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RE: Idaho Conservation League's Comments on the Big Creek Hazardous Fuels Reduction Project Environmental Assessment

Dear Mr. Botello:

Thank you for considering our comments on the proposed Big Creek Hazardous Fuels Reduction Project Environmental Assessment (EA). Since 1973, the Idaho Conservation League (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 also has a significant interest in the Big Creek area. Big Creek is not only an important gateway to the Frank Church, but also encompasses several important tributaries for threatened fish species and ecologically intact Inventoried Roadless Areas. ICL invested several years working with the Forest Service and other stakeholders to develop the Big Creek Resource Restoration and Access Management Plan and were pleased that there was an outcome that ICL and other collaborative members could support.

The Payette National Forest (PNF) proposes to implement a hazardous fuels reduction project consisting of 9,818 acres of treated lands, including 887 acres of shaded fuel breaks, 776 acres of mastication, 862 acres of hand-thinning in Riparian Conservation Areas (RCAs) and 7,765 acres of prescribed burning. The majority of the project acreage consists of prescribed burning. Other treatments include commercial thinning, non-commercial thinning with no removal, mastication, and hand-thinning. We appreciate the Forest Service re-evaluating the proposed actions and adapting treatment options based on received scoping comments.

We do have significant concerns regarding several components of the project, including the need for a temporary road in an Inventoried Roadless Area (IRA) and the lack of sufficient discussion in the EA related to private inholdings within the project area. In particular, the Forest Service has failed to provide a thorough explanation and sufficient justification for expending diminishing resources to build protective fuel breaks around historic mining sites and private inholdings that do not contain structures or other properties that could be damaged by wildfire. We have included our specific comments in the document following this letter.

Again, thank you for the opportunity to submit comments and we ask that you please send us subsequent documents for this project. We look forward to continuing to work with the Payette

Idaho Conservation League's Comments on the Big Creek Hazardous Fuels Reduction Project Environmental Assessment

General Comments

We appreciate the Forest Service's re-evaluation of the Big Creek Hazardous Fuels Reduction Project and

making changes to the proposed actions based on comments received during the Environmental Assessment (EA) process. Specifically, we appreciate the reduction of commercial thinning from 2094 to 887 acres, the addition of mastication with no material removal on 776 acres, and hand-thinning in RCAs. We also appreciate that the Forest Service plans adhere to the 2014 Farm Bill which calls for maintaining a large-tree class component of no less than 20% of the forest stand composition. ICL recognizes that large trees, both live and dead (snags) are underrepresented across the National Forest system, and we encourage the PNF to retain as many of these trees with a diameter at breast height (dbh) of 20" or greater as possible.

We also appreciate the Forest Service attempts to address concerns about impacts on aquatic life and habitats from increased road use. The latest proposal reduces the number of trips and the quantity of materials removed from 1504 acres to 604 acres. These reductions will help avoid impacts to waterways and fisheries by decreasing sedimentation and potential erosion sources. Moreover, the reduced trips will result in less air-borne dust, particularly on the Big Creek/Smith Creek, Golden Cup Mine, and Pueblo Summit roads. However, numerous inconsistencies and the proposed work in the Smith Creek drainage continue to raise concerns with the project. Our specific comments regarding inconsistencies and watershed health are found below.

ICL understands that the project's focus is to remove hazardous fuels from around the Edwardsburg community. However, the most significant portion of work revolves around creating shaded fuel breaks away from the Community Protection Zone (CPZ), with a focus on commercial thinning and mastication, which does little to remove fine fuels, the more significant component of wildfire spread. We recommend the Forest Service utilize prescriptive fire more extensively throughout the project area, breaking burn blocks into smaller management parcels to provide effective control and protection to private inholdings and forest infrastructure.

