IDAHO CONSERVATION LEAGUE

January 29, 2026

Ms. Heather DeGeest
Forest Supervisor
Salmon-Challis National Forest
311 McPherson
Salmon, ID 83467

Electronically submitted: https://cara.fs2c.usda.gov/Public/CommentInput?Project=68910

**RE: Idaho Conservation League's Scoping Comments for the Proposed Peel Tree Vegetation Project #68910**

Dear Ms. DeGeest:

I am writing on behalf of the Idaho Conservation League (ICL) to provide our scoping comments and recommendations for the proposed Peel Tree Vegetation Project #68910.

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 30,000 members and supporters. ICL's members and supporters care deeply about protecting and restoring the environment.

We appreciate the opportunity to provide scoping comments for the proposed vegetation management project. However, we were disappointed to find that the scoping documents do not include a map of the location of the potential temporary roads. Further, the scoping document fails to identify the projected number of or total length (in miles) of the potential temporary roads. Our additional comments and recommendations for the Peel Tree Vegetation Project are below.

Thank you for the opportunity to provide comments regarding the proposed Peel Tree Vegetation Project #68910. We look forward to the opportunity to work with the Salmon-Challis National Forest and the Salmon-Cobalt Ranger District on this, and any future projects.

Respectfully submitted,

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# Idaho Conservation League's Scoping Comments for the Proposed Peel Tree Vegetation Project #68910

**Slash treatments**
The Forest Service needs to manage slash in a timely manner so that fuel risk is minimized. We recommend using whole-tree yarding to help reduce fuel loads within treatment units. Additional attention needs to be paid to how slash is handled once at the landing. We support the stacking of material usable for firewood at landings for public use and think that this should be utilized whenever practical.

**Prescribed fire**
Slash left within treated areas will elevate fuel loads in the short term and should be managed through prescribed burning as soon as reasonably possible. The Forest Service should be sure to follow up with additional prescribed fire treatments as needed to meet fuel reduction goals.

The Forest Service should work with members of the public health services, the medical community, IDEQ, relevant counties, businesses, residents, and homeowners to craft a prescribed burning program that minimizes adverse impacts of smoke to the public. Particular attention needs to be paid to vulnerable populations. Issues to address include helping residents improve air filtration systems in homes or retrofitting at least one room to have cleaner air, designating public buildings where improved air filtration systems already exist or can be upgraded to serve as safe air places in the event of unhealthy air quality from prescribed burning or wildfires, and publishing advanced notice of prescribed burning so people vulnerable to poor air quality can plan accordingly.

**Legacy tree retention**
The goal of protecting Legacy Trees and maximizing retention of large diameter trees is outlined in the Collaborative Forest Landscape Restoration Act; Sec. 4003(D) fully maintains, or contributes toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health and retaining the large trees contributing to old growth structure; (E) would carry out any forest restoration treatments that reduce hazardous fuels by-- (i) focusing on small diameter trees, thinning, strategic fuel breaks, and fire use to modify fire behavior, as measured by the projected reduction of uncharacteristically severe wildfire effects for the forest type (such as adverse soil impacts, tree mortality or other impacts); and (ii) maximizing the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire-resilient stands.

More recently updated Forest Plans and Wildlife Conservation Strategies from neighboring national forests highlight the value of these mature trees for wildlife. The Forest Service's purpose for this project includes reducing connectivity and removing Douglas fir mortality attributed to bark beetles and dwarf mistletoe, reducing canopy cover, and to promote an increase in the number of early seral species such as Engelmann spruce, aspen, and lodgepole pine. With the goals clearly outlined, it is important to find the best means of protecting Legacy Trees and maximizing the retention of large diameter trees.

While Douglas fir represents the preferred species for retention, Engelmann spruce, aspen, and lodgepole pine also occur in the project area. Because the large tree component is underrepresented across much of our nation's forests, the majority of all particularly large native

trees, regardless of species, should be protected for both wildlife and as part of the forest's natural heritage. Girdling undesired tree species could be one tool to retain the large tree structure important for wildlife while eliminating competition for water and nutrients with more desirable, early seral tree species.

