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and via email to comments-intermtn-payette@fs.fed.us

December 17, 2018

RE: Idaho Conservation League scoping comments on the Granite Meadows Landscape Restoration Project

Dear Keith,

Thank you for considering our comments on the Granite Meadows Integrated Landscape Restoration Project. Since 1973, the Idaho Conservation League has worked to protect Idaho’s clean water, wilderness, and quality of life. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters who have a deep personal interest in restoring Idaho’s forests and watersheds.

The Idaho Conservation League is also a member of the Payette Forest Coalition (PFC) and we have consistently advocated for an increase in the scope and scale of restoration projects within the Collaborative Forest Landscape Restoration (CFLR) area. Forest Collaboratives like the PFC have proven to be successful ventures across Idaho for increasing the quality of Forest Service proposals, restoring forest and watershed conditions, and improving the dialogue among a wide variety of stakeholders. Our goal is to see a successful project that balances forest health, watershed, wildlife and community goals and that is implemented on the ground in a timely manner.

The Proposed Action includes approximately 70,000 acres of National Forest Lands on the McCall and New Meadows Ranger Districts as well as 7,000 acres of state lands managed by the Idaho Department of Lands and 6,000 acres of private property. Through the Wyden Amendment, non-federal landowners are eligible for cooperative agreements for fuel reduction and habitat improvement projects on non-federal lands.

Proposed vegetation management treatments on National Forest Lands include 25,000 acres of commercial treatments, 40,000 acres of non-commercial thinning, and prescribed burning on much of the project area. Proposed watershed improvement and restoration treatments include decommissioning 30-35 miles of National Forest System roads, restoring 50-75 miles of unauthorized routes, stabilizing streams, improving fish passage at five NFS road/stream crossings. Recreation improvements include adopting user-created trails where appropriate, rehabilitating those causing resource damage, improving recreation infrastructure, and maintaining current oversnow vehicle area closures.

In October, the PFC reviewed a draft Proposed Action, offered suggestions and then voted in support of the Proposed Action. The Idaho Conservation League supports the Purpose and Need statements, Proposed Action, and the associated actions. Large-scale restoration projects of this scale important because both wildlife and wildfires move through large areas.

Because one of the primary goals of the Idaho Conservation League is to protect habitat for fish and wildlife, we are focusing on potential areas for further improvement for this project as consistent with the PFC’s original recommendations. Please see our comments below:

Once again we thank you for the opportunity to submit comments on this project. Please send us any subsequent documents for this project. We look forward to continuing to work with the McCall and New Meadows Ranger District on this project and others in the future.

Sincerely,



John Robison

Public Lands Director

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**Idaho Conservation League scoping comments on the Granite Meadows Landscape Restoration Project**

**Improving habitat for species of greatest conservation concern**

The Forest Service should identify which species of conservation concern will be the focus for restoration efforts. In addition, the Forest Service should disclose the negative impacts of vegetation treatments on other species. A monitoring program should assess baseline conditions as well as the effectiveness of the different treatments on the productivity of these species.

**Slash treatments**

The Forest Service needs to manage slash in a timely manner so that fuel risk is minimized. We appreciate the fact that whole-tree yarding will be used to help reduce fuel loads within commercial treatment units but additional attention needs to be paid to how slash is handled once at the landing. We support the stacking of material usable for firewood at landings for public use and think that this should be utilized whenever practical. We also support utilizing this material at biomass cogeneration facilities.

We recommend that the Forest Service provide an estimate of the amount of material that will be managed through public firewood use, biomass utilization or pile burning at landings. Before authorizing burning at remaining slash piles at landings, the Forest Service should carefully manage the size, location and burning windows of these piles to minimize adverse impacts to soils.

**Prescribed fire**

Slash left within treated areas will elevate fuel loads in the short term and should be managed through prescribed burning as soon as reasonably possible. The Forest Service should be sure to follow up with additional prescribed fire treatments as needed to meet fuel reduction goals.

The Forest Service should work with members of the public health services, the medical community, the Idaho Department of Environmental Quality, Adams and Valley county, businesses, residents and homeowners to craft a prescribed burning program that minimizes adverse impacts of smoke to the public. Particular attention needs to be paid to vulnerable populations. Issues to address include helping residents improve air filtration systems in homes or retrofitting at least one room to have cleaner air, designating public buildings where improved air filtration systems already exist or can be upgraded to serve as safe air places in the event of unhealthy air quality from prescribed burning or wildfires, and publishing advanced notice of prescribed burning so people vulnerable to poor air quality can plan accordingly.

**Demonstration projects and tours**

We recommend that the Forest Service select some demonstration projects where fuel reduction projects have already been implemented and host tours to showcase treatments that could be implemented on private property. We also recommend offering tours of the Mesa Fire to show the effectiveness of various fuel treatments. For members of the public not able to attend a field trip, we recommend creating a Story Map of integrated restoration projects.

**Create Community Base Maps**

We recommend working with Adams and Valley County, residents and community organizations to create community base maps to improve fire response and evacuation preparedness:

https://fireadaptednetwork.org/using-community-base-maps-to-improve-the-safety-and-effectiveness-of-wildland-fire-response/

**Watershed Improvements**

We support the proposed system road decommissioning, unauthorized road restoration and fish passage improvements. The Forest Servicce should describe the anticipated improvements with respect to each Watershed Condition Indicator in each watershed. Priority should be given to streams that support listed fish species and that flow into Payette Lake which serves as the City of McCall’s municipal water supply.

