Data Submitted (UTC 11): 3/4/2024 8:00:00 AM
First name: Karen
Last name: Crosby
Organization: Idaho Recreation Council
Title: CBC Representative
Comments: Please see comments in attachment

March 4, 2024

Nez Perce-Clearwater National Forests

1008 Highway 64

Kamiah, Idaho 83536

Subject: Dixie-Comstock Community Protection Project

Dear Supervisor Probert,

The Idaho Recreation Council has reviewed the Draft Environmental Assessment and Finding of No Significant Impact dated February 1, 2024. We are quite supportive of the purpose of the project to reduce hazardous fuels as shown in Alt. B near the community of Dixie, Idaho and the adjacent Comstock area.

Idaho Recreation Council has participated in the CBC and concurs that the following be considered in the finalization of this project.

1. We appreciate the strategy to keep the project streamlined in order to move forward expeditiously.

a. It appears that unburned areas exist in the Comstock and Dixie area and east of Road 11222 that may benefit the Dixie and Mackay Bar communities through fuels treatment. Idaho Recreation Council would support additional treatments in these areas.

b. We are concerned about existing burned areas with the CPZ that will add fuels for potential reburn as dead

trees fall. We would request that this project include treatments in burned areas within the CPZ to reduce these fuels and further satisfy the purpose of the project.

c. Road #222 is an important ingress/egress route for the Mackay Bar Community and Snow Groomer route. Fire mitigation work must keep the road surface intact, drainage free as project work progresses. It has been communicated with the forest service to clear tree wads from the road so they do not hinder their operation and other pushout areas that are plugged up due to no maintenance done in past years and since last touched by the Forest Service Road Department.

d. We support the decision to keep the fuels treatments with the[frac12] mile CPZ at this time. However, we believe additional protections to these communities has been inadequate as seen with the 2022 Orogrande Fire. There is benefit in providing additional protection within the broader 1 [frac12] mile CPZ. Roadless Commission would like to see fuels in a larger area be a priority and encourage the Forest to consider this for future treatments.

2. The Dixie area and Mackay Bar Communities areas are a popular area for year-around recreation including users with disabilities, equestrian, hunting, hiking, bicycling, snowmobiling and offhighway vehicle, 4X4'ing. This area is portal for multi-use recreation in the road less backcountry. Initial planning for the Dixie-Comstock Community Protection Project included consideration to integrate improvements to recreation. We note that inclusion of recreational opportunities are no longer addressed in this project.

a. We recognize and support that this project is not-over complicated. However, given the opportunity under the Idaho Road less Rule and the Wildfire Crisis Strategy to address recreation, we encourage the Forest Service to include these resources in future treatment projects. This might include, but is not limited to, conversion of temporary roads to trails, trail construction between these trails to provide loop opportunities, retaining current recreation access on existing temporary roads.

b. Karen Crosby on behalf of IRC, communicated with the Red River District and Road Maintenance personnel about the need to clear routes for the mobility impaired hunters on Moose Butte 1150 Rd which hasn't been touched for the last 10 plus years. While this road is outside of this target area, the money generated from this Dixie-Comstock project cannot be used to maintain this road because of this requirement/exclusion. This scenario highlights the need for the forest service to re-visit as to why money cannot be spent from various timber sales in the Red River Ranger District to maintain the few, three mobility impaired hunter routes (1150, 1110, 9950).

c. We would like to emphasize the need for regular maintenance and improvement of the recreation infrastructure in the area including roads, trails, trailhead facilities and signage.

i. Karen Crosby has been collecting road signage and trail signage for the Road Maintenance Manager. The Red River District does not have personnel to go out and bring in deteriorated signs for replacement.

d. Tnls project wlll bring with It an Increase in traffic including logging trucks, transport of heavy equipment and employee travel on roads in and around Dixie. The Dixie Community pays for and applies dust abatement each year. It would be appreciated, if this project progresses, if assistance could be given in the form of road watering or such. Also, with the increase in traffic, could temporary signage be used, in an attempt to keep the traffic speeds down, through the Dixie Town properties.

e. The Dixie Community requests that road building to do a project like this needs to be done. And, under Idaho Roadless Rule, those roads need to be obliterated. There are concerns that existing roads and trails could be "accidently" obliterated in this process. They would appreciate assurances that this will not happen. They saw a case over in Orogrande Fuels Reduction project where a road was obliterated that went up to the Frisco Mine. This road should not have been obliterated. The only section that should have been obliterated should have been the extension off of this road that was created so the loggers used to bring in the timber to a stagging location. Wild land Fire Fighters commented that the Frisco Road could have assisted them in gaining access out in front of the fire; along with equine users were using access for trail rides. Some previously used temporary roads currently exist and serve as trails that are used by residents and visitors for recreation purposes. Whether these roads prisms are -used in this project or not, IRC would like these existing trails to remain open rather than obliterated after this project.

f. Additionally, we believe existing and constructed road infrastructure should be assessed for its future needs for timber harvest or other vegetative treatments, fire access, and public access prior to decommissioning or obliteration.

3. We understand that the Forest Plan requirements for old growth cannot be met with implementation of this project due to existing vegetation conditions in the area. Idaho Recreation Council supports an exemption to the old growth Plan in order to move forward with this project.

We strongly support this project. We thank you for considering these points of interest in the Planning and Implementation phases of the project. Please keep us informed as it moves forward and let us know if our assistance is needed.

Karen Crosby

CBC Representative