IDAHO CONSERVATION LEAGUE

March 28, 2024

Buddie Carroll, District Ranger
Nez Perce-Clearwater National Forest
1700 Highway 6
Potlatch, ID 83855
(208) 875-1131

Electronically submitted:
https://cara.fs2c.usda.gov/Public//CommentInput?Project=63102

RE: Idaho Conservation League's Comments on the Longleaf Project Draft Environmental Assessment

Dear Ranger Carroll:

I am writing on behalf of the Idaho Conservation League (ICL) to provide our comments and recommendations on the Longleaf Project Draft Environmental Assessment (EA).

Founded in 1973, the mission of ICL 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's seven strategic initiatives include confronting climate change, recovering Idaho's wild salmon and steelhead, cleaning up the Snake River, protecting public land, restoring abundance and diversity of Idaho's wildlife, safeguarding North Idaho lakes and waters, and reducing pollution. ICL achieves these goals through public outreach and professional advocacy. With offices in Boise, McCall, Ketchum, and Sandpoint, the organization is a consistent, statewide voice for conservation in Idaho and represents more than 26,000 members and supporters. ICL's members and supporters care deeply about protecting and restoring the environment.

In our scoping comments dated February 2, 2023, we noted that the Forest Service identified the need to reduce sediment delivery from national forest lands in the project area, and that the agency identified 5.4 miles of road for decommissioning. However, we expressed the concern that given the total maximum daily load improvement plan and water bodies with 303(d) listings associated with Long Meadow and Elk Creeks, the

proposed decommissioning activities would not outweigh the 1.3 miles of new road and 27 miles of temporary road construction. Sedimentation is not the only water quality issue in the project area. Long Meadow Creek and Elk Creek are both listed as impaired due to nutrients, with grazing activities being a primary contributor to the high nutrient loads.

We are disappointed that the Forest Service has opted to move the project forward without adequately addressing the water quality issues outlined in ICL's, and others, scoping comments for the Longleaf project. The Idaho Department of Environmental Quality's (IDEQ) CWA & 305(b) Status Report (2016) lists the beneficial uses of Long Meadow Creek as cold water and secondary contact recreation, and both of these beneficial uses are impaired by sediment, temperature, nutrients, and bacteria. Yet the Forest Service remains myopically focused on responding to forest conditions centered around vegetation and vegetation treatments while inadequately addressing other significant issues of concern regarding forest condition, including water quality. While we do appreciate proposing additional activities that could contribute to reduced sediment delivery through culvert installation and/or replacement and unauthorized route obliteration (Longleaf Draft EA, p. 12), we would have more confidence in the agency's intentions if specific locations for culvert replacement/installation were identified in the EA, or if the Forest Service committed to obliterating unauthorized routes beyond "as funding and resources allow," (EA, p. 12).

We recommend that the Forest Service revisit the Longleaf proposed actions and make adjustments that clearly demonstrate the agency's ability to address not only forest conditions related to fuel loads and impacts from insects and disease, but also address water quality issues, such as sediment delivery and nutrient loads.

The 2002 TMDL for the Lower North Fork clearwater Subbasin calls for a sediment load reduction from roads in Long Meadow Creek of 1,691 tons/year. While we do not have access to information that outlines what sediment load reductions have occurred since the approval of the TMDL, if any. The relatively insignificant amount of unauthorized route decommissioning combined with timber harvest, and erosion does not go far enough to make significant improvements to water quality in Long Meadow and Elk Creeks. Further, soil disturbance attributed to recreation activities, and specifically OHV use continues and will likely continue. The EA states, "Where and when OHV use may or may not occur is not predictable, and therefore not analyzed as part of cumulative effects," (p. 49). We disagree with this statement, as we believe the Forest Service knows that user-created trails are often associated with temporary roads and skid trails and therefore does maintain the ability to predict where erosion-causing unauthorized OHV use occurs. Further, the EA makes no commitment to bring all authorized routes

into compliance through Best Management Practices to reduce sediment delivery. We ask that the Forest Service commit to reducing sediment delivery impacts through additional unauthorized route decommissioning and maintaining all authorized routes to Forest Plan standards.

As we previously mentioned, nutrient loads also contribute to below-standard water quality in the project area, yet the EA does not address those concerns. In fact, the EA fails to include Design Features or management direction that could potentially address these issues, such as changing grazing management practices in the project area. We urge the Forest Service to revisit this issue and include provisions to reduce streambank erosion and nutrient delivery by identifying sensitive wetlands and constructing exclusion fencing or requiring allotment permittees to exclude grazing from riparian damaged or sensitive riparian areas.

Thank you for the opportunity to submit comments on the proposed Longleaf Project 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 Palouse Ranger District on this and future projects.

Respectfully submitted,

Randy Fox
Conservation Associate
Idaho Conservation League
rfox@idahoconservation.org
(208) 345-6933 x 510