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March 6, 2024

Cheryl Probert, Forest Supervisor
Nez Perce-Clearwater National Forest
1857 Highway 16, Suite A
Kamiah, Idaho 83536

Subject: Dixie-Comstock Community Protection Project

Dear Supervisor Probert:

On behalf of the Idaho Department of Lands (IDL), thank you for the opportunity to provide comments on the Dixie-Comstock Community Protection Project.

The Idaho Department of Lands manages approximately 2.5 million acres of State endowment trust lands. These lands were granted to the State through various Territorial Acts and upon statehood by the federal government for the express purpose of maximizing returns to the trust beneficiaries – the largest trust beneficiary being K-12 public schools. Healthy, resilient forests are essential to accomplishing this mandate. Insect and disease outbreaks and wildfires on federal lands do not recognize jurisdictional boundaries and pose a threat to private property and State endowment trust lands. IDL is also responsible for fire management of over 9 million acres of federal, state, and private forest and range lands throughout Idaho. IDL has become increasingly concerned about the risk of wildfire to private property and livelihoods as rapidly increasing populations in many rural communities are near federal forestlands.

Idaho has developed effective partnerships and collaborative teams to accomplish mutual goals and effectively respond to forest threats. Idaho's "Shared Stewardship" initiative emerged as a result of increased collaboration between the State and the USFS, and on December 18, 2018, the State of Idaho, USDA, and the USFS Northern and Intermountain Regions executed the first Agreement for Shared Stewardship in the nation. This effort has resulted in robust programs, utilizing all available resources such as state and county Good Neighbor Authority agreements, Joint Chiefs' Landscape Restoration Partnership projects, and increased wildfire mitigation grant funds to expedite desperately needed forest health treatment activities across the landscape in Idaho.

IDL has reviewed the Draft Environmental Assessment of the Dixie-Comstock Community Protection Project and would like to express its full support for the Purpose and Need of this project. IDL recognizes that this project falls within the Lower Salmon Wildfire Crisis Strategy

Landscape area and agrees with the assessment that current forest conditions have resulted in an elevated risk for a catastrophic wildfire for the community of Dixie, Idaho and the Comstock area. IDL supports the project's overall objective of strategically reducing fuels loads to protect these at-risk communities and reduce the risk to firefighters and the public. Further uncharacteristic disturbances in the area threaten aquatic resources, wildlife habitat, and the social and economic wellbeing of the nearby communities of Orogrande and Elk City.

While we support implementation of this project to reduce future exposure to wildfire, the IDL offers the following comments for consideration in the finalization of this project:

IDL appreciates the inclusion of treatments to create "shaded fuel breaks" along roads within the project area to improve ingress and egress for firefighters and the public. However, we question why roadside treatments are limited to the areas outlined in the proposed action. IDL recommends inclusion of additional roadside treatments of approximately 4 miles immediately adjacent to FSR 222 (Dixie Road). Specifically, from the project boundary headed south towards Dixie to the junction with FSR 9527 (Stage Road). IDL recommends treating areas within this description not otherwise excluded due to existing fuel breaks, Riparian Habitat Conservation Areas (RHCA's) or other resource concerns.

1. IDL agrees with the proposed vegetation treatments within the Community Protection Zone (CPZ) to create defensible space adjacent to private property. IDL would strongly support expanding these treatments further into the 1½-mile CPZ to optimize their efficacy.
2. IDL supports the use of helicopter logging to minimize potential impacts on roadless characteristics for Gospel Hump IRA and roadless expanse. However, IDL recommends utilizing ground-based or cable harvest system to implement treatments in the Gospel Hump IRA within 1,000 feet of existing roads. Use of traditional harvest systems under these conditions would not require construction of new permanent or temporary roads but would significantly improve the operational and economic feasibility of implementing the proposed vegetation treatments.

IDL appreciates its ongoing partnership with the Nez Perce-Clearwater National Forest and welcomes the opportunity to assist with implementation of activities included in the project through our Shared Stewardship and Good Neighbor Authority programs.

Respectfully,

A handwritten signature in blue ink, appearing to read "Craig Foss". The signature is stylized with a large "C" and a long horizontal stroke.

Craig Foss
State Forester

cc: Jace Hogg, Federal Lands Coordinator, Idaho Governor's Office of Species Conservation,
jace.hogg@osc.idaho.gov