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August 5, 2019

RE: Huckleberry DEIS

Thank you for considering our comments on the Huckleberry DEIS.

Since 1973, the Idaho Conservation League has worked to protect and Idaho's clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. The Idaho Conservation League has a long history of involvement with forest restoration projects. As Idaho's largest statewide conservation organization, ICL represents over 30,000 supporters who have a deep personal interest in protecting and restoring our forests and watersheds. ICL staff and members have recreated in the project area and toured it several times.

ICL is also a member of the Payette Forest Coalition which has a mission to build diverse community support for forest restoration. The group represents a range of interests in the Payette National Forest. A common bond is the recognition that current forest conditions depart from those desired. Landscape scale restoration can transition the forest towards improved conditions and address five goals of the Coalition's diverse interests: Wildlife, Wildfire, Watershed Health, Access and Recreation, and Restoration Economics. The PFC submitted recommendations for the Huckleberry Project in 2016 (attached) and comments on the DEIS in July 2019. We are writing to support the PFC's comments on the DEIS.

ICL has reviewed the DEIS for the Huckleberry Restoration Project and 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. ICL concludes 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 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 area 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.

Once again we thank you for the opportunity to submit comments on this project. Please retain the Idaho Conservation League on the mailing list for this and other projects on the district. We look forward to continuing to work with the Payette National Forest on this project and others in the future.

Sincerely,

A handwritten signature in black ink that reads "John Robison". The signature is written in a cursive style with a large, looping initial "J".

John Robison
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Idaho Conservation League