

**FINDING OF NO SIGNIFICANT IMPACT**  
**AVERY FUELS REDUCTION PROJECT**

United States Department of Agriculture, Forest Service  
Idaho Panhandle National Forests  
St. Joe Ranger District  
Shoshone County, Idaho

After considering the environmental effects described in the Avery Fuels Reduction Environmental Assessment (EA), I have determined that the proposed management activities will not have a significant effect on the quality of the human environment based on the context and intensity of its impacts (40 CFR 1508.27). Therefore, an environmental impact statement will not be prepared.

Charles A. Mark

CHARLES A. MARK  
District Ranger  
St. Joe Ranger District  
Idaho Panhandle National Forests  
(208)245-2531

9/17/07

Date

I base my finding on the following:

**A. Context:**

The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short and long-termed effects are relevant (40 CFR 1508.27).

The project will reduce fuels and decrease stand densities within the wildland-urban interface designated in the Shoshone County Wildland Urban Interface Fire Mitigation Plan. This will reduce the effects of future wildfire and increase the margin of safety for firefighters. It will also convert areas with off-site ponderosa pine to more resilient, native tree species; and it will improve big game browse. Approximately 3,022 acres of shrubfields will be prescribed burned north of the St. Joe River; 253 acres that have off-site ponderosa pine will be treated near the town of Avery, Idaho; and 112 acres will be thinned using commercial timber harvest in Roundhouse Gulch southwest of Avery.

The proposed action will implement project activities that are of limited scope and duration, affecting only the immediate area around the proposed treatment units. The project will be implemented over a period of three to five years and was designed to minimize environmental effects through harvest unit location, riparian buffers, logging methods, silvicultural prescriptions, and design features (EA pp. 6 and 12). The project will improve conditions within the project area, but even the benefits are not likely to be noticed outside the project area.

## **B. Intensity:**

This refers to the severity of impact. The following are considered in evaluating intensity:

### **1. Impacts that may be both beneficial and adverse:**

I considered beneficial and adverse impacts associated with Alternative C as presented in the Avery Fuels Reduction EA (pp. 8-12). These impacts are within the range of effects identified in the IPNF Forest Plan. I conclude that the specific direct, indirect, and cumulative effects of the selected alternative are not significant, and this action does not rely on beneficial effects to balance adverse environmental effects.

#### **No Effects**

Project design and design features effectively eliminated or reduced to negligible most of the potential impacts, therefore, implementation of the proposed activities will result in no effect to: water yield in the St. Joe River downstream of the project area (EA p. 51); road densities (EA p. 51); stream temperature (EA p. 52); access to fish habitat (EA p. 53); fishery potential (EA p. 55); recreational fishing opportunities (EA p. 55); heritage resources (EA p. 56); unique features and special places (EA p. 57); our ability to manage the roadless area boundaries (EA p. 57); old growth (EA pp. 62-64); species of the Aquatic, Deciduous Riparian, Peatland, and Subalpine rare plant guilds (EA p. 69); Threatened plant species *Silene spaldingii* or *Howellia aquatilis* (EA p. 69); water quality or beneficial uses (EA p. 110); Canada lynx (EA p. 118); black swift (EA p. 118); Coeur d'Alene salamander (EA p. 118); common loon (EA p. 118); fisher and marten (EA p. 118); fringed myotis (EA p. 119); harlequin duck (EA p. 119); northern goshawk (EA p. 119); peregrine falcons (EA p. 119); pygmy nuthatch (EA p. 119); Townsend's big-eared bat (EA p. 119); wolverine (EA p. 119); habitat structure used by bald eagles (potential nesting, roosting, or perching habitat within the river corridor) (EA p. 124); gray wolf populations (EA p. 127); and potential breeding habitat for western toads (EA p. 132).

