


David Simmonds


December 14, 2018

Keith Lannom
Forest Supervisor
Payette National Forest
500 N Mission St
McCall, ID 83638

Subject: Scoping Comments, Granite Meadows Project

Please accept for the record my scoping comments for the Granite Meadows Project proposed action on and adjacent to the Payette National Forest (PNF).

Scope

The scope of the proposed action – both geographically and objectively – is enormous. It is too large to ask the public to understand and meaningfully comment upon. It spans multiple watersheds, and a head-spinning range of objectives and habitats. It appears far too large to result in meaningful responsiveness to NEPA and NFMA with regard to site-specific analysis and too large to result in well-managed implementation by PNF staff. It reminds me of a congressional omnibus budget bill, where the failure to complete a detailed process leads to a giant pile of cans kicked down the road at the end of the day.

While it's interesting that the proposal evolved out of an advisory group seeking common solutions and compromise, I don't think that process really works, and may even suggest why the scope of the proposed action seems out of scale. It looks like it may be the result of back-room horsetrading by a too-small group with good intentions, but with a limited range of interests, trying to do too much too quickly. The general public's divergent interests and opinions on management objectives and activities, I believe, get pushed out until too late in the process. Science, data, open public discourse, and professional land managers should be driving planned projects and activities.

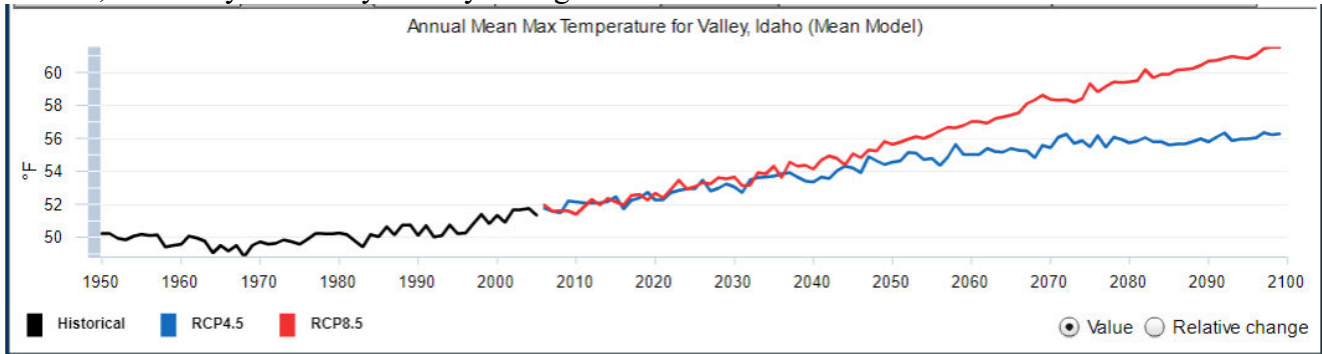
Please break this project up into coherent pieces that can be better analyzed, understood by the public, and implemented within the spirit of NEPA, NFMA and the PNF plan.

Climate

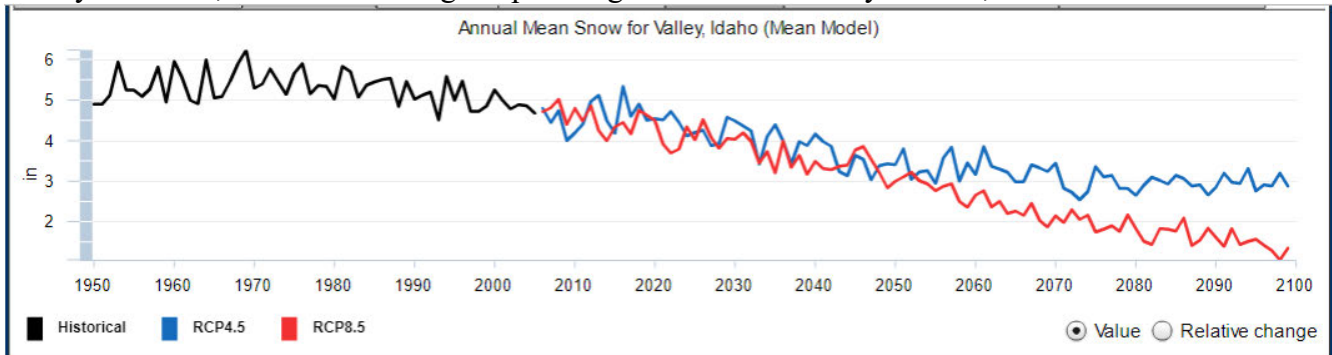
The project overlooks the elephant in the room. Please increase emphasis in the "Purpose and Need" and the range of proposed actions, on the intersection of climate factors and the project landscape. Reducing, responding and adapting to climate change is an overarching focus of public policy worldwide, and certainly should have a prominent place in the context of major public land management proposed actions such as this one. It is not beyond the scope of this proposal and its underlying planning assumptions. USGS modeling, available via the February 2017 National Climate Change Viewer (https://www2.usgs.gov/climate_landuse/clu_rd/nccv/viewer.asp), shows mean Valley

County, temperatures, both minimum and maximum, increasing more than 6° F between the baseline periods 1981-2010 and out-years 2050-2074, with a reduction in mean snow of 2.7”.

