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Submitted electronically to:

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

Snag Nellie <https://cara.fs2c.usda.gov/Public/ReadingRoom?Project=67427>  
and to

[brian.lawatch@usda.gov](mailto:brian.lawatch@usda.gov)

May 9, 2025

RE: Idaho Conservation League comments on the Environmental Assessments for the  
Lava Ridge Restoration and Snag Nellie Projects

Dear Brian,

On behalf of the Idaho Conservation League (ICL), thank you for the opportunity to submit comments on the Environmental Assessments for the Lava Restoration and Snag Nellie Restoration Projects. Since 1973, ICL has had a long history of involvement with public lands issues. As Idaho's largest state-based conservation organization, we represent over 30,000 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 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. Unique comments submitted by ICL are underlined to make it easier to respond to specific comments.

### **About the Boise Forest Coalition**

In September 2010, the BFC was formed to bring together diverse interests to craft recommendations for multi-faceted forest projects. The citizen-led group is open to anyone with an interest in Boise National Forest management.

The mission of the citizen-led Boise Forest Coalition is to provide the Boise National Forest with management recommendations that:

1. Are developed through consensus decisions involving all members of the Coalition;
2. Address natural resource, economic, recreational, and societal needs;
3. Are compatible with Forest Plan direction including implementation of the Forest's Wildlife and Aquatic Conservation Strategies;
4. Are economically realistic;
5. Promote future collaboration during implementation and monitoring.

The BFC's objectives include the following:

- Restore forest and ecological health
- Reduce forest fuel hazards
- Create economic opportunities
- Produce forest products
- Protect designated Idaho roadless areas
- Enhance bull trout habitat and connectivity
- Maintain and enhance fish and wildlife habitat
- Provide a variety of trail-related recreational pursuits
- Improve management of recreational uses to better address impacts on natural resources
- Provide dispersed camping and wildlife-related opportunities
- Coordinate with adjacent land

The BFC seeks to provide consensus-based recommendations for these undertakings, track projects through implementation, and is committed to working with the Forest Service to achieve joint goals that improve, manage, protect and restore the Boise National Forest. The BFC has worked closely with the Forest Service on the Clear Creek, High Valley Integrated, Bogus Basin Forest Health, Sinker Creek-Boise Ridge, and Upper Mores, to name a few.

## **Lava Restoration and Snag Nellie Comments**

We support the purpose and need for the Lava Restoration and Snag Nellie Comments.

The Lava Restoration Project is a 39,340-acre Project within the 97,615 Lava Fire where it overlaps with the previously authorized Sage Hen Project. The Snag Nellie Project is focused around the 33,440 acre Snag Fire and the 50,070 acre Nellie Fire. We support the purpose and need for these projects, which include hazard tree mitigation, commercial salvage, reforestation, revegetation of non-forested areas, recreation and access management, infrastructure repair and range management.

The Forest Service is seeking approval for an Emergency Situation Determination (ESD) in which there will be no objection processes or opportunity for an administrative review of the draft Decisions. As such, we appreciate the Forest Service providing multiple comment opportunities to incorporate recommendations and address concerns before the Decision Notice is signed.

Our primary request is to incorporate additional design features to avoid impacts to Sacajawea's bitterroot individuals, particularly within identified populations within the Snag Nellie Project.

Sincerely,

A handwritten signature in black ink, reading "John Robison". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

John Robison  
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## Boise Forest Coalition comments on the Environmental Assessments for the Lava Restoration and Snag Nellie Restoration Projects

### **Maps**

We appreciate the presentation of a map at the May 1 BFC meeting showing the project boundary in relation to the whole 97,000 acres of the Lava Fire and the original Sage Hen project area. We recommend that the DN and FONSI include a map showing these features as well as Inventoried Roadless Areas and the nearby Lava Project just north of the project area on the Payette National Forest.

### **Hazard tree mitigation**

We support the removal of identified hazard trees within up to 200 feet of a road or trail, with an emphasis on trees uphill of roads and trails as trees tend to fall downhill. We appreciate the use of log felling and transportation practices that minimize soil disturbance, particularly within Riparian Conservation Areas.

### **Commercial salvage**

We remain concerned about the economic feasibility of salvage timber sales. What happens if sales don't sell? Other plans

The Forest Service should prioritize timber sales that are the most economically viable. We appreciate that commercial logging is focused along existing roads and outside of areas that experienced high fire severity and where soils are particularly susceptible to erosion from ground-disturbing activities. In areas where soil erosion is a significant concern, we recommend that the Forest Service retain an option of winter logging over snow and frozen soil in the 25/26 season if the timber value will last that long.

