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## United States Senate

COMMITTEE ON  
ENERGY AND NATURAL RESOURCES

WASHINGTON, D.C. 20510

MICHAEL D. HATHAWAY, STAFF DIRECTOR  
CHARLES A. TRABANDT, CHIEF COUNSEL  
D. MICHAEL HARVEY, CHIEF COUNSEL FOR THE MINORITY

May 2, 1984

Dr. Lewis Nelson, Jr., President  
The Wildlife Society  
Idaho Chapter  
10658 Winterhawk  
Boise, Idaho 83705

Dear Lew:

I talked to Mike Field, in Senator McClure's Pocatello District Office, some time ago regarding your inquiry on the Targhee National Forest. Mr. Field has been up to the Targhee National Forest and had a chance to do some checking into the matter.

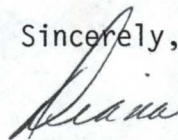
Mr. Field said that your letter, dated March 12, 1982, was logged in and the record indicates that it was acknowledged by return mail. They also show a letter logged in on November 7, 1983, and show that it was answered on November 8. Mr. John Burns says that a detailed response to the initial letter will be provided at the time the Final Environmental Impact Statement is issued.

If, for any reason, you did not receive the above mentioned letters, we could obtain a copy for you. If this doesn't answer your question, please let me know what further assistance we can provide you.

I had a chance to attend the Project WILD workshop that was held here in Boise. It was very informative - and thoroughly enjoyable. I hope to have a chance to do the extended workshop at some future time.

Hope to see you soon.

Sincerely,



Diana Hunsucker  
Boise District Assistant  
Senator James A. McClure

DH:dj

28 February 1984

Ms. Diana Hunsucker  
District Assistant to  
Senator Jim McClure  
304 N. 8th Street  
Room 434  
Boise, ID 83702

Dear Ms. Hunsucker:

Enclosed is some correspondence that Senator McClure may be interested in reviewing. Although the Idaho Chapter of The Wildlife Society provided public input on these matters to Mr. John Burns of the Targhee National Forest, we have not received a response of any kind. The letter of November 2, 1983, was also ignored.

Since this correspondence represents public input, it is our feeling that it should be acknowledged and included in the revised environmental impact statement. This has not been done.

Please feel free to use this information as you see fit.

Sincerely,

Lewis Nelson, Jr., President  
Idaho Chapter, The Wildlife Society

LN:jd

Enc.

November 2, 1983

Mr. John Burns  
Targhee National Forest  
Post Office Box 208  
St. Anthony, ID 83445

Dear Mr. Burns:

Enclosed is a copy of the March 12, 1982, letter we wrote concerning the Proposed Land Management Plan (LMP), Draft Environmental Impact Statement (DEIS), and Briefing Guide #4 (BG). To date we have not received a formal reply and the letter was apparently omitted from the DEIS. I am writing once again to request that our correspondence be answered.

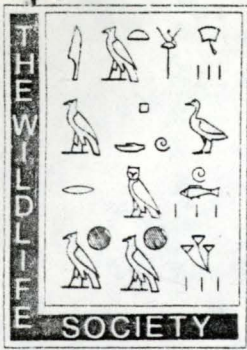
Thank you for the kind help.

Sincerely,

Lewis Nelson, Jr., President  
Idaho Chapter - The Wildlife Society

LN:jp

Enclosures



IDAHO CHAPTER  
**THE WILDLIFE SOCIETY**

NATIONAL HEADQUARTERS  
SUITE 611  
7101 WISCONSIN AVE. N.W.  
WASHINGTON, D.C. 20014

10658 Winterhawk  
Boise, Idaho 83705  
March 12, 1982

Mr. John Burns  
Targhee National Forest  
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St. Anthony, Idaho 83445

Dear Mr. Burns:

On behalf of the many professional wildlife scientists in our Chapter, thank you for the opportunity to review and comment on your Proposed Land Management Plan (LMP), Draft Environmental Impact Statement (DEIS), and Briefing Guide #4 (BG). Because of the plan's complexity, it was difficult to adequately review although many biologists worked on it. We're sure we've missed several points. Our comments follow:

Briefing Guide - What does it accomplish?