We also recommend that the Forest Service continue and expand upon outreach to private property owners regarding tools and resources for reducing home ignition and hazardous fuels around properties. This type of cross-boundary communication is a priority for both the Intermountain Region and the State of Idaho. By coordinating more closely with private property owners, there may be opportunities to leverage resources and increase the overall effectiveness of fuel reduction efforts. Please see more information here:

<https://gis1.idl.idaho.gov/portal/apps/MapSeries/index.html?appid=185c39a78f4340f58235e189d40845e7>

Focal Areas and Cultural Resources

Reducing hazardous fuels surrounding private property and along the Wildland-Urban Interface (WUI) needs to be done in a strategic manner mindful of the other resources at risk. We continue to have numerous concerns regarding the location and extent of shaded fuel breaks proposed for this project. In our previous comments, we recommended the Forest Service provide a synopsis of the private inholdings associated with the project and indicate whether the inholdings contained structures and whether homes or residences are present. We also suggested that the Forest Service indicate whether the inholdings included vacant properties, abandoned mines or other structures that are unlikely to be affected by wildfires.

We appreciate the description the private property at the Walker Mill site on the North Fork of Logan Creek. The EA documents this private property as consisting of 5 acres with a residence, shop, guest cabin and storage for mining equipment. This serves as the sole description of private inholdings outside of the community of Edwardsburg. However, the Forest Service fails to provide sufficiently detailed information and documentation to justify treatments around other inholdings. Without additional documentation, it is difficult to justify treatments around other properties.

Given limited resources and the potentially negative effects of vegetation manipulation activities on aquatic resources, the Forest Service should consider focusing fuel reduction treatments on those areas directly surrounding residences and community safe zones. Even the most intensive hazardous fuels work will not

reduce the flammability of protect homes or private property if homeowners do not adopt Firewise building materials and roofing and incorporate other responsible measures.

We understand that historic mines like the Independence, Moscow, and Sunday mines, all associated with larger inholdings in the project area and the proposed focus of surrounding shaded fuel breaks, may comprise some or all of the National Register of Historic Places (NRHP) eligible resources identified within the project area, and therefore may deserve proactive protection. However, the EA fails to document these potential relationships. According to Appendix A of the Golden Hand Mine Draft Environmental Impact Statement (DEIS), the Independence, Sunday, and Moscow mines represent inactive mine claims of 100-200 acres with future development unlikely. The DEIS indicates that all three mines are old enough for NRHP eligibility. An examination of the project area using Google Earth failed to identify intact or standing structures at any of these three mine locations. Two private inholdings were identified in the project area that have modern structures and/or residences; the previously described Walker Mill site, and a site located to the east of the Sunday Mine.

ICL believes if these three major focal areas of proposed hazardous fuels reduction work are NRHP-eligible and worthy of protective measures, the Forest Service should provide a full justification for those treatments. For example, if a resource is eligible with standing architecture, the Forest Service should reveal which criteria contributes to the property's eligibility, i.e., is it associated with an important person, does the architecture represents a significant style or era, or is the locale associated with a significant historic moment/time. If no significant intact structures or architecturally relevant buildings (NRHP eligible) or if no modern structures or residences exist at any of these inholdings, we do not believe the properties warrant the level of effort and monetary expenditures necessary to complete the proposed work. The Forest Service should provide a thorough justification for constructing shaded fuel breaks around these large, but relatively unknown and unexplained private inholdings.

Should the Forest Service provide information justifying these significant fuel breaks, we believe the agency should inform the public about the degree of communication and coordination with private property owners and the extent to which private property owners will also be taking responsibility for the defense of their inholdings. We recommend the Forest Service consider using the Wyden Authority to provide a vehicle for helping fuel reduction treatments on private property in coordination with willing private property owners. If property owners do not contribute to the meaningful reduction of fuels on their private property, particularly those inholdings with no critical or current infrastructure, we do not believe the Forest Service can justify expending limited public resources on efforts that are unlikely to be successful.

Inventoried Roadless Area and Temporary Road

ICL previously recommended that the Forest Service denote the location of the proposed temporary road on subsequent maps. Unfortunately, the agency failed to address this suggestion in the EA. Using the project area maps and the written descriptions within the EA, we have determined that the temporary road's general location is in the vicinity of Lick Creek, south and east of Edwardsburg, and within the Big Creek Fringe Inventoried Roadless Area (IRA). The paucity of map details referencing the temporary road prevents us from determining an exact location. We were able to focus in on this area through references to the Forest Service needing two temporary stream crossings associated with the temporary road, and a later reference to those crossings in the Hydrology section of the EA (p. 36). The EA indicates the agency cannot achieve the desired results and work east of Edwardsburg without the temporary road. Only two alternatives were presented in the EA; no action, and the preferred action. The single action alternative fails to consider removing the temporary road from proposed actions. We do not believe this accurately reflects conditions on the ground as numerous private roads currently exist in the area.

