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September 24, 2021

Jim DeMaagd, Forest Supervisor
Sawtooth National Forest
370 American Ave
Jerome, ID 83338
208-423-7500

RE: Idaho Conservation League's Comments on the EA for the Sawtooth National Forest's Proposed Prescribed Fire for Restoration and Fuels Reduction Project

Dear Mr. DeMaagd:

Please accept the Idaho Conservation League's comments on the EA for the proposed Prescribed Fire for Restoration and Fuels Reduction Project within the Sawtooth National Forest. Since 1973, the Idaho Conservation League has had a long history of involvement with public lands issues. As Idaho's largest state-based conservation organization, we represent over 35,000 supporters who have a deep personal interest in restoring our forests to more resilient conditions by reintroducing fire to restore historic fire regimes and reduce the likelihood of uncharacteristic wildfires. We also work to restore wildlife habitat and improve ecosystem and watershed health.

The Idaho Conservation League (ICL) recognizes the importance of reintroducing fire as a part of the natural ecosystem, and we generally support these efforts on our public lands. We appreciate the Sawtooth National Forest using LANDFIRE datasets to evaluate vegetation condition classes throughout the forest, and acknowledging the need for restoring fire as a natural part of the ecosystem. The following document includes our specific comments and recommendations regarding the EA for this project.

Thank you for the opportunity to submit comments for the Sawtooth National Forest Prescribed Fire Restoration Project, and please send us any subsequent documents related to the undertaking. We look forward to working with the Sawtooth National Forest on this and future projects. Should you have any questions regarding these comments or recommendations, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Josh Johnson', with a stylized, flowing script.

Josh Johnson
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Idaho Conservation League
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Idaho Conservation League's Comments on the Proposed Sawtooth National Forest Prescribed Fire Restoration Project EA

Level of Analysis

ICL recognizes and supports increasing the pace and scale of restoration, fuels reduction, and prescribed fire across the Sawtooth National Forest (SNF). Restoring fire adapted ecosystems is too important to be based on insufficient analysis, inadequate public involvement and poor project design and coordination and a poor legal foundation. We would like to reiterate from our scoping comments that we appreciate the SNF choosing not to analyze this significant project using the agency's Categorical Exclusion (CE) authority. Stretching CE authorities way beyond their intended limits is not the appropriate way to achieve that goal of increased pace and scale. Not only does this approach go against the intent of those authorities, it also opens the Forest Service up to legal challenges which could be avoided with more thoughtful analyses and better designed projects.

Effectiveness Monitoring

The Forest Service should provide the full details of a developed monitoring plan to determine action effectiveness. The current description of monitoring protocols in the Implementation Checklist, Part VI is insufficient. A robust monitoring plan should be included within each burn block implementation plan. We encourage the agency to put an emphasis on monitoring as part of this project and to thoroughly evaluate pre- and post-treatment conditions, both in terms of tree and soil health. Parameters evaluated should include fuel conditions, extent of mortality, down woody material (tons/acre), photo plots, tree response, goshawk surveys, etc. Additionally, before and after photos of different treatment sites would likely be very helpful. We also hope that the Forest Service can utilize existing data from prior and ongoing forest health treatments throughout the SNF to better inform future treatments.

Public Engagement

One of the challenges of implementing a project that allows for prescribed burning over the span of 15-20 years is how to keep the public involved in the process. The public has the opportunity to get involved now, in the NEPA process, but what about in the implementation of the project? A lot can change in 15 to 20 years and this project decision should have some mechanism in place to keep the public informed and allow them the opportunity to provide further input as the project progresses and evolves over time.

We recommend that the Forest Service conduct 5-year reviews of this prescribed burning project that would include the release of a brief document updating the public on what burning has been completed already, what burning is slated for the next few years, and how the project has adapted since the initial decision or last review. The public should then be given the opportunity to provide their input on the 5-year review before it is finalized. This approach would build trust

between the public on the Forest Service on this project and would codify a commitment to transparency and adaptability.