**Water quality**

The Forest Service should also disclose any water quality issues from historic mining activities in the project area that may be having an impact on aquatic organisms or public health. There may be the possibility that some restoration activities can help address this issue.

**Recreation Improvements**

We support all the proposed improvements. A key to designing a good restoration project is having feedback from local recreationists and sportsmen who know the trails and the backcountry areas. We recommend working directly with members of local and state recreation groups, including but not limited to the McCall Hiking Club, Central Idaho Trail Riders Association, Central Idaho Mountain Biking Association, Idaho Wildlife Federation, Trout Unlimited, Backcountry Horsemen, McCall Snowmobile Club, and Winter Wildlands Alliance on recreation improvements. We also recommend working closely with the Idaho Department of Fish and Game and the Nez Perce Tribe to ensure that recreation improvements are consistent with restoring habitat for terrestrial and aquatic species of conservation concern.

Where there are opportunities to designate redundant routes as trails and still meet resource goals, we recommend considering designating some short, non-motorized, non-mechanized trails for families, similar to the interpretive sites at the east side of Lost Valley Reservoir. If an unauthorized route leads to a dispersed camping site that could be retained and still meet resource goals, the Forest Service could consider narrowing these routes to still allow for non-motorized access and hardening the dispersed campsites. The result would be walk in, “far car” camping sites where families can hike a short distance to a camping area away from the road.

**Legacy Tree Retention**

The Forest Service should review the Legacy Tree Retention guides and make sure that large diameter trees are maintained. The goal of protecting Legacy Trees and maximizing retention of large diameter trees is outlined in the Collaborative Forest Landscape Restoration Act; Sec. 4003(D) fully maintains, or contributes toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health and retaining the large trees contributing to old growth structure; (E) would carry out any forest restoration treatments that reduce hazardous fuels by-- (i) focusing on small diameter trees, thinning, strategic fuel breaks, and fire use to modify fire behavior, as measured by the projected reduction of uncharacteristically severe wildfire effects for the forest type (such as adverse soil impacts, tree mortality or other impacts); and (ii) maximizing the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire-resilient stands.

The Forest Plan and Wildlife Conservation Strategy highlight the value of these mature trees for wildlife.

The Forest Service’s purpose for this project includes promoting an increase in large tree class size, canopy cover and in the number of early seral species. With the goals clearly outlined, it is important to find the best means of protecting Legacy Trees and maximizing the retention of large diameter trees.

While Ponderosa pine, western larch and Douglas fir are the preferred species for retention, grand fir also occurs in the project area with old growth/legacy tree/large tree characteristics. Because the large tree component is underrepresented across the majority of the area, the majority of all particularly large native trees, regardless of species, should be protected for both wildlife and as part of the forest’s natural heritage. Girdling undesired tree species could be one tool to retain the large tree structure important for wildlife while eliminate competition for water and nutrients with more desirable, seral tree species.

**Other wildlife issues**

Regarding Goshawks, we encourage you to incorporate *Management Recommendations for the Northern Goshawk in the Southwestern United States* (Reynolds et al. 1992).

With regard to elk, we support using permanent or seasonal road closures to enhance elk security habitat in areas where there are redundant routes.

Recreation improvements should be designed to either decrease conflicts with wolverine or have a neutral effect.

**Riparian treatments**

We recommend carefully pre- and post-treatment monitoring of any riparian treatments to ensure that Watershed Condition Indicators are maintained or improved. . The Forest Service should look back at the positive and negative impacts of RCA treatments in other projects as part of this planning effort. Within RCAs, additional attention should be paid for retaining large-diameter trees of all species. We appreciate the RCA vegetation treatments are not proposed in the anadromous subwatersheds. We do have concerns that trees of any size could be removed in RCAs in the Brundage Mountain ski area and ask for additional clarification.

**Snag retention**

A sufficient number of snags need to be left standing in each treatment area for cavity nesters until snags can be replaced by natural recruitment. Standing trees need to be overstocked to ensure sufficient habitat until new trees mature. Snags should be clumped rather than spaced evenly. Regional Snag Management Guidelines should be adhered to as part of this project and should be addressed in the EIS. We are also concerned about the removal of snags by firewood cutters and recommend design features that ensure that large snags important for wildlife will not be cut.

**Coarse Woody Debris**

To promote development and protection of soils, coarse woody debris should be maintained in accordance with the recommendations in *Managing Coarse Woody Debris in Forests of the Rocky Mountains*  (Graham et al, 1994).

**Grazing**

The Forest Service may adjust grazing levels within the permitted levels to help with project goals. This may include using targeted grazing to reduce fine fuels in the Wildland Urban Interface or decreasing grazing so that more grass is present to help carry prescribed fires. More intensive grazing in fuelbreaks will need to be carefully managed to ensure that resources are protected. Some popular recreation areas in high elevations may benefit from additional rest cycles.

**Project implementation**

The Forest Service should host an implementation and monitoring website for this project so the public can track the areas through different restoration activities over time. Activities that may restrict public access or pose traffic safety concerns (such as logging trucks) need to be scheduled to minimize conflicts with members of the public. Timing may need to be adjusted depending on season, day of the week, and time of the day. Log hauling may need to be restricted on weekends, public holidays and during the start of hunting seasons. We recommend utilizing signage and pilot cars.