#### **Beneficial Effects**

The Avery Fuels Reduction Project EA documents the following beneficial effects of implementing the proposed management activities:

- Surface fuel loads will be reduced which will reduce potential surface fire severity within treated units (EA p. 28).
- The commercial thinning will reduce the potential for a crown fire in the treated units (EA p. 30).
- The treatments will create a mosaic of vegetation with fuel interruptions that will reduce the potential for fast-spreading, high-intensity fires. Fuel mosaics can result in delayed fire spread or delayed fire build-up, reducing the risk of escaped fires. The spatial arrangement of treatments will likely disrupt the growth of a fire burning towards Avery and modify fire behavior so that fire suppression might be more effective (EA p. 30).
- The project will help develop cost-effective fire programs by making progress toward reducing potential intensities of wildfire (EA p. 28).
- Treatments would begin to trend stands away from potential fire behavior that could threaten human life and property in the project area (EA p. 28).
- Removal of off-site ponderosa pine will benefit the long-term condition of the watershed by improving the overall stand health (EA pp. 49, 107).
- Prescribed burning shrubfields will reduce the overall risk of potential detrimental effects to the stream channel conditions compared to the potential effects of wildfire if the areas were left untreated. The fuels and vegetation treatments will reduce the potential effects of severe wildfire on the watershed and allow the watershed to move towards a more natural fire regime. This will provide a long-term benefit of reducing the risk of degradation of the watershed from potential increases in runoff and sediment delivery and will also reduce potential beneficial use impairment that could result from a wildfire (EA pp. 50, 108).
- The felled off-site ponderosa pine trees will likely provide habitat for aquatic life and provide additional sediment traps if they are felled along the contour of the land. This could reduce the amount of sediment entering the streams, which will likely maintain and/or slightly improve the existing water quality and beneficial uses (EA p. 52).

- The Dunn Peak trail may be used as a fire line and may be brushed out to improve the fire line. Brushing the trail will be beneficial for the trail (EA p. 71).
- Alternative C will increase the percent of western larch and western white pine in the commercial thinning areas by removing other species (EA p. 95). In the off-site ponderosa treatment areas the representation of larch and white pine will increase as a result of planting those species.
- The health and vigor of stands will increase where off-site ponderosa is removed (EA p. 96).
- The percent of older, less palatable shrubfields will be reduced by approximately 26% (EA p. 96).
- The cumulative effects on water yield from the proposed treatments will be less than the effects on no action which would have an increased risk of higher intensity wildfire (EA p. 112).
- The increased quality and availability of the browse resulting from treating shrubfields is expected to noticeably enhance forage conditions for big game and is expected to benefit wolves by increasing the prey base (EA p. 126).
- Although ignition of prescribed fires in clumps and stringers of timber will be avoided (Design Feature 3.e.), it is expected that there will be some mortality of trees. This will improve habitat for black-backed woodpeckers by providing some fire-killed trees (EA p. 129).
- Forage conditions for elk will improve because the amount and availability of browse will increase where shrubfields and off-site pine areas are burned (EA p. 136). The thinning of stands in the Roundhouse Gulch area is expected to allow an increase in underbrush while maintaining overhead cover. This has the potential to provide slightly better habitat for elk on 112 acres (EA p. 136).

### **Potential Adverse Effects**

The Avery Fuels Reduction EA documents the following potential adverse effects from implementing Alternative C:

Air Quality (EA p. 21): Alternative C will have limited immediate adverse effects on air quality. These effects will be localized and last for a short duration. Prescribed burning will be monitored and controlled to avoid individual or cumulative violations of air quality standards (EA pp. 8 and 21).

Fisheries and Water Yield (EA pp 50, 110): The timber harvest will reduce crown cover which will decrease interception and transpiration and could increase snow pack levels, evaporation and sublimation of snow. This could potentially result in increases in soil water retention and slightly increased water yields and peak flows in Roundhouse Gulch over the short-term. However, these effects are not likely due to the retention of ground cover and the 300-foot stream buffer width, which will slow delivery and protect snow layers near the stream.

Inventoried Roadless Areas (EA p. 57): Prescribed burning on large areas within the Storm Creek Roadless Area will have a noticeable visual effect for the first one to two years after burning. Some people may view the burned areas as completely natural and others may not. At any rate, the effect will be temporary and after the flush of brush the following spring the activity will not be noticeable. Access may be restricted, and there will be noise from helicopters, trucks, and other management operations. There will be smoke from the prescribed burning. Recreation opportunities and solitude will remain unchanged except when operations are actually in progress; however, the sounds and smoke will be temporary.