The Forest Service should also factor in any cumulative impacts from salvage activities on adjacent ownerships. We appreciate that dust abatement will occur as needed to mitigate impacts to the environment and provide for public safety. We note that logging operations on state and private properties have already led to traffic increases along NF-618 which have created large amounts of dust. Some additional mitigation measures for dust control would be beneficial to forest resources, private landowners and water quality. We encourage the Forest Service to reach out to the County and timber contractors about additional monitoring measures and mitigation measures such as coordinating on speed limits, limiting operating periods and prioritizing road sections for watering.

Some roads used for winter logging may be plowed, and we recommend coordinating with Valley County and snowmobile clubs on any winter management activities that can impact snowmobile grooming and recreational access.

We also recommend that the Forest Service deck any non-commercial trees at landings in such a way that material could be available for fuelwood for the community. Some other timber projects have participated in the Wood for Life Program<sup>1</sup> through which fuelwood is donated to Tribal residents to assist in heating homes. We encourage the Forest Service to see if this program is a potential fit for this project.

One potential use for slash and root wads from timber operations would be for streambank stabilization and habitat improvement.

The Boise National Forest should consider the addition of a CharBoss burner to help complete the disposal of the biomass created from the commercial and noncommercial timber operations. This would allow for lengthening the time for disposal as the burner can be run when prescribed fires are not in prescription as long as you can transport the unit to the disposal site. This could be done in conjunction with the Rocky Mountain Forest and Range Experiment Station unit from Moscow, Idaho as a test to start or as a unit to help get the Boise National Forest into the process.

### **Reforestation and Revegetation of non-forested areas**

Reforestation and revegetation efforts should be focused on areas of greatest need where there is a low likelihood of natural recovery.

We appreciate the identification of 2,920 acres in the Lava Project and 2,670 acres in the Snag Nellie Projects where shrub planting would be most beneficial. The Decision Notice should confirm how much of an area the Forest Service has the seedlings and capacity to actually replant. There may also be some islands of remnant native vegetation that survived the fire, adjacent seed sources, or areas where native vegetation is more likely to recover on its own. We recommend using native seed sources to the extent practicable. Herbicide use for weeds should be focused in areas with highest potential for noxious weeds and invasive species and away from areas with intact assemblages of native plants. We recommend working with the Idaho Department of Fish and Game and the Master Naturalist Program in case volunteers are needed for revegetation efforts. Regardless of best intentions, noxious weeds will likely expand and we recommend including a long term noxious weed monitoring and treatment plan as part of the project.

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<sup>1</sup> <https://www.nationalforests.org/get-involved/wood-for-life>

The EA states that “reforestation/revegetation would only be implemented in RCAs to improve riparian function and process (Lava p. 41). This sentence is somewhat unclear as written. This sentence could be interpreted to say that reforestation would only occur in RCAs and not elsewhere. Perhaps the EA means to say that that reforestation and revegetation that would be implemented in RCAs is only for the purpose of improving riparian function and process and not for future timber harvest.

Additional information is needed on the priority areas, acreages and likelihood of whitebark pine reseeding efforts.

In the Lava EA, we appreciate that Forest Botany staff will identify “known” Region 4 Sensitive and Forest Watch plant populations and make locations known to implementation staff, but the use of the term “known” is unclear. If the plant populations are already known or identified, these maps could just be included in the Decision Notice. If the populations are currently unknown, another way to convey this information might be to say “Forest Botany staff will survey likely locations for Region 4 Sensitive and Forest Watch plant populations and make any confirmed locations known to implementation staff.”

In the Biological Evaluation of the Snag Nellie EA, the Forest Service notes that there are nine known subpopulations of Sacajawea’s bitterroot along Forest System Road 555EC and that hazard tree removal is planned along the entire length of the road and that there may be effects to this Sensitive species:

Hazard tree logging post-fire could significantly impact Sacajawea’s bitterroot populations by disrupting their habitat, reducing available soil moisture, increasing erosion, damaging root systems, and potentially altering the competitive plant community, potentially leading to decreased Sacajawea’s bitterroot abundance and diversity, especially if the species is already stressed by the fire event itself; this is because salvage logging operations often involve heavy machinery that can disturb the soil profile where Sacajawea’s bitterroot seeds germinate and establish.

