



IDAHO CONSERVATION LEAGUE

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March 10, 2023

Linda Jackson
Forest Supervisor
Payette National Forest
500 North Mission Street
McCall, Idaho 83638

Electronically submitted:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=63507>

RE: The Idaho Conservation League's Scoping Comments for the Proposed Granite Goose Landscape Restoration Project

Dear Ms. Jackson:

Please accept the Idaho Conservation League's scoping comments for the proposed Granite Goose Landscape Restoration 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 25,000 supporters who have a deep personal interest in restoring our forests to more resilient conditions and reducing the likelihood of uncharacteristic wildfires. We also work to restore wildlife habitat and improve ecosystem and watershed health.

We support the comments submitted by the Payette Forest Coalition (PFC), of which ICL is a long-time member in good standing. These comments focus primarily on specific recommendations regarding vegetation management treatments and watershed improvements, which are central themes of the project's Purpose and Need.

ICL supports the Payette Forest Coalition (PFC) scoping comments for this project, and have included those comments in the following document. We have also included additional comments and recommendations that were not included or adopted by the PFC.

Thank you for the opportunity to submit scoping comments for the proposed Granite Goose Landscape Restoration project. Should you have any questions regarding these comments and recommendations, please do not hesitate to contact me. We look forward to working with the McCall and New Meadows Ranger Districts on this and

future projects.

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 Proposed Granite Goose Landscape Restoration Project Scoping Comments

Payette Forest Coalition Comments

This specific Granite Goose Landscape Restoration Project Proposed Action is a landscape-scale effort to improve conditions across multiple resource areas including vegetation, watersheds, roads, and recreation. The PNF is proposing to implement a variety of vegetation treatments including thinning (of all class sizes), regeneration harvest, and prescribed fire to address hazardous fuels and reduce fuel loading to counter catastrophic wildfire risk, respond to insect and disease outbreaks, and promote whitebark pine conservation in the project area. Other actions proposed include watershed restoration, recreation management, and travel management to enhance streams, wetlands, and meadows, promote safe and efficient recreation access, reduce recreation conflicts, and reduce impacts of no longer needed roads and trails on resource conditions.

Our current members, who represent a number of constituent groups, believe the proposed action can advance the PFC's restoration goals. We recognize that this Granite Goose landscape is a highly utilized and visible area, and as such, will have significant public scrutiny throughout the project lifecycle. We encourage you to work closely with all stakeholders during all phases of 2 project design, planning and implementation. Effective communication of goals and risks as well as listening to concerns and adjusting plans where possible in order to address these concerns will help gain public support for necessary treatment and recreation actions.

The Payette Forest Coalition developed and provided a standard set of vegetation treatment and roads and recreation recommendations on April 21, 2021 that have applicability to this proposed action. Our review of this proposed action finds the action to be responsive to our past recommendations and we support the project, with the clarifications discussed below.

The PFC is concerned that the Granite Mountain extended closure could affect the implementation of other critical management actions outlined in the Proposed Action. We request the PNF to consider implementing the closure under a separate action or separate decision as long as doing so does not interfere with the implementation of other actions in the area.

The Proposed Action has not specifically addressed wildlife or range resource areas. The PFC encourages the PNF to reach out to the Idaho Department of Fish and Game McCall staff, in coordination with the Idaho Office of Species Conservation, for comment on the Proposed Action. For the range resource, the PFC also recommends that livestock grazing in existing allotments be discussed as a component of the baseline to manage fine fuels within the project area. Communication and close coordination with permittees in the ongoing grazing program can contribute to project success. Past NEPA project managers may provide useful insight on how to present this baseline, since it is an ongoing action and not new.

In light of the recent listing of white bark pine, the Coalition recommends the PNF limit the use of prescribed fire where white bark pine regeneration exists. We encourage the use of existing livestock grazing programs for the fine fuels management in those areas.

The Proposed Action includes “sanitation” as a silviculture treatment where the trees may not be economically viable saw timber. We strongly encourage you to look for opportunities to utilize this material through the use of commercial contracts, agreements with local communities, tribes or charitable organizations and public free use permits. This could create new small business opportunities along with achieving fuel reduction goals. The removal of a portion of this combustible material from the landscape is also important in order to reduce fire intensity, and the amount and duration of smoke associated with the application of prescribed fire.

The Proposed Action indicates that prescribed fire could be implemented during summer months and may be applied to areas prior to commercial harvest of timber. We recognize and support the need to bound the NEPA analysis in order to provide sufficient flexibility for implementation. We request that the actual practice during implementation minimizes prescribed burning during summer months. Limiting the burning of areas in advance of commercial harvest will reduce resource loss, benefit the timber harvest and processing operations, and increase the economic value of these resources. We also encourage the Payette and Boise National Forests to coordinate their prescribed fire planning and effectively coordinate and communicate these 3 plans with all stakeholders.

