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December 29, 2021

New Meadows Ranger District
Attn: Cold July Project
P.O. Box J
New Meadows, ID 83645

RE: Cold July Forest Restoration Project EA

Dear Forest Supervisor Linda Jackson,

The State of Idaho, through the Idaho Governor's Office of Species Conservation (OSC) appreciates the opportunity to provide comment on the Payette National Forest's (PNF) Cold July Forest Restoration Project EA. The project aims to provide a landscape-scale level treatment across ownership boundaries to enhance forest stand structure and resiliency as well as wildlife habitat in the New Meadows and Council Ranger district of the PNF by reducing tree densities and fuel loadings to result in less intense fire behavior, facilitate effective wildland fire response; and enhance habitat for the northern Idaho ground squirrel, *Urocitellus brunneus* (NIDGS) and white-headed woodpecker, *Picoides albolarvatus* (WHWO).

OSC and IDFG previously commented during the scoping period of this project earlier in 2021. Those letters included comments on topics regarding the above ground activity of young NIDGS prior to hibernation, amount of canopy cover needed for NIDGS, improving monarch habitat through targeted prescribed burning efforts, analyzing the effects of the proposed activities to fisher and timing of prescribed burning related to fisher, *Pekania pennanti*, denning periods, adding a project design feature to assess annual grass status before or after prescribed burning treatment in non-forested areas and potential vegetation groups with ponderosa pine, adding a project design feature for detection surveys for WHWO prior to forest management activities within previously identified WHWO habitat as well as other comments regarding Columbia spotted frog and details on activity implementation.

After a review of the EA, it appears that many of the previously submitted comments were mostly considered and incorporated into the NEPA documentation. Review of the EA was helped immensely by the ArcGIS story map and posting of relevant and detailed supporting documents on the PNF website.

Below are additional comments based on the review of the EA and further questions on other comments that were not fully addressed during the scoping period.

Comments Regarding Conditions Based Management:

Reference: Vegetation management, Non-commercial thinning, pg. 8

Comment: Under the supporting document titled “Scoping Comment Consideration”, on page 2 one of the Payette Forest Coalition comments was for the FS to ‘clarify what conditions-based management (CBM) is.’ and the FS said this clarification was ‘added to EA’. However, when reviewing the document, the first mention of CBM is found under the noncommercial thinning proposed action description, and to a reader who may be unfamiliar with the concept, could interpret CBM as being an analysis used only for that activity. CBM should be described much sooner in the document and explain how it applies to the whole project analysis. This sets expectations for the level of detail within the analysis clearly in the beginning and could potentially avoid public confusion as to why, for example, the document includes tentative language like: X and Y activities *could* occur across the project area... aspen within the project area *may be* trending towards declining populations, etc.

Comments Regarding Roads:

Reference: “Existing undetermined roads used for haul (22.2 miles total) would need reconstruction or maintenance before use, depending on the existing condition of the road. This could include activities such as brushing, blading, tree removal, and culvert improvements/replacement. *The majority of these would be closed to motorized access* and stabilized post-project use so that a long-term management decision could be made in the future... It should also be noted that addressing motorized use off of designated roads and trails is not part of the purpose and need of the project.” Road Related Activities, pg. 14, 15

Comment: It is unclear why the document specifically states that addressing motorized use of non-system roads is outside the purpose and need of the project when the project will change (e.g. close) the motorized use of over 20 miles of non-system roads. It would be more accurate to say that motorized recreation improvements are outside the purpose and need of this project and closed undetermined routes will be evaluated for their recreation potential at a later time.

Comments Regarding Wildlife

Reference: Table 1: Information on the project area, pg. 7

Comment: Great Gray Owls, *Strix nebulosa*, (GGOW) are a Tier 3 state Species of Greatest Conservation Need and a Region 4 Sensitive species. We are aware that the Forest has a report detailing GGOW detections from surveys conducted in 2012 and 2013. The location of detections were along the east side of Lost Valley Reservoir in the vicinity of units A159, A205, A160 and other nearby units. We recommend that GGOW be included as a species to monitor under Wildlife PDF #8.

Reference: “Two previously decommissioned roads (50093 and 51447) are also proposed for haul under the proposed action. These would require re-building a road template.” Road Related Activities, pg. 14

Comment: Proposed haul roads near Treatment A167 occur in occupied NIDGS habitat. Wildlife PDF 3 partially addresses the IDFG scoping comments regarding this concern, but does not clearly outline the work needed to improve existing roads for hauling, nor does it give a

timeframe for when that road work would be conducted. Both the physical road construction and the timing of such construction could have direct impacts to NIDGS. As well as implementing Wildlife PDF 3 and 6, the Forest should conduct surveys prior to any road construction in occupied NIDGS surveys to delineate colony boundaries and provide spatial buffers where appropriate.

Reference: Table 3: Summary of proposed commercial vegetation management treatments, pg. 9

Comment: As stated in the IDFG scoping comments, the Forest's goal of 15 to 30 percent canopy cover (p. 3) likely will not produce high-quality NIDGS habitat as the project proposal is suggesting. Scoping comments highlight the recent research suggesting a targeted canopy cover of <15% is optimal for NIDGS, and anything above that may unintentionally create habitat for the Columbian ground squirrel, a direct competitor to NIDGS. The State recognizes that the forest plan may put limits on how much thinning can occur (as pointed out in the Forest's consideration of the original scoping comment), however the 278 acres of commercial treatments that aim to benefit NIDGS will only be effective if they are patch cuts or shelterwoods (which aim for 10-15%; p. 32) immediately adjacent to occupied habitat. Other commercial treatments that make up the 278 acres of potential NIDGS habitat are likely to benefit Columbian ground squirrels, rather than NIDGS, in the long term. The Forest should clearly identify areas that will be treated to a canopy cover of <15% as NIDGS improvement areas, and evaluate how the potential for unintentionally increasing Columbia ground squirrel habitat with other treatments would impact NIDGS in the project area.

Reference: Invasive Annual Grasses (IAG), pg. 46

Comment: The NIDGS Technical Working Group has recently deemed invasive grasses as an emerging issue for NIDGS habitat. The State agrees with the EA statement that low severity fire will rejuvenate grasses and forbs, which could benefit NIDGS, particularly if those burns were close enough to occupied habitat and native plants are able to establish. However, the EA (p. 46-47) anticipates an increase in cover and extent of invasive annual grasses, especially in PVGS 1, 2, and 5, which is where NIDGS occur. The proposed mitigation is to apply PDFs General 1 (too general to be useful), and Plants 8, 9, 10. The State cautions the use of spring burning in NIDGS habitat. Spring burning is encouraged outside of occupied NIDGS habitat.

If you have any questions regarding these comments, please contact: OSC's Federal Land Coordinator Jace Hogg at 208 – 332 – 1553; jace.hogg@osc.idaho.gov.

Sincerely,



/s/ *Mike Edmondson*
MIKE EDMONDSON
Administrator