



IDAHO FARM BUREAU FEDERATION

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August 5, 2019

Mark Fox
Payette National Forest
Council Ranger District
2092 Highway 95,
Council, ID 83612

Dear Mr. Fox:

On behalf of the more than 80,000 Idaho families who are members of the Idaho Farm Bureau Federation, I am writing to provide comments on the Huckleberry Project Draft Environmental Impact Statement. We have members who hold grazing permits within the Payette National Forest. We have a substantially larger number of members who recreate in this area including hunting, hiking, camping and riding ATVs. Our members have a significant vested interest in ensuring these opportunities continue and are enhanced into the future.

1. The contribution of grazing toward all project objectives (defined in PL 111-11, Title IV, Section 4001) is not acknowledged in the Huckleberry DEIS and grazing is not addressed as a component of the action alternatives. The CFLR purpose is to encourage the collaborative, science-based ecosystem restoration of priority landscape through a process that:
 - Encourages ecological, economic, and social sustainability; Livestock grazing is an ecological, economic, and social necessity and need on this landscape.
 - Leverages local resources with national and private resources; Livestock grazing leverages both local and national resources to carry out management actions on the forest through revenue generation and beneficial treatments.
 - Facilitates the reduction of wildfire management costs, including through reestablishing natural fire regimes and reducing the risk of uncharacteristic wildfire; livestock grazing reduces fuel load which allows for acceptable fire exposure both in terms of frequency and intensity on the landscape. Livestock grazing on the forest has historically not been managed with fire risk reduction as an aim, if a strategic and coordinated approach is taken to grazing, it will contribute toward the long-term reduction of wildfire management costs. and
 - Demonstrates the degree to which:
 - i. Various restoration techniques-
 1. Achieve ecological and watershed health goals; Livestock grazing along with other restoration techniques will yield better restoration results. Grazing is a tool when used on the landscape can be the most cost

effective and restoration positive technique (such as the White Bark Pine areas of Huckleberry). Grazing on these projects will aid in achieving ecological, watershed and overall forest health objectives. and

2. Affect wildfire activity and management costs; Grazing reduces excess fuel from the landscape. This results in fire frequency and intensity reductions. and
 - ii. The use of forest restoration byproducts can offset treatment costs while benefitting local rural economies and improving forest health. Grazing stimulates forage which encourages healthy native species to maintain populations and health. Distribution of grazing fee revenue includes 50% back to the Forest; 25% to the County; and 25% to the treasury. The 50% back to the Forest is to be used for improvements on the allotment, including water development, vegetation restoration habitat, fences, trails, weed management and other similar actions which contribute to ecological and watershed health. Livestock grazing is critical to the sustainability of the local rural economies. Also grazing as a treatment reduces overall forest viability treatment costs and improves forest health.
2. The DEIS Chapter 1, Section 1.1.1, includes a statement of purpose and need for this action. Since this action is in fact in response to legislation (PL 111-11), the purpose as stated in that legislation should be clearly included in this section. As the purpose and need is presently written, the objectives of the legislation and their relative priority are not clear. See 40 CFR 1502.4 and 40 CFR 1502.13.
3. The DEIS does not include a comparison of alternatives relative to the objectives of PL 111-11. While some of this can be ascertained through review of the various narrative, tables and figures contained in the DEIS, there is nothing that provides the reviewer or decisionmaker with a clear comparison of how well each of the alternatives meet the objectives of PL 111-11. The content of the EIS is supposed to include considerations relevant and important to a decision (such as how well it meets the authorizing legislation), including factors not related to environmental quality. See 40 CFR 1502.14, 1502.16 and 1502.23.
4. The CFLRP is supposed to be a landscape level look at improving our forest condition on a longer time scale, meeting the objectives defined in PL 111-11. In order to do that successfully, all contributions to the system need to be considered. The action cannot be a single treatment of the landscape, but instead must be a defined set of actions that is sustainable. And other ongoing actions, such as grazing, must be considered (See 40 CFR 1508.25). Even though there is separate NEPA analysis for grazing and new analysis should not be required in the CFLRP NEPA (See 40 CFR 1502.20 and 1502.21), the CFLR NEPA should include the contributions grazing makes to the CFLRP objectives in similar terms used to present the benefits of other treatments. The role of the ongoing grazing program in accomplishing project objectives should be addressed. Note: The Huckleberry DEIS does provide a much better description of grazing under Affected Environment than contained past Payette CFLR EISs.
5. The DEIS does not address some environmental impacts relative to prescribed fire. Particularly, air emissions and impact to wildlife from the application of prescribed fire are not addressed. 40 CFR 1502.14 and 40 CFR 1502.16 require that environmental impacts of the proposal be presented for the proposal and alternatives. While climate change and greenhouse gases are

discussed a number of places in the DEIS and are represented as a concern, the estimated emissions from prescribed are not quantified or presented. Impacts to wildlife are described in terms of habitat impact but wildlife mortality is not addressed. 40 CFR 1502.14 requires the agency to rigorously explore and objectively evaluate all reasonable alternatives. Grazing should be included in the action alternatives and could be used to reduce the need for prescribed fire, reducing greenhouse gas emissions and reducing impact to wildlife.

