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## **BEFORE THE REGIONAL FORESTER, INTERMOUNTAIN REGION, USDA FOREST SERVICE**

**BEFORE THE REGIONAL FORESTER, INTERMOUNTAIN REGION, USDA FOREST  
SERVICE**

**Idaho Conservation League**

Objector

v.

**Linda Jackson, Forest Supervisor**

Responsible Official

Objection to the Huckleberry Landscape Restoration Project Draft Record of Decision, Council  
Ranger District, Payette National Forest

**IDAHO CONSERVATION LEAGUE:** Randy Fox, Lead Objector, Conservation Associate, 311 E.  
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### **Certification of Filing**

This objection was timely filed by electronic transmission to:

[objections-intermtn-regional-office@usda.gov](mailto:objections-intermtn-regional-office@usda.gov) and submitted online ATTN: Objection Review  
Officer

Dated this 28th day of April, 2022.

Respectfully submitted,

Randy Fox

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# **Objector's Notice, Statement of Reasons, & Suggested Remedies**

## **Objector's Notice, Statement of Reasons**

### **Notice of Objection**

Pursuant to 36 CFR 218 Subpart B and § 218.5(a), the Idaho Conservation League objects to the Cold July Forest Restoration Project, proposed by Payette National Forest (PNF) Forest Supervisor Linda Jackson on the New Meadows Ranger District. This is a supportive objection and we intend to use the objection process as a means to strengthen the project record, participate in any objection resolution discussions with other objectors, address any remaining issues of uncertainty, and update the adaptive management approach to better guide project implementation as needed.

### **Connection Between Prior Specific Comments**

The Idaho Conservation League has been engaged in discussions and deliberations on this project since it was initially scoped. We have toured the project area and also submitted comments in response to the Draft Environmental Assessment (EA), both as an individual organization and as an active member of the Payette Forest Coalition (PFC). The Payette Forest Coalition is a group of organizations and individuals which formed to work with the Payette National Forest on planning and executing large-scale forest landscape restoration projects. The goals of the PFC are to improve the forest's resiliency to wildfires, enhance access for recreation, resource management and safety; improve watershed health and water quality, improve habitat for terrestrial and aquatic species, and bring economic benefits to surrounding communities. We have participated in numerous discussions about the project on several occasions during Payette Forest Coalition meetings.

The PFC has been engaged in discussions regarding the landscape that comprises the Cold July Project Area since March, 2011. The PFC provided letters and comments to the Payette National Forest on June 9, 2021, July 7, 2021, and December 16, 2021, that served to reinforce recommendations, provide clarifications, and express the coalition's specific interests in the Forest Service providing adequate explanations for the proposed actions listed in the EA. Similarly, ICL provided written scoping comments on June 10, 2021, and comments with recommendations regarding the draft EA on December 31, 2021.

### **Statement of Reasons**

ICL has invested significant time and effort developing recommendations for the Cold July Forest Restoration Project. We want to see the project successfully implemented in a timely manner and in such a way that projected benefits are realized and any negative effects are successfully avoided, minimized, and mitigated.

We support the project's overall purpose and feel that the draft Decision Notice (DN) and Finding of No Significant Impact (FONSI) will have a beneficial impact on this landscape's forest

health. As noted above, we have had extensive discussions on this project with the Payette National Forest, and we look forward to proceeding with this important restoration effort.

We intend to use the objection process as a means to strengthen the project record, participate in any objection resolution discussions with other objectors, address any remaining issues of uncertainty, and update the adaptive management (also known as Condition Based Management) approach to better guide project implementation as needed.

Should other objectors raise additional concerns or bring additional information to the Forest Service's attention, we hope to use the objection process to review this information and offer our perspective on any needed project modifications. We are concerned that if another party requests changes, the final outcome may not strike an appropriate balance between PFC's restoration goals.

We do note that some members of the PFC expressed concern over the changes in the draft EA and the Draft Decision Notice and the addition of 4.7 miles of undetermined roads slated for obliteration and removal from the landscape. The Forest Service explained that these roads were identified for obliteration in order to balance watershed impacts directly related to vegetation management in the area. We appreciate the Forest Service providing a thorough justification for these changes and we also understand the concerns expressed by members that removing these roads could impact recreation opportunities.

For future projects, the USFS should be sure to evaluate both unauthorized and authorized *and* undetermined (or unclassified) routes slated for obliteration for potential recreation opportunities as long as project goals can still be met and water quality and plant and wildlife resources can still be protected. While full decommissioning will often have the biggest conservation benefits, narrowing full sized roads to standard width trails can also have beneficial effects compared to full roads. Potential recreation opportunities to consider could include converting routes into trails for motorized recreationists and/or non-motorized recreationists such as mountain bikers, equestrians and hikers. Recreational features could include trails, drive in hardened campsites, walk in campsites, and signage.

If there are no other objections or no new relevant information is brought forward in the objection process, ICL would be willing to withdraw this objection. If the Forest Service selects a different alternative or combination of alternatives, we ask that the Forest Service work with the Idaho Conservation League, the Payette Forest Coalition, and any other objectors to craft an alternative that works for all parties.