activities such as timber harvest, splash dams, flumes, and road building have affected hillslope hydrologic and stream channel processes in much of the Coeur d'Alene River Basin. The degree to which channel function has been impaired is largely dependent on harvest intensity, hillslope location, and years since disturbance.”*

On page 14 of Chapter III the Cumulative Effects discussions concerning the proposed action includes the following statements. *“Past management practices have **severely degraded** the Coeur d'Alene River Basin. With the implementation of the rehabilitation activities, a trend toward sediment reduction would be initiated. Complete channel*

recoveries probably would not occur until all damaging hillslope and riparian road developments are treated, and the recovery of healthy, mature, and diverse riparian and hillslope vegetation occurs throughout the basin.” (Emphasis added)

Neither the Aquatics nor Silviculture sections of the DEIS mention previous USFS NEPA documents that were prepared after 1980 for large timber sales in the Beaver Creek watershed. Also, no NEPA documents are mentioned in the Hydrology report or the Silviculture report, of the previous NEPA EA’s that were written for the large timber sales that occurred after 1980.

It is not clear in the DEIS if any NEPA documents produced after 1980 for timber sales in the Beaver Creek watershed currently exist.

Three USFS NEPA documents of particular importance concerning cumulative effects analysis are the Capitol Hill EA, the 1989 Unknown Pony EA, and the 1996 IPNF Central Zone Beaver Creek Helicopter Salvage EA and DN.

If any of the three NEPA documents are missing or unavailable, the Final EIS is required to state the document(s) that do not exist, 40 CFR 1502.22.

There is extensive information throughout the Beaver Creek Helicopter Salvage EA that directly address cumulative impacts to the environment in the project area as a result of past USFS logging and road building.

On page III-6 the analysis area is listed as 12,438 acres in size with seven major drainages. Approximately 1,162 acres were to be logged with approximately 4 MMBF to be removed, EA at page II-3. In a number of units up to 65 percent of the canopy would be removed. On page II-6 it was stated, “*Currently waters in the analysis area are not fully supporting designated beneficial uses.*”

The aquatics discussions in Chapter III of the EA included statements on page III-12 concerning riparian logging in Deer Creek, and clearcutting leaving no buffer strips, page III-13. On page III-13 it was stated. “*Hillslope hydrologic recovery would be largely complete in 20 to 75 years*”

Similar statements are found in the discussions for Alder Creek, White Creek, and Scott Creek. Concerning Scott Creek, on page III-17 the following statements are found. “*Of the 31 percent riparian harvest, 50 percent is associated with clearcutting leaving no buffer strips. These figures indicated relatively high amounts of riparian harvest presently within the drainage.*”

Pages III-19 and III-20 of the EA include a discussion of the entire 28,456-acre Beaver Creek watershed. On page III-19 the following statements are made. “***Extensive timber harvest and mining exploration has occurred in the past and is ongoing at the present time. Approximately 3,800 acres of harvest has been completed or are currently under contract within the drainage. Clearcutting is the most common harvest prescription. Approximately 15 miles of new road construction was recently completed, associated with the Unknown Pony timber sale.***” (Emphasis added)

On page III-20 the following statement was made. *“The effects from timber harvest, mining, and associated road building activities **have severely impaired channel morphology.**”* (Emphasis added)

The Fisheries discussions in the EA, Chapter III, page III-23 includes the following analysis concerning the Action Alternative. *“Poor water quality would continue, resulting from the introduction of sediments and debris from road and culvert failures, and from the **on going rain-on-snow and spring peak flow increases.**”* (Emphasis added)

None of the statements cited from the Beaver Creek Helicopter Salvage EA are found in the DEIS. The aquatics and fisheries information cited from the EA do not indicate the very significant regeneration/clearcut logging activities in the 1990’s, four square miles, were distributed evenly throughout the entire Beaver Creek watershed.