**Aspen restoration**
The Forest Service should take proactive measures to restore aspen stands within the project area. Treatments could include removing or girdling encroaching conifers. Prescribed fire or scarification may also be needed to stimulate aspen suckers. Because grazing by sheep, cattle, deer or elk may adversely affect aspen sucker regeneration, the Forest Service should work with any potential allotment permittees to discourage grazing in these areas by modifying livestock herding patterns and timing and by stacking felled conifers around the aspen stand to serve as natural fencing.

**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.

Snag densities should reflect the variability across the landscape and should vary, roughly according to a normal statistical distribution. If there is a lack of snags in the project area, the Forest Service should design the silvicultural prescription to recruit additional snags over time. Before any areas are opened for firewood gathering, the Forest Service should clearly mark trees and snags important for wildlife habitat. These snags need to be monitored to ensure their continued existence.

We recommend tailoring the commercial harvests and prescribed burns to maximize the retention of large-diameter snags:

> Retention of large-diameter snags and decayed trees, particularly ponderosa pine, can provide vital nesting and roosting habitat for a variety of wildlife species (Bull and others 1997; Martin and Eadie 1999). For example, the sapwood of ponderosa pine is relatively thick compared to other conifers and exceptionally valuable for the excavation of nesting and roosting tree cavities (Bull and others 1997).[1]

Prescribed burns can have the unintended effect of decreasing large downed wood, which plays an important role in nutrient cycling, carbon sequestration and habitat for small animals, among other roles:

> Nearly half of large downed wood (≥ 9 inch LED) was consumed by prescribed fire in both regions. Drought conditions, followed by low wood moistures prior to fire treatments, may have contributed to the large loss of downed wood. When moisture contents are less than 15 percent, fire generally consumes about half of large downed

[1] Changes in Downed Wood and Forest Structure After Prescribed Fire in Ponderosa Pine Forests. Victoria Saab, Lisa Bate, John Lehmkuhl, Brett Dickson, Scott Story, Stephanie Jentsch, and William Block, appearing in Fuels Management, p. 482—How to Measure Success: Conference Proceedings. 28-30 March 2006; Portland, OR. Proceedings RMRS-P-41. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 809 p. https://www.fs.fed.us/rm/pubs/rmrs_p041.pdf

> woody materials (Brown and others 1985). Efforts to retain these large structures may require seasonal adjustments for burning times when moisture contents are higher and fire severity effects are lower (Thies and others 2005). Maintenance of large, downed wood is important ecologically because these structures provide foraging habitat, thermal cover, and concealment for many sensitive wildlife taxa (Bull and others 1997; Szaro and others 1988), although logs may have been a limited resource in low-severity fire regimes (Agee 2002).[2]
>
> and
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> In contrast to our results that suggest increased densities of large snags after fire, Horton and Mannan (1988) reported that large ponderosa pine snags were reduced by about 50 percent within the first year after a moderately-intense prescribed fire. Detrimental effects of prescribed fire on suitable nesting snags were also reported in ponderosa pine forests of Canada, where burning caused heavy scorching of large snags (Machmer 2002). Differences in fire severity among studies likely contributed to the opposing results of snag changes after prescribed fire.[3]

We believe that negative effects to snags and large woody debris can be avoided by project design and implementation:

> Several authors suggest protecting nest trees by removing combustible materials around their base prior to burning to reduce losses of suitable nest/roost snags (Horton and Mannan 1988; Machmer 2002; Tiedemann and others 2000). Specifically, Horton and Mannan (1988) recommend protecting large (>50 cm [20 inch] d.b.h.) snags and logs with moderate decay. Tiedemann and others (2000) recommended removing combustible material around snags > 30 cm (12 inch) d.b.h. These methods are labor intensive and cost prohibitive for large-scale prescribed fire programs, unless snag protection is required for Threatened and Endangered species.[4]

Due to the labor intensive nature of some of these measures, we recommend focusing on areas of known old growth and nesting sites for sensitive bird species and species of greatest conservation concern. One way to remove combustible materials around the base of large trees or snags is to conduct early spring prescribed fires in the snow-free tree wells while snow still blankets the larger area. This treatment method has been conducted in the Boise Experimental Forest on the Idaho City Ranger District.

**Soils**

Skid trails should be designed and managed to reduce impacts to soils. For units where soil disturbance is a concern, we recommend that the Forest Service consider ground hauling over sufficient snow and frozen roads. Areas should be restored within three years of project activities.

