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February 2, 2024

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=63507>

**RE: Idaho Conservation League's Comments on the Granite Goose Landscape Restoration Project Draft Environmental Assessment**

Dear Supervisor Jackson:

Please accept the Idaho Conservation League's (ICL) comments on the proposed Granite Goose Landscape Restoration Project Draft Environmental Assessment (EA). Since 1973, the Idaho Conservation League has had a long history of involvement with public lands issues. Our mission is to create a conservation community and pragmatic, enduring solutions that protect and restore the air you breathe, the water you drink, and the land and wildlife you love. ICL represents over 26,000 members and advocates, and we protect these values through public education, outreach, advocacy, and policy development.

ICL is a member of the Payette Forest Coalition (PFC), and has participated in discussions centered on this project area since the inception of the original Granite Meadows landscape restoration project. Since that time the Forest Service has moved away from the larger Granite Meadows project by addressing emergency fuels reduction efforts through the Rusty and Red Goose projects and revisiting the larger project area in the form of the current Granite Goose Landscape Restoration project. Further, ICL produced a Granite Goose blog in February 2023, to communicate with our members about the project activities. We link the blog to these comments [here](#), and have provided a pdf copy to demonstrate our efforts to inform the public about the Granite Goose project. ICL supports the project, with caveats regarding commercial treatments proposed for the Inventoried Roadless Areas; these actions were added to the project post-scoping.

If the Forest Service is going to significantly amend the project, we would appreciate as much advance notice as possible so we can provide our members with the most accurate information and context. We address our concerns more specifically and thoroughly in this document, while providing recommendations we believe will strengthen the overall project.

Thank you for the opportunity to submit comments on the proposed Granite Goose Landscape Restoration project's Draft EA. 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".

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## **Idaho Conservation League's Comments on the Granite Goose Landscape Restoration Project Draft Environmental Assessment**

We appreciate the Forest Service's efforts to inform the public of the proposed Granite Goose project through the creation of an effective StoryMap, detailed maps found in Appendix A, public meetings, and through engagement with the Payette Forest Coalition. We further appreciate that no new roads, either temporary or permanent, are proposed for actions within Inventoried Roadless Areas (IRAs). However, the draft EA does not clearly indicate that the Forest Service analyzed the potential impacts for the project area through the lens of the most intensive treatments. We suggest that if this is the case, as presented to ICL staff (Dana Harris, personal communication), then the Forest Service should make extra efforts to communicate this to the public in the EA. We believe that a more in-depth analysis of potential positive and negative effects of these actions on Roadless values is needed in the final EA.

### **Post-Scoping additions for commercial treatments in IRAs**

The Idaho Conservation League (ICL) has a long history of engagement in Idaho's roadless areas, which arose from the "timber wars" of the 1990s and concern that the timber harvest policies of the period were adversely impacting ecological function on numerous levels. Our organization participated in crafting the Idaho Roadless Rule and currently holds a seat on the Idaho Roadless Commission. Many of our members and supporters express deep ties to these remote and largely unroaded areas, using them for a wide variety of recreation activities while relying on the areas to provide intact ecological benefits for wildlife and plant communities. In fact, an expectation exists that the Forest Service will allow largely natural processes to play out within designated IRAs unless some intervention is needed to restore or maintain roadless characteristics. Roadless treatments are limited and infrequent by design.

While the Idaho Roadless Rule does allow for vegetation treatments in IRAs related to forest health and wildfire risk reduction, the original project purpose and need described in the scoping notice did not include these treatments. We believe that rationale for these proposals was not adequately explained or justified in the draft EA.

We first learned about the addition of "non-incidental" commercial vegetation treatments to Inventoried Roadless Areas (IRAs) within the project boundary on release of the Draft Environmental Assessment (EA) for the Granite Goose Landscape Restoration project (p. 6). We also learned that the Regional Forester had approved these IRA additions on June 9, 2023, 7 months before the draft EA was released for public comment. However, the general public was not informed of these significant changes to the proposed action. The reasoning behind the additions does not appear in the EA itself and can only be found by poring through Appendix D: Treatments Within Inventoried Roadless Areas and Appendix E: Implementation Plan. Further, the EA does not define "non-incidental" beyond the sole mention found on page 6 and we ask that the Forest Service provide a definition in the post-scoping additions section. "Non-incidental" is by

definition more than de minimis and could mean any level of significant treatment, potentially warranting an Environmental Impact Statement. ICL also tracks roadless projects through the Idaho Roadless Commission so we can inform ICL staff and members that such entries are justified and that there will be opportunities to participate in the NEPA process. Despite the Regional Forester approving the Roadless entries over eight months ago, this project has not been presented to the Roadless Commission and this was a surprise to our staff and members.

