

To:
Payette National Forest
McCall Ranger District
102 W. Lake Street
McCall, Idaho 83638

January 19, 2024

From:
Katherine Lanspery
PO Box 35
Riggins, Idaho 83549

RE: Granite Goose Landscape Restoration Project EA Comments

There are several concerns that I have as a local water resources/environmental consultant for over twenty years regarding this project. I understand the need to manage the landscape in a fire suppressed area that has tracts of diseased trees with numerous pest problems. I am concerned with the lack of details on the implementation timeline and lack of environmental analysis presented in this environmental assessment (EA).

My general concerns for this project include:

- What is the overall timeline of the implementation? What are the phases of the project?
- Each project category is greatly lacking details for the work to be completed. I further detail this in the sections below.
- Why is there no assessment of the impacts to our various resources (wildlife, hydrology, fisheries, botany, soils, range, etc.)? I further detail this in the sections below.
- How will these projects impact summer and winter recreation?

All sub-sections of the Vegetation Management section of the EA do provide any specifics. There is no timeline for the implementation of the projects. In addition, specific projects details are not provided, and there is no discussion on how Payette National Forest Species of Interest, and threatened and endangered species will be avoided, and impacts minimized.

A residual canopy cover of 20 percent will alter the composition of the understory over time. Increased sunlight on the forest floor will provide a pathway for invasive species and increased densities of grasses and shrubs. This project does not account for the increase in understory fuels. How this fire hazard will be managed in the future?

With the upgrade in status of the whitebark pine and wolverine on the ESA, it seems that more analysis would need to be provided through a Biological Opinion with US Fish and Wildlife Service.

The reference publication on whitebark pine provided in the EA (https://www.climatehubs.usda.gov/sites/default/files/rmrs_gtr361.pdf) states that:

“Mycorrhizae considerations should be taken into account in management strategies to help ensure establishment, maintenance, and conservation of this pine species under changing climates (see Keane et al. 2012b for details).”

The whitebark pine treatments section of the document states that heavy equipment will be used in areas accessible by road. Large equipment on soils will also disturb the soils and mycorrhizae that support these trees. The soils in these areas are highly erodible granitic soils. How will soil be stabilized after disturbing them with heavy equipment?

The watershed restoration section of the EA again provides few details as to the type of work to be completed. For example, the image below shows three spring sources/wetland areas that are to be restored. I have conducted three summers of fieldwork in this area. These spring sources are unique and are worthy of protection. The southernmost spring is a vertical wetland and has very unique habitat. The map provided in the EA, simply says 300-foot riparian buffer which provides no details for the “restoration” efforts. In addition, until the sheep grazing practices are altered or discontinued, why should government dollars be used to restore an area that will continue to be grazed in the future. I have been in this area before sheep grazing and after sheep grazing. Sheep erode the stream banks, degrade and alter the vegetation community, introduce noxious and invasive species, reduce available forage for wildlife, and likely increase the nutrients present in the spring fed creeks.



The overall lack of environmental analysis presented in the EA is unacceptable and is quite a double-edged sword. My clients have to analyze multiple resources for a single project that has in some cases delayed their projects for years, but a Payette National Forest, 39,000-acre project, has zero analysis presented on resource impacts. This is simply unacceptable.

With increased analysis of the resources impacted and a project implementation timeline, I do believe that these areas need to be managed to remove diseased trees.

Sincerely,

Katherine Lanspery
Water Resources Consultant