Noxious Weeds (EA pp. 60-61): New weeds could possibly become established, and existing populations could expand. Ground-disturbing activities will increase the area available for weed colonization; however, design features (Design Feature 7) are expected to aid in the reduction of opportunities for weed colonization. Shrubfield burning will initially reduce cover; but shrubs will not be killed, and their extensive root systems will continue to compete with weed species.

Rare Plants (EA p. 69): Indirect effects to rare plants could result from encroachment of noxious weeds into rare plant habitat; however, ground disturbance will not occur in the immediate vicinity of any known rare plant sites.

Recreation (EA p. 71): Non-system trails may be impacted by falling debris and trees. Currently people using these trails either detour around debris or cut out the trail themselves. There would likely be more debris on these trails than there would be without the proposed activities. There may be limited access to

trails during burning activities, and there will be noise from helicopters and trucks and smoke from burning at the time these activities are implemented.

Soil Productivity (EA p. 81-86): All proposed activities are consistent with the IPNF Forest Plan soil standards. The proposed activities of helicopter logging and prescribed burning are expected to generate  $\leq 2$  percent detrimental soil impacts throughout the project area. Although yarding tops is proposed for 112 acres, retention of existing large woody debris and fine organic material is expected to meet Forest and Regional standards. Little to no effects on soil productivity and nutrient retention are anticipated with the off-site ponderosa pine treatments. Overall, the activities are expected to have a minimal effect on the productivity of and nutrients in the soils and will have little to no cumulative effect on the soil conditions since the proposal excludes ground-based activities. Alternative C does not include shrubfield burning on areas with high potential for mass failure, so it complies with the INFS standard to buffer landslide-prone areas.

Watershed Resources (EA pp. 109, 112): Stream channels are unlikely to be adversely affected by minor, short-term predicted water and sediment yield increases. In-stream effects from the potential small increases in water yields and peak flows are expected to be inconsequential.

Snag/Cavity Habitat (EA p. 120): The project will meet Forest Plan goals and objectives for snag and cavity habitat, and Forest Plan standards will be met or exceeded. Some cavity habitat in the form of snags will be lost due to prescribed burning in shrubfields with some trees. Some snags may also be cut for safety reasons in the commercial thin units. However, the potential impacts on snags and down wood are alleviated by a number of factors (see EA p. 120).

Wildlife Disturbance/Access (EA p. 122): Post-sale conditions for wildlife related to access (i.e. fragmentation, security, vulnerability) will not be changed from the existing condition, but the gate on Road 3465 will be open to access the commercial thin units and allow for its use as the log landing. This will be a temporary increase in open road density for the duration of the timber sale activity.

Connectivity (EA p. 123): Opportunities for wildlife movement and travel will be maintained, and the proposed activities are expected to have little effect on identified travel ways.

Bald Eagle (EA p. 124): The proposed activities may affect but are not likely to adversely affect bald eagles because of the scope and location of the project and the short-term, intermittent nature of the disturbance. The helicopter flights crossing the St. Joe River for shrubfield burning and commercial thinning are the only disturbance with the potential to directly affect bald eagles. It is expected that temporary displacement and avoidance of the immediate area during the times of helicopter activity will be the main effect on eagles. The overlap between occasional eagle use of the area and the sporadic, short-term helicopter flights will be infrequent, so this disturbance is unlikely to have an adverse effect on the continued use of the area by eagles.

Gray Wolf (EA pp. 126-127): The proposed project is not likely to jeopardize the continued existence of the species or result in destruction or adverse modification of proposed critical habitat. With the project spread out over a three- to five-year period, the area of disturbance at any one time will be a small percentage of the project area and an even smaller fraction of the wolves' territories. For a highly mobile species such as wolves, avoiding the areas and times of disturbance from all phases of project implementation will not have any consequential impacts. The potential displacement of big game or change in elk use will be negligible and will not affect potential elk use or wolf prey base populations. Any effect will be localized, minor, and will not affect species occurrence or populations at a landscape level.

