



Mr. Keith Lannom, Supervisor Payette National Forest
500 N. Mission Street
McCall, Idaho 83638

August 1, 2019

RE: Huckleberry Landscape Restoration Project #50218 Draft Environmental Impact Statement

Dear Supervisor Lannom,

Thank you for the opportunity to provide comments on the draft Environmental Impact Statement for the Huckleberry Landscape Restoration Project#50218. Idaho Wildlife Federation appreciates the thoughtful analysis that agency staff put forth throughout the scoping and full analysis of the restoration needs and impacts to the landscape.

Idaho Wildlife Federation (IWF) is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations and 45,000 affiliate members and supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

IWF is also a member of the Payette Forest Coalition (PFC) since April 19, 2019 and has worked within the coalition to help increase the scope and scale of forest restoration projects within the Collaborative Forest Landscape Restoration (CFLR) area. Our goal as a member of the PFC is to help shape and guide projects that, when implemented, adequately address wildlife, wildfire, watershed health, access and recreation, and restoration economics in a timely manner.

PFC members reached consensus on a Huckleberry DEIS comment letter, with one dissenting vote. On July 30, the PFC submitted the following comments with suggestions for incorporation in the FEIS:

Idaho Wildlife Federation
1020 West Main Street, Suite 450
Boise, Idaho 83702

July 30, 2019

Mr. Keith Lannom, Supervisor Payette National Forest
500 N. Mission Street
McCall, Idaho 83638

Supervisor Lannom:

The Payette Forest Coalition (PFC) has reviewed the DEIS for the Huckleberry Restoration Project. In general, we find Alternative 2 to most closely align with the PFC Recommendations Report adopted by consensus on August 18, 2016 and submitted to Forest Service November 11, 2016. The members conclude that the alternative can be improved by addressing the topics below in the FEIS:

- Include the proposed Lynes Point trail and Huntley Gulch loop from Alternative 3.
- Outside of the Lick Creek watershed and Bull trout habitat in the Bear and Indian Creek watersheds, we recommend providing additional seasonal access by incorporating some routes included in Alternative 3 via use of effective seasonal road closures instead of long-term closure, Maintenance Level 1 closure, or road decommissioning where possible. Determining whether effective seasonal closure is possible should be based upon whether motorized entry can be successfully prevented outside of a road's seasonal use.
- We would like to reemphasize the Coalition's vegetation treatment recommendations in regard to tree species composition, stand ages, stand structures, fuel loading, and patch size and arrangement on the landscape. When there is a choice to achieve vegetation and habitat objectives, including tree size, density and species composition objectives, insect and disease-infected trees should be removed and healthy trees retained.
- We ask that measures should be taken to protect whitebark pine seedlings when implementing treatments in and around whitebark pine stands.
- The Coalition recommends that management of white-headed woodpecker habitat in PVGs 1,2 and 5 be done in a manner consistent with monitoring data (Saab et al, June 2019)¹.
- We support the use of shaded fuel breaks proposed in Alternative 2 as well as strategic use of additional shaded fuel breaks within the project areas as long as doing so does not compromise other project objectives.

The Payette Forest Coalition appreciates the work of the Interdisciplinary Team on the design and analysis of this project. We look forward to successful implementation and monitoring.

IWF supports the consensus reached by the PFC and would like to express additional supporting comments below.

The project area lies within Idaho Department of Fish & Game (IDFG) General Management Unit (GMU) 22. IDFG offers both general and controlled hunts in this unit, with a highly sought after 60-tag controlled deer hunt. In 2018, Unit 22 was enjoyed by 10,258 general deer hunters, 423 controlled hunters, and 20,528 general elk hunters. In total, 39 antlered deer at least 4 points or greater were harvested for a 71% total success rate during the controlled hunt period. Other

Idaho Wildlife Federation
1020 West Main Street, Suite 450
Boise, Idaho 83702

successes ranged from 18.5% for general elk hunters up to 24.1% success for general deer hunters. Between the 2018 controlled and general hunts available for both deer and elk, hunters spent a total of 31,209 days in Unit 22. Because of the extensive use and enjoyment on National Forest System lands in GMU 22, IWF is appreciative of the increase of elk security acreage from 9,772 acres in Alternative 1 to 10,571 acres in Alternative 2. As hunters, we have obligation to look after the health and integrity of our big game herds. Part of the obligation is providing adequate habitat security and productive landscapes for a multiple ungulate species. The loss of elk security acreage laid out in Alternative 3, particularly within the Lick Creek watershed, would run counter to the CFLR goals of landscape restoration and forest health that also benefits a diversity of wildlife.

We also appreciate the total stream miles improved in both Alternative 2 and Alternative 3 but are particularly supportive of Alternative 2 totals.

We look forward to continuing participation in the Payette Forest Coalition to seek broad consensus on forest restoration projects within the Weiser-Little Salmon Headwaters CFLR area, as well as providing individual and supportive comments as an organization. Thank you again for the opportunity to provide comments during the 45-day comment period.