The BG is vague and misleading. It does not present layman with a clear picture of the plan's potential impacts or the tradeoffs involved. For example, the guide implies that no one will have to give up any values and everyone will benefit, which is not true. Unfortunately, most people would tend to rely on the BG rather than wade through the plan. Unless this document is thoroughly revised to present a programatic, concise summary of your proposed action, it should be discontinued.

Maps - Nice job.

The maps have some errors, but the main significance of them to wildlife is certain restrictions or constraints are referred to in the plan, the maps show where the restrictions will be imposed. For instance, in referring to "calving areas", certain forage/cover ratios are supposed to be maintained. We suspect that if an area is not specifically designated as a "calving area" the restricting of timber cuts, road building, etc. will be ignored. Will you give us assurances that positive and prescribed wildlife practices will be carried out on all of the forest and not just on special mapped zones?

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The DEIS is a real puzzle. You do an admirable job describing the several alternatives. However, you don't explicitly say why you chose Alternative "C" as the proposed plan of action. What was your rationale?

Members of the public, at one of your public workshops, developed alternative E. It is described on pages 35 and 36. It would appear that the public has a greater feel of sensitivity to soil, water, wildlife, and other natural resources than the Forest's planning folks. We fail to see why the Forest Service would not adopt this alternative. Please review your table II-15 (page 48). Compare alternatives C and E. Wood fiber production is basically the same (97 vs 100) and range production is relatively close (170 vs 155). Elk (your only indicator species for the DEIS???) carrying capacity is greatly improved while old growth is increased (money in the bank). Recreation and roading is generally unchanged. Water standards are slightly reduced and most important, net worth is the same.

Explain to us why you did not choose alternative E as the preferred action? What was your rationale for choosing alternative C?

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Proposed Land Management Plan - How to snowball the public!

Most concerns of biologists stem from the basic direction of the plan - harvest the lodgepole before it dies because of pine beetle infestations. The assumption is that all the lodgepole will die and that it must be harvested within the next 10 years, even at the risk of degrading some other resources.

In order to achieve the above goal, some lodgepole areas will have the clearcut size limit enlarged to 100 acres with no limit on clearcut width. In one management area (#10, LMP p. 284), lodgepole stands adjacent to clearcuts can be harvested as soon as the earlier clearcuts are planted. In all other management areas, clearcuts are no longer considered openings when regeneration reaches an average of 5 feet tall with minimum stocking of 200 trees per acre (LMP p. 121, 7i). Thus, in some areas, recent clearcuts and trees 5 feet tall would cover several hundred acres with no interspersed cover.

With wildlife rated by the public as a greater concern than sawtimber (firewood was about equal with wildlife), the proposed timber harvest levels cannot be justified. Your plan (alternative C) has to be evaluated from the basic premise that all the lodgepole will be harvested in the next 10 years. If that is accepted, clearcut size, leave strips, cover/forage ratios all go out the window.

Cover values, even in important grizzly bear habitat, appear to take a back seat to deficit timber sales. You justify this as only a short term habitat loss, but this is not the case. You are turning the forest into one age class of timber - a 0 to 15 year spread. The plan has no mention of diversity, both in age classes and within stands. Without managing for within stand diversity, you can never have high quality elk cover, or very good non-game species habitat. Even aged lodgepole stands are sterile habitats. You have not dealt with a range of cover needs, or habitat effectiveness of cover in relation to roads. Road density, even in grizzly Situation 1 areas, is staggering! You should set some goal of maximum road density for habitat effectiveness. Research is showing now that 40% cover is not adequate to provide much recreational hunting opportunity. Hunting seasons have to be cut way back, or permits reduced when cover levels are low.