Potential direct effects to Sacajawea’s bitterroot include physical damage from heavy machinery. Large equipment can directly crush or uproot plants, particularly if they are small or located in shallow soil such as the loose, rocky habitat of Sacajawea’s bitterroot (Figure 1). Soil disturbance from machinery can significantly disrupt the soil structure, altering its moisture holding capacity and nutrient availability, which are important for Sacajawea’s bitterroot germination and growth. Reduced light availability or shading of plants may occur if burned

trees are dropped, lopped, and scattered or masticated on site. Potential indirect effects from hazard tree removal and the use of heavy equipment include increased erosion. Removing vegetation cover, even burned vegetation, can accelerate erosion, potentially encouraging rills that wash away Sacajawea's bitterroot individuals or habitats. BE p. 6.

While we appreciate that crews will be informed about locations of these populations, it seems that additional design features could be incorporated to mitigate many of these effects without compromising human safety. As with the removal of hazard trees in RCAs for the Lava Project, the Forest Service could limit harvest of hazard trees to feller bunchers with no vehicle travel or soil disturbance beyond the existing roadway. Alternatively, hazard trees could simply be felled and left in place within the identified plant populations. We note that the Forest Service is adopting this same no-harvest design feature for hazard tree mitigation along trails in the Snowbank Inventoried Roadless Area described in the Lava Restoration Project EA:

A portion of the Snowbank Inventoried Roadless Area is in the project area. The only proposed actions within the IRA are reforestation and hazard tree mitigation along existing trails. This project is consistent with the Idaho Roadless Rule as it does not include road construction/reconstruction or minerals activities, nor does hazard tree mitigation meet the definition of timber cutting, sale, or removal, which is prohibited except for personal or administrative use (36 CFR §223); or when incidental to the implementation of a management activity not otherwise prohibited (e.g., trail clearing). Lava EA, p. 19.

If the primary purpose for hazardous tree mitigation is public safety, it is not a requirement to also capture the economic value of these trees, particularly given the estimated negative effects to this Region 4 sensitive plant species. In addition, in the relatively high elevation areas (7,500') where Sacajawea's bitterroot is found, tree productivity and commercial value is likely to be relatively low. We note that there are no salvage sales planned in this area. While the felling of hazard trees could also impact some Sacajawea's bitterroot individuals and change some site characteristics, the impacts would be far less than also removing these trees as the main concern is soil disturbance from log removal activities. If capturing the value of these trees is also a priority, the trees could be logged over snow when soil is better protected and the plants are underneath the soil surface. Alternatively, the Forest Service could utilize the same techniques for felling hazard trees that are utilized in RCAs whereby feller bunchers can reach out from the roadbed cut and remove the trees next to Forest Road 555EC without disturbing the soils within the Sacajawea's bitterroot populations.

Ground disturbance from harvesting is also likely to increase the likelihood of noxious weed establishment within Sacajawea's bitterroot populations. Commercial harvest of trees within the Sacajawea's bitterroot populations will require mapping and monitoring Sacajawea's bitterroot during the short period of time when individuals are above ground and observable. We are concerned that the Forest Service may not be able to comply with the required baseline monitoring given the time-sensitive nature of salvage operations, decreases in Forest Service staff, and the overall difficulty of timing botanical surveys correctly. As such, it would be far easier, faster and less costly to simply not harvest hazard trees within already identified Sacajawea's bitterroot populations.

Because populations vary over time, it would also be prudent for the Forest Service to resurvey for Sacajawea's bitterroot (*Lewisia sacajawean*a or LESA) in suitable habitat along Forest System Road 555EC beyond the currently mapped populations. The Supplemental Information Report for the CuMo Exploration Project recommended the following field work be conducted to determine how the Pioneer Fire affected the following criteria regarding botanical resources:

*The changed conditions and new information related to LESA populations indicate that fire and fire suppression activities varied in effects to the LESA population over time within the Project area, as well as populations within the 10-mile radius surveyed around the Project area. Based on the new survey information and changed conditions resulting from the 2016 Pioneer Fire related to the LESA population, the baseline conditions in the 2015 SEA should be updated and, based on these updates, direct, indirect, and cumulative impacts of Alternatives A, B, and C should be re-evaluated. As stated in the 2015 SEA, page 138, the analysis area for assessing cumulative effects for LESA included the range of the species. Work within the 10-mile radius of the Project area should be specifically updated within the CIA analysis.*

The Forest Service must ensure it complies with Forest Plan standard BTST01 which requires: "Management actions that occur within occupied sensitive plant species habitat must incorporate measures to ensure habitat is maintained where it is in desired conditions, or restored where degraded." We recommend that the Snag Nellie EA and supporting documents identify which occupied LESA habitat meets desired conditions and which is degraded. We also recommend that the Forest Service take steps to ensure habitat is maintained where it is in desired conditions or restored where degraded.