**Botanical resources**

We recommend that the Forest Service botanist review potential fire lines and make adjustments in thinning, harvest, and prescribed burn placement, design, or in the timing of activities to avoid, minimize, and mitigate impacts to plant species and their habitat(s).

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[2] Ibid. p. 482.
[3] Ibid. p. 482
[4] Ibid. p. 483

**Pollinators**
We recommend that the Forest Service design project activities to avoid, minimize, and mitigate impacts to native pollinators, and in fact design activities to optimize habitat for native pollinators, including monarch butterflies and bumblebees.

**Wildlife habitat**
We have concerns that the intensity and locations of the vegetation treatments will decrease security cover for elk as well as habitat for pileated woodpeckers, flammulated owls and Northern goshawks. Additional steps should be taken to avoid, minimize, and mitigate these impacts. These steps could involve adjusting the treatment locations and prescriptions so that wildlife corridors and any security areas are not adversely impacted or developing additional design features to provide wildlife security.

We also recommend the retention of clusters of snags in stands and specifically those trees with broken tops, cavities, lightning scars, and dead portions as available. While some vegetation management may be beneficial to raptors, the prescription and timing of these activities may need to be adjusted.

Thinning activities and prescribed burns should be conducted during times to minimize disturbance and mortality of nesting birds.

**Effects on nesting birds**
We are also concerned that springtime burns and/or commercial logging activities may cause adverse impacts to other bird species during nesting and fledgling:

> Direct effects of prescribed burning on wildlife should also be considered. For example, prescribed fires conducted during spring or early summer may cause direct mortality to nestlings and fledglings (Lyon and others 2000).[5]
>
> Fires during the nesting season may reduce populations more than fires in other seasons; and migratory populations may be affected only indirectly, or not at all, by burns that occur before their arrival in spring or after their departure in fall.[6]
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> Spring burns may destroy active nests (Ward 1968).[7]

As such, we recommend that the Forest Service consider shifting the burn times to early spring before nesting occurs or in the fall. If this is not possible, we recommend that the Forest Service develop additional design features, including multiple surveys for nesting birds in advance of spring burns.

**Temporary road construction**
We were disappointed to learn that the scoping document, while referencing the use of temporary roads, does not provide any indication of where those temporary roads might be located or how many miles the Forest Service anticipates the agency will need for project

[5] Ibid. p. 483
[6] Wildland Fire in Ecosystems, L. Jack Lyon Mark H. Huff Edmund S. Telfer David Scott Schreiner Jane Kapler Smith, USDA Forest Service Gen. Tech. Rep. RMRS-GTR-42-vol. 1. 2000. Page 25. https://www.fs.fed.us/rm/pubs/rmrs_gtr042_1.pdf
[7] Ibid. p. 26

implementation. The Forest Service should minimize the amount of temporary road construction and disclose any unauthorized routes discovered during project implementation. These unauthorized, non-system routes could either be decommissioned if causing resource degradation or considered for a variety of recreational uses (motorized and non-motorized trails) if consistent with protection of other resources. Regarding road decommissioning, we recommend removing all culverts from unneeded and temporary roads and laying slash across the initial stretch of road within sight distance of the main road to discourage illegal motorized use.

**Hazardous materials**

Because machinery will be used during the proposed Peel Tree Vegetation project, a hazardous material plan needs to be in place in the event of a fuel or solvent leak. Hazardous wastes, including grease, oil, and fuels, need to be disposed of off-site in an environmentally appropriate manner. We are especially concerned about the use of fuels, lubricants, solvents, and other toxic chemicals in or around streams and drainages. The use of these hazardous materials must be carefully evaluated and an approved spill containment kit should be on-site at all times. Secondary containment systems should be in place. Fuel depots and storage facilities should be at least 300' from any live stream or water source. We do appreciate that no treatments will occur within Riparian Habitat Conservation Areas (RHCAs).

**Noxious weeds**

Vehicles and equipment serve as vectors for the spread of noxious weeds when proper inspection and cleaning are not practiced to limit their spread. Disturbed soil needs to be stabilized to prevent erosion and expansion of noxious weeds. All equipment should be inspected, cleaned, and washed prior to the operator entering public lands. Work crews trained in noxious weed recognition and removal should patrol the project area and mechanically remove any weeds or microtrash. The Forest Service should use this opportunity to restore native vegetation, and ICL recommends the use of all native species in the project area, especially areas that have direct associations with temporary roads and/or skid trails.