The Forest Service justifies the temporary road by referencing Management Prescription Category (MPC) 3.2, road standard 1309, which allows for the construction of a temporary road in an IRA if there is an "immediate

response" situation, such as an approaching or eminent wildfire. The EA does not include an "immediate response" scenario and the Forest Service fails to provide a credible, explicitly stated need for the road using the cited standard. Further, the threat of wildfire, which exists throughout our public lands system, does not rise to the level of "immediate response." Road construction, including temporary roads for restoration work, requires regional forester approval based on thorough analysis and justification. We do not believe the EA currently provides either for the regional forester to make a qualified, informed decision.

We note that in areas of mixed severity or stand replacing burns there can be a difference between treatments designed for hazardous fuel reduction for private property protection and treatments designed for forest and watershed restoration. In dry site Ponderosa pines, these goals can often be accomplished by the same thin-from-below silvicultural prescription. However, in forests where mixed severity or stand replacing fires are typical, treatments to reduce hazardous fuels around homes may differ dramatically from treatments to restore forest stands, functioning and structure, if any such treatments are needed. As such, it may be inappropriate to utilize MPC 3.2 as a justification for the temporary road construction and proposed treatments around private property.

While we appreciate the Forest Service indicating the temporary road would be fully reclaimed post-fuel load reduction work, we do not believe the agency has fully justified its construction and use, nor has the Forest Service adequately analyzed fuel reduction alternatives. Moreover, the road would require two temporary stream crossings, adding potential impacts to streams and aquatic habitat to the total "cost" of this limited benefit action. If two stream crossings are created to access the temporary road, the EA is inaccurate by stating the road would not impact nor be constructed in an RCA. Even if the agency choose to ford Lick Creek on private land, the Forest Service must consider the potential adverse effects these undertakings may have.

Finally, we have significant concerns regarding the creation of any additional roads, temporary or otherwise, in an IRA when no less than three roads exist in the immediate vicinity from which to base shaded fuel breaks. ICL does understand the regulatory ability to use temporary roads for fuel reduction work in IRAs if the work is associated with a Community Protection Zone (CPZ), but we do not believe the agency has met an adequate "burden of proof" to necessitate the implementation of this significant undertaking at this point. We note that the EA indicates additional routes and fuel reduction work in the project area was not pursued due to the Idaho Roadless Rule (p. 21). Specifically, providing access to trucks and equipment outside of the CPZ is prohibited unless the road is a CPZ ingress/egress route or is adjacent to a prescribed burn block. The proposed temporary road does not appear to meet either of these exceptions and we recommend removing it from the project's proposed actions. Instead, we recommend the Forest Service work with private landowners and seek access to the area using existing private roads rather than constructing a temporary road that will encourage unauthorized use and potentially create more potential impacts than those the Forest Service is seeking to prevent.

Transportation System

We discuss many of our concerns pertaining to the transportation system in earlier sections of these comments, specifically the proposal to construct a 0.8 mile segment of temporary road in an IRA. We have concerns regarding the 18 proposed stream crossings in the Smith Creek drainage but appreciate that the crossings will be constructed at existing fords/crossings on an existing OHV trail. Unfortunately, the EA does not contain Figure 7 which identifies crossing locations in the project area and we recommend addressing this in the final EA. Because the crossings are currently unimproved, we concur with the Forest Service's assessment that hardening these locales to Forest Service standards will reduce erosion and sedimentation in Smith Creek. We support this design feature and request that it be part of continued maintenance into the future.

However, we still have significant concerns regarding equipment passage in the Smith Creek drainage. While commercial thinning and associated logging trucks are not currently proposed for the South and Middle Forks of Smith Creek, the Forest Service does propose a significant amount of mastication in RCAs in the area. While hardening crossings will reduce sediment delivery in the waterways, the EA fails to account for the additional

work/reconstruction necessary on the OHV trail to provide access that accommodates tracked vehicles like a masticator. We believe significant reconstruction efforts that will change the character of these routes should be reviewed through a Travel Plan analysis that avoids, minimizes and mitigates the negative effects of accommodating larger vehicles than standard OHVs. Thinning with removal is currently slated for the main stem of Smith Creek, and ICL foresees similar problems in this area regarding road conditions and access for large equipment, including logging trucks.