Your timber-wildlife coordination guidelines are really only to benefit timber, i.e., 100 acre clear cuts, no 600 foot minimum buffer strip unless its convenient, clear cutting adjacent to other clear cuts following nothing more than seedling establishment! Is Douglas fir being over harvested? We understand that you are logging almost every stand with little provision for leaving any old growth. You say old growth will be 3%, but unless this is selected soon, there won't be any left. Three % of a section is 20 acres. The Gallatin N.F. has a minimum goal of 10% old growth. Also your method of managing Douglas fir is even age. These stands will be changed from very structurally diverse ones to a simple even age stand. It will take hundreds of years to replace these again. A better explanation of old growth timber management is needed.

Another point of concern is your allocation of range forage. The Targhee has an extensive over grazing problem. Your method of dealing with forage allocation to wildlife is inadequate. It appears that wildlife will get about 18% of the total AUMs.

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LMP Pg. 58 Left Column, 5a - "large scale vegetative manipulation must be limited". "Limited" to what? This plan proposes to have large clearcuts. We recommend they be limited to 40 acres

- g. You are actually planning for inadequate cover in some areas.
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LMP Pg. 64 5 (at bottom of page) - Points out conflict with grizzly (see LMP pg. 54). The Grizzly should have priority. Will it?

LMP Pg. 71 a, 2, 7, & 8 - These items in particular will affect wildlife. Commerical firewood operations are increasing and the type (quality) of logger who uses these kinds of sales is not professional. Trying to administer alot of operations such as these will be very difficult and time consuming. By "increasing to meet demands" you may find yourselves over committed (so many contracts that you won't be able to properly administer them). The No. 1 problem for wildlife is the increased access that will result from this increased timber harvest. Some wildlife might be able to make it with the proposed cover reductions but not when coupled with the additional roads and access.

9 & 10 - Clearcutting Douglas fir (DF) has been a very poor silvicultural prescription for inland DF. What you do now is clearcut DF, then replant with lodgepole - i.e., a type conversion from a very productive covertype (DF) to a much poorer one (LP). All this really does is fulfill your mandate to "regenerate cutover areas within 5 years".

LMP Pg. 73 Table #24 - Under current (Projection Category). You show a marked increase in DF production in 1991. We are really concerned about this. As soon as the lodgepole salvage is over, we believe Douglas fir habitats are going to catch holy hell. With this plan the future for DF stands really looks bleak.

LMP Pg. 74 5.b - Do you really believe this statement? Eighty or ninety years from now you'll have an even aged (15 year spand) lodgepole stand and the pine bark beetle again.

LMP Pg. 119 left column 3rd para. - Again, a referral to the potential impacts of timber harvest on hunting opportunity. A major concern is that the average reviewer will not be able to find or decipher this statement unless they are familiar with the situation.

B3 - "except where exceptions are noted ... salvage." This is notable exception. There are 21 management areas - except for a few, they are all excepted.

B6 - Your 3% old growth figure here does not agree with your old growth figures on page 57 a(1) i.e., (6%). Also, would this be a total management for 9% old growth (3% plus 6%)? Page 556 calls for 3% plus 3% for replacement. It appears that at any given time, only 3% old growth would be available on the forest after initial logging. Three percent old growth is too low; for wildlife consideration you should manage for at least 8-10% old growth.

LMP Pg. 121. Under 7b - "these ratios may be modified"; another exclusion statement. This is so conditional that any "forester" could justify not doing any habitat work for wildlife. A much stronger committment must be shown for wildlife resources. What is the size (acreage) of your analysis area for the 40/60 habitat ratio?



i. - This statement says that cover is characterized as being 5 ft. high with a minimum stocking of 200 trees/acre. This one statement undermines the whole cover/forage ratio concept. This definition of cover has absolutely no backing in any wildlife scientific literature that we know of. The accepted definition of cover is "conifer vegetation capable of hiding 90% of an elk at 200 feet"! Explain your reasoning for paragraph i.

LMP Pg. 125 c. 3 - Are you subsidizing deficit sales through road construction with taxpayers funds? Justify!

LMP Pg. 204 item d - First exception to 40 acres clear cut.

LMP Pg. 207 B - Clearcut exception again.

LMP Pg. 235 (Area 6) - This page contains exceptions that are common to almost all lodgepole habitats. Leave strips are taken out before adjacent cover is developed!