Our primary concern with these post-scoping changes to the proposed action is the surprise addition of commercial treatments within the IRAs, specifically those areas designated Primitive. The Primitive classification is one of the more protective rankings, exceeded only by Special Areas of Historic and Tribal Significance and Wild Land Recreation (WLR), an IRA theme generally reserved for recommended wilderness areas. This designation is associated with the maintenance of the undeveloped character and preservation of biological strongholds and ecological integrity. Active management is allowable in Roadless areas, provided it is justified. Given the intensity of shaded fuel breaks along the major transportation corridors in the project area and whitebark pine restoration efforts in the area (which we comment on below), the need for additional commercial treatments in the IRA remains unclear. In addition, forest stands in the higher elevation potential vegetation groups (PVGs) consist primarily of species that hold little to no commercial value. Therefore, we recommend removing the commercial treatments from the proposed action, especially in those IRA portions managed as Primitive.

We suggest that the Forest Service still address forest health and wildfire risk reduction efforts in the identified roadless units through treatments such as non-commercial thinning and prescribed fire. We understand that removing excessive fuel materials from the area is important to reducing wildfire risk, and commercial operations provide one tool for achieving this goal. However, we believe other options are available, including decking any non-commercial trees at landings in such a way that material could be available for fuelwood for the community or through the Wood Bank program or Wood Stock event. Some other hazardous fuel reduction projects have had success partnering with the National Forest Foundation in their Wood for Life Program<sup>1</sup> through which salvaged, small-diameter timber is donated to Tribal residents to assist in heating homes. We encourage the Forest Service to reach out to the National Forest Foundation to see if this program is a potential fit for this project.

We also recommend describing the justification for roadless entries up front in the section covering post-scoping additions, making it more accessible and front-facing for the public. The addition of these descriptive elements will significantly improve the document by answering several “who, what, where, and why” questions related to why these treatments were added post-scoping.

ICL supports the proposed meadow and wetland restoration efforts proposed for the IRAs, including restoration of Hartley Meadows, which has been adversely affected by

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<sup>1</sup> <https://www.nationalforests.org/get-involved/wood-for-life>

unauthorized off-trail motorized use. We recommend the Forest Service use historic and/or stereoscopic photographs to determine the extent of conifer encroachment and to establish a base historic treeline. Treatments should be based on these historical perspectives.

### **Whitebark pine treatments**

We appreciate the Forest Service basing the proposed whitebark pine treatments on the most up-to-date and currently available science, specifically Tomback et al. 2022. While our review of the referenced article found that the proposed treatments do indeed follow the Tomback et al. recommendations, we found one significant missing component: monitoring.

Tomback et al. freely admit that whitebark pine restoration remains a largely experimental undertaking (Section 4.1, Integrating monitoring into project planning and management), and that monitoring is a key component of any restoration effort in order to validate or disprove restoration actions. Tomback et al. (2022) state that:

A monitoring plan must be developed in concert with restoration project planning.....Furthermore, assessment of the effectiveness of a restoration project requires clear, measurable management objectives that are identified in the project planning phase.

Table 5.

We are concerned that if the PNF develops project objectives without addressing how the agency will monitor project activities, success may not be verifiable. Therefore, we recommend the Forest Service develop a robust monitoring program that examines the efficacy of treatments on a 3/5/10-year timeline, and adjust treatment methods and protocols based on the results of the monitoring program.

We understand that prescribed fire activities will primarily be limited to jackpot and pile burning in whitebark pine habitat, with the agency avoiding broadcast burn applications to reduce or eliminate unwanted impacts to this fire-sensitive species. We applaud the agency's efforts to increase whitebark pine resiliency within the project boundary, and across the Payette National Forest through the reintroduction of fire to help restore and/or maintain ecological integrity and balance. Because some of the proposed treatments involve ground disturbing activities, we strongly recommend that the Forest Service take extra precautions while using Best Management Practices (BMPs) and Design Features found in Appendix C to avoid the spread or introduction of invasive and/or noxious weeds and plants.

### **Treatments in wolverine habitat**

The Granite Goose project contains two species recently listed as Threatened under the Endangered Species Act (ESA): whitebark pine and wolverine. ICL recognizes the challenges posed when an agency is faced with managing habitat for two species that commonly occupy similar habitats and elevation zones but have differing sensitivities to

habitat treatments, as is the case with the Granite Goose project. We understand that the Forest Service is actively consulting with the U.S. Fish and Wildlife Service (USFWS) so that treatment activities have a neutral or beneficial effect for both species.