The following figure, courtesy USGS, display both historical (observed) and projected temperature rise for Valley County, Idaho over the past 50, and next hundred years or so. Maybe less than the lifespan of an average tree. Maybe four or five generations of local residents; the bullseye is largely on our grandchildren. How would such change affect forest ecosystems that are the purview of PNF planning and management? Forest plan assumptions about management and desired conditions for species, habitats, and ecosystems may be very wrong.



The next graph indicates we may need to expect far less snow here in that same time span. What does that mean for the species and communities that rely on watersheds today? What management plans and actions might help reduce local contribution to the problem, and help position us for something other than a disaster going forward? Will the proposed project area remain forested, become a grassland, a brushy burn scar, or a desert during the planning horizon? It actually matters, and we should know.



These time spans are well within the range of forest planning. The lives of local residents are already affected by changes in fire behavior, season lengths, snowpack, rainfall, and heat waves. As an example, the loss of large stands of Englemann spruce in the upper Payette River watershed from declining snow pack, rising temperatures, insects and catastrophic fire led to the shut down of my specialty wood products business in the 1990's. The trees which the market valued were essentially gone. The trend for declining snow pack and rising temperature has accelerated since that time, and is predicted to continue. Socioeconomic impacts of land management decisions and expected future conditions should be understood and mitigated. As both the causes and effects of climate change are geographically distributed, each opportunity to assess landscape-scale conditions is potentially important and significant. Locally, we own a piece of the problem and the solution. It doesn't look like we have the luxury of ignoring that.

To improve project context and better address cumulative effects, the proposal and subsequent analysis should broaden the scope of applying the “most recent science” that informs how we manage landscapes to help stabilize environmental change, and how environmental conditions are diverging from those that were anticipated in the PNF forest plan. The desired future conditions defined in the forest plan for vegetation don’t reflect our present understanding of a changing environment. The correlation between increasing global atmospheric CO₂ and temperatures is partly out of scope here, but not entirely, as PNF managers also own part of the carbon sequestration problem.

So, some questions. How can active or passive management of this landscape best protect its cold water biota and minimize species and diversity loss in all elevation zones? At the same time, how can this project minimize greenhouse gas emission and maximize carbon sequestration?

Watershed Effects – Payette Lake

Surface waters of Payette Lake provide the sole drinking water source for over 3,000 residents (2010 census). There is no plan “B” water source for the community. Overriding priorities of all land management activities in the Payette Lake watershed should focus on reducing and minimizing soil disturbance, deforestation, sedimentation, nutrient loading and thermal impacts particularly considering past and present cumulative effects. After the broad scale Blackwell and Corral fires of 1994, during which over half of the watershed burned, a spike in lake and tributary dissolved nitrogen, phosphorus, reduced oxygen and increased temperatures compared to pre-fire conditions was documented. Payette Lake algae blooms also occurred in the years immediately following the fires. These responses demonstrated a sensitivity of the lake and watershed to soil disturbance and loss of vegetative cover. In subsequent years, PNF and IDL logging in the watershed have cumulatively reduced forest cover further, and several instances of mass failure or stream blowouts have contributed additional sediment and nutrient spikes.

Watershed Effects – Little Salmon

In general, the Little Salmon is a heavily managed and impacted watershed. Private, state and PNF logging, road building and soil disturbance impacts have broadly affected water quality and watersheds. Agricultural sedimentation and nutrient loading of the Little Salmon are significant. Widen Amendment cooperative agreements for watershed improvements should be sought. Cumulative effects, salmon, steelhead, bull trout, and cold water biota are all significant factors to plan around. Large fire impacts such as the recent Teepee Springs exhibit behavior, scale and impacts outside the naturally expected range, and should color management assumptions about future conditions. Decommissioning of some roads is a commendable element given the controversy it can cause, however I request that additional roads be removed in watersheds with higher road densities such as Mud Creek, Little Mud Creek and Boulder Creek to improve watershed stability, water quality, wildlife security habitat, and higher quality hunting opportunities.

Prescribed Fire

Unintended or tolerated consequences of prescribed burning include escaped burns, human health impacts from smoke, and loss of visibility or visual quality across large areas. While fuels treatments in the WUI may be justified, the air quality and carbon emission impacts of prescribed fire deserve

consideration and analysis. As suggested in Appendix 3, fuels treatments, particularly near inhabited and in higher risk areas should include mastication/mulching, such as has been used in some southern pine and southeastern US forests, with the opportunity for local study of outcomes and data generation. Where intermountain west data is lacking, a net-benefit analysis of mastication/mulching versus prescribed burning would be an appropriate predicate, or piece of the project EIS, given the large amount of prescribed fire area contemplated in the Proposed Action, and its proximity to inhabited land in many cases.

