Data Submitted (UTC 11): 2/2/2024 7:00:00 AM
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Organization: Weiser River Cattle Association
Title:
Comments: See Attached Letter.
Comments1. The proposed action does not identify or acknowledge the contributions of livestock grazing to the fuel reduction and forest health objectives of this EA. Following the Huckleberry Environmental Impact Statement, the Forest Service committed to acknowledge the contributions of grazing on future projects which include fuel reduction objectives. Since the grazing program is an ongoing program, this information was to be included as a component of the baseline environmental conditions. Additionally, during the preparation of the proposal for the West Central Idaho Initiative, the Forest Service committed to include grazing in projects to be conducted under that initiative. To date, the commitments for inclusion of baseline grazing contributions and the consideration of the benefits of the grazing tool as a treatment have not been reflected in any of the Payette[rsquo]s proposed actions.2. The following language is suggested as the minimum for inclusion in this Granite Goose EA and future Payette NEPA documents involving fuels reduction. [ldquo]The ongoing grazing program provides benefits to forest health and fuel reduction objectives. In the Granite Goose project area, an estimated XX tons of fine fuels are removed annually from Federal lands by the grazing program. These fine fuels include grasses, forbs, and brush. This fuels reduction contributes to the Forest Plan desired conditions and plays an important role in our long-term forest management objectives. This fuel management and removal is part of the baseline environmental condition and will continue under any proposed action as well as the no action alternative. The grazing results in reduced ground fuel loads and reduces fuel continuity. This in turn will result in less intense fire and lower flame heights, reducing the potential impacts from fire. The fuel removal through the grazing program generates revenue for the federal government, local counties, and provides funds back to the local forest for range improvements. In addition to generating revenue and providing significant fuel reduction and land health benefits, the livestock industry is an important component of our local rural economies, and is important to our state and nation[rsquo]s food and fiber production.[rdquo] The Forest Service can easily quantify the annual estimated fuel removal from grazing by multiplying the average daily consumption per animal unit by the number of animals and animal days in the project area. This can then be presented in the NEPA document as total annual tonnage removed. The calculation for the heating value (BTUs) of the fuel removed by grazing is also simple and that number would be easy to present in the NEPA document. Under an action alternative, the annual fuel removal by grazing works as a treatment and a maintenance action, reducing the need for other actions (such as prescribed fire) and/or frequency of those other actions. Impacts to wildlife and other natural resources from the application of prescribed fire can also be reduced through reducing the fire frequency.3. Grazing is not included as a potential treatment on or adjacent to private lands and WUI areas. The EA addresses the use of the Wyden authority for the treatment of private and state lands in this action. Livestock grazing could be used as one of the funded treatment tools if it is addressed in this EA. Additionally, recent appropriations (e.g., the Biden bipartisan infrastructure law) included funding for fuel breaks utilizing livestock, which would appear to be an ideal fit for the actions proposed for federal lands adjacent to the private (or state) that are addressed under this EA.4. The EA addresses the planting of white bark pine in modeled habitat that is suitable. White bark pine should only be planted in the historically occupied habitat (i.e., where it is currently growing and reproducing). Modeled suitable or potential habitat that is outside of the historical occupied habitat should not be planted. Planting in areas outside of the historical habitat creates an automatic potential conflict with other uses, including timber management, grazing, and recreation. Nature knows better than the Forest Service models and specialists on what is suitable habitat. This comment regarding expansion of white bark pine habitat has been made previously (e.g., Railroad Saddle action) but appears to have been ignored.5. The EA indicates that prescribed fire will be applied to 36,000 acres, with up to 10,000 acres burned annually, and potential for multiple entries, including maintenance burns. Please confirm that there has been coordination with grazing allotment owners/permittees on this prescribed fire planning used in developing this EA, and that there will be no impact to grazing as a result of burning up to 10,000 acres annually. If burning 10,000 acres in a single year would impact grazing allotment use, the Forest Service should select a lesser maximum annual acreage

that will result in no adverse impact to grazing allotments.6. The EA describes some changes to trail systems, including the addition of new trails. For example, up to 7 new miles of new trails will be designated and constructed in the Bear Basin area. There is no discussion of any associated changes to historical use (such as grazing) or land use designations in these areas that might be associated with these new trails and uses. Will there be any changes to grazing in any of these areas as a result of these new trails and uses? Please address this in the EA, and if there are changes to grazing, please address these impacts, the coordination with allotment owners/permittees, and how they were mitigated. Please also address all impacts to grazing allotments from the expansion of commercial recreation ventures in this project area.7. The EA includes discussions of the fire models and expected flame length, fire intensity, etc. These fire models are used to inform the planning for vegetation treatments, including prescribed fire. These same fire models were used on recent past projects and prescribed fire planning and implementation. These models have apparently underestimated the flame height, rates and intensity, as is evidenced by the significant tree mortality, soils impacts, wildlife impacts, plantation impacts, fences burned, etc. seen on these recent prescribed burns (e.g., Fourth Rock, Mud Creek, and others). The Forest Service has stated that the first entry burn behavior/intensity has been unexpected. Given this underprediction of impacts from the models, the predictions and model results discussed in this EA are in question. The Forest