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Title: Public Lands Director
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Ann Hadlow
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McCall, Idaho 83638

Electronically Submitted: https://www.fs.usda.gov/project/?project=56833

RE: Sloans Point Forest Resilience Project #57337

Dear Ms. Phelps:

Thank you for considering our scoping comments on the proposed Sloans Point Forest Resilience Project #57337. Since 1973, the Idaho Conservation League (ICL) has had a long history of involvement with public lands issues. As Idaho's largest state-based conservation organization, we represent over 30,000 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.

The Idaho Conservation League is also a member of the Payette Forest Coalition (PFC) and we have consistently advocated for an increase in the scope and scale of restoration projects on the Payette National Forest. Forest Collaboratives like the PFC have proven to be successful ventures across Idaho for increasing the quality of Forest Service proposals, restoring forest and watershed conditions, and improving the dialogue among a wide variety of stakeholders. Our goal is to see a successful project that balances forest health, watershed, wildlife and community goals and that is implemented on the ground in a timely manner.

The project includes 2,273 acres of prescribed fire and 2,273 acres of non-commercial thinning. Within this area, 591 acres is proposed for overstory treatment/commercial logging which would require 3.3 miles of new road construction. For watershed improvements, the Forest Service is proposing 5.5 miles of road decommissioning and 3 aquatic organism passage upgrades.

The Idaho Conservation League generally supports the need and purpose of the proposed action based on existing forest health issues, suboptimal watershed conditions and the ecological need for prescribed fire. Because one of the primary goals of ICL is protecting fish and wildlife habitat, we focused our comments on potential areas for further project improvement. These comments are found in the following document.

Once again we thank you for the opportunity to submit comments for the Sloans Point Forest Resilience proposal. Please send us any subsequent documents related to the project. We look forward to working with the McCall Ranger District on this and future projects.

Respectfully submitted,

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Idaho Conservation League's Scoping Comments for the Sloans Point Forest Resilience Project #57337

Payette Forest Coalition comments
The Idaho Conservation League is also a member of the Payette Forest Coalition (PFC) and we have consistently advocated for an increase in the scope and scale of restoration projects within the Collaborative Forest Landscape Restoration (CFLR) area.

The PFC has already submitted consensus comments on this project and we are including them here as well since ICL is a member of the PFC.

The Payette Forest Coalition formed in June 2009 to offer feedback and support to the Payette National Forest for management that will improve forest health. We believe the Sloans Point Forest Resilience Project aligns with Coalition goals to move the forest toward desired conditions, and we support the proposed action.

The Kennally Creek subbasin was identified as being at high risk of insect and disease infestation and designated for treatment under the 2014 Farm Bill. We recognize that endemic levels of native insects and disease naturally exist in healthy forests. However, the current combination of dwarf mistletoe, western spruce budworm, and invasive non-native Balsam Woolly Adelgid and other insects threatens to accelerate tree mortality. If left unchecked, we can expect an increased risk of wildfire and a loss of timber value in the project area. Therefore, we support your use of a Categorical Exclusion under the Healthy Forest Restoration Act to respond quickly to the situation.

In addition to limiting the extent of insect and disease effects, the proposed suite of vegetation treatments on 2273 acres will help restore desirable species composition, stand structure, and size classes in Sloans Point, thus improving resilience to future disturbance. At the same time, commercial harvest on approximately 600 acres provides an economic benefit to the PNF and local communities.

We also support the evaluation of the three aquatic organism passages and effective treatment of 5.5 miles of unclassified roads to improve watershed conditions. We encourage the Forest Service to evaluate routes for potential recreational use in the future. The Forest Service should make sure that new temporary road construction and management activities are consistent with maintaining or improving soil and watershed conditions.

Finally, the Coalition applauds your use of the Good Neighbor Authority to partner with Idaho Department of Lands to implement the Sloans Point Project efficiently and expeditiously.

The Coalition appreciates the opportunity to comment on behalf of our diverse membership in support of the Sloans Point Forest Resilience Project. Sincerely, Payette Forest Coalition.
Additional comments
Because one of the primary goals of ICL is protecting fish and wildlife habitat, we are providing the additional recommendations below. These comments are intended to complement the PFC's comments.
Improving Habitat for Species of Greatest Conservation Concern
The Forest Service should identify if there are any species of conservation concern that will be the focus for restoration efforts. In addition, the Forest Service should disclose the negative impacts of vegetation treatments

on other species. A monitoring program should assess baseline conditions as well as the effectiveness of the different treatments on the productivity of these species.

Regarding Goshawks, we encourage you to incorporate Management Recommendations for the Northern Goshawk in the Southwestern United States (Reynolds et al. 1992).

The USFS Rocky Mountain Research Station has been studying white-headed woodpeckers and their habitat needs on the Payette National Forest. The RMRS has made observations about how the location and distribution of tree clumps appears to affect the density of white-headed woodpeckers.