Sacajawea's bitterroot is very rare and endemic to central Idaho. It is a Forest Service-designated "sensitive species," which is defined in the Forest Plan as follows:

A Forest Service or BLM designation, sensitive plant and animal species are selected by the Regional Forester or the BLM State Director because population viability may be a concern, as evidenced by a current or predicted downward trend in population numbers or density, or a current or predicted downward trend in habitat capability that would reduce a species' existing distribution.<sup>2</sup>

In advance of any harvest of timber within Sacajawea's bitterroot populations, the Forest Service would be required to take a hard look under NEPA and update plant surveys in order to comply with Forest Plan Botany Guideline "BTGU01" (which requires that "suitable habitat should be determined for sensitive species within or near the project area" and directs the Forest Service to "[c]onduct surveys for those species with suitable habitat to determine presence"). See *Idaho Conservation League, et al. v. U.S. Forest Service*, 2016 WL 3814021 (D. Idaho July 11, 2016). "[W]ithout [baseline] data, an agency cannot carefully consider information about significant environment impacts" and "the agency fail[s] to consider an important aspect of the problem, resulting in an arbitrary and capricious decision." *N. Plains Res. Council v. Surface Transp. Bd.*, 668 F.3d 1067, 1085 (9th Cir. 2011) (quotation omitted). See also *Lands Council v. Powell*, 395 F.3d 1019, 1031 (9th Cir. 2005) (finding that six-year-old data, without updated habitat surveys, was too stale).

Fortunately, we believe that this issue can be resolved by not harvesting the hazard trees in known LESA populations. Strategic felling of hazard trees in alignment with the road might actually help address some post-fire threats to Sacajawea's bitterroot. One potential negative post-fire impact to Sacajawea's bitterroot is unauthorized OHV travel through plant populations. Illegal vehicle use of pull outs and spur trails for dispersed camping could impact individual plants through direct disturbance or spread of noxious weeds. Where this is a concern, we recommend that the Forest Service fell the hazard trees in such a way that discourages illegal motorized use off Forest System Road 555EC. The Forest Service should also close the areas along Forest Road 555EC with Sacajawea's bitterroot populations from firewood cutting and gathering, discourage uses that would disturb soils in this area, and direct members of the public to the many other areas where firewood cutting can occur.

## **Recreation and access management**

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<sup>2</sup> Boise National Forest Plan, Chapter 4 – 2003-2010 integration  
[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5394056.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5394056.pdf)

According to the scoping notice, user-created trails and unauthorized roads are now much more visible and accessible following the fire. These areas are also now more prone to erosion. We recommend that the Forest Service start by conducting hazard tree removal along trail networks and repairing existing authorized routes so there is less incentive to explore unauthorized routes. We support the Forest Service use of slash from hazard tree removal and commercial sales to cover up unauthorized routes within sight distance of open roads.

Improved maintenance of authorized trails is integral to successful project implementation, as the lack of maintenance on some routes has led to resource damage from erosion and resulted in people pioneering new routes adjacent to authorized routes, further increasing resource degradation. We request that the Forest Service reach out to local recreationists who regularly utilize these trails and ask them to report any trail maintenance issues. The Forest Service could also commit to a maintenance schedule for roads and trails in the project area and reach out to local recreationists to see if they are interested in assisting with this work. We note that local recreational clubs might be interested in helping bucking trees after felling and we encourage the Forest Service to reach out to them.

We encourage the Forest Service to build upon partnerships with user groups, County, state and federal agencies to educate the public about responsible recreation and better manage trails and campgrounds. One option to consider would be posting a kiosk at the turnoff in Smiths Ferry and with maps and a QR code so recreationists could download mapping applications such as ONX or Avenza before venturing into areas with no cell coverage. The Forest Service could also reach out to the owners at the Cougar Mountain Lodge and ask about posting Sage Hen recreational information on the bulletin board.

### **Infrastructure repair**

We support the repair of damaged campgrounds (Cozy Cove for Snag) bridges (mile 20.6 on NFS Road 653 for Lava), culverts (AOP culvert near milepost 11.8 on NFS Road 625 for Lava), roads, trails, and signs. There are 42 miles of trails in the Snag and Nellie Projects to be assessed, repaired and stabilized.

The post-fire flood event that occurred was modeled as a 500-year event but these events are occurring more often and we recommend upgrading infrastructure like the Chief Eagle Eye Bridge and AOP so they can withstand 500 year events and not just 100-year events, particularly given higher post-fire flows.

