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Mr. Brant Petersen, Forest Supervisor
Boise National Forest
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Electronically submitted:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=67305>

December 10, 2024

RE: 2024 Wildfire Impacts Response #67305 Scoping Comments

Dear Supervisor Petersen:

Please accept the Idaho Conservation League's comments for the 2024 Wildfire Impacts Response #67305 Project. Since 1973, the Idaho Conservation League has had a long history of involvement with public lands issues. As Idaho's largest state-based conservation organization, we represent over 26,000 supporters who have a deep personal interest in restoring our forests to more resilient conditions and reducing the likelihood of uncharacteristic wildfires. We also work to restore wildlife habitat and improve ecosystem and watershed health.

The Idaho Conservation League (ICL) is also a voting member of the Boise Forest Coalition (BFC) which formed in 2010. Forest Collaboratives like the BFC have proven to be successful ventures across Idaho for increasing the quality of Forest Service proposals, restoring forest and watershed conditions, and improving the dialogue among a wide variety of stakeholders. Our goal is to see a successful project that balances forest health, watershed, wildlife and community goals and that is implemented in a timely manner. It is also imperative that the environmental analysis of restoration projects accurately represents the scale and scope of the proposed actions. These comments are intended to complement those from the BFC.

We appreciate Brian Lawatch and other Boise National Forest staff for providing information and making themselves available to answer questions regarding several of the fire restoration projects related to this scoping notice. It was helpful to hear specific proposed plans and to learn about the impacts of burned soils and vegetation and how the relationship between the two can affect restoration efforts.

The Purpose and Need of these post-fire projects is to address safety risks emanating from Hazard trees along National Forest System roads and trails, to restore portions of the landscape through post-fire watershed improvements and replantings, to realize economic value of fire-killed trees through salvage commercial harvest operations, to protect fire-damaged landscapes from unauthorized access through the decommissioning/obliteration of unauthorized roads and user-created trails, to repair forest infrastructure, and to work with permittees to rest affected grazing allotments from livestock grazing for a minimum of two years.

ICL supports the overall goals of strategic removal of hazard trees, tree reforestation, and rehabilitation of unneeded roads and trails. These projects also include commercial salvage logging operations in areas that are suitable for timber harvest. We can also support carefully managed commercial salvage operations in areas that are suitable for timber harvest, particularly in stands that were already planned for harvest before the Lava, Flat, Snag, Nellie, Dollar, Bulldog, Bull Trout, Goat, and Wapiti fires. We include our specific recommendations and comments below.

Thank you for the opportunity to comment on these projects. The Boise Forest Coalition looks forward to working with the Boise National Forest on this, and future, projects.

Sincerely,



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ICL Comments for the Proposed 2024 Wildfire Impacts Response #67305 Project

Purpose and need

ICL is supportive of the purpose and need for these projects. The fires resulted in significant public safety issues and selective hazard tree removal is appropriate. Long distances separate some areas with extensive tree mortality from surviving trees that can serve as seed sources. These areas of high mortality can likely benefit from active reforestation efforts. The fires have impacted soil stability within the project area and watershed restoration actions such as decommissioning high-risk, low-use non-system roads and unauthorized/user-created trails will help reduce the impacts. Significant portions of the project area were authorized for timber sale but were burned before harvest was completed and the economic value of these stands is rapidly expiring. By salvage harvesting these and other suitable areas in an environmentally responsible manner, the value of this timber can be captured and used to help offset the other components of these projects. ICL recommends that the Forest Service utilize a flexible approach to accomplishing the work proposed for these projects, given current conditions and the strong potential for changing conditions.

We also recommend that the Forest Service review applicable portions of the Forest Plan to discern if there are any potential improvements or restoration efforts that could be included in this work that would support the fulfillment of the Forest Plan Goals, Objectives, and Standards and strengthen these restoration undertakings.

Salvage operations

We support the Forest Service's criteria to determine hazard trees and salvage locations. We wish to emphasize the time-sensitive nature of salvage harvest operations and encourage the Forest Service to conduct an efficient yet thorough analysis so individual projects can be implemented in a timely manner. We appreciate the consideration of logging impacts on soils and support the Forest Service's approach to reduce those impacts. Given the current timber market, we recommend that the Forest Service consider a variety of approaches to accomplishing salvage operations.

Hazard tree removal

We understand that trees within 200 feet of each side of roads and trails may be considered hazard trees and be marked for felling and removal if suitable. We also understand that the hazard tree removal efforts will not result in "clear cut" swaths along those transportation and recreation corridors. We appreciate that the Forest Service will mindfully assess hazard risks along roads and trails, removing only those trees that pose health and safety risks. We support the Forest Service's general assessment that removal efforts should target trees on the uphill side of a road or trail as uphill trees are more likely to fall across a road or trail.

Snags

As part of the EA, the Forest Service should describe the differences in snag retention criteria between green trees and burned trees. The Forest Service should also describe what percent of the project area will remain unharvested and how the overall snag diameters in these areas compare to snag diameters in harvest areas. Particularly important snags for wildlife should be marked as wildlife trees so firewood cutters do not remove them. These snags should be monitored to ensure they are retained on the landscape.

Elk security

The 2024 wildfires on the Boise National Forest likely will result in decreased elk security in the portions of the project area for several years. If not properly designed and implemented, salvage logging efforts may further decrease elk security. The Forest Service should analyze the fire's impacts on elk security and design the projects in such a way to avoid, minimize and mitigate any adverse effects from this project. Design features could include adjusting the snag retention guidelines in certain areas with high-value for elk, implementing seasonal road closures during hunting season in strategic areas, or decommissioning additional unauthorized routes that are found as part of field work. We would appreciate having a Forest Service wildlife biologist present at future BFC meetings so we can learn about how elk and other wildlife may be affected by the fires and these proposed projects.

