



Payette Forest Coalition  
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June 9, 2021

Linda Jackson  
Forest Supervisor  
Payette National Forest  
500 North Mission Street  
McCall, Idaho 83638

Dear Supervisor Jackson:

The Payette Forest Coalition (PFC) wishes to express our appreciation to you and the Cold July Interdisciplinary Team (IDT) for the opportunity to comment on the proposed action for the Cold July Environmental Assessment.

Coalition members discussed the proposed action at their May 20, 2021 meeting and believe it can be improved by addressing the topics below.

- The PFC understands the rationale for focusing primarily on vegetation management in this project. However, we encourage the ID Team to look for opportunities to include watershed restoration, such as removing or blocking unauthorized routes, and recreation improvements, such as creating new trails or hardening dispersed camping sites, within the project area. It would seem that efficiencies could be gained in accomplishing this work while equipment for logging, temporary road building and road maintenance activities is already on-site. Since these activities were not objected to nor litigated in the LCBC decision, we see little downside to including these activities when it's within the footprint of the vegetation treatments proposed.
- We ask the Payette National Forest to consider doing road maintenance and updating signage within the project area even if these actions are not specific elements of this project.
- While the purpose and need for this project clearly describes restoration goals which are wholly consistent with PFC goals and recommendations to the Forest Service, we are



concerned that some of the treatments proposed differ from those within the PFC recommendations for treatments in this area. This makes it difficult for some PFC members to garner support from their organization's leadership or members.

- To help the public better understand what is proposed concerning regeneration harvesting, we request that the terminology used better reflect the true nature of these treatments. For instance, we recommend the treatment called "patch cut" be changed to reflect your intention to also thin within these treatment units in addition to creating smaller openings sufficient for regenerating early seral species. Also, non-commercial activities such as aspen regeneration, prescribed burning, and non-commercial thinning are listed within the proposed action as "to be determined." These treatments are typically essential components of a forest restoration project and are beneficial for wildlife and watershed health. Developing estimated acreages for these types of treatments would demonstrate a stronger commitment to non-commercial activities and may help garner support for this project among conservation interests.
- The PFC asks the Forest Service develop actions to prevent and/or manage unauthorized travel on roads (including unauthorized routes) that will be used to access treatment areas over a 20+ year period.
- Consider impacts of understory prescribed fire on huckleberry harvest.
- Explain condition-based management in way that is easily understood.
- The PFC recommends that slopes prone to landslides be identified so that treatments which might destabilize them can be avoided.
- Before the PFC can fully support this project, we desire to better understand what silvicultural practices are intended in stands slated for regeneration harvest units (patch cut and shelterwood prescriptions) as they appear to differ from what the Coalition supported under the LCBC project. We intend to facilitate this understanding through field discussions with Forest Service staff.

We look forward to continuing our engagement with the Payette National Forest throughout the NEPA process.

Thank you once again,

PFC Steering Team