Page 10 of the Silviculture Report associated with the Beaver Creek DEIS notes that over 2,500 acres of regeneration/clearcut logging occurred during the 1990’s. There is no discussion in the DEIS with specific high quality data regarding the number of clearcut units that were located on steep hillslopes in each of the drainages where the over 2,500 acres of regeneration/clearcut logging occurred.

There is no information presented in the DEIS concerning the number of acres of regeneration logging that occurred on steep slopes in each drainage that have a slope gradient 45%+.

There is no discussion in the aquatics sections of DEIS concerning the issues of one or more large clearcut units, > 40 acres, located on steep hillslopes in any of the drainages that require 75 years for complete hillslope hydrologic recovery.

The DEIS does not indicate the number of acres of regeneration logging in each Compartment in the project area that occurred after 1985.

The FEIS needs to list the number of acres of regeneration logging that has occurred after 1985 in each of the Compartments in the project area, including Compartments 183, 187,188,189, and 190.

The issue of cumulative effects and regeneration logging is a significant NEPA issue due to the large and very large new units that would result from Alternatives 2 and 3. The Table 28 located in the vegetation section of the DEIS shows a 434 acre unit that would result with Alternative 2 with another six units each over 100 acres in size. No data is given in Table 28 as to whether any unit larger than 40 acres would be located on steep hillslopes that have a slope gradient 45%+.

There is also no hillslope data in Table 28 associated with the large openings that would result from Alternative 3.

NEPA at 40 CFR 1508.27(b)(7) directly addresses the issues of cumulative effects analysis required in the Beaver Creek EIS. *“Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts”*. Due to the

highly degraded conditions in the entire watershed, it is a significant NEPA issue as to which Compartments have had the most regeneration logging and which Compartments will have the largest amount of new canopy openings with Alternative 2 and with Alternative 3.

It is also a significant issue as to which Compartment has the largest amount of regeneration logging units on steep slopes with a slope gradient 45%+.

The FEIS needs to supply high quality data concerning the number of and size of current regeneration logging units and proposed new regeneration units being located on steep slopes. Each of the Compartments in the watershed that will have new units > 40 acres need to be described and listed in the FEIS.

Additionally, among the references listed in the Hydrology Report of the Beaver Creek DEIS is the following USFS research document.

Reid, Leslie M. 1993. *Research and Cumulative Watershed Effects*. Gen. Tech. Rep. PSW-GTR-141. Albany, CA: Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture; 118 p.

The following statements found in Chapter 8 of this GTR pertain directly to the issues relating to accurate cumulative analysis in the Beaver Creek EIS. “*A cumulative effect is a change influenced by multiple, progressive, or repeated activities. Effects can accumulate through time or grow by contributions from multiple sources*”, page 93.

On page 94 of the GTR the following statements are found. “*Sediment routing is more poorly understood because methods to evaluate sediment delivery are poorly developed*” and “*Our current inability to accurately calculate rates of sediment accumulation and scour in channels as a function of sediment input and flow is of particular concern. These mechanisms are the driving force for altering channel morphology, and morphological change affects other watershed processes and frequently impacts resources.*”

The aquatics and vegetation cumulative effects analysis in the DEIS regarding previous regeneration/clearcut logging, in particular on steep slopes, does not provide sufficient information to be in full compliance with NEPA regulations at 40 CFR 1508.7, 1508.8(a) & (b), and 1508.27(a), and (b)(7).

40 CFR 1508.27(b)(10) also directly applies to an accurate cumulative effects analysis in the Beaver Creek DEIS.

“*Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.*” There are a number of streams in the project area that currently impaired due to both sediment and temperature and therefore do not meet Clean Water Act requirements and Idaho Water Quality Standards. There is a sediment TMDL in existence for the Beaver Creek watershed. TMDL regulations require there be no net increase in sediment. As has been noted, the Beaver Creek Helicopter Salvage EA indicated there are steep slopes in the Beaver Creek watershed and indicated significant regeneration logging has occurred in the watershed.