Black-Backed Woodpecker (EA p. 129): The proposed activities may impact individuals or habitat, but will not likely contribute to a trend towards federal listing or cause a loss of viability to the population or species. Proposed activities will reduce habitat quality in places and increase it in other places. With the amount of suitable mature forest and off-site ponderosa pine habitat remaining, it is not anticipated that any proposed federal action will contribute to adverse impacts on black-backed woodpecker populations within the project area or at a landscape level. Sufficient habitat will be maintained for black-backed woodpeckers to persist at current levels. The off-site ponderosa pine treatment will eliminate the pine that is the major component of this higher quality suitable habitat. Remaining trees of other species and existing pine snags will still provide habitat, although it will be of lower quality.

Flammulated Owl (EA p. 131): The proposed activities may impact individuals or habitat, but will not likely contribute to a trend towards federal listing or cause a loss of viability to the population or species. Stands will not have their condition changed with regard to owl habitat needs, so there should be no

direct effects on flammulated owls. Temporary displacement of owls during activities is the only potential indirect effect that may occur. A portion of one of the shrubfield burn stands in the Avery analysis area is adjacent to the base of one of the potentially suitable nest stands. If this stand is occupied it is possible that some smoke from the burn or the helicopter noise could disturb owls.

Western Toads (EA p. 132): The impacts from proposed federal actions under this alternative will not contribute appreciably to existing impacts and will not affect population viability. The protection of potential breeding habitat along streams and only minor changes to timbered habitat toads may use, coupled with the low probability of western toad presence mean the activities may impact individuals or habitat, but will not likely contribute to a trend towards Federal listing or cause a loss of viability to the population or species.

Pileated Woodpecker (EA p. 134): The activities will not likely result in appreciable adverse habitat modification or a perceptible change in populations of pileated woodpeckers. No treatment of any mature timber stands that constitute suitable pileated woodpecker nesting habitat is proposed. All the proposed harvest units are commercial thins from below of immature sawtimber size class stands. These cuts would remove the smaller trees, some of which are a component of suitable feeding habitat. Canopy cover of at least 20% would remain, and snags will be retained within the units when safely possible. These stands could still function as feeding habitat, although at a lower quality, due to the reduction in canopy closure and the removal of some of the less healthy trees. Future snags will come from the residual stands, and existing snags will also persist in the riparian buffers. The project area will retain snags at levels that have been shown to maintain viable populations of cavity dependent species. Effects on feeding habitat in shrubfield stands will be inconsequential.

Elk (EA p. 136): There will be a temporary increase in disturbance from the commercial thins and connected activity behind the gate on Road 3465. This will be a small and inconsiderable effect as the surrounding stands along with uncut timber in Roundhouse Gulch provide an adequate area for elk to displace to during logging activity.

**2. The degree to which the proposed action affects public health or safety:** The main purpose for the project is to reduce potential effect of wildfire to adjacent land owners and the communities of Avery and Hoyt Flat. Another purpose of the project is to increase the margin of safety for firefighters in case of a wildfire (EA p. 2). It is my determination that by incorporating the design features for air quality and access management (Design Features 1. and 9; EA pp. 8 and 11), the proposed action will have no significant adverse effects on public health and safety. Placing warning signs in strategic locations and having flaggers or temporary road closures during logging activity and prescribed burning activities will limit risks to the public. Conducting prescribed burning activities according to the Memorandum of Understanding established between the states of Idaho and Montana and burning only when weather and air conditions are favorable for smoke dispersal will protect air quality (EA p.21) and public health.

**3. Unique characteristics of the geographic area, such as proximity to historic or cultural resources, parklands, prime farms, wetlands, wild and scenic rivers or ecologically critical area:** The selected alternative will not impact any known cultural sites (EA p. 56). The project area does not contain any parklands, prime farmlands, wild and scenic rivers, mapped wetlands, or ecologically critical areas (EA p. 57; project file U-1). The proposed activities will not affect unique features of the Storm Creek Roadless Area or special places in Setzer Creek and Storm Creek (EA p. 57). Unmapped wetlands are relatively scarce in the project area (EA p. 132) and will not be damaged (EA p. 55).

