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Submitted electronically to:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=56701>

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May 6, 2024

To: Objection Reviewing Officer
 Intermountain Region, U.S. Forest Service
 324 25th Street
 Ogden, UT 84401
 objections-intermtn-regional-office@usda.gov

Re: OBJECTION to the Sage Hen Integrated Restoration Project #56701
Environmental Assessment (EA) and Draft Decision Notice and Finding of No
Significant Impact (DN/FONSI)

Responsible Official: Brant Peterson, Forest Supervisor, Boise National Forest

I. INTRODUCTION

Pursuant to 36 CFR Part 218, the Idaho Conservation League files this Supportive Objection to the Environmental Assessment (Revised), Draft Decision Notice and Finding of No Significant Impact dated May 20, 2022 (Draft DN/FONSI), issued by Boise Forest Supervisor for the Sage Hen Integrated Restoration Project on the Emmett Ranger District. The EA and Draft DN/FONSI are available at: <https://www.fs.usda.gov/project/?project=56701>.

Pursuant to Part 218, the Idaho Conservation League is the Lead Objecter.

Contact person: John Robison, Idaho Conservation League, PO Box 844, Boise ID 83701
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ICL supports the overall purpose and need for the Sage Hen Integrate Restoration Project. The project encompasses 67,800 acres on the west side of the Emmett Ranger District of the Boise National Forest, and incorporates additional land owned by the Bureau of Land Management, Idaho Department of Lands, and private lands. This area is highly utilized by a variety of recreation user groups and visitors.

The purpose of the Sage Hen Project is to:

- Manage and restore vegetation conditions to improve landscape resiliency and resistance to natural disturbances (insects and diseases, wildfire, etc.) occurring at uncharacteristic scope and scale.
- Conserve or restore habitat for wildlife species that depend on low-elevation, old forest habitats within the nonlethal and mixed 1 fire regimes.
- Maintain or improve aquatic habitat and watershed conditions.
- Improve and manage recreation opportunities; and
- Support local and regional economies and livelihoods.

Pursuant to 36 CFR 218.8, the Objector states that the following content of this Objection demonstrates the connections between the Objectors' comments for all issues raised herein unless the issue or statement in the EA or Draft DN/FONSI arose or was made after the opportunity for comments, as detailed herein. Pursuant to 36 CFR 218.8(b), the Objector's previous comments are hereby incorporated by reference.

The Objector has met with the Forest Service staff numerous times to discuss the project in detail and fully participated in the NEPA process for this project. The Boise National Forest first initiated discussions with ICL about the Sage Hen area in 2012. The objector submitted scoping comments on the Sage Hen project on May 14, 2020, an objection letter on December 23, 2020, a follow up letter with concerns and recommendations on May 12, 2021, comments on the revised Sage Hen project prior to the release of the revised EA on May 18, 2023 and comments on the Revised EA in February of 2024. We appreciate the Forest Service's hosting of a public open house and comment period in April of 2023 for the revised project and providing comment period on the revised draft EA in January of 2024.

Please include the ICL's previous comments and original objection as part of the project record.

During initial project development and the objection period, ICL and other stakeholders had asked for the consideration of additional alternative(s) and a public comment period on the EA.

Over 80 objections were received during the 2020 objection period but no significant changes were made as part of the objection reviewing process. The subsequent 2021 Decision Notice did

incorporate earlier recommendations from ICL, including modifying treatments for the south and east sides of Chief Eagle Eye Creek, Buck Canyon and Lava Gulch to reduce impacts to bull trout critical habitat and big game winter range.

The project was subsequently litigated but time-sensitive salvage removal of timber stands affected by the recent tussock moth continued and campground improvements proceeded under separate decisions. In October of 2022, the Forest Service and plaintiffs reached a settlement agreement providing a path forward for the project. As part of the agreement, the Forest Service developed an additional alternative to reduce impacts to bull trout. Alternative B drops additional units from commercial harvest treatments and temporary road construction while retaining options for non-commercial treatments and prescribed burning in these areas:

Alternative B incorporates the same management actions as Alternative A, except Alternative B eliminates a ford on Chief Eagle Eye Creek, reduces associated commercial harvest acres, and eliminates associated temporary roads. Alternative B also eliminates additional acres adjacent to Chief Eagle Eye Creek. These changes were made based on comments and objections to the rescinded decision...This alternative is responsive to concerns raised in objections and litigation related to potential impacts to watershed function and bull trout habitat. (2024 EA p. 13).

Alternative B also carries forward the final Decision Notice modifications that were recommended by ICL to reduce adverse impacts of the project to wildlife species and reduce sedimentation.

II. STATEMENT OF REASONS

ICL is supportive of the overall direction of the revised Sage Hen Integrated Project and has invested time and effort in reviewing the proposal and providing comments throughout the NEPA process. We would like to see the revised version project successfully implemented in such a way that the projected benefits are optimized and any negative effects are successfully avoided, minimized, and mitigated - all while allowing for public participation and transparency.

We intend to use the objection process as a means to strengthen the project record, participate in any objection resolution discussions with other objectors, further reduce environmental impacts, improve restoration benefits, address any remaining issues of uncertainty, and update the adaptive management approach to better guide project implementation as needed. Should other objectors raise additional concerns or bring additional information to the Forest Service's attention, we hope to use the objection process to review this information and offer our perspective on any needed project modifications. If other objections are submitted on this project, we request that the Forest Service host an objection resolution meeting with all of the

objectors during the agency's objection review period. Although it is not a statutory requirement for the Forest Service, we believe this kind of meeting would be beneficial to potentially resolve any objections that arise and improve the project.

Objection Resolution recommendations that will better achieve the purpose and need by reducing negative project impacts and improving restoration components

Management of sediment is an important element of project implementation:

Additionally, a variety of monitoring and evaluation techniques such as monitoring recovery of temporary roads and turbidity monitoring will be used to ensure that Forest Plan Standards are being met throughout the duration of the Project and conservation measures are effective in meeting Forest Plan guidelines and management requirements. Sage Hen Response to Comments, p. 7.

The project record would be strengthened if the Forest Service described the specific temporary road and turbidity monitoring and evaluation techniques and the frequency of these measures.

There is a small potential for the Forest Service to exceed the Equivalent Clearcut Area Forest Plan threshold of 15% in Third Fork (18.4%) and Second Fork (19%) for two years if project activities are not properly staggered. We appreciate the Forest Service's statements that project activities will be sufficiently spread out in time to avoid any exceedances but recommend that the Forest Service describe a design feature so that new Forest Service personnel or contractors know that project activities cannot result in an exceedance of 15% ECA.

One of the project goals is to maintain or improve aquatic habitat and watershed conditions. Properly sized culverts allow for continued use of the transportation system for recreation and commercial activities and help prevent plugged culverts, road failures and watershed damage. Originally, the Forest Service had considered 6 new Aquatic Organism Passages (AOPs) to improve fish habitat connectivity but is only proceeding with the 4 AOPs in occupied bull trout habitat:

The culverts on Sagehen and Joes Creeks are not within bull trout critical habitat, nor are bull trout present. Alternative methods to address the issues at Sagehen Creek and Joes Creek are being considered.

We recommend that the Forest Service strengthen the project record by detailing these alternative methods and timing for Sagehen Creek and Joes Creek. Even though the undersized culverts on these streams are outside of critical habitat for bull trout, upgrading them should be considered as part of this project as these creeks are popular fishing designations and would benefit sportsmen.

Respectfully submitted,

A handwritten signature in black ink, reading "John Robison". The signature is fluid and cursive, with a large loop at the end of the last name.

John Robison
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