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Comments: Please accept the attached document as the Idaho Conservation League's comments on the proposed Resilience and Fuels Reduction Prescribed Fire Project Environmental Assessment and Finding of No Significant Impact. If you have any questions regarding these comments and recommendations, please do not hesitate to contact me.

RE: Idaho Conservation League's Comments on the Resilience and Fuels Reduction Prescribed Fire Project Environmental Assessment and Finding of No Significant Impact

Dear Ms. Jackson:

Please accept the Idaho Conservation League's (ICL) scoping comments for the proposed Resilience and Fuels Reduction Prescribed Fire Project Environmental Assessment (EA) and Finding of No Significant Impact (FONSI). 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 25,000 supporters who have a deep personal interest in restoring our forests to more resilient conditions, reducing the likelihood of uncharacteristic wildfires, and restoring fire-impacted regions. We also work to restore wildlife habitat and improve ecosystem and watershed health. ICL supports the purpose and need for the proposal. Over half of the Payette National Forest has departed from natural fire regimes. Through the Resilience and Fuels Reduction Prescribed Fire project, the Payette National Forest (PNF) proposes to authorize multiple prescribed burns on up to 30,000 acres within the PNF each year. These acres exclude landscapes covered by previous National Environmental Policy Act (NEPA) decisions. Approval of this project would return fire to the natural system, reduce hazardous fuel loads, and promote ecosystem restoration, including aspen propagation. ICL concurs with the Forest Service's determination that the absence of regularly occurring fire has altered stand composition and structure with increased fuel loading (EA, p. 1). We are hopeful additional funding will be directed to this important area. Even with the additional funding, ICL recognizes that it will still take several years for the Forest Service to scale up its staff and other resources to successfully implement this project at the desired landscape level. Successful implementation will also require unprecedented coordination and cross-boundary work with state and federal partners, Tribes, non-governmental organizations, municipalities, and private property owners, among others. Thank you for the opportunity to submit scoping comments for the proposed Resilience and Fuels Reduction Prescribed Fire Project. Should you have any questions regarding these comments and recommendations, please do not hesitate to contact me. We look forward to