**4. The degree to which the effects on the quality of the human environment are likely to be highly controversial:** The effects on the quality of the human environment are not likely to be highly controversial. I received several public comments through the scoping process. The majority of the comments are in support of the proposed action. Two letters from groups requested specific analysis, but did not indicate disagreement with the project (PI-18, PI-19). Professionals within the Forest Service discussed uncertainties of burning shrubfields with soil moistures that are lower than the recommended (EA pp. 80-81) and re-burning shrubfields that have already been burned (SW-20). I consider these points to be slightly controversial, but not significant enough to outweigh the need for the project. The proposed activities will reduce fuels and reduce potential effects of wildfire within the wildland-urban interface around the community of Avery. No highly-controversial or significant issues related to the human environment were identified during scoping (EA pp. 6). No significant issues were raised during the analysis process (EA pp. 6). Effects analysis was conducted using scientific literature (see

Bibliography), and the literature does not indicate that the effects of this project would be highly controversial.

**5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risk:** Shrubfield burning and off-site ponderosa treatments were done in the past in and near the project area. Monitoring was conducted on some of these areas (SW-15, SW-18a, SW-18b). Monitoring shows the projects were successful in terms of fisheries, soils and watershed. Analysis of the proposed action considered the effects of past actions, as a frame of reference in conjunction with best available science, available information, and best professional experience and judgment to estimate effects to the human environment. It is my conclusion that there are no uncertain or unique characteristics in the project area which have not been previously encountered or that would constitute an unknown risk to the human environment.

**6. The degree to which the action may establish a precedent for future actions with significant effects or presents a decision in principle about future consideration:** The selected alternative will not set a precedent for future actions with significant effects. The proposed activities are similar in nature and effects to other projects in the immediate area and are consistent with the IPNF Forest Plan. This action does not represent a decision in principle about future considerations. No future fuel reduction activities are foreseen. If additional treatments are needed in the future to reduce fuels they would be subject to additional analysis and disclosure.

**7. Whether the action is related to other actions with individual insignificant but cumulative significant impacts:** The effects of the selected alternative combined with the effects of past, present, and reasonably foreseeable actions will not have any significant cumulative effects. The selected alternative would have no effect on some resources (see #1 above) and no cumulative effects on tributary channels in the project area (EA p. 49); the St. Joe River (EA p. 49); fish populations (EA p. 50); watershed conditions (EA p. 50); water yield (EA p. 51); water quality (temperature) (EA p. 52); beneficial uses (EA p. 52); large woody debris (EA p. 53); heritage resources (EA p. 56); roadless area unique features, special places, or manageability (EA p. 57); allocated old growth or stands meeting minimum criteria for old growth (EA p. 64); recreation opportunities or trails (EA p. 71). For the following resources the proposed action may contribute to effects from past, present and reasonably foreseeable actions, but the cumulative effects would not be significant.

Air Quality (EA p. 18): Air quality will remain good until the occurrence of a major wildfire event near or down-wind of the area, after which a return to pre-existing conditions could be expected within a matter of days. Proposed prescribed burning will be monitored and controlled by airshed regulations to avoid individual or cumulative violations of air quality standards. Other reasonably foreseeable future activities will have no effect on air quality.

Noxious Weeds (EA p. 61): Activities associated with this project may contribute to a net increase in weed populations within the project area. Alternative C will have less ground disturbance than Alternative B, so it will provide less opportunity for increases in weeds. Past activities have likely contributed to the presence of noxious weeds in the area. Reasonably foreseeable activities will consist primarily of public access and recreation along with trail and road maintenance. Ground disturbance associated with these activities is expected to be small in scale and short in duration. Design Feature 7 will limit the spread of weed seed and establishment of new populations, but they cannot fully prevent expansion of weed populations. The proposed activities will meet the intent stated in the Forest Plan for moderate weed control through the implementation of design features (Design Feature 7; EA pp. 10-11).

