

# THE WILDLIFE SOCIETY

## NORTHWEST SECTION

3205 Pinehill Drive  
Coeur d'Alene, ID 83814

February 23, 1981



Regional Forester  
Northern Region  
USDA Forest Service  
Federal Building  
Missoula, MT 59807

Dear Sir:

I apologize for the delay in sending these comments on the Draft Environmental Impact Statement for the proposed Northern Region Plan, but it took longer than anticipated to consolidate reviews from our members. I hope you will still give them consideration when preparing your final draft.

In general, Wildlife Society members were disappointed in the superficial way wildlife issues were handled in the DEIS and Forest Plan. Trade-offs of wildlife for commodity resources were inadequately addressed. Population estimates and targets listed were sometimes inaccurate. The proposed program for wildlife appeared insufficient to provide the habitat needed to "maintain and improve the habitat of selected indicator species," as required by the National Forest Management Act. Specific comments and recommendations follow:

1. Significant conflicts have been documented between livestock and wildlife by researchers in many ecosystems. The Plan casually dismisses this body of research with the statement on Page 62, 2b "some individuals or groups may foresee a possible conflict between livestock and big game." We suggest that you address the range-wildlife issue in a more scientific manner and specify wildlife trade-offs that occur with increased grazing. Only rarely would any beneficial results to wetlands, riparian, big game and fish result from even well-managed livestock grazing, contrary to your statement on Page 66, second paragraph under 2a.
2. The accelerated road development program recommended in Alternative B, the preferred wood fiber alternative, would not only affect the fish and wildlife populations as mentioned on Page 89, but would significantly reduce the quality of fishing and hunting experiences.
3. We believe that Alternative B should have been selected to deal with the checkerboard ownership problem. Intermingled ownership makes road management very difficult and therefore elk habitat cannot be protected with road closures as many would desire. We take exception with your statement on Page 117 that "National Forest System lands will not be disposed when the action will: Reduce the Northern Region commercial

forest base." Since you do not make similar statements about big game winter range or quality summer habitat, you show a strong bias toward just one of the multiple resources you are equally responsible for.

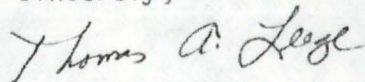
4. Under current direction, 2a, Page 125, we suggest that you expand on the forage production statement by indicating that many winter ranges have not been improved by prescribed burning because of a lack of adequate funding, and also because if they are even poorly stocked with conifers they've been set aside for timber management. The second paragraph under the physical and biological section should be eliminated since there is no indication that soil productivity and water quality have been adversely affected by the very cool burns which are typical of wildlife fires. It also is uncommon that these prescribed burns have been used too frequently on winter ranges.
5. The proposed wildlife alternative on Page 128 provides for increased coordination, but it doesn't mention the additional funding that is needed to meet the Forest Service share of state population goals shown graphically on Page 124. Region 1 should recognize that it is getting far less of the national wildlife dollars than what the value of the resource should dictate. This inequity needs to be resolved.
6. We believe the regional plan should speak more to the issue of maintaining some "old-growth" conifer habitat for wildlife. This is a controversial issue because of the conflict with timber needs, and the apparent current direction to cut the remaining old growth as fast as possible. Since the National Forest Management Act requires diversity and maintaining viable populations of all wildlife species, this issue should be addressed.
7. Alternative A, Page 150, appears to best meet the intent of NFMA regulations. If wildlife were the only consideration, we would recommend Alternative B, but because of economic realities, we can accept Alternative A. Your preferred Alternative C, since it provides for 80-acre clearcuts, would cause too much habitat to become relatively unusable for wildlife for long periods of time.
8. Your rationale for preferring Alternative B, Page 168, appears to be weak. No mention is made of the economics involved in managing such marginal lands for timber or the possible trade-offs of other valuable resources in so doing. We prefer Alternative C because roading will impact a smaller portion of the national forest and cause less habitat degradation for wildlife.
9. On Page 206, second paragraph under 1, the statement is made that "Elk herds could also increase as a result of the assigned timber program objectives." This statement is untrue since the timber objective calls for building roads into the remaining high quality elk habitat on the forests. This additional access will increase the vulnerability of elk to the hunter, and will also displace some elk from preferred habitats

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to areas where there is less disturbance. The only areas where increased timber harvest might provide some benefits to elk habitat are on certain winter ranges where the right kind of logging could increase forage needed by elk to survive the winter months.

Thank you very much for the opportunity to comment on these documents. We look forward to seeing the final plan and environmental impact statement.

Sincerely,

A handwritten signature in cursive script that reads "Thomas A. Leege".

Thomas A. Leege  
President