

Data Submitted (UTC 11): 2/5/2024 7:00:00 AM

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Comments: Please see the comments in the document below: Granite Goose EA

Please accept these comments from Mike Medberry on the Granite Goose Landscape Restoration Project Draft Environmental Assessment. I have been a member of the Payette Collaborative Group since it[rsquo]s beginning with its early meetings in Council and have submitted my comments many times over the years. I[rsquo]ve also been a leader on the subcommittee for the collaborative group addressing the French Creek and other roadless areas on the PNF, have put in hundreds of hours, and provided critical information to the PNF Collaborative Group. The PNF group recently rejected the validity of the subgroup on roadless areas. The Collaborative Group and the USFS must not fail to include and respond to my comments on this draft Environmental Assessment which I am now submitting. But, of course you[rsquo]ll do as you wish.

These comments also incorporate the 132 pages of the Wildlands Defense organization, whose comments were written by Katie Fite, by stating their inclusion. Please read them and consider Ms Fite[rsquo]s incisive content.

I have further significant comments on wolverine, portions of the Idaho Roadless Areas, and whitebark pine within this draft EA. And assessing the cumulative impacts of this action on the Payette NF should be fully considered. Dropping the former Goose Creek EA and proposing the more limited landscape Goose Granite EA, will still create damage that may be done by logging and ancillary actions, the wolverine listing, and the damage that the whitebark pine harvesting would do and should trigger production of an EIS.

The Granite Goose Landscape Restoration Project Draft EA should become an Environmental Impact Assessment because of the existence of rare or sensitive habitats for birds and mammals, and rare, sensitive, and threatened individual species living seasonally within this timber sale area. Moreover, the existence of roadless areas in this timber sale area, and the changing environment of the warming trends in this forest further require production of an EIS.

Wolverine

The existence of threatened wolverine have been documented in areas adjacent to the current Granite Goose Draft EA and given the wide-ranging use of varied habitats and the denning habitat of wolverine, they must be assumed to occur within the Granite Goose area unless they can be decisively shown to not occur there.

A regionwide assessment of wolverine survival needs to be written to protect the threatened species and the roadless areas. Recreation Vehicles should be eliminated above roughly 3,000 feet and each of the roadless areas in all National Forests within Idaho and Montana, among other associated habitats for wolverine, where they have been documented over the past 20 years. That would include the entire Granite Goose EA area. It should also include portions on the McCall and New Meadows Districts that support the wide-ranging wolverine in each roadless area and beyond. Many of the proposed actions will negatively affect the distribution of wolverine and that shouldn[rsquo]t be allowed as it diminishes the limited areas that are key for survival of these animals. (Not to mention the increased area for hunting of wolves.) For instance, all of the winter logging and use of over-snow vehicles should be precluded in the Payette NF acres that are higher than 3000 feet in elevation.

Idaho Roadless Areas

Neither of the two roadless areas, French Creek and Patrick Butte IRAs, that would be affected by this environmental assessment action should be allowed. Although the State of Idaho Roadless Area language permit

these roadless areas to be logged, the land is entirely within the discretion of federal land managers, not the State of Idaho nor its minions at the PFC. Although the State and its collaborators can suggest that the land be logged and otherwise eliminating its roadless characteristics, it is unwise for you to do that as the appeal will have to be heard by the Supervisor, then the Regional Forester, the Chief Forester, and then will go to court for this issue to be decided. After all, the Idaho Roadless Area Policy is only the policy of the Forest Service that the State of Idaho can determine the characteristics of the unroaded landscape. It is not the law of the land. The law of the United States as it relates to roadless areas is defined by NFMA, the Wilderness Act, and by Congress.

The French Creek and Patrick Butte IRAs must receive the most protective work in maintaining their wilderness qualities until Congress decides upon their final worth. Not one soul in the State of Idaho's management agencies or the NCOs in Idaho is competent to make that decision for me or others of a like mind. Eliminate the two roadless areas from logging and manglement or provide a legitimate format for that decision to be made. The first step would be an EIS but the process of determining when the roadlessness should be eliminated must be a logical, rational and legitimate way to determine what should be done within a roadless areas. Three thousand, nine hundred, and sixty acres damaged by the intrusion into the IRAs is too much by exactly 3,930 acres. Stop it!

Whitebark Pine

All whitebark pine habitat should be removed from the project area. Any whitebark pines are vulnerable to being damaged by logging actions and all treading upon the land in the area. The seeds that are distributed naturally will have a certain percentage of being immune to whitebark pine blister rust and a some of them will survive. But I suppose the spreading of the whitebark pines as seedlings may be a legitimate action through an EA. However the treatment of whitebark pine habitat will also negatively affect a few species which habitually use that habitat, such as at black bears and Clarks's nutcrackers. Those species are not currently sensitive but should be conserved and given fair thoughts. On the Boise NF, I have seen seedling whitebark pines recolonizing the land immediately below the diseased or dead whitebark pines that were high on a ridge in the Sawtooth Wilderness. That was an inspiring thing to see.

Poisons that may harm whitebark pines should never be used in whitebark pine habitat and the use of the many kinds of poisons that are used in the PNF should be controlled only by federal agencies (especially those independent from the USDA) regarding insecticides and herbicides when they affect whitebark pines.