Rare Plants (EA p. 69): Past activities have likely affected rare plant habitat. Cumulatively, the effects resulting from all activities within the project area will not have a negative effect on rare plants or their habitats. Project activities will not occur in areas with rare plants. Field surveys show most of the potential habitat within proposed activity areas is poor to marginal at best. None of the reasonably foreseeable activities is expected to result in the degree of ground disturbance that would imperil rare plant populations.

Soils (EA pp. 80-86): Overall, the proposed activities of helicopter logging and prescribed burning are expected to generate  $\leq 2\%$  soil impacts throughout the project area. The potential 2% impact, in addition to the current condition and reasonably foreseeable future impacts will have minimal cumulative detrimental soil impacts and is in accordance with both Forest and Regional standards. Proposed

activities, in addition to the current condition and reasonably foreseeable future effects, will have a minimal cumulative effects on soil productivity and nutrients. There likely will be localized, short-term, small increases in erosion and sediment delivery following the prescribed burns and essentially no effect from the off-site ponderosa pine and commercial thinning treatments. The proposed activities will likely have little to no cumulative effect on the soil conditions since the proposal excludes ground-based activities that directly expose the soil or cause displacement. No new road construction is planned, although existing roads will continue to contribute to the overall sediment loading. Alternative C does not include shrubfield burning on landslide-prone areas, so it complies with INFS standards (F-3).

Forest Composition and Structure (EA p. 97): Cumulatively, a relatively small increase of long-lived, early-seral species (approximately 3.7%) resulting from activities is expected, and aggressive suppression of wildfires will continue. As a result, the trends in stand structure and composition related to the absence of fire will also continue. The rate of change influenced by the lack of wildfires is relatively slow, resulting in expected incremental cumulative effects on the vegetation resource over time.

Visual Quality (EA p. 101): The proposed activities with associated design features are consistent with management direction in the IPNF Forest Plan and will meet visual quality objectives.

Watershed Resources (EA pp. 108-110, 112): Overall, it is anticipated that there will be no measurable direct, indirect or cumulative effects on the watershed condition within the Avery Fuels Reduction Project Area. Stream channels within the project area are primarily transport-type and are unlikely to be adversely affected by minor, short-term predicted water and/or sediment yield increases. The cumulative effects on water yield from the proposed treatments will be less than the effects of no action, which would have an increased risk of higher intensity wildfire. The streams in the project area have resilient channel types and high transport capacities; therefore, in-stream effects from the potential small increases in water yields and peak flows due to proposed activities are expected to be inconsequential. No cumulative water yield effects are expected in the St. Joe River downstream of the project area due to the negligible effects on its tributaries.

Connectivity for Wildlife (EA p. 123): The effects of past, present, and reasonably foreseeable actions continue to affect and alter wildlife movement in and through the analysis area. Based on the deliberate lack of treatment of travel cover, as well as existing and foreseeable conditions, the area will still maintain corridors suitable for wildlife movement. Given the relatively limited potential for tree mortality through fire moving beyond its ignition area, the design features of the project, and the conscious desire to minimize impacts through alternative design, (i. e. burned buffers below timbered ridges) these activities will not have unacceptable, irreversible and irrevocable adverse impacts on connectivity. Alternative areas for movement by wildlife exist and opportunities for movement/travel will be maintained.

Bald Eagle (EA p. 125): The proposed activities may affect but are not likely to adversely affect bald eagles because of the scope and location of the project and the short-term, intermittent nature of the disturbance. Occasional administrative helicopter use from the Avery Ranger Station at Hoyt Flat is the only potential federal action that will add to disturbance along the river corridor within the project area. This activity is generally short-term in nature and limited in amount. Since nearly all helicopter use is for fire suppression and occurring mainly during summer, it is not expected there will be much overlap with this project's helicopter activity. Eagles that may be affected by this project are expected to make use of areas of undisturbed river habitat within and adjacent to the project area.

