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December 31, 2021

Ms. Linda Jackson
Forest Supervisor
Payette National Forest
500 N. Mission Street
McCall, Idaho 83638

Electronically submitted:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=60060>

RE: Idaho Conservation League's Comments on the Draft Cold July Environmental Assessment

Dear Supervisor Jackson:

Please accept the Idaho Conservation League's scoping comments for the proposed Cold July Forest Restoration Project draft Environmental Assessment (EA). Since 1973, the Idaho Conservation League has had a long history of involvement with public lands issues. As Idaho's largest state-based conservation organization, we represent over 35,000 supporters who have a deep personal interest in restoring our forests to more resilient conditions and reducing the likelihood of uncharacteristic wildfires. We also work to restore wildlife habitat and improve ecosystem and watershed health.

We appreciate the Forest Service addressing the concerns and comments submitted by the Payette Forest Coalition (PFC) in regards to the proposed Cold July Forest Restoration Project, and we have copied those comments into this document. On further review of the draft EA following the December PFC meeting, ICL has additional recommendations and suggestions for the Forest Service to consider. These additional comments center on the topics of monitoring, sediment management for the Little Weiser River, and the decommissioning/obliteration of temporary and unauthorized/non-system roads used to facilitate project implementation. We believe that the establishment of a monitoring protocol can inform the agency and the PFC regarding vegetation treatment success, and can help the Forest Service determine the amount and source of sediment being delivered to the Little Weiser River, possibly reducing the significant increase in sediment load the Forest Service believes could affect the Little Weiser

River (as outlined in the Hydrology Specialists Report). Further, we recommend that the Forest Service continue using long established Best Management Practices (BMPs) to decommission/fully obliterate not only any temporary roads constructed during the project, but commit to decommissioning and rehabilitating any unauthorized/non-system routes used to implement the Cold July project, especially if those roads are found within Riparian Conservation Areas (RCAs). Restoring these routes to a natural state can also contribute to reducing sediment delivery.

Thank you for the opportunity to submit comments for the proposed Cold July Forest Restoration Project Draft Environmental Assessment. Should you have any questions regarding these comments and recommendations, please do not hesitate to contact me. We look forward to working with the New Meadows Ranger District on this and future projects.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Randy Fox', is centered below the text 'Respectfully submitted,'.

Randy Fox
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Idaho Conservation League's Comments on the Cold July Draft Environmental Assessment

Payette Forest Coalition Comments

The Payette Forest Coalition (PFC) has reviewed the Environmental Assessment for the Cold July Project. The PFC wishes to express our continued appreciation to you and the Cold July Interdisciplinary Team (IDT) for the opportunity to comment on the Cold July EA.

In our July 7, 2021 letter to you, we provided a status of our initial reaction to the proposed action. At the Cold July Restoration Project field visit on June 17, 2021, members of the Coalition and Forest Service discussed proposed vegetation treatments at the sites within the project landscape, including free thin, shelterwood, and aspen treatments. The PFC also visited a completed patch cut treatment site. The field visit allowed the PFC to better understand the proposed silvicultural practices for stands slated for regeneration harvest units. With that, we believe they are necessary and appropriate to reach desired conditions, improve forest resilience, and better prepare the landscape for threats of wildfire, insects and disease. Following the field visit, the Coalition voted that our concerns about the proposed silvicultural treatments had been satisfactorily addressed and would like to provide overall support for the Cold July Restoration Project.

The July 7 PFC letter recommended that the Environmental Assessment (EA) provide a detailed summary on the purpose and need for the Cold July Restoration Project's proposed treatments as well as historical background on the past proposed projects that fall under the same landscape. We also requested the EA include a brief outline of the Forest's intent to conduct projects following the Cold July Restoration Project that have a focus on watershed restoration or recreation within the former Lost Creek-Boulder Creek (LCBC) project landscape. We recommended that the EA should contain a discussion of how treatment units were categorized and that the treatments and how the treatment prescription in units that do not have a sufficient number of early-seral species to be considered a thinning will be more open to allow for regeneration of those species.

Our review of the Cold July EA released December 3, 2021 concludes that the above matters were sufficiently addressed. We support the implementation of the proposed action.

The PFC encourages the IDT to continue to refine the unit categorization for proposed vegetation treatments as more field assessments are completed, including noncommercial activities such as aspen regeneration, prescribed burning, and noncommercial thinning. While we understand that certain suggestions (watershed restoration, road maintenance and sign updates) were found to be outside the scope of this focused EA, we urge the Forest Service to consider these actions for future project planning.

The PFC supports the proposed action in the Cold July Environmental Assessment and appreciates the work of the IDT on the design and analysis of this project. We look forward to successful implementation and monitoring.

ICL Additional Comments

Monitoring

A review of the Cold July Draft EA reveals that neither the document or supporting documents contain an outlined monitoring protocol, unlike recent forest restoration projects on the Payette National Forest. ICL recommends the Forest Service include a monitoring program protocol for vegetation treatments, particularly for areas proposed for shelterwood/regeneration clearings. This will help the agency and the PFC determine the effectiveness of the proposed treatments and allow for improving future project outcomes. Further, we believe the Forest Service should monitor sediment delivery to the Little Weiser River, based on the results of the hydrology analysis found in the Cold July Watershed Specialists (Hydrology) Report (see below for further comments).

Sediment Delivery

We are concerned that the BOISED model results found in the Watershed Specialists Report indicates a significant rise in sediment delivery of some 55% over natural sediment delivery (Appendix D). We recognize that these modeled increases represent temporary conditions with sediment levels returning to normal states by 2030; however, the significant increase in the interim period may adversely affect fisheries, aquatic life, and contribute to downstream sediment deposition around or in irrigation infrastructure. While the draft EA details a majority of the hydrology report, the draft EA fails to include this data. Other tributaries within the project area have modeled increased sediment loads averaging between 20% and 25% of the natural load over the same time period. We suspect these tributary increases directly affect the modeled increase for the Little Weiser River.

ICL recommends the Forest Service re-examine methods to reduce these modeled impacts, adjust the project as necessary to reduce sediment delivery, and establish a monitoring program to evaluate the effectiveness of the directed project alterations/additions as well as obtain real-time data regarding sediment loads in the Little Weiser River.

Road BMPs

We appreciate the Forest Service remaining committed to decommissioning and rehabilitating any temporary roads constructed during the course of the Cold July project. However, an examination of the project maps suggests that some currently established unauthorized/non-system routes in Riparian Conservation Areas (RCAs) will be used to help facilitate the project. ICL understands that the Cold July project remains focused on vegetation treatments, with additional PFC goals, such as addressing recreation needs and watershed restoration activities will follow under separate, targeted projects, and we generally support this decision. However, given the significant increased sediment delivery for the Little Weiser River and other tributaries, we believe that applying the same BMPs for these unauthorized/non-system routes as are identified with constructed, temporary roads will lead to reduced sediment delivery, enhanced riparian areas, and can be achieved while equipment is on the ground and in place, reducing costs and capacity requirements. We urge the Forest Service to consider applying temporary road BMPs to unauthorized/non-system routes where possible, and especially in RCAs.