The Forest Service estimates a 1-3 year closure for the Cozy Cove campground. We recommend prioritizing the restoration and reopening of the campground given the recreational importance of this area. If possible, we recommend that the Forest Service utilize retained receipts from Shared Stewardship projects or GNA funds to reopen the campground and adjacent trails.

On p. 17 of the Lava EA refers to a total of 13 pre-existing stream crossings that will be utilized by log trucks. We understand that the term “crossings” refers to structures such as bridges and not fords. We recommend that the Forest Service update the term accordingly to avoid any confusion as the use of fords can have much greater impacts on water quality and fisheries than bridges.

### **Watershed and fisheries**

In terms of mitigation for potential impacts to bull trout, the Lava EA states that “no travel” will occur on the downhill (creek) side of NFS Road 625G while implementation of hazard tree removal is occurring on that route. The Forest Service should specify if “no travel” means no vehicle travel, no jammer/skidder travel, or no foot travel, as that term can have many meanings.

FWS-12 states that “trees outside the roadside hazard tree mitigation zone that provide stream bank stability or are needed to comply with RCA sharing guidelines will not be felled.” The meaning is unclear since if trees are outside the hazard mitigation zone in the first place, there would not be any need to fell them. Salvage logging should not target these trees either. Some additional clarification would be helpful. Perhaps this sentence is supposed to say, “trees inside the roadside hazard tree mitigation zone that provide stream bank stability or are needed to comply with RCA sharing guidelines will not be felled.”

Hazard tree mitigation within RCAs has design features such as requiring full suspension of trees within 0'-70' of a stream (RCA Zone 1) and cut and removal (equipment entry dependent on slope consideration) more than 70' from a stream (RCA Zone 2). The EA implies that all hazard trees will be removed and harvested. However, there may be scenarios where the removal of trees from RCAs, either by full suspension or with other equipment, could exacerbate sedimentation. The Forest Service should also develop a third option of simply felling hazard trees in RCAs and leaving them on site without harvest if the public safety goals can still be accomplished, particularly if the coarse woody debris can benefit stream recovery and avoid additional sedimentation from log hauling.

We also recommend conducting eDNA samples for bull trout (Lava and Nellie) and bull trout, salmon and steelhead (Snag) to determine presence/absence following the fire and 500-year flood event. This information is helpful so project activities can focus on protecting remaining refugia and prioritize the most important areas for habitat restoration and connectivity. One potential use for slash and root wads from timber operations would be for streambank stabilization and habitat improvement. Trails and roads that are having adverse impacts on water quality and fisheries should be prioritized for repair and maintenance.

The Lava Project EA has specific information about activities within bull trout critical habitat and potential impacts to bull trout (there are 371 feet of road segments available for hazard tree removal that are located next to Woody Creek). However, the Snag Nellie Project, which also contains habitat for bull trout as well as Chinook salmon and steelhead, simply says that “proposed management activities within the RCA that may significantly impact bull trout individuals include roadside hazard tree felling/removal, sediment associated with road maintenance, and project activities affecting fish habitat (LWD), temperature, streambank condition, RCA function and process, etc.” (Snag Nellie EA p. 21). In terms of consistency, disclosure and assessment of impacts, it would be helpful if the Snag Nellie EA also disclosed the linear feet of road segments the EA is referring to.

### **Range management**

We recommend prioritizing the repair of stock water developments to provide water and protect resources. The Forest Service should talk with the permittees about any opportunities to rebuild cabins, corrals, fences and range improvements in different locations to better support livestock operations and improve the restoration and protection of riparian areas and wet meadows. We appreciate that all range fences will be constructed using wildlife friendly specification as recommended by the Idaho Department of Fish and Game. Construction of spring developments can help provide off-site water for livestock in less sensitive areas. We recommend designing spring developments so that sufficient spring water remains available on site for native plants and wildlife.

The Forest Service had previously conducted a riparian habitat improvement project with permittees and other partners along Chief Eagle Eye Creek and its tributaries. There may be benefits from revisiting these efforts, particularly along streams supporting bull trout.

### **Project implementation**

We recommend that the Forest Service create a Story Map to report on the completion of each year's restoration and salvage work. Topics could include news about any trail or other recreation changes, an update on compliance and any hot spots needing additional attention, and reports from the trail maintenance partners to the Forest Service on trail maintenance work completed and remaining trail maintenance needs.

### **Monitoring**

The EA notes that timber haul on gravel and native surfaces will be limited to dry or frozen conditions and that haul will cease at any time when turbid water or fine soil particles are observed moving off the road surface, regardless of time of year (TH-5). We support these measures but it is unclear who will be monitoring this, where this will occur, and how water turbidity changes will be quantified and measured so this can be consistent.