Gray Wolf (EA pp. 126-127): Proposed activities are not expected to affect species or population occurrence within the landscape. The project is not likely to jeopardize the continued existence of the species or result in destruction or adverse modification of proposed critical habitat. No reasonably foreseeable activities will impact forest vegetation within the project area. Routine road maintenance mainly along the periphery of the area and administrative site use and maintenance are known Forest Service management activities planned for the project area that will contribute to disturbance effects from the proposed activities. Effects from these activities are a part of the baseline existing conditions. The potential displacement of big game or change in elk use will be negligible and will not affect potential elk use or wolf prey base populations. Effects will be localized, minor, and will not affect species occurrence or populations at a landscape level. The project will not significantly affect the forest structure component of habitat for wolves or interrupt any linkages or connections between habitats. The project will improve forage conditions for ungulates, and therefore it is expected to have a positive impact on existing/baseline prey availability.

Black-Backed Woodpecker (EA p. 129): Alternative C may impact individuals or habitat, but will not likely contribute to a trend towards federal listing or cause a loss of viability to the population or species. It will not result in appreciable adverse habitat modification or a perceptible change in populations of black-backed woodpeckers. With the amount of suitable mature forest and off-site ponderosa pine habitat remaining, it is not anticipated that any proposed federal action will contribute to adverse impacts on black-backed woodpecker populations within the project area or at a landscape level.

Flammulated Owl (EA p. 131): The proposed activities may impact individuals or habitat, but will not likely contribute to a trend towards federal listing or cause a loss of viability to the population or species because of the lack of treatment of suitable habitat, inconsequential effects from treatment of low-quality capable habitat, and the inconsiderable potential for flammulated owls to be present in the project area. Post-activity habitat conditions for flammulated owls will be essentially unchanged from the existing condition because no suitable habitat or capable habitat of consequence is being treated. The burning of sparsely timbered shrubfield-dominated habitat will have little effect on flammulated owls. Those shrubfields with greater potential to progress to timbered stands and possibly provide habitat in the future were not included in the proposal. There are no reasonably foreseeable actions in the project area that will have an impact on flammulated owls. None of the action alternatives will result in appreciable adverse habitat modification or a perceptible change in populations of flammulated owls.

Western Toad (EA p. 132): The proposed activities may impact individuals or habitat, but will not likely contribute to a trend towards federal listing or cause a loss of viability to the population or species because of the protection of potential breeding habitat along streams, minor changes to timbered habitat toads may use, and the low probability of western toad presence. The impacts from proposed federal actions under this alternative will not contribute appreciably to existing impacts and will not affect population viability.

Pileated Woodpecker (EA p. 134): None of the alternatives will likely result in appreciable adverse habitat modification or a perceptible change in populations of pileated woodpeckers. Stands meeting minimum criteria for old growth will be maintained at existing levels, and untreated stands will continue to age and increase tree size. The trend for continuing endemic levels of tree mortality through insect and disease agents is expected to persist. The amount and quality of suitable habitat will continue to increase as immature sawtimber stands succeed and increase in tree size and snag numbers. The project area's ability to support pileated woodpeckers will improve over time. Based on the lack of treatment of suitable nesting habitat, and the inconsequential level of feeding habitat treated; the action alternatives will not adversely impact pileated woodpecker populations. The amount of mature nesting and feeding habitat remaining, the design features (i.e. snag retention levels), and prescriptions (i.e. commercial thin designation) will maintain the suitability of the project area for pileated woodpeckers. There will be no cumulative effects associated with this project or analysis areas that will jeopardize populations of pileated woodpeckers. This is based on the limited effects from this project, the maintenance of existing suitable habitat in the analysis area, the retention of existing immature sawtimber stands that will succeed to suitable habitat, and the abundance and distribution of nest site habitat and winter forage habitat across Region 1 and the IPNF (Samson 2005 pp. 65-67).