Commercial Thinning

As we have previously mentioned, we appreciate the Forest Service reducing commercial thinning from the original proposal of 2094 acres to 887 acres. However, we believe the agency fails to follow a consistent application of "commercial thinning" throughout the EA and project proposal. Most significantly, on page 21 of the EA the agency states that:

This alternative was determined infeasible primarily because of limitations associated with the Idaho Roadless Rule. The road reconstruction required to provide equipment and truck access to these areas is prohibited outside of the community protection zone (CPZ) unless the road is a CPZ ingress/egress route or adjacent to a prescribed burn block. In addition, commercial timber harvest is prohibited outside of the CPZ for the same reasons as for Idaho roadless areas (emphasis added).. The Moscow and Independent mine areas are outside of the CPZ.

Applying the same, quoted justification to the remainder of the project indicates that most of the proposed commercial thinning lies outside the CPZ and is therefore prohibited. This includes the majority of Government, Logan, and Big Creeks, and the entirety of the Smith Creek drainage. Moreover, the roadless rules prohibit commercial thinning/logging in IRAs for similar reasons. Therefore, commercial thinning associated with the proposed temporary road appear to be beyond the scope of allowable undertakings. The inconsistent application of CPZ and Roadless rules and the lack of justification for commercial thinning in restricted areas suggests the project proposal does not meet significant design criteria standards. We recommend the Forest Service consider pile and burning, broadcast burning, or other methods including the use of private roads to accomplish work in the Big Creek Fringe IRA. We also recommend the Forest Service reconcile the inconsistencies described above and remove commercial thinning operations from all areas outside the CPZ and IRA.

There may also be opportunities for local firewood and post and pole use by private property owners in the Big Creek, Edwardsburg or Yellow Pine areas which would not necessitate hauling log trucks back to Cascade or McCall. We could support making trees from the shaded fuel breaks available for local use as long as riparian, legacy tree and wildlife protections could be secured.

Riparian Conservation Areas

ICL appreciates that no material will be removed from RCAs through commercial thinning. All work within RCAs will consist of hand thinning 8" dbh or less conifers (excepting western larch and whitebark pine) and all conifers less than 8" dbh within 40' of aspen stands. According to the EA, two temporary stream crossings at Lick Creek will be necessary to access the temporary road area. The crossings will purportedly be designed for one trip in/one trip out use. However, we do not understand how this will be possible with the entire east side of the fuel break surrounding Edwardsburg being slated for Commercial Thinning with Removal (Proposed Action Map; Close-Up Map, Tile B-2). The EA fails to reconcile these conflicting proposed actions and how commercial thinning with material removal will take place with stream crossings set for one trip in/one trip out.

We welcome the Forest Service's proposal to retain coarse woody material in RCAs and to reduce canopy cover in such a way that avoids removing stream shade and raising water temperatures. The agency will achieve these goals by only removing canopy from the outer 180' of perennial streams and outer 75' of intermittent waterways.

Ingress and Egress routes

The shaded fuel break along FR 340 toward Pueblo Summit appears justified, however, fuel breaks along FR 343, 340 up Government Creek and 371 do not appear to be justified unless they will help manage additional prescribed burning in the area. In the event of a wildfire, the main ingress/egress route is FR 340 toward Pueblo Summit. Encouraging the public to evacuate via Smith Creek or Government Creek could be problematic. We note that the Huckleberry Project focused fuel breaks along the main Cuprum/Bear access routes and did not emphasize treatments along the recreational route to Black Lake. We encourage the Forest Service to prioritize efforts on creating high quality safe zones along FR 340 toward Pueblo Summit in and around the airstrip and existing treatments.

Maintenance

The Forest Service also needs to describe the future maintenance work needed to maintain the effectiveness of these treatments and make a commitment to do this work.

Goshawks

The Forest Service should phase treatment implementation to avoid impacts to goshawks and other wildlife.