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December 14, 2022

Ms. Linda Jackson  
Forest Supervisor  
Payette National Forest  
500 North Mission St.  
McCall, ID 83638  
(208) 634-0700

Electronically submitted: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=63166>

**RE: Idaho Conservation League's Scoping Comments for the Proposed Payette National Forest Resilience and Fuels Reduction Prescribed Fire Project**

Dear Ms. Jackson:

Please accept the Idaho Conservation League's scoping comments for the proposed Payette National Forest Resilience and Fuels Reduction Prescribed Fire Project. 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 30,000 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 Payette 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 scoping for this project.

Thank you for the opportunity to submit comments for the Payette National Forest Resilience and Fuels Reduction Prescribed Fire Project, and please send us any subsequent documents related to the undertaking. We look forward to working with the Payette 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 "Randy Fox", is centered within a light gray rectangular box.

Randy Fox  
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# **Idaho Conservation League’s Scoping Comments for the Proposed Payette National Forest Resilience and Fuels Reduction Prescribed Fire Project**

## **Level of Analysis**

ICL recognizes and supports increasing the pace and scale of restoration, fuels reduction, and prescribed fire across the Payette National Forest (PNF). 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 appreciate the PNF 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 the 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.

## **Design Features**

We appreciate the thoughtful Design Features the PNF have incorporated into the project’s scoping document. These Design Features are meant to provide a “matrix” for decision-making as it relates to implementation of the programmatic prescribed fire project. The scoping document states that, “post-treatment monitoring would occur, and based on certain conditions, additional follow-up actions may be triggered,” (p. 10) with the Design Features providing additional details on post-treatment activities. We identified eight (8) Design Features (ST-3, FWT-13, S-1, S-3, S-8, BT-6, BT-7, and WLD-1) that directly relate to active and post-implementation monitoring efforts.

We believe that the monitoring efforts could be stronger for this programmatic project. 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, as well as the numerous topics already covered by the existing Design Features. We recommend that the Forest Service add a Fisheries and Watershed (FWT) Design Feature that incorporates turbidity monitoring stations in areas that have experienced moderate to high severity burns and where the possibility of ash and fire-related sediments could enter perennial waterways, particularly in anadromous fish habitat.

Design Feature S-12 calls for the possible decking of larger logs to create an air cushion over the soil surface. We recommend that the Forest Service also deck larger materials for firewood gathering/use by the public. We also suggest that the agency add a botanical Design Feature that avoids burning existing huckleberry patches during prescribed burns whenever possible. Huckleberries are an important local resource which many Idahoans gather to extend their food

resources and use the outings as opportunities to strengthen family ties and extend generational traditions. The Payette Forest Coalition (PFC) has also made this recommendation regarding prescribed fire implementation on previous projects such as Cold July and Railroad Saddle. Finally, in regard to WLD-1, we recommend that the Forest Service closely monitor season/timing restrictions related to wildlife to ensure timing differences related to climate change are taken into account.

### **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.

### **PFC Recommendations**

We also share the concerns expressed by the PFC in the coalition's scoping comment letter for the PNF Forest Resilience and Fuels Reduction Prescribed Fire Project. The coalition states:

The third paragraph of the Proposed Action on page 6 states that prescribed fire could be implemented year round. Escaped prescribed fire and burning during high fire danger periods is a fast way to lose public support. Strict adherence to agency policy regarding the application of prescribed fire will be important to maintaining support for this treatment method.

In order for the PNF to retain the trust the public is extending regarding prescribed fire, and to avoid a repeat of the situation that unfolded during the 2022 season in New Mexico, agency officials must treat each prescribed burn as if it is the first ever, avoid complacency by following established protocols and guidelines, and continuing to extend the recent successes we experienced with the Cold July and Rusty Goose prescribed burns during the Fall of 2022.