Elk (EA p. 136): There will be a temporary increase in disturbance from the commercial thins and connected activity behind the gate on Road 3465. This is considered to be a small and inconsiderable effect as the surrounding stands along with uncut timber in Roundhouse Gulch provide an adequate area for elk to displace to during logging activity. There are no known reasonably foreseeable activities that will effect elk habitat conditions. The treatment of 3,778 acres (Alternative C) (total forage stand acres) which is 32% of the analysis area, will improve forage conditions for elk for roughly the next twenty years. Approximately 63% of the existing forage habitat in the analysis area will be treated, which is expected to provide a considerable improvement in conditions for elk.

**8. The degree to which the action may adversely affect districts, sites, highway structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historic resources:** A comprehensive evaluation of heritage resources was conducted. No known sites will be impacted (EA p.56). District Ranger, Chuck Mark, consulted with representatives of the Coeur d'Alene Tribe about this project, and they expressed no concerns with the proposed action (EA p. 55). The Nez Perce Tribal Representative expressed no concerns about the proposed action (project file Vol. I PI-23).

**9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973:** This project will not significantly adversely affect Threatened or Endangered species or their habitat. The selected alternative will have no effect on grizzly bear (EA p. 117), woodland caribou (EA p. 117), Canada lynx (EA pp. 117-118), water howellia (EA p. 69), or Spalding's catchfly (EA p. 69). It will not jeopardize the continued existence of bull trout (EA p. 55). Implementation of the selected alternative is not likely to jeopardize the continued existence of gray wolf or result in destruction or adverse modification of proposed critical habitat (EA p. 217).

**10. Whether the proposed action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment:** The selected alternative meets federal, state, and local laws for air quality (EA p. 21), fisheries (EA pp. 54-55), heritage resources or cultural sites (EA p. 56), inventoried roadless areas (EA p. 57), noxious weeds (EA p.61), rare plants (EA p. 69), vegetation (EA pp. 97-98), water quality (EA p. 113), and wildlife (EA p. 136).

The proposed action is consistent with the NFMA and the Idaho Panhandle National Forests Forest Plan. This proposal does not require any Forest Plan amendments. According to 36 CFR 219.12 (Federal Register, Vol. 70, No. 3, January 5, 2005, page 1059) a final determination of suitability for timber production is made through project decisions. Proposed commercial thinning is on lands classified as suitable for timber production (EA p. 98).

**16 USC 1604(g)(3)(E) National Forest System Land and Resource Management Plans**

- (i) Timber harvest is not expected to result in irreversible damage to soil, slope, or watershed conditions (EA pp. 86, 113).
- (ii) Openings will not be created with the commercial thinning which is the only timber harvest proposed. Openings created in the off-site ponderosa treatment units will be restocked within five years (EA pp. 97-98).
- (iii) The proposed harvests will not seriously or adversely affect water conditions or fish habitat (EA pp. 55, 113).
- (iv) The proposed harvesting system is not selected primarily because it will give the greatest dollar return or the greatest unit output of timber (Purpose and Need for Action, EA pp. 2-3). The only timber harvest proposed is a commercial that will remove the smaller, less valuable trees (EA p. 7).

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- (i) Regeneration harvests are not proposed (EA p. 7-8).
- (ii) An interdisciplinary team reviewed and assessed the project. Their findings are reported in detail in the Avery Fuels Reduction Environmental Assessment.
- (iii) Harvest units will be shaped and blended to the extent practicable with the natural terrain (EA, Design Feature 6).
- (iv) Small openings in the off-site ponderosa pine treatment areas are expected to be created, ranging in size from 0.2 acres to 2 acres in size. Treating some of the area with prescribed fire following the felling of the off-site pine may cause a slight increase in opening size. These opening would be artificially regenerated with long-lived seral species.
- (v) The proposed harvests will be carried out in a manner consistent with the protection of soil, watershed, fish, wildlife, recreation, and esthetic resources, and the regeneration of the timber resource (EA pp.49-137).
- (vi) The proposed timber harvest is a commercial thin that will generally remove the smaller trees (EA p. 7) to improve stand health and vigor and maintain or enhance species composition and stand structure. The intent of the off-site pine treatments is to eliminate as much of the off-site ponderosa pine as possible whether or not it has reached the culmination of mean annual increment of growth (EA pp. 97-98).