D. - Excepts the 600' buffer strip requirements. Also, most leave strips from earlier sales are 600', so they can be cut out too. Most lodgepole stands will approach a 75% mortality, and in certain cases they do provide cover (sometimes they are the only cover). This clause precludes any chance of saving cover or at least maintaining it until adjacent cover develops.

E. - 40 acre clearcut excepted to 100 acres.

In Paragraph E you are saying that 100 acre clearcuts are permissible in Situation 1 grizzly habitat - remember that's where grizzlies come first. Please have your planners review the literature for the beneficial effects of 100 acre clearcuts for grizzlies and wildlife in general. If you proceed and allow 100 clearcuts in situation 1 grizzly habitat, you fail to follow the Interagency Yellowstone Ecosystem Grizzly Management Guideline for timber management. How do you justify this departure? In looking at lodgepole treatment, think about species such as marten and the Forest's small mammal prey base. The 100% scarification of clearcuts and piling and burning of all slash will pretty much eliminate small mammal habitat. This is especially so since you're dealing with big tracts of land. The Marten populations have already been pushed into existing leave strips and over the next 60 years their only possible habitat will be in spruce/fir (subalpine) zones along riparian areas.

F. A really nice one here! Summer range and calving areas often overlap each other. This exception excepts the exception in E. Explanation as we understand it -- in E you could have 100 acres clearcuts if cover (600') can be left around them. Under F, the leave strip can be taken out after planting or certification of natural regeneration. Planting

is usually done with 2 year old stock and natural regeneration is certified after 3 years. This means you have "trees" 6"-8" tall! Now - take a 3000-5000 acre area of lodgepole, apply these guidelines and see what size clearcut you can come up with. Analyze this area over an 80 year rotation and determine what wildlife diversity you have! This does not spell out a good or even "moderate" impact as your plan says on wildlife. What has happened to the biological concept of "edge effect"? Your Forest has lost it. Please justify and provide rationale for this prescription. Remember, the public rated wildlife concerns ahead of timber production!

- Pg. 251 Management Area 8 - Fish and wildlife in green box - will not attain "optimum habitat conditions" on 20% of the area. This will be a severe wildlife impact on this area.
- Pg. 272 Green box under wildlife and fish. "habitat conditions not achieved on 80% of area." Wildlife is taking it in the shorts again!
- Pg. 277 C, D, E, F repeated exceptions. (and in the shorts again)
- Pg. 321 Area 12 - Since this area is 100% situation 1 grizzly habitat, explain to us how you justify paragraphs D and E! Do paragraphs D and E comply with the Yellowstone Grizzly guidelines? Since this would affect grizzly bears, have you considered Section 7 consultation according to the Endangered Species Act, as amended?
- Pg. 322 - Does paragraph I take precedent over paragraphs D and E on page 321? Please clarify.

para. J - Tree planting should be included in the activities excluded during this time period.

Summary - It's time to replan.

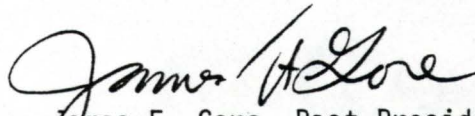
In several places of the text you state that you will provide and protect wildlife habitat. However a review of the specific management area directions reveals just the opposite. For example, see area management direction for unit 10 on page 293. Implementation of practices in paragraphs C, D, and E would seriously degrade wildlife habitat. These exceptions for your general "Goody-Goody" management directions are found in most of the other specific area directions. We're afraid your credibility has been blown.

The general feeling we have about the plan is that it was developed with a bias toward districts with the greatest pine beetle infestations. Guidelines developed for those districts were applied to others which did not have as heavy an infestation. Departures from the 40 acre clearcut guideline should be the exception only in the more highly infested districts.

