



February 2, 2024

Dana Harris
New Meadows District Ranger
Payette National Forest
3674 Highway 95, PO Box J
New Meadows, ID 83638

Re: Granite Goose Landscape Restoration Project Draft Environmental Assessment

Dear Ms. Harris,

Idaho Wildlife Federation (IWF) and Trout Unlimited (TU) thank you for the opportunity to comment on the Granite Goose Landscape Restoration Project Draft Environmental Assessment (Draft EA).

IWF is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations and 45,000 affiliate members and individual supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

TU is the nation's oldest and largest non-profit coldwater conservation organization with over 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU staff and volunteers have worked toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges.

Additionally, TU recognizes the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes that the actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

The Granite Goose Landscape Restoration Project is proposed to improve vegetation, recreation, watershed, and transportation conditions within the project area. This project would implement vegetation and fuels treatments to address hazardous fuels to reduce the risk of uncharacteristic

wildfire, respond to insect and disease outbreaks, and promote whitebark pine (*Pinus albicaulis*), aspen (*Populus tremuloides*), and meadow conservation in the project area. Other actions proposed include stream and wetland restoration, recreation management, and travel management, which includes enhanced hydrological conditions, recreational opportunities, and reduces negative watershed impacts of unneeded roads and routes.

IWF and TU believe that the proposed landscape-scale treatments will improve conditions across multiple resource areas, including vegetation, watersheds, roads, and recreation. We offer our brief comments on the Draft EA below.

Vegetation Management

Our organizations are largely supportive of the proposed vegetation management actions in the Draft EA to improve stand characteristics fire regime condition classes, as well as to address insect and disease outbreaks. Since scoping, we have learned that vegetation management in the French Creek and Patrick Butte Idaho Roadless Areas (IRAs) have been added to the project, particularly to address insect and disease outbreaks that have plagued the area and to reduce the risk of wildland fire effects. We are pleased to see that on June 9, 2023, the Intermountain Region acting deputy regional forester reviewed and approved activities within the IRAs qualify for a Roadless Rule exception. Additionally, we are pleased to see that there is no proposed temporary road construction associated with the vegetation management activities proposed in the IRAs. We ask that the Payette National Forest commits to engaging with the Idaho Roadless Rule Commission before the decision is signed to ensure consistency with the Idaho Roadless Rule. We also ask the Payette National Forest to spell out the exceptions to the prohibited actions within IRAs rather than listing the Code of Federal Register sections to allow readers to better understand and reference proposed treatments.

Road Management

We appreciate the effort that has gone into the Draft EA in addressing management actions for unauthorized routes. We feel that these actions will contribute towards a more efficient and effective road system on the Payette National Forest and shows that projects are contributing towards the desired road densities outlined in the Forest Plan.

Fisheries and Watershed Treatments

IWF and TU support the proposed watershed restoration actions that improve degraded conditions at Hartley Meadows and within Bear Basin. We also commend the Payette National Forest for including the replacement of two culverts on Brundage Creek in the Draft EA to improve resident fish passage, fish habitat connectivity, and improve hydrologic connectivity. We also appreciate the Brundage Reservoir boat ramp improvements as this will improve the recreation experience and safety of recreationists at Brundage Reservoir.

Granite Mountain Area

We have participated in discussions with numerous user groups around the proposed extension of the over-snow vehicle closure in the Granite Mountain Area. As we understand, the boundaries of the closure area would not change from the previous closure order, but the closure would remain in place year-round instead of seasonally from January 15 to March 31 in an effort to reduce recreation conflicts. Our organizations are not offering a position to the proposed over-

snow vehicle closure extension in the Granite Mountain Area at this time. We believe this particular issue in the proposed action has led to a breakdown in collaborative support for the overall project which has many components that are desperately needed for forest health. We believe it would benefit the Payette National Forest to offer a more robust explanation and narrative of the proposed extension in the Final EA to better inform readers.

Thank you for the opportunity to provide comments. We appreciate the Payette National Forest staff in their efforts to engage with the Payette Forest Coalition throughout the entirety of this project. We'd also like to thank Payette National Forest staff for the helpful story map that makes the proposed action more digestible to readers.

Sincerely,

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