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Keith Lannom

Forest Supervisor

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VIA Email: comments-intermtn-payette@fs.fed.us

Re: Huckleberry Landscape Restoration Project Scoping Comments

Dear Supervisor Lannom:

Thank you for considering these scoping comments on the proposed Huckleberry Landscape Restoration Project.

As a member of the Payette Forest Coalition and chair of the Roads & Recreation Committee, I support the PFC's recommendations for the Huckleberry project. In general, the draft Proposed Action aligns with the PFC's recommendations.

In reviewing the Proposed Action, the Roads and Recreation Committee came up with some additional suggestions to consider. Due to time constraints, the committee was not able to submit these items to the PFC for adoption and submission during the scoping period. Therefore, I offer these comments as a private citizen

concerned with maintaining public access to public lands while working to improve forest and watershed health.

Geomorphic Roads Analysis and Inventory Package (GRAIP)

There is no mention of GRAIP in the Draft PA. The PFC has made clear its desire to see GRAIP utilized in prioritizing road segments and treatment types.

According to Payette National Forest specialists, GRAIP has been completed in the upper Bear and Indian Creek sub-watersheds, and the Forest Service has no plans to do further GRAIP in this project area. I encourage you to conduct GRAIP throughout the project area in order to target restoration funds where they will achieve the greatest improvement to watershed health. The GRAIP development team at Rocky Mountain Research Station has said that 80 percent of resource damage from roads occurs on just 20 percent of road miles. Using GRAIP will help you target those road segments where resource damage is occurring, and it also builds trust and support for specific restoration actions among the PFC and the public.

Gravel sources and re-use of sites

The interdisciplinary team has identified gravel sources/pits within the project area for gravel that will be needed for road improvements and maintenance.

After the gravel has been removed, please look at these gravel pits as potential locations of trailheads, as they would be flat, open areas that could accommodate parking and stock trailer turn-arounds.

ATV/UTV trails and loops

There are no designated ATV/UTV trails in the project area, and none are proposed in this draft scoping document. The PFC has consistently requested that the PNF look for opportunities to create ATV/UTV trails on existing roadbeds that are being considered for closure or decommissioning. Given the popularity of this area among recreationists, I believe it is important to develop ATV/UTV trails where doing so will have minimal negative impact on wildlife, watershed and other resource values. Look for ATV/UTV loop opportunities, as well as out-and-back trails. Providing trails where motorized recreationists are not sharing the road with full-size vehicles will create a safer experience for forest users.

One possibility is to include analysis of Level 1 Long-term Closure (LTC) routes for possible motorized trails. Because the IDT has identified these road segments as necessary for future management, LTC roads will be retained in the FS road system and the roadbeds will remain on the landscape. The culverts have been or will be pulled and the roads will be closed until needed. But the road miles will be included when calculating road density. Does it make sense, then, to analyze these roads for possible ATV/UTV designation? They could be closed seasonally where needed to enhance wildlife security during hunting seasons.

Net loss in open system road

The three previous CFLR projects on the Payette have greatly reduced miles of road on the landscape, both system road and non-system or unauthorized road, without eliminating roads that are currently open to the public. In Huckleberry, however, 15 miles of the 57.7 miles of system road proposed for decommissioning are currently seasonally open roads, resulting in a net loss of motorized public access.

The PFC's Roads & Recreation Recommendations for Huckleberry CFLR state, "The PFC recommends that the environmental review includes an analysis of the impact of the proposed action on the recreation user and compares those impacts among alternatives. The PFC preference is to maintain a road and trail network that supports the current spectrum of recreation opportunities within the project area." I support these recommendations and ask that you look for alternatives that do not result in a net loss of public motorized access within this project area.

Firewood

The draft Proposed Action does not appear to provide for long-term, sustainable access to personal use firewood on the Forest. Rather, it would seem to exacerbate the challenge by decommissioning 57.7 miles of system road. Firewood gathering is a very important economic and cultural issue in Adams County and surrounding areas. Access to firewood ought to be considered a key benefit when the IDT evaluates the risk and benefit of roads during the Travel Analysis Process.

I support your efforts to improve forest, wildlife and watershed health on the Payette National Forest, Keith. What I would like to see as a result of the Huckleberry project is a smarter road and trail system—one that reduces negative impacts on resources while still providing adequate access for forest management and diverse dispersed recreation.

Thank you.

Cordially,

/s

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