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Idaho[rsquo]s leading voice for conservation

What[rsquo]s YOUR Idaho? Learn more about ICL's exciting It[rsquo]s My Idaho campaign!

Keith Lannom
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November 14, 2016

RE: Idaho Conservation League scoping comments on the Huckleberry Landscape Restoration Project

Dear Keith,
Thank you for considering our comments on the Huckleberry Landscape Restoration Project. Since 1973, the Idaho Conservation League has worked to protect Idaho[rsquo]s clean water, wilderness, and quality of life. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters who have a deep personal interest in ensuring that vegetation management projects integrate sound ecological restoration measures.
The Idaho Conservation League is also a member of the Payette Forest Coalition and we have consistently advocated for an increase in the scope and scale of restoration projects within the Collaborative Forest Landscape Restoration (CFLR) area. Forest Collaboratives like the PFC have proven to be successful ventures across Idaho for increasing the quality of Forest Service proposals, restoring forest and watershed conditions, and improving the dialogue among a wide variety of stakeholders. Our goal is to see a successful project that balances forest health, watershed, wildlife and community goals and that is implemented on the ground in a timely manner.
On November 11, the PFC, with ICL as a supportive member, submitted the following letter in support of the scoping proposal:
November 11, 2016 Mr. Keith Lannom Forest Supervisor Payette National Forest 500 North Mission Street McCall, Idaho 83638 Dear Supervisor Lannom: The Payette Forest Coalition (PFC) is pleased to forward the attached Landscape Restoration Priorities and Recommendations for the Huckleberry Landscape Restoration Project adopted at its August 18, 2016 meeting. Based upon our initial review, the Proposed Action appears to be consistent with the PFC's recommendations. During the DEIS comment period, the PFC will review the proposed

action and the alternatives by comparing the outcomes to the PFC recommendations. The review will provide the basis for the Coalition's comment letter on the DEIS. In addition to PFC objectives, the group will also review environmental effects described in the DEIS. We would like to express our gratitude to the Forest Service and the Interdisciplinary Team for considering and incorporating these recommendations into the design of the Proposed Action. The PFC looks forward to the review of Scoping Comments and the Draft Environmental Impact Statement.
Sincerely, Paul Litow, PFC Facilitator On behalf of the Payette Forest Coalition
Because one of the primary goals of the Idaho Conservation League is to protect habitat for fish and wildlife, we are focusing on potential areas for further improvement for this project as consistent with the Coalition[rsquo]s original recommendations. Please see our comments below:
Once again we thank you for the opportunity to submit comments on this project. Please send us any subsequent documents for this project. We look forward to continuing to work with the Council and New Meadows Ranger District on this project and others in the future.
Sincerely,

John Robison
Public Lands Director
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Idaho Conservation League scoping comments on the Huckleberry Landscape Restoration Project

Improving habitat for NIDGS and white headed woodpeckers
Treatments should be prioritized in areas with the most likely benefits for NIDGS and white headed woodpeckers. A monitoring program should review the effectiveness of the different treatments on the productivity of these species.

Slash treatments
The Forest Service needs to manage slash in a timely manner so that fuel risk is minimized. Whole-tree yarding can help reduce fuel loads within vegetation units but 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 a requirement whenever practical. We also support utilizing this material at biomass cogeneration facilities. We recommend that the Forest Service provide an estimate of the amount of material that will be managed through public firewood use, biomass utilization or pile burning at landings. Before authorizing burning at remaining slash piles at landings, the Forest Service should carefully manage the size, location and burning windows of these piles to minimize adverse impacts to soils.

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.

WUI treatments
We recommend that the Forest Service conduct some demonstration projects and follow up tours near the communities of Cuprum and Bear to showcase treatments that could be implemented on private property. We support the Cuprum community trail and believe that this could be developed as a non-motorized, interpretive trail for community members and the public. We recommend working with the community of Cuprum on opportunities to post interpretive signage about the cultural and natural history of the area.

Watershed Improvements

We support the proposed system road decommissioning, unauthorized road restoration and fish passage improvements. The scoping notice states that the Indian and Lick Creek subwatersheds are Functioning at Risk and that the Bear Creek Watershed is classified as Impaired Functioning. The scoping notice goes on to state that the Lick Creek subwatershed is likely to remain the in [ldquo]Impaired[rdquo] category (scoping, p. 10). This appears to be a typo as the Bear Creek Watershed is currently impaired. The DEIS should describe the anticipated improvements with respect to each Watershed Condition Indicator in each watershed.

Water quality
The Forest Service should also disclose any water quality issues from historic mining activity that may be having an impact on aquatic organisms or public health. There may be the possibility that some restoration activities can help address this issue.

Recreation Improvements
We support all the proposed improvements. Where there are opportunities to designate spur roads or landings as dispersed campsites, we recommend considering some dispersed sites for walk in, [ldquo]far car[rdquo] camping sites where families can hike a short distance to a camping area. Where there are opportunities to designate redundant roads as trails, we recommend designating some short, non-motorized, non-mechanized trails for families, similar to the interpretive sites at the east side of Lost Valley Reservoir. As mentioned above, we support the Cuprum community trail and believe that this could be developed as a non-motorized, interpretive trail for community members and the public. We recommend working with the community of Cuprum on opportunities to post interpretive signage about the cultural and natural history of the area.

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.

The Forest Plan and Wildlife Conservation Strategy highlight the value of these mature trees for wildlife.

The Forest Service[rsquo]s purpose for this project includes promoting an increase in large tree class size, canopy cover and in the number of early seral species. 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 Ponderosa pine, western larch and Douglas fir are the preferred species for retention, grand fir also occurs in the project area with old growth/legacy tree/large tree characteristics. Because the large tree component is underrepresented across the majority of the area, the majority of all particularly large native trees, regardless of species, should be protected for both wildlife and as part of the forest[rsquo]s natural heritage. Girdling undesired tree species could be one tool to retain the large tree structure important for wildlife while eliminate competition for water and nutrients with more desirable, seral tree species.

Other wildlife issues
Regarding Goshawks, we encourage you to incorporate Management Recommendations for the Northern Goshawk in the Southwestern United States (Reynolds et al. 1992).

With regard to elk, we support using permanent or seasonal road closures to enhance elk security habitat in areas where there are redundant routes.

Riparian treatments

We recommend carefully pre- and post-treatment monitoring of any riparian treatments to ensure that Watershed Condition Indicators are maintained or improved. Within RCAs, additional attention should be paid for retaining large-diameter trees of all species. We appreciate the RCA vegetation treatments are not proposed in the Indian and Bear Creek subwatersheds because they contain bull trout critical habitat.

Snag retention

A sufficient number of snags need to be left standing in each treatment area for cavity nesters until snags can be replaced by natural recruitment. Standing trees need to be overstocked to ensure sufficient habitat until new trees mature. Snags should be clumped rather than spaced evenly. Regional Snag Management Guidelines should be adhered to as part of this project and should be addressed in the EIS. We are also concerned about the removal of snags by firewood cutters and recommend design features that ensure that large snags important for wildlife will not be cut.

Coarse Woody Debris

To promote development and protection of soils, coarse woody debris should be maintained in accordance with the recommendations in Managing Coarse Woody Debris in Forests of the Rocky Mountains (Graham et al, 1994).

Project implementation

The Forest Service should host an implementation and monitoring website for this project so the public can track the areas through different restoration activities over time. The Forest Service should clarify that a variety of methods may be used to treat a single area to avoid the perception of double counting. A map could be updated as needed to describe the treatments and locations.