



November 13, 2024

Mr. Jeff Jones, Council District Ranger
Payette National Forest
P.O. Box 567
2092 Highway 95
Council, ID 83612
(208) 253-0100

Electronically submitted:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=67112>

RE: Idaho Conservation League's Scoping Comments for the Proposed Council Ranger District 2022-2024 Post-fire Reforestation Project

Dear Jeff:

I am writing on behalf of the Idaho Conservation League (ICL) to provide our scoping comments and recommendations on the proposed Council Ranger District 2022-2024 Post-fire Reforestation Project.

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.

We generally support the proposal to re-forest and plant fire-adapted and Federally-listed tree species in areas of the Payette National Forest impacted by wildfire from 2022-2024. However, we do believe that the Forest Service is narrowly defining

the Purpose and Need and Management Direction by citing only one Forest Plan goal (TRGO02) and one Objective (TROB01) directly related to Timber Resources. The project scoping document fails to reference or acknowledge the more critical aspects of reforestation, such as Timberland Resources Goal 1 (TRGO01), which calls for managing forested vegetation for conditions that are resilient and resistant to uncharacteristic fire, insect, and disease damage, and conditions that contribute to desired vegetative conditions, including distribution of tree sizes, species composition, and canopy cover. Further, we believe that all of the goals outlined in the Forest Plan's Management Direction for Vegetation (VEGO01-VEGO07) apply to this project proposal. These vegetation goals are:

- VEGO01 - Maintain or restore (emphasis added) desired plant community components, including species composition, size classes, canopy closures, structure, snags, and coarse woody debris as described in Appendix A
- VEGO02 - Maintain or restore (emphasis added) vegetative conditions as described in Appendix A to provide for ecological processes, including disturbance regimes, soil-hydrological processes, nutrient cycles, and biotic interactions
- VEGO03 - Maintain or restore (emphasis added) vegetation conditions as described in Appendix A to reduce frequency, extent, severity, and intensity of uncharacteristic or undesirable disturbances such as fire, insects, and pathogens
- VEGO04 - Maintain or restore (emphasis added) distribution and abundance of habitats that contribute to variable populations of existing native and desirable non-native plant, fish, and wildlife species
- VEGO05 - Maintain or restore (emphasis added) a representation of native plant communities throughout the Forest
- VEGO06 - Facilitate regeneration of desirable plant species, particularly those that are currently identified as declining
- VEGO06 - Maintain or restore (emphasis added) elements of vegetative spatial pattern, such as amount, proportion, size, inter-patch distance, variation in patch size, and landscape connectivity important to the achievement of vegetation or other resource goals and objectives in the Forest Plan

We realize that certain aspects of each of the listed goals will not immediately apply to the proposed Post-fire Reforestation project, as much of the previously existing coarse woody debris was burned during these wildfire events, and species composition, class sizes, and populations are affected. The replanting will begin those processes anew. However, the overarching goals are applicable to this project and the Forest Service is missing an opportunity to emphasize forest health and restoration while focusing solely on the future return of commercial harvest in these areas. This is particularly

concerning as the Payette National Forest is located at the southern extent of truly viable timber resources and production. The conditions of the Council Ranger District are primarily dry and warm, making it more likely to support Ponderosa pine, western larch, and douglas fir. Further, climate change will likely impact growth rates and there are no assurances that some areas will even regenerate vegetation that reflects pre-fire conditions. Therefore, we recommend that the Forest Service incorporate more of the vegetation and botanical goals, objectives, and standards into the Council Ranger District 2022-2024 Post-fire Reforestation project.

The Forest Service should also include other applicable portions of the Forest Plan in the Management Direction section of the proposed reforestation project. These include goals, objectives, and standards as they relate to the Management Direction for Botanical Resources, including:

- BTGO01 - Provide habitat capable of supporting viable populations of native plant species within the Forest and supporting plant biodiversity to meet social needs, biological diversity, and ecological and functional integrity
- BTGO06 - Manage plant community habitats (e.g., riparian, wetland, and upland forest, shrub and grassland habitats) to provide for the desired amount, quality, and distribution of habitats, reduced fragmentation within habitats, juxtaposition and connectivity to other habitats, and ecosystem processes that shape habitat
- BTST05 - In revegetation and seeding projects in occupied sensitive plant habitat, a Forest botanist shall be consulted to ensure appropriate species are used
- BTGU03 - When available and not cost-prohibitive, seeds and plants used for seedings and plantings in revegetation projects should originate from genetically local sources of native species. When project objectivity justify the use of non-native plant materials, documentation explaining why non-natives are preferred should be part of the project planning process

We support the proposed plantings, which should include ponderosa pine, whitebark pine, and western larch. We also encourage the Forest Service to expand the scope of the proposed project and consider adding riparian restoration plantings to the project's proposed actions. Douglas fir should also be considered. In addition to these plantings, the Forest Service should consider partnering with the Idaho Department of Fish and Game and other organizations to plant native shrubs and forbs to benefit wildlife. Planting desired species such as bitterbrush may help slow the spread of invasive species and provide forage for big game and other wildlife. We are particularly concerned about the establishment and spread of noxious weeds in the project area. Invasive and noxious species such as rush skeletonweed, cheatgrass, Canada thistle and others are already well established in several project area locations.

We appreciate the Forest Service highlighting Inventoried Roadless Areas (IRA) as part of the project proposal, noting that portions of the Limepoint, Lava, Four Corners, and Wolf Creek fires impacted IRAs. The scoping document does state that any planting that would occur within these areas would be in compliance with roadless rules and maintain the natural integrity of these landscapes. However, the Forest Service does not offer detailed plans for how the agency will accomplish replanting efforts, and especially for those efforts including the replanting of whitebark pine, within the roadless polygons. We recommend that for any replanting efforts in roadless areas that the agency commits to avoiding the construction of any roads and trails, either temporary or otherwise. Road and/or trail construction in areas impacted by wildfire can lead to further unintended impacts and consequences, such as soil compaction, the spread or establishment of noxious and/or invasive plant species, erosion, and sediment delivery to surrounding waterways. We further recommend that the Forest Service submit the project to the Idaho Roadless Commission as soon as possible, if local staff have not already done so. This affords the Commission ample time to consider the project proposal at the next meeting and provide recommendations and guidance that would enhance the project.

We appreciate the Forest Service acknowledging the fact that these replanting and reforestation efforts will require dedicated capacity for several years, and that accomplishing the end goal(s) will best be met by tapping into a variety of opportunities, including multiple-agency support and volunteer recruitment. The Idaho Conservation League has long partnered with the Forest Service and other land management agencies to help accomplish these sometimes overwhelming undertakings, and we look forward to partnering with the Payette National Forest for this project. Please contact me or other ICL staff members when the Forest Service is prepared to bring volunteers into the equation and we will help meet those needs.

According to the scoping document, the project as proposed will not include salvage timber operations and firewood gathering/supply, and we suspect that removing the occasional hazard tree will likely occur during planting operations. Therefore, we expect that any salvage operations and firewood gathering will potentially occur under separate authorizations. Because hazard trees are found within burned areas slated for reforestation, we recommend that the Forest Service include a stipulation or Design Feature that places sideboards on hazard tree removal while authorizing said activities for the purposes of replanting and reforestation and the safety of all those involved.

Thank you for the opportunity to submit comments on the proposed Council Ranger District 2022-2024 Post-fire Reforestation Project. Should you have any questions regarding these comments and recommendations, please do not hesitate to contact me. We look forward to working with the Council Ranger District on this and future projects.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Randy Fox", is centered within a light gray rectangular box.

Randy Fox
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