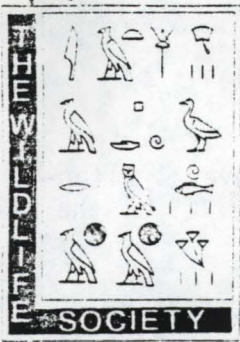
We believe the general public will not realize the impacts that timber salvage sales will have on wildlife habitat. In the early public involvement stage, wildlife was as or more important an issue than timber, as rated by the public. This concern by the public for wildlife was not really emphasized in the management area direction of the plan. We would like to see the final plan oriented more toward what the public wants i.e., more attention to the wildlife resources. We may seek an appeal of the final plan if wildlife habitat management practices are not improved.

Sincerely yours,

Dr. Lewis Nelson, Jr. Phd.  
President, Idaho Chapter



James F. Gore, Past President  
Idaho Chapter



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**THE WILDLIFE SOCIETY**

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LMP Pg. 64 5 (at bottom of page) - Points out conflict with grizzly (see LMP pg. 54). The Grizzly should have priority. Will it?

LMP Pg. 71 a, 2, 7, & 8 - These items in particular will affect wildlife. Commerical firewood operations are increasing and the type (quality) of logger who uses these kinds of sales is not professional. Trying to administer alot of operations such as these will be very difficult and time consuming. By "increasing to meet demands" you may find yourselves over committed (so many contracts that you won't be able to properly administer them). The No. 1 problem for wildlife is the increased access that will result from this increased timber harvest. Some wildlife might be able to make it with the proposed cover reductions but not when coupled with the additional roads and access.

9 & 10 - Clearcutting Douglas fir (DF) has been a very poor sivil-cultural prescription for inland DF. What you do now is clearcut DF, then replant with lodgepole - i.e., a type conversion from a very productive covertime (DF) to a much poorer one (LP). All this really does is fulfill your mandate to "regenerate cutover areas within 5 years".

LMP Pg. 73 Table #24 - Under current (Projection Category). You show a marked increase in DF production in 1991. We are really concerned about this. As soon as the lodgepole salvage is over, we believe Douglas fir habitats are going to catch holy hell. With this plan the future for DF stands really looks bleak.

LMP Pg. 74 5.b - Do you really believe this statement? Eighty or ninety years from now you'll have an even aged (15 year spand) lodgepole stand and the pine bark beetle again.

LMP Pg. 119 left column 3rd para. - Again, a referral to the potential impacts of timber harvest on hunting opportunity. A major concern is that the average reviewer will not be able to find or decipher this statement unless they are familiar with the situation.

B3 - "except where exceptions are noted ... salvage." This is notable exception. There are 21 management areas - except for a few, they are all excepted.

B6 - Your 3% old growth figure here does not agree with your old growth figures on page 57 a(1) i.e., (6%). Also, would this be a total management for 9% old growth (3% plus 6%)? Page 556 calls for 3% plus 3% for replacement. It appears that at any given time, only 3% old growth would be available on the forest after initial logging. Three percent old growth is too low; for wildlife consideration you should manage for at least 8-10% old growth.

LMP Pg. 121. Under 7b - "these ratios may be modified"; another exclusion statement. This is so conditional that any "forester" could justify not doing any habitat work for wildlife. A much stronger committment must be shown for wildlife resources. What is the size (acreage) of your analysis area for the 40/60 habitat ratio?



i. - This statement says that cover is characterized as being 5 ft. high with a minimum stocking of 200 trees/acre. This one statement undermines the whole cover/forage ratio concept. This definition of cover has absolutely no backing in any wildlife scientific literature that we know of. The accepted definition of cover is "conifer vegetation capable of hiding 90% of an elk at 200 feet"! Explain your reasoning for paragraph i.

LMP Pg. 125 c. 3 - Are you subsidizing deficit sales through road construction with taxpayers funds? Justify!

LMP Pg. 204 item d - First exception to 40 acres clear cut.

LMP Pg. 207 B - Clearcut exception again.

LMP Pg. 235 (Area 6) - This page contains exceptions that are common to almost all lodgepole habitats. Leave strips are taken out before adjacent cover is developed!

D. - Excepts the 600' buffer strip requirements. Also, most leave strips from earlier sales are 600', so they can be cut out too. Most lodgepole stands will approach a 75% mortality, and in certain cases they do provide cover (sometimes they are the only cover). This clause precludes any chance of saving cover or at least maintaining it until adjacent cover develops.

