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Comments: Date: December 30, 2019

Mr. Anthony B. Bothello

District Ranger, Krassel District

US Forest Service

500 North Mission Street

McCall, Idaho

83638

Subject: Public Comment on Environmental Impact Assessment for Big Creek Edwardsburg Fuels Reduction Project - Gerringer

Dear District Ranger Bothello:

I am a homeowner in Edwardsburg and support the goals and general direction of the Big Creek Edwardsburg Fuels Reduction Project. However, I am concerned that the Environmental Assessment (EA) and accompanying material on the project website are silent regarding points in my original public comment dated August 19, 2018. Specifically the safe burn window and requirement to preposition equipment and resources (given the limited seasonal access through the southern portion of Warren Profile Gap Road and from Yellow Pine) require much more detail planning early on to ensure the EA contemplates full impacts of the project. By formal reference in the EA (page 13) to the Forest Service Manual 5140, I understand you are committing overall and specifically to:

5140.46 - District Rangers

3. Collaborate with State and local partners to coordinate hazardous fuels management and prescribed fire projects and activities.

5142.6 - Prescribed Fire Plans

1. Prepare a site-specific Prescribed Fire Burn Plan as described in the Interagency Prescribed Fire Planning and Implementation Procedures Reference Guide for each prescribed fire in advance of the ignition. If more than 1 year has elapsed since approval, a burn plan will be reviewed, updated, as necessary, and approved before implementation.

The point relevant to the EA is that in order to assess the preventative and contingency elements impacting road requirements, equipment traffic, travel windows, and evacuation planning much more needs to be understood. Public input from the Big Creek Edwardsburg property owners is crucial to ensure that knowledge of local conditions and limitations is incorporated into this plan.

The Forest Service needs to commit that if a prescribed burn gets out of control and destroys private property that the owner(s) will keep their land and the Forest Service will ensure they are compensated to rebuild and occupy like structures to whatever is lost.

Additional specific feedback and requests by document:

Environmental Assessment:

Pg 9 - Public Involvement - suggest add informal update by Brian Anderson and Patrick Schon to Big Creek Edwardsburg Homeowners on Sept 28, 2019.

Pg 16 - (bottom..."burned at later date") needs to reference timeframe; suggest as soon as practical under 5140. Point is that to reduce both risk and eyesore the piles should not be left for extended periods/multiple seasons.

Pg 18 - (Piling and Burning paragraph) "piles may be burned" needs to commit on disposition, suggest "piles will be burned or otherwise removed"

Page 35 - Resource Indicator #3 - "We then used the location of a sample of these pour points to run the background sediment produced by the haul route and compared it to the estimated sediment that the haul route would produce with an increase in truck traffic. We used the Forest Service road WEPP model for this (see

results located in project record). The WEPP results at all sample points indicate that increasing the traffic on the haul routes does not measurably increase sediment to project area streams. Increases are so small that measurable detection in the field would not be possible."

I was unable to locate the results of the WEPP model on the public website. That said, it seems implausible that the additional 544 trips (EA, Page 18 table) on segment #8 Warren to Profile Gap Road will not measurably increase sediment in Logan and Government Creeks without specific mitigation. (Does the model include the parallel W/E road track along Logan Creek downhill from the Warren Rd Intersection that can generate dust in proximity to the creek?) Further, in the meetings with Big Creek Edwardsburg Homeowners on September 2, 2018 and Sept 28, 2019, homeowners surfaced dust from large truck traffic as a significant concern on this road segment. The EA and accompanying documents do not sufficiently address the concerns or impacts of dust on this segment.

Page 48 - "Graveling can substantially reduce sediment production from roadways (Burroughs and King 1989, Seyedbagheri 1996) contributing to improved stream sediment conditions." Makes scientific and practical sense, suggest use as mitigant to concern raised in "Page 35" through the Logan and Government Creek proximate areas of Warren to Profile Gap Segment #7.

Page 25, 81, other - ("5-20 years for the prescribed fire activities", "10 year life of plan",...) - The timeframe for the project is unclear. No one wants to "rush" this effort or take unnecessary risk by marching to an arbitrary date. However, the need for fuels reduction has been discussed at least since 2004 with no visible commitment until 2018. Suggest clarifying timeframes to clearly communicate with all stakeholders what to expect and to ensure the Forest is credited for acting with the warranted priority created by excess fuels on Forest lands.

Appendix B - Project Design Features

Page 11 - WAT-17 "Range and recreational access should be maintained where needed." Change to "must".

Page 12 - SWRA Prescribed Fire Section (addition to WAT 21 thru 25) - Section is too limited given the consequences of a failure. Further call out the Burn Plan and full reference to ensuring required elements from Manual 5140 are applied. Call out specific Enforcement Mechanisms and Responsibilities such as the accountability of District Ranger per 5140 and the limits on delegation of responsibility (i.e. complexity) per 5140.

Page 15 - WAT 30 (Objective - "Reduce levels of soil disturbance, erosion, and potential sedimentation. Meet requirements of the State of Idaho nonpoint source pollution management plan. Maintain water quality and associated beneficial uses"). Expand objective or create new line item to explicitly reference not impacting resident's quality of life re: dust, traffic, travel risk from heavy equipment.

Page 27 - REC-5 (Objective - "Where necessary, restrict log hauling during periods of high recreation use, such as the opening day of big game hunting season. ") Please expand. This language is inadequate to protect residents with one access road to the valley. Logging, equipment and other large trucks need to have limited numbers of trips per day. The EA (page 18) predicts 604 heavy equipment trips on the southern segment (#7) of Warren to Profile Gap Road. Tactics such as defined travel windows, pilot vehicles, specific yielding requirements, and safety protocols for high use ATV roads are suggested. During periods of snow and ice additional precautions are warranted. FS must recognize that a single large equipment accident could incapacitate the ONLY escape route for days. In the most restricted road stretches, additional turnouts should be constructed. Please also note that there is significant stock trailer activity required for both residents and the FS itself, so precautionary measures regarding large equipment travel are further appropriate.

Page 28 - A-2 (Objective - "Minimize smoke impacts to users in the project area") expand to call out "residents". Recognizing that this project may go on for many years, residents cannot be continuously negatively impacted over extended periods by smoke. Suggest add additional line item to call out air quality impacts and tactics for dust.

Proposed Action Close Up Maps Attachment

Tile B2 - is missing structures that were surveyed by Forest personnel in July 2017. Suggest locating that work product and updating source maps from that survey. It was an extensive walk of the valley by multiple Forest personnel. The County has also subsequently updated maps and applied addressing, all of which may be valuable to the project plan.

It bears repeating - I support the objectives and general approach to the Big Creek Edwardsburg Fuels Reduction Project. Its very clear a great deal of excellent work has gone into the project thus far. The intent of this communication is not to criticize but to ensure that we have the absolute best and most complete plan possible to execute a much needed but dangerous project. I have learned, going into my second year as Big Creek Fire Chief, that the local residents have deep knowledge of the risks and how to mitigate them regarding fuel and fire in the area. The example (that other public commenters also pointed out) of the Forest calling a possible public meeting on this project during the holiday season in a location inaccessible to summer residents could be interpreted as not really valuing our feedback.

As local partners we are in this together, please let us help make this successful for all.

Sincerely,

Michael Gerringer

Big Creek Edwardsburg Homeowner