Riparian Conservation Areas

We support the Forest Service's plans to remove hazard trees within RCAs in a way that best protects both the public and riparian resources. We recommend that the Forest Service carefully evaluate hazard tree removal within RCAs as the snags or fire-killed trees continue to provide shade which cools water temperatures, supporting aquatic life.

Reforestation and other plantings

We support the proposed plantings, including ponderosa pine and Douglas fir, with additional plantings of whitebark pine, Western larch, and riparian restoration plantings. We also recommend that the Forest Service consider planting aspen clumps with appropriate protection mechanisms, such as cages or exclusionary fencing. Aspen regeneration has been a goal for many of the recent BNF forest restoration projects and these replanting efforts provide an excellent opportunity to expand the successional establishment of aspen throughout the footprint of these numerous wildfires. In addition to these plantings, the Forest Service should consider partnering with the Idaho Department of Fish and Game (IDFG) 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 spread of noxious weeds in the project area. Invasive species such as cheatgrass and rush skeletonweed are already well established or present in much of the impacted areas.

Reforestation and plantings will require a significant amount of capacity and we encourage the Forest Service to enlist the assistance of IDFG, Idaho Conservation Corps, local stakeholders, and NGOs to recruit volunteers to support these efforts.

Legacy Tree Retention

Because the large tree component is generally underrepresented across the Boise National Forest, any particularly large native trees in the project area, either live or fire-killed, should be protected for both wildlife and as part of the forest's natural heritage. The only reason the Forest Service should remove a Legacy tree is for health and safety concerns. The agencies should survey the project area for large diameter, legacy trees and wildlife habitat live trees and snags. Individual trees or stands of trees that represent large diameter trees or are important trees for wildlife should be marked for retention at the base and at breast height. Design features such as a site-specific diameter limit should be in place to ensure the persistence of any large-diameter snags that serve as important wildlife habitat. Commercial salvage activities should be designed to retain such trees.

Sediment and Fisheries

There are concerns that sediment delivery to streams will increase during spring snowmelt or during heavy precipitation events. Sediment delivery can be especially impactful on ESA-listed species such as bull trout by covering and smothering eggs in spawning redds. We recommend that the Forest Service consult with USFWS to augment the agency's in-house fisheries staff to develop Design Features that will reduce sediment delivery to all streams, but particularly those that support bull trout populations. The Design Features could require the use of sediment fencing, straw bales, and other elements to trap or divert sediment before it enters streams and waterways.

Firewood

Where suitable, we recommend that contractors deck any wood material that is not commercially viable and that is not needed for nutrient cycling and leave it for the public to utilize. We recommend that the Forest Service clarify which areas are open and closed to firewood cutting in firewood permits and by signing specific areas and increasing outreach efforts. We are concerned that firewood collectors may remove snags and felled trees that should remain in Riparian Conservation Areas. We are also concerned about increased unauthorized motorized use, particularly with regard to firewood collecting. The Forest Service should emphasize the need to follow motor vehicle use maps in outreach and education efforts.

Specific Locale Recommendations

We understand that roughly $\frac{2}{3}$ of the Sage Hen project area was burned over during the Lava Fire, likely the most significant 2024 fire on the BNF. We also understand that the Sage Hen project has become a lower priority in light of the 2024 fires and the need to begin stabilization and restoration efforts as soon as possible. However, ICL believes there are several elements of the Sage Hen project related to watershed improvements that could be implemented during the Lava Fire recovery efforts. These include culvert

replacements, addressing blowouts that contribute a significant amount of sediment to bull trout bearing waters. The BFC believes that completing these Sage Hen-related improvements during the Lava fire recovery efforts makes sense as the agency (or its contractors) will have equipment in place, taking advantage and making the most of available capacity and workforces.

Regarding recreation across the project areas, ICL encourages the Forest Service to identify opportunities to provide further separation from motorized and non-motorized recreation opportunities, proactively reducing conflict between user groups.

One of the Needs of the 2024 Wildfire Impacts Response project is to repair and/or replace infrastructure such as bridges, signs, fences, culverts, campgrounds and water and wastewater facilities. There are concerns that spring runoff or flooding events from significant rain or rain-on-snow events could cause localized flash floods such as the event that took place in Chief Eagle Eye Creek late this fall after the Lava Fire had concluded. Our members are also concerned with debris flows that could further impact bridges, roadways, and other infrastructure elements. We encourage the Forest Service to use LiDAR, GRAIP Lite, and other remote sensing technologies to identify potential landslide areas or flood zones, such as the Bull Creek drainage, and implement Design Features that would mitigate impacts from localized flooding or landslides.

Cumulative Effects

We understand that the 2024 fires are widely dispersed around the BNF and impact numerous watersheds, with each having its own local response needs. However, some issues cross watershed boundaries and need to be analyzed in the cumulative effects analysis. These cross-boundary issues include terrestrial wildlife, birds, recreation, and economic and social impacts. By addressing these issues in the cumulative effects sections of the analysis documents, the Forest Service can meet NEPA and NFMA requirements so the project can be implemented in a timely manner.

Monitoring

We recommend that the Forest Service consider supporting an independent, citizen-led, monitoring committee for each project. These committees would conduct visual monitoring regarding the implementation and effectiveness of each of these projects with respect to the primary goals. Members of ICL and the Boise Forest Coalition may be interested in participating in these efforts so please keep the coalition informed.