The FEIS requires accurate scientific analysis, high quality information with expert agency comments that will indicate the methods to be used with a selected Alternative that would result in no net increase of sediment into any of the impaired streams in the project area.

Best Available Science (ECA):

The hydrology report on page 13 cites a USFS Flathead NF ECA User Guide being used for ECA analysis, as well as peak flow and water yield analysis. This model apparently has been adopted from the Montana Department of Natural Resources (2002). The ECA User Guide is not listed in the Reference section of the hydrology report.

There is no discussion in the Hydrology report as to why the WATSED model is not being used for any ECA, peak flow and water yield analysis. The Coeur d'Alene River Ranger District as part of the June 2012 Red Beauty HFRA EA, used the WATSED model, pages 144 and 146. NEPA at 40 CFR 1500.1(b) requires accurate scientific analysis and the information must be high quality. NEPA at 40 CFR 1502.24 requires professional and scientific integrity in environmental impact statements.

The Final EIS is required to describe each of the features of the Flathead NF ECA model that were judged by the Coeur d'Alene River Ranger District to be superior to the WATSED model.

There also needs to be high quality information in the Final EIS that will indicate whether the ECA model being used was calibrated and updated for use in the Beaver Creek watershed.

The Final EIS needs to indicate whether coefficients associated with ECA model were added or removed in order to account for the specific landtypes found in the Beaver Creek project area.

There needs to be high quality information in Final EIS that will indicate whether the ECA model being used is capable of calculating the slope length of individual logging units.

If the ECA model was not calibrated, updated, and no coefficients were changed, this information needs to be stated in the Final EIS.

IPNF Forest Plan Standards for Water at #7 also directly concerns the model being used. The model is to be used in conjunction with field data, monitoring results, continuing research and professional judgment, page II-33 of IPNF Forest Plan, August 1987. The Final EIS needs to indicate whether there is field data, monitoring results, and research papers that indicate the ECA model being used for ECA analysis, peak flows, and water yields fully meets Water Standard #7.

Clean Water Act and Idaho WQS:

The DEIS on page seven states the streams in the project area are not in compliance with the CWA and Idaho WQS. Water quality issues that apply to the project area are cold

water aquatic life and salmonid spawning. High sediment loads are also cited on page seven. The hydrology report on page five states streams in the project area are impaired for sediment, temperature, cadmium, lead, and zinc and therefore are not in compliance with the CWA and Idaho WQS.

The DEIS on page 43 indicates both Alternative 2 and Alternative 3 would be in compliance with both the CWA and Idaho WQS.

The Final EIS needs to clarify whether the characteristics of soil depths, slope gradients, and slope positions in each the areas where new logging units would be placed will not lead to releases of sediment into any of the CWA and Idaho WQS impaired streams.

Fire issues:

The Fire section of the DEIS mentions models and procedures being used that include FRCC, Landfire data, FVS-FFE, and FlamMap model. Were any other models such as ArcFuels10 used for any part of the fire behavior modeling, wildfire risks, or fuels management for the project area?

As part of the Fire analysis, the Final EIS should indicate whether a National Interagency Fire Center (NIFC) three page Wildland Fire Statistics report dated 9/20/02 is included as part of the official record for the Beaver Creek project. This report was located at <http://www.nifc.gov/stats/wildlandfirestats.html> On page two of this report the historical record goes back to 1919. The average acres burned in the 1920's and 1930's shows the acres burned during those time periods were significantly greater than in more recent years.

Fisheries/Forest Plan monitoring:

The Final EIS should include information that indicate the degree of fisheries monitoring in the not properly functioning streams and/or functioning at risk streams that occurred after 1996. If the monitoring activities included analysis of bedload movement, reductions in pool volume, and reductions in pool frequency, the monitoring data should be included as part of the official record if it currently exists.

If there is no fisheries monitoring data relating to bedload movement, reductions in pool volume and reductions in pool frequency, the Final EIS needs to state this information does not exist.

We wish to remain on the mailing list for this project.

Sincerely,

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