6. The DEIS does not address the concept of sustainability required by PL 111-11. Instead, the DEIS presents a single treatment approach (with the exception of prescribed fire). Active management of the forest (continued treatment) will be required beyond the initial treatment in order to maintain an improved condition expected to be realized from the treatments. Local rural economies will only see benefits during the treatment period (DEIS projects to be up to ten years). Sustainability should be addressed. Grazing should be one of the ongoing treatments.
7. The DEIS acknowledges that the action alternatives will open the forest canopy and result in additional production of grasses, forbes and brush. Since this increased forage is also an increase in ground fuels, an associated treatment action would be appropriate. Using grazing as a treatment for this increased forage production would contribute to the CFLR goals of reducing wildfire risk and management costs, and utilizing forest restoration byproducts while benefitting local rural economies and improving forest health.
8. Grazing impacts are attributed to some current watershed conditions in the DEIS (for example, see Table 3.5-3) and in the associated Water Resource Report (Table 4; Narrative in 1.3.2.1.2). The Lick Creek, Steve's Creek, Deer Creek, Doe Creek, Slim Creek, and Cow Creek drainages all show grazing impact but no mention is made of these impacts potentially being caused by elk. During the last 40 years, this whole area has seen large herds of elk (up to several hundred head per group) traveling together for much of the spring, summer and fall seasons. These large herds of elk leave their mark wherever they travel. The attribution of watershed impacts to grazing without acknowledgement of the wildlife suggests that the science being relied upon is either incomplete or has a bias. Please use good science to support decision-making.
9. Please consider the following for the decision on roads and trails:
 - Include the additional shaded fuel breaks under Alternative 3 to assure availability of safe access/egress routes for local residents, members of the public and emergency crews.
 - Continue coordinating with private landowners and grazing allotment owners on any plans for road obliteration to assure needed access to property or grazing allotments is not compromised through an action. Some remote private lands in this project area rely on these old roads within the proximity of their property to gain access to their property
 - For all existing roads that are planned for use for treatment access on this project but then obliterated after use, please consider closure rather than obliteration. Since most of these roads were likely constructed for timber management activities in the last 30 to 50 years, and these roads are considered necessary to accomplish same/similar activities under this project, these same roads will be needed in order to properly manage these lands in the future. Road removal is expensive and a watershed-friendly closure can achieve the necessary level of protection; instead of obliteration, use a long-term closure and use the money saved for some real restoration need.

- Assure proper modeling is conducted to support decisions on roads. The use of the GRAIP-Lite Model rather than the GRAIP Model is not appropriate to support decisions on individual roads or segments. Assure the modeling includes the contributions to sediment for the period of the obliteration action through a complete healing of the disturbed road prism. Assure the model does not assume a natural hydrologic function following recontouring, since that will only occur with geologic time. Include modeling of intermediate actions (such as seasonal and long-term road closures) to compare against full obliteration and no action in order to give the decisionmaker the ability to make a cost-benefit determination on each proposed road action.
 - Assure the elk security model does not include seasonally closed roads (closed during hunting seasons) under Alternative 3 when comparing Alternative 2 and Alternative 3.
10. The economic analysis presented for the project is very limited in information provided. Section 3.12 of the DEIS presents the economic/socioeconomic analysis for the project. The following are items for further consideration:
- The economic analysis is blended across four counties. The project area is entirely within a single county (Adams). Valley County has an entirely different socioeconomic profile than the other three counties. While the impacts of the project will not be limited to the county containing the project area, the blending of the analysis across four counties gives a different result than one would see if Valley County were addressed separately. Please consider splitting this analysis to show impacts with four counties as well as separating Valley County from the other three.
 - The analysis does not include the revenue to counties from traditional timber sales. These revenues are important to counties with a large percentage of federal land that is not taxed, and this revenue is used for basic infrastructure (e.g., roads, bridges, schools), creates jobs, etc. The potential revenue to counties from the timber to be harvested on the Huckleberry project is significant.
 - The analysis does not include the economic contributions of the grazing program.
 - The analysis does not address sustainability.
 - The analysis is unclear on what type of jobs are created (seasonal, part-time, permanent), whether they will be mostly local labor or imported labor, and the duration of jobs created. An objective of CFLRP is to stimulate local job opportunities and to create a sustainable contribution to local rural economies. Please provide sufficient information associated with this analysis to allow the reviewer and decisionmaker to better understand the potential economic impacts.
11. Please check validity of references used. For example, CEQ 2016 was withdrawn in 2018 and is not a credible reference.

Thank you for the opportunity to comment on this DEIS. If you have any questions about these comments, please contact Zak Miller in our Pocatello office at 208-239-4341.

Sincerely,



Bryan Searle, President
Idaho Farm Bureau Federation