Preliminary results show the following effects:

· Stand-level treatments are substantially reducing fuels, while maintaining woodpecker occupancy.
· Large diameter pines are reduced after treatments.
· Large diameter pines are essential to woodpecker
· foraging.
· Nest densities increased in treated units; nests are typically placed in relatively open-canopied forests that are created after treatments.
· Home range sizes increased in treated units.
· Woodpeckers potentially range farther after treatments to obtain foraging needs in relatively closed-canopied, untreated forests with large diameter pines.

The results appear to show that home range size and foraging distance increases after treatments in order to feed in closed-canopied, untreated forests with large diameter pines. It appears the Forest Service is retaining or improving nesting habitat but is increasing the distance to foraging habitat and decreasing the overall quality of the habitat. If there is existing or potential white headed woodpeckers habitat present in the project area, ICL recommends the Forest Service implement RMRS findings into the Sloans Point Forest Resilience project. Monitoring reports are available for 2017 and 2018 field seasons.

Water quality protections

Several streams in the project area are 303d listed. The Forest Service should make sure that the proposed vegetation management and temporary road construction is consistent with protecting water quality. The Forest Service should analyze and disclose the effects in terms of changed watershed conditions, sediment production and wildlife habitat from the 5.5 miles of road decommissioning and proceed if water quality and wildlife conditions will be demonstrably improved.

Slash Treatments

The Forest Service needs to manage slash in a timely manner so that fuel risk is minimized. We recommend using whole-tree yarding to help reduce fuel loads within commercial treatment units but additional attention needs to be paid to how slash is handled once at the landing. We support the stacking of material usable for firewood at landings for public use and think that this should be utilized whenever practical. We also support utilizing this material at biomass cogeneration facilities.

Prescribed Fire

Slash left within treated areas will elevate fuel loads in the short term and should be managed through prescribed burning as soon as reasonably possible. The Forest Service should be sure to follow up with additional prescribed fire treatments as needed to meet fuel reduction goals.

The Forest Service should work with members of the public health services, the medical community, the IDEQ, Valley counties, businesses, residents and homeowners to craft a prescribed burning program that minimizes adverse impacts of smoke to the public. Particular attention needs to be paid to vulnerable populations. Issues to address include helping residents improve air filtration systems in homes or retrofitting at least one room to have

cleaner air, designating public buildings where improved air filtration systems already exist or can be upgraded to serve as safe air places in the event of unhealthy air quality from prescribed burning or wildfires, and publishing advanced notice of prescribed burning so people vulnerable to poor air quality can plan accordingly.

Legacy Tree Retention

The Forest Plan and Wildlife Conservation Strategy highlight the value of these mature trees for wildlife. The Forest Service's purpose for this project includes promoting an increase in large tree class size, reducing canopy cover, and to promote an increase in the number of early seral species. With the goals clearly outlined, it is important to find the best means of protecting Legacy Trees and maximizing the retention of large diameter trees.

While Ponderosa pine, western larch and Douglas fir are the preferred species for retention, Grand fir, aspen, lodgepole pine also occur in the project area with old growth/legacy tree/large tree characteristics. Because the large tree component is underrepresented across much of our nation's forests, the majority of all particularly large native trees, regardless of species, should be protected for both wildlife and as part of the forest's natural heritage. Girdling undesired tree species could be one tool to retain the large tree structure important for wildlife while eliminating competition for water and nutrients with more desirable, seral tree species.

Hazardous Materials

Because machinery will be used during the proposed Sloans Point Forest Resilience Project, a hazardous material plan needs to be in place in the event of a fuel or solvent leak. Hazardous wastes, including grease, oil, and fuels, need to be disposed of off-site in an environmentally appropriate manner. We are especially concerned about the use of fuels, lubricants, solvents, and other toxic chemicals in or around streams and drainages. The use of these hazardous materials must be carefully evaluated and an approved spill containment kit should be on-site at all times. Secondary containment systems should be in place. Fuel depots and storage facilities should be at least 300' from any live stream or water source.

Noxious Weeds

Vehicles and equipment serve as vectors for the spread of noxious weeds when proper inspection and cleaning are not practiced to limit their spread. Disturbed soil needs to be stabilized to prevent erosion and expansion of noxious weeds. All equipment should be inspected, cleaned, and washed prior to the operator entering public lands. Work crews trained in noxious weed recognition and removal should patrol the project area and mechanically remove any weeds or microtrash. The Forest Service should use this opportunity to restore native vegetation, and ICL recommends the use of all native species in the project area, especially areas that have direct associations with temporary roads and/or skid trails.

Shared Stewardship opportunities

The project is within one of Governor Little's Shared Stewardship Priority Areas. We encourage the Forest Service to reach out to neighboring private property owners and discuss opportunities for cross-boundary restoration work. These outreach efforts should consist more than posting a notice in the Star News, but should include direct outreach in terms of e-mail, phone call, personal visits and would ideally lead to one or more field trips of the project area and neighboring lands.

Monitoring

The Forest Service should work with members of the public and the PFC on developing a program to monitor project implementation and effectiveness.