Wildland-Urban Interface

Thank you for the emphasis on “Supporting the development of fire-adapted rural communities” in Purpose and Need. I commend the PNF for proposing resources to assist communities and landowners coexist in landscapes that are subject to increasingly extreme wildfire events outside the range of historic conditions. Communities such as McCall do have “Firewise” programs to help landowners understand and manage risks, however actual resources to get the work done are limited. If the PNF can facilitate additional resources and education for landowners and local government, there’s likely to be a demonstrable range of benefits. Wildland-urban interface (WUI) fuel and vegetation management projects have already occurred across many ownerships, so understanding what’s been accomplished, and the effectiveness of those activities, would be a good predicate for any proposed action. Such a review would help make for an effective proposed strategy to tie these efforts together. At the same time, WUI projects have sometimes strayed from the primary intent of fire risk mitigation, for instance toward biomass generation, as a step toward moving private land use from forested to developed, or applied in areas where wildfire risk to private property is minimal. WUI resources should be applied in an appropriate, effective and efficient manner. WUI treatments should be carefully balanced against soil disturbing and watershed impacts, particularly in critical habitats or drinking water source watersheds such as that of Payette Lake. As suggested in the preceding section, and proposed in Appendix 3, some areas are more suited for mastication/mulching to lessen risks and impacts to residents and private property. As these areas are also important scenic and recreation areas, maintaining a mosaic of natural landscapes and varied visual treatments is an important consideration where WUI objectives can be met. Uniform stands of limbed-up trees without understory may mitigate fire risk, but they can also look like hell and unnecessarily diminish public benefits.

Recreation

Summer - Given the PNF’s limited resources to do so in recent times, an inventory and report on trail and trailhead conditions, with an action plan, would be a valuable part of this project analysis. Some trails and trailheads on the PNF (but not all within this analysis area) have been significantly damaged by over-use or inappropriate use, without timely intervention of land managers to repair damage, change or restrict use, or close the most heavily impacted areas pending restoration.

Winter – Unsupported statements have been made in recent public meetings on PNF recreational user groups that over-snow travel essentially has no impacts, and therefore should be unrestricted across the project area except where the noted usage conflicts and exclusions are currently mapped. However, there has been significant peer-reviewed research which contradicts those assertions. Snowpack and water quality impacts from snowmobile emissions, particularly in more heavily concentrated usage areas, or adjacent to water bodies, and where two-stroke engines are still in use, has been documented (Ingersoll et. al., 1997). Significant damage to vegetation from over-snow vehicles (OSV) has been

documented, particularly in steep terrain or, logically, when snow depths are low (Baker and Bithmann, 2005; Stangl, 1999; Neumann and Merriam 1972). Impacts, or expected impacts, of over-snow vehicle travel to wolverine, lynx, rodents and other species have been studied and noted (Banci, 1994; Magoun and Copland, 1996; Fisher et al. 2013; Koehler and Aubry, 1994; Buskirk, 2000; Brunnel, et.al., 2006; Gese et al., 2013; Sanecki et al., 2006). Air quality and noise impacts from OSVs are well documented, primarily with two-stroke engines, but in some cases including four-stroke OSV engines (Eriksson et al., 2003; Reimann et al., 2009; Janssen and Schettler, 2003; Musselman and Korfmancher, 2007; Vos et. al., 1985; Burson, 2008).

Decisions about whether and where to permit, restrict, manage or prohibit over-snow vehicle recreation should be adequately and defensibly based on science, resource management objectives and direction from existing wildlife management studies and initiatives. Blanket unrestricted use isn't appropriate.

Personal Notes

My involvement in PNF activities spans about 40 years. It includes direct work in entomology, range management, road engineering, soils, post-sale land management, and wildlife, as well as environmental advocacy in the context of planning and regulatory processes. I was a member of the 1980's PNF Consensus Group throughout development of the initial NFMA forest plan. I served on the Big Payette Lake Water Quality Council throughout development and codification of the Lake Management Plan. I participated on the IDL/DEQ Watershed Advisory Group for the upper Payette River area, addressing Clean Water Act monitoring and compliance for non-point source impacts. I also served on the City of McCall drinking water source citizen's committee, which advised the McCall City Council on continued use of Payette Lake as its sole source of drinking water and implementation of its water filtration plant. I am a McCall resident, homeowner and water customer.

Thank you for the opportunity to comment on the proposed action. Please keep me informed of news, documents, deadlines, meetings and other opportunities to stay involved, via email and postal mail.

Sincerely,

David Simmonds
