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Comments: Please see the attached letter.

The Payette Forest Coalition (PFC) was formed in June 2009 to offer feedback through recommendations and support to the Payette National Forest for management that will improve this Forest's health and resilience. The PFC's goals include increasing forest resilience to fire, insects and disease, supporting wildlife and watershed health, providing recreation opportunities to the public, and economic benefits to rural communities.

This specific Granite Goose Landscape Restoration Project Proposed Action is a landscape scale effort to improve conditions across multiple resource areas including vegetation, watersheds, roads, and recreation. The PNF is proposing to implement a variety of vegetation treatments including thinning (of all class sizes), regeneration harvest, and prescribed fire to address hazardous fuels and reduce fuel loading to counter catastrophic wildfire risk, respond to insect and disease outbreaks, and promote whitebark pine conservation in the project area. Other actions proposed include watershed restoration, recreation management, and travel management to enhance streams, wetlands, and meadows, promote safe and efficient recreation access, reduce recreation conflicts, and reduce impacts of no longer needed roads and trails on resource conditions.

Our current members, who represent a number of constituent groups, believe the Proposed Action can advance the PFC's restoration goals. We recognize that this Granite Goose landscape is a highly utilized and visible area, and as such, will have significant public scrutiny throughout the project lifecycle. We encourage you to work closely with all stakeholders during all phases of project design, planning and implementation. Effective communication of goals and risks as well as listening to concerns and adjusting plans where possible in order to address these concerns will help gain public support for necessary treatment and recreation actions.

The Payette Forest Coalition developed and provided a standard set of vegetation treatment and roads and recreation recommendations on April 21, 2021 that have applicability to this Proposed Action. Our review of this Proposed Action finds the action to be responsive to our past recommendations and we support the project, with the clarifications discussed below.

The PFC is concerned that the Granite Mountain extended closure could affect the implementation of other critical management actions outlined in the Proposed Action. We request the PNF to consider implementing the closure under a separate action or separate decision as long as doing so does not interfere with the implementation of other actions in the area.

The Proposed Action has not specifically addressed wildlife or range resource areas. The PFC encourages the PNF to reach out to the Idaho Department of Fish and Game McCall staff, in coordination with the Idaho Office of Species Conservation, for comment on the Proposed Action. For the range resource, the PFC also recommends that livestock grazing in existing allotments be discussed as a component of the baseline to manage fine fuels within the project area. Communication and close coordination with permittees in the ongoing grazing program can contribute to project success. Past NEPA project managers may provide useful insight on how to present this baseline since it is an ongoing action and not new.

In light of the recent listing of whitebark pine, the Coalition recommends the PNF limit the use of prescribed fire where whitebark pine regeneration exists. We encourage the use of existing livestock grazing programs for the fine fuels management in those areas.

The Proposed Action includes [ldquo]sanitation[rdquo] as a silviculture treatment where the trees may not be

economically viable saw timber. We strongly encourage you to look for opportunities to utilize this material through the use of commercial contracts, agreements with local communities, tribes or charitable organizations and public free use permits. This could create new small business opportunities along with achieving fuel reduction goals. The removal of a portion of this combustible material from the landscape is also important in order to reduce fire intensity, and the amount and duration of smoke associated with the application of prescribed fire.

The Proposed Action indicates that prescribed fire could be implemented during summer months and may be applied to areas prior to commercial harvest of timber. We recognize and support the need to bound the NEPA analysis in order to provide sufficient flexibility for implementation. We request that the actual practice during implementation minimizes prescribed burning during summer months. Limiting the burning of areas in advance of commercial harvest will reduce resource loss, benefit the timber harvest and processing operations, and increase the economic value of these resources. We also encourage the Payette and Boise National Forests to coordinate their prescribed fire planning and effectively coordinate and communicate these plans with all stakeholders.

The Coalition wishes to thank the Payette National Forest employees for their continuing supportive interaction, cooperation and deliberation with the PFC about the management activities on the Payette National Forest. We look forward to working with you further as this Granite Goose project develops.