We appreciate the Forest Service creating Design Features that reduce or mitigate potential impacts to wolverine and their habitat, which include no activities in the project area's wolverine habitat during the natal months of February through May and the protection of known denning areas. We also appreciate the agency acknowledging potential impacts, such as possible temporary displacement outside of the denning period. We believe that one area of concern is insufficiently covered in the EA: the potential impacts to snow retention capacity through vegetation treatments. We understand that whitebark pine (and subalpine fir) treatments are meant to increase stand and individual tree resiliency and health, therefore increasing snow retention capacity at higher elevations over time. However, we are concerned that vegetation treatments may result in immediate or near-future loss of tree-provided snow retention, thereby inadvertently affecting the suitability of wolverine habitat. This issue becomes more critical when we consider climate change-related impacts to snow depth and retention. We urge the Forest Service to proactively work with USFWS during the consultation process, and focus on the issue of vegetation treatments, snow retention, and the potential impacts to wolverine, then apply the USFWS recommendations to the project through the adaptive management process outlined in the EA.

### **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.

### **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.

### **Harvesting techniques**

ICL supports exploring the use of tethered logging if it is available for use on the Payette and can be accomplished at scale for Granite Goose. When considering timber and

fuels removal methods, consider the volume to make it economical for both tethered logging and biochar (see biochar comments below).

### **Recreation and Travel Management**

There are numerous proposals to improve recreation opportunities in the Granite Goose project area including, but not limited to, the installation of new vault toilets, an improved boat ramp at Brundage Reservoir, the creation of a motorized loop opportunity in the Ecks Flat area, the addition of 7 miles of non-motorized trails in Bear Basin, an expansion of the Gordon Titus snowmobile parking lot and corresponding Goose Creek Trail parking area, and an extended over-snow vehicle (OSV) closure for the Granite Mountain area.

Given the increasing popularity of recreating on public lands and the adverse effects and negative impacts that oftentimes come with increased use, ICL supports the majority of the Granite Goose recreation improvement proposals, including extending the winter OSV closures in the Granite Mountain area. We believe the Forest Service has demonstrated the ineffectiveness of the current seasonal closure through increased user conflicts, many of which arise from permitted OSV use in the area until January 15, followed by the seasonal closure and the mistaken belief by some that the area remains open.

ICL is generally supportive of addressing multiple issues, such as forest health, hazardous fuels, water quality, wildlife habitat, and recreation into larger integrated projects, as this approach serves multiple stakeholders, provides for better community engagement, gives full consideration of cumulative effects in one document, and encourages efficiencies in project implementation. However, the Titus Gordon parking lot expansion may warrant a separate analysis and decision. We are concerned that the proposal to expand the Titus Gordon parking lot by up to 3.5 acres may have more significant implications than originally believed when the Forest Service scoped the project. ICL originally supported including the proposed expansion as part of the Granite Goose Project per the reasons cited above. However, since the scoping period the USFWS listed wolverine as Threatened under the ESA. We are concerned that there are unknown factors at play with the expansion proposal, such as: would the expanded parking lot result in a net increase of snowmobile use in and/or through wolverine habitat; if so, what are the potential impacts of the increased use; are there existing denning areas beyond what have been identified and where are they; how can these areas be avoided; and are any additional OSV or full-access closures or seasonal restrictions for both motorized and non-motorized use necessary and warranted to mitigate potential impacts?

Unfortunately, we do not believe that these questions are answerable using the analysis process currently in place for Granite Goose. Further, because these difficult questions extend beyond a parking lot expansion into more significant ecological issues, we believe that the parking lot expansion proposal as currently presented represents an



issue that perhaps leaves the entire Granite Goose project open to litigation. Therefore, we recommend the Forest Service separate this component from the proposed action.

We see three potential solutions for meeting the increasing recreation demand. First, and most importantly, the Forest Service should complete Winter Travel Planning, which has been in stasis for several years. Winter Travel Planning, when combined with an in-depth and fine-detail study of wolverine data previously collected on the PNF, would provide a Forest-wide perspective on winter travel management, climate change, and potential impacts to ESA-listed species. However, winter travel planning does not provide an immediate solution to the question of Titus Gordon parking lot expansion. Second, if the Forest Service believes that the Titus Gordon proposal is intrinsic and critical to the Granite Goose project, then we suggest expanding the analysis to an Environmental Impact Statement (EIS) to address these issues. Again, this potential avenue does not provide an immediate solution for the Granite Goose project as the EIS process would extend the timeline for project analysis and implementation for the rest of the project activities.