ICL-Specific Comments

Visual Impacts

The scoping document indicates that addressing the balsam woolly adelgid infestation and impacts to subalpine fir is a priority for the proposed Granite Goose project. Potential treatments may have a variety of potential visual impacts, particularly from the Meadows Valley and McCall. We recommend that the Forest Service analyze these potential visual impacts and design treatments for highly visible areas that meet the project’s Purpose and Need while ensuring that the visual impacts remain minimal. We believe this is best accomplished by coordinating with the Forest silviculturist and the timber division to determine location and appropriate sizes of patch/regeneration cuts.

Regeneration/Patch Cut Treatments

Regarding patch/regeneration cuts, we appreciate that none will be larger than 40 acres and will not require Regional Forester approval. ICL suggests that the forthcoming Environmental Assessment (EA) include an analysis that determines the appropriate separation or space between regeneration/patch cut treatments. The EA should state this separation gap distance (preferably in acres) in order to fully establish that each patch/regeneration cut area is distinctly separate from the next. For example, we do not believe that a separation gap of 2 acres would be adequate; the two hypothetical regeneration/patch cuts in this scenario would be considered a single unit. If this were

to rise above the 40 acre limit, the cuts would require Regional Forester approval and would likely be quite contentious amongst the general public.

Meadow Restoration

Regarding wet and alpine meadow restoration efforts, the scoping document states that, “coniferous trees are encroaching on historically open meadows,” (p. 18). We recommend the Forest Service use historic and/or stereoscopic photographs to determine the extent of the encroachment and to establish a base historic treeline.

Fire Line Construction

We are concerned with the proposal to pre-establish fire lines prior to an actual fire event (p. 19). While we appreciate that existing barriers would be used wherever possible to restrict fire spread, pre-constructing fire lines, and especially machine-constructed lines, would lead to the introduction and/or spread of noxious and invasive weeds and plants and would invite unauthorized motorized vehicle use. We recommend fully analyzing the potential impacts of pre-constructing fire lines and dropping this proposed action from the project’s implementation plan. If these proposed fire lines are specific to prescribed burn activities (which is not clear in the scoping document), ICL then recommends that the Forest Service not establish the fire breaks until burn activities are eminent, then fully rehabilitate the fire line, including any necessary decompaction, address any invasive or noxious plant and weed issues, and re-vegetate the area using native seed.

Prescribed fire

ICL supports the Forest Service in the agency’s efforts to reintroduce fire into the natural system. 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.

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 Service 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, and into Goose Creek, a primary tributary of the Little Salmon River in the Meadows Valley.

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.

Winter Closure Extension

The scoping document does not adequately explain or justify the proposed extension of the Granite Mountain over-snow vehicle closure. We recommend that the forthcoming EA describe the reasoning behind this proposal (wildlife winter habitat needs, capacity and patrolling issues, user conflict, or Conditional Use Permit expansion are a few examples of potential reasoning. Further, Map 5 and Map 13 in the scoping document do not match with one another regarding the boundaries/limits of the special winter management area. We suggest the agency reconcile these apparent differences.

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 the agency consider designating some short, non-motorized, non-mechanized trails for families, similar to the interpretive sites at the east side of Lost Valley Reservoir.

Given the recent Bear Basin Trails Project and the further proposed recreation management prescriptions for Bear Basin, we recommend that the Forest Service use this opportunity to analyze the full effects and potential impacts of the Bear Basin

master plan. If a master plan for non-motorized recreation does not exist, we recommend that the agency work with local interested stakeholders to develop a master plan, then analyze the potential impacts of the entire package. We realize that a master plan would likely not achieve full build-out within two or even five years, but we do see the value in completing the NEPA review for this iconic area which continues to rise in popularity as a McCall attraction. The analysis could be completed under the Granite Goose project with separate decisions tying back to this NEPA process. It is important to understand that while an analysis may be completed for a proposed trail, it does not necessarily mean that the trail would be constructed. Ground truthing trail locations, funding opportunities, and capacity issues all play a role in final decision making, but those decisions are directly tied to the NEPA process and environmental review. For these reasons we recommend completing the review of the Bear Basin master plan to avoid either an overuse of the Categorical Exclusion authority or multiple NEPA processes.

Wildlife

Given the increasing demand for camping facilities and hardened dispersed camping sites throughout the Intermountain West, we recommend that the Forest Service consider adding bear resistant food storage lockers at dispersed campsites and campgrounds within the project area. The Granite Goose project area is one of the most highly used recreation areas on the Payette National Forest and the addition of bear resistant storage lockers will reduce human/wildlife conflicts, discourage bears and other animals from becoming dependent on human food sources, and increase human health and safety. We recommend the Forest Service begin implementing this proposal with this project, focusing first on areas of historic bear/human encounters or sites of previous bear removal due to increased bear/human encounters. Reducing these conflicts and discouraging bears through the use of food storage lockers will also reduce bear mortality associated with euthanizing nuisance or troublesome animals.

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.

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.

Slash treatments

The Forest Service should 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.

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 eliminating competition for water and nutrients with more desirable, seral tree species.

Further, the current Administration has called for protecting mature US Forests to slow climate change while allowing thinning and restoration efforts to reduce wildfire risk to continue. We recommend that the Forest Service use the Granite Goose Landscape Restoration Project as an opportunity to provide Intermountain Region and Payette National forest old growth definitions.

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 EA. 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.