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Submitted electronically to:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=67425>

March 17, 2025

RE: Comment to Proposed Actions for the Lava Restoration Project

Thank you for the opportunity to review and provide comment on the Proposed Actions for the Lava Restoration Project public scoping information document. I am the Land Manager for the J.R. Simplot Company, Land & Livestock Division. The J.R. Simplot Company owns the base property and holds grazing Permit Number 02271, which permits Simplot to graze within the Payette C&H and Ola C C&H grazing allotments, both of which were impacted by the Lava Fire that took place during 2024 and are subject to these proposed actions. I appreciate the opportunity to be included within discussions with the Forest Service regarding the restoration and rehabilitation of these grazing allotments and look forward to providing more detailed comments on the anticipated draft Environmental Assessments. Included below are the comments we have organized by heading.

Project Location

The project is located entirely within the boundaries of the Ola C C&H and Payette C&H grazing allotments, the Lava Fire and the subsequent rehabilitation and restoration projects have directly and will continue to directly impact our ranching operations. We are permitted to graze up to 411 cow/calf pairs on the Payette C&H Allotment and 232 cow/calf pairs on the Ola C C&H Allotment. At this time, both allotments are closed for livestock grazing for the next two grazing seasons, though we are working with the Forest Service to determine if there is opportunity to graze in the unburned portions of the allotments.

Potentially Affected Environment

In addition to the issues identified within this section, it should be noted that within the Payette C&H Allotment the rider cabin at Third Fork and associated horse corral, as well as a livestock corral were destroyed in the fire.

Purpose and Need: Why do we need to act?

In general, we support the purpose and need of the Lava Restoration Project for hazard tree mitigation, commercial salvage, reforestation, revegetation of non-forested areas, recreation and access management, and range management activities.

One specific comment as related to the Purpose and Need is as follows:

Range Management: We recognize the need to provide for recovery of vegetation, improving water quality and soil stabilization within the burned area, and believe the two years required by the forest plan provides adequate time for recovery and reintroduction of livestock to the burned area should happen no later than June of 2027. This will allow for fine fuels management as the forest continues to heal post fire. The Forest Service should work with permittees to identify opportunities to graze the unburned portions of the allotments and to find vacant allotments for displaced cattle during the 2025 and 2026 grazing seasons.

Proposed Action: What are we proposing to do?

In general, we support the proposed actions in the Lava Restoration Project for hazard tree mitigation, commercial salvage, reforestation, revegetation of non-forested areas, recreation and access management, and range management activities.

Specific comments as related to the Proposed Action are as follows:

As to Vegetation Management:

Hazard Tree Mitigation – In addition to the areas listed at page 4 of the Lava Restoration Project details, the USFS should also consider removing hazard trees near the Third Fork Holding Facility, Payette Rider Cabin, and all other range infrastructure in order to mitigate hazard risk during restoration, reconstruction, rehabilitation, and use of range improvements.

Reforestation of Forested Areas – Future documents should include maps of proposed reforestation project areas, information on livestock use restrictions within the reforestation areas, and what tools will be available to producers during plantation growth.

Revegetation of Non-Forested Areas – Any revegetation of non-forested areas should be focused in areas where natural recovery is not possible. Revegetation projects should be completed during the two-year rest period required by the forest plan, and not impact livestock grazing after the initial two-year closure.

As to Recreation and Trail Management:

Wilson Corrals #135006 – This trail runs adjacent to a bull trout stream in which we worked with the Forest Service to construct a straw jack fence by falling trees along the trail to prevent livestock from accessing the stream, except for in identified livestock watering areas. This was done to protect critical bull trout habitat. Because this area was burned, any stabilization and restoration work along this trail system should reconstruct that straw jack fence by felling hazard trees strategically to create a barrier similar to what was there pre-fire.

As to Transportation Management:

Road Maintenance and Use – We fully support the road maintenance on all open roads within the project area and timber haul routes. Increase in traffic to complete restoration efforts, paired with the damages caused by the fire and subsequent flooding will result in major impacts to the roadways that are already in disrepair due to heavy use. Future documents should include a road repair and maintenance plan and schedule.

As to Range Management:

Reconstruction of the Third Fork Gathering Corral – This corral is a critical component of our range management, and we are fully in support of its replacement. We recommend the Forest Service analyze the reconstruction to be done in steel pipe. This was our recommendation when the corrals were recently reconstructed. Had the corrals been constructed out of pipe at that time, they likely would have survived the impacts of the fire. The long-term benefit of steel pipe corrals outweighs the cost of the materials.

Reconstruction of the Third Fork Riders Cabin and Horse Corral – This range improvement is a critical component of the management of the Payette C&H Allotment and we are fully in support of its replacement.

Fence Repair and Replacement – These range improvements are critical for livestock management within the allotments, and we are fully in support of their maintenance and reconstruction. If possible, let down fencing structure should be utilized for future maintenance. Also, if possible, rerouting some of the fences to better fit the terrain and aid in proper management should be considered. Authorization for hazardous tree removal during fence reconstruction is required.

Water Developments – These are key range improvements critical for livestock management within the allotment and we are fully in support of their replacement. In addition, all hazardous trees should be removed from the immediate vicinity of water developments.

We look forward to working with you as you move forward with the restoration and reclamation of this area post Lava Fire. Please feel free to reach out to me directly with any questions or concerns.

Thank you,

A handwritten signature in blue ink, appearing to read "Darcy Helmick", written over a horizontal line.

Darcy Helmick
Land Manager