Third, perhaps the best way to move the Granite Goose Restoration project forward would be removing the Titus Gordon proposal from the Granite Goose project, analyze the expansion as a separate EA in consultation with the US Fish and Wildlife Service, and authorize it in a separate decision, provided there are no issues with NEPA segmentation. We note that the Forest Service separated and advanced similar issue-specific proposals from previous multi-issue integrated projects, including Little Red Goose, Cold July, and Railroad Saddle on the Payette National Forest. Similarly, the Boise National Forest Service removed the Shady Pines and Cartwright and Reservoir Campgrounds Reconstruction Projects and salvage timber sales Antelope Swale, Joe's Creek and Southside GNA from the Sage Hen Integrated Restoration Project and authorized these in separate decisions.

### **Watershed Restoration**

There are numerous watershed restoration proposed actions associated with the Granite Goose project, including over 60 miles of route decommissioning (20.2 of these miles in Riparian Conservation Areas), the installation of two Aquatic Organism Passage (AOP) culverts, and meadow and wetland restoration efforts. ICL applauds the Forest Service's efforts to increase watershed function, and we appreciate the agency using GRAIP Lite modeling to model sediment delivery (Table 16). Further, the current road density of 4.2 miles per square mile would decrease to 3.2 miles per square mile following implementation. While the Forest Service predicts a 4% long-term reduction of road-generated sediment delivery post-implementation, we are concerned with the nearly 250% increase in sediment delivery during project implementation, the majority of which will occur in the Upper Goose Creek subwatershed (p. 44; Table 16).

Despite the agency's laudable efforts to reduce sediment delivery, improve watershed conditions, and restore hydrologic function within the project area, we are concerned about the significant projected increase in sediment delivery for the Upper Goose Creek subwatershed. We recommend incorporating into the implementation plan a phased or

staged approach that reduces activity on system and non-system roads and routes in this area and deploying additional Design Features elements, such as mesh-encased straw barriers, boughs and branches to slow run-off and filter sediment, and silt fencing to reduce sediment delivery. Further, the Inflation Reduction Act provides additional funding for watershed restoration and we encourage the Forest Service to make the most use of these opportunities as possible by replacing old and/or undersized culverts with appropriately sized aparati or AOP structures where possible and warranted.

### **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.

### **Climate Change**

Although climate change is cited in numerous locations throughout the Granite Goose Draft EA, the context is primarily citing climate change as a potential impact or “influence” or resource condition, such as forest stand health, whitebark pine, and subalpine fir to be specific. There are two references to the potential impacts of climate change on water resources and fisheries (pp. 47 and 49, respectively); in both instances the EA determines that the project’s proposed actions would not impact these two resources. However, both the determinations cite, “the Fuels, Fire, Air Quality, and

Climate Change reports in the project record for additional rationale”, (pp. 47 and 49). However, none of these documents are currently available for the public’s review on the project’s webpage.

The public cannot be reasonably expected to fully understand and provide meaningful recommendations to the Forest Service without having the full complement of information available to them. This becomes even more challenging when the draft EA references these specialists reports, but then the agency fails to provide them, thus retarding the suppressing the public engagement process. The final EA and all future draft EAs should have links to the specialist reports.

### **Cross-boundary work**

We encourage the Forest Service to continue to engage with adjacent land managers on proposed cross-boundary vegetation management and watershed restoration work. There are at least three land owners in the project area, including the State of Idaho and private owners, as well as the Forest Service. We ask that the final EA provide a map of the Wildland-Urban Interface (WUI) area and Forest Service-identified Community Protection Zones (CPZ) and show the location and types of any proposed cross-boundary treatments. We believe that the inclusion of these important designations will help the public better understand the Forest Service’s justification for the proposed actions, including municipal water and infrastructure protection.

### **Editorial Comments**

We identified two typographical errors during our review of the Granite Goose Draft EA, and we bring these to the Forest Service’s attention solely for the purpose of creating a more comprehensive and complete document. These typos include:

- In the Table of Contents, p. iv, Section 9.4 Appendix D contains the word “Inventories.” We believe the intended word is “Inventoried”
- On p. 46, 2nd paragraph refers to Table 7; we believe this should be Table 17

### **References**

Tomback, D.F., Keane, R.E., Schoettle, A.W., Snieszko, R.A., Jenkins, J.B., Nelson, Cr.R., Bower, A.D., DeMastus, Cr.,R., Guiberson, E., Krakowski, J., Murray, M.P., Pansing, E.R., and Shamhart, J. 2022. Tamm review: Current and recommended management practices for the restoration of whitebark pine (*Pinus albicaulis* Engelm.), an imperiled high-elevation Western North American forest tree. *Forest Ecology and Management*. 522. 119929.