Service should be evaluating/analyzing a range of potential outcomes based on this experience with the fire models and implementation of prescribed fire.8. The EA does not quantify greenhouse gas emissions. NEPA requires that impacts from proposed actions be addressed. Prescribed fire is an intentional action under this agency proposed action, with many potential impacts to many resource areas. The NEPA documents must (but do not) quantify the air emissions and clean air impacts from prescribed fire, including particulates and greenhouse gases. Smoke management is only one aspect of air impacts.9. The EA discusses the need for treatments of areas with subalpine fir. The specifics of those needed treatments will depend on location of the stands as well as whether or not there is an end use for the trees. The subalpine fir stands requiring treatment occur on grazing allotments. It will be important that treatments and the end conditions do not adversely impact livestock movement and use of these treated areas. Planned actions in these areas must include adequate mitigation to avoid or compensate for impacts to grazing. For example, if trees are felled and not physically removed, other actions are needed to allow free livestock movement through the areas and do not impact livestock[rsquo]s ability to access and use the forage, etc. Or if trees are left standing and prescribed fire is used, assure sufficient after burn actions are taken to reduce hazards to people and livestock associated with the standing dead trees in these burned areas. And include grass seeding as an after-fire planned action to assure soils are stabilized as soon as possible, to minimize impacts to watersheds and the landscape.10. Any prescribed fire analysis must present expected and acceptable levels of resource impacts (such as air, timber mortality, white bark pine mortality, all wildlife mortality, watershed impacts, sediment contributions, impact to grass/forbs/range/grazing, etc.) and identify mitigative measures and commitments for actions to avoid unacceptable impacts or address post-fire actions where results were outside of acceptable limits. Clear definitions/standards/objectives for what results are acceptable and what isn[rsquo]t, for all resource areas, addressed specifically for the location it is to be applied, must be included in the NEPA documents. This EA is very unclear in this regard, particularly in areas such as timber, range, wildlife, watershed, and other biological impacts. Acceptable levels of impacts must be quantified and formal post-implementation monitoring conducted. Excessive impacts from prescribed fire are no different than excessive impacts from wildfire. Post-fire mitigation activities must be immediate, and not delayed. Salvage timber values diminish quickly following fire, soils erode without plant life to hold them, sediment ends up in our streams, watersheds don[rsquo]t function properly following intense fires, etc. Impacts from prescribed fire to timber allowable sale quantity as well as other resource areas (range, wildlife populations, etc.) need to be analyzed and quantified.11. Using other treatment tools alone or in conjunction with prescribed fire (such as grazing and mastication) should be alternatives considered and selected on some of the lands within this project area (e.g., WUI areas, white bark pine habitat). Also, given the recent focus on climate change and greenhouse gas emissions, alternatives to burning (with the significant air impacts) must be considered. This could include the use of tools such as grazing and mastication without burning, or with reduced burning, in order to reduce fuels and sequester carbon, thus reducing the greenhouse gas and particulate emissions. The NEPA regulations require that alternatives to proposed actions be addressed, however this EA does not consider alternatives that could be used to help mitigate impacts from

prescribed fire.12. This EA estimates that up to 10,000 acres of the project area could be burned annually. The prescribed fire EA anticipates up to 30,000 acres per year could be burned under that project action. These 40,000 acres of prescribed fire are in addition to all other active project areas where NEPA has previously authorized the use of prescribed fire, and are in addition to all of the other prescribed fire in the western U.S. The Payette Forest management must inform the public of the entire plan for annual prescribed fire application. This then must be properly analyzed for impacts to all resource areas, including cumulative impacts. The local communities in particular deserve this as a courtesy, and it is also required by laws and regulations.13. The EA does not address cumulative impacts. Given the proposed actions, potential decisions and the broad applicability of some elements such as roads and trails (including recreation and other uses), prescribed fire (including associated air impacts), and changing land use, cumulative impacts, individually and collectively, could likely be significant and should be included in the analysis.14. This EA does not provide quantification of impacts from the planned actions, so it is not possible to tell from any of the information presented whether any impacts to any resource areas rise to the level of significant, requiring further analysis in an EIS.15. This EA does not provide any analysis or information regarding economic and social impacts of the proposed action. The NEPA regulations require these impacts to be addressed in actions where social or economic and natural or physical environmental effects are interrelated.16. Section 1.3.7 of the EA discusses watershed restoration and includes a list of the past detrimental activities that are identified as contributing to current conditions. Neither prescribed fire or wildfire are included in the Forest Service list, but both have and will in the future significantly contribute to less than desirable conditions. While this comment references section 1.3.7, the Forest[rsquo]s presentation of past practices and impacts routinely provide the same type of list and normally omits prescribed fire. Please be fair and complete (or don[rsquo]t list any specifics) when presenting information on activities considered detrimental.17. This Granite Goose EA does not directly address matters related to the recent wolverine listing and does not address the recent notice of nationwide direction related to the [ldquo]protection and recruitment[rdquo] of old growth forest. Both of those federal actions were known to the PNF and predated the release of the Granite Goose EA. Due to the lack of information in the EA, it is unclear whether or how these actions could impact the proposed actions as well as ongoing actions included in the no action alternative in the EA.