E. - 40 acre clearcut excepted to 100 acres.

In Paragraph E you are saying that 100 acre clearcuts are permissible in Situation 1 grizzly habitat - remember that's where grizzlies come first. Please have your planners review the literature for the beneficial effects of 100 acre clearcuts for grizzlies and wildlife in general. If you proceed and allow 100 clearcuts in situation 1 grizzly habitat, you fail to follow the Interagency Yellowstone Ecosystem Grizzly Management Guideline for timber management. How do you justify this departure? In looking at lodgepole treatment, think about species such as marten and the Forest's small mammal prey base. The 100% scarification of clearcuts and piling and burning of all slash will pretty much eliminate small mammal habitat. This is especially so since you're dealing with big tracts of land. The Marten populations have already been pushed into existing leave strips and over the next 60 years their only possible habitat will be in spruce/fir (subalpine) zones along riparian areas.

F. A really nice one here! Summer range and calving areas often overlap each other. This exception excepts the exception in E. Explanation as we understand it -- in E you could have 100 acres clearcuts if cover (600') can be left around them. Under F, the leave strip can be taken out after planting or certification of natural regeneration. Planting

is usually done with 2 year old stock and natural regeneration is certified after 3 years. This means you have "trees" 6"-8" tall! Now - take a 3000-5000 acre area of lodgepole, apply these guidelines and see what size clearcut you can come up with. Analyze this area over an 80 year rotation and determine what wildlife diversity you have! This does not spell out a good or even "moderate" impact as your plan says on wildlife. What has happened to the biological concept of "edge effect"? Your Forest has lost it. Please justify and provide rational for this prescription. Remember, the public rated wildlife concerns ahead of timber production!

- Pg. 251 Management Area 8 - Fish and wildlife in green box - will not attain "optimum habitat conditions" on 20% of the area. This will be a severe wildlife impact on this area.
- Pg. 272 Green box under wildlife and fish. "habitat condtions not achieved on 80% of area." Wildlife is taking it in the shorts again!
- Pg. 277 C, D, E, F repeated exceptions. (and in the shorts again)
- Pg. 321 Area 12 - Since this area is 100% situation 1 grizzly habitat, explain to us how you justify paragraphs D and E! Do paragraphs D and E comply with the Yellowstone Grizzly guidelines? Since this would affect grizzly bears, have you considered Section 7 consultation according to the Endangered Species Act, as amended?
- Pg. 322 - Does paragraph I take precedent over paragraphs D and E on page 321? Please clarify.

para. J - Tree planting should be included in the activities excluded during this time period.

Summary - It's time to replan.

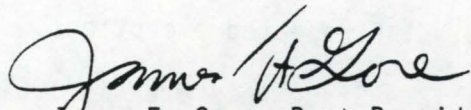
In several places of the text you state that you will provide and protect wildlife habitat. However a review of the specific management area directions reveals just the opposite. For example, see area management direction for unit 10 on page 293. Implementation of practices in paragraphs C, D, and E would seriously degrade wildlife habitat. These exceptions for your general "Goody-Goody" management directions are found in most of the other specific area directions. We're afraid your credibility has been blown.

The general feeling we have about the plan is that it was developed with a bias toward districts with the greatest pine beetle infestations. Guidelines developed for those districts were applied to others which did not have as heavy an infestation. Departures from the 40 acre clearcut guideline should be the exception only in the more highly infested districts.

We believe the general public will not realize the impacts that timber salvage sales will have on wildlife habitat. In the early public involvement stage, wildlife was as or more important an issue than timber, as rated by the public. This concern by the public for wildlife was not really emphasized in the management area direction of the plan. We would like to see the final plan oriented more toward what the public wants i.e., more attention to the wildlife resources. We may seek an appeal of the final plan if wildlife habitat management practices are not improved.

Sincerely yours,

Dr. Lewis Nelson, Jr. Phd.  
President, Idaho Chapter

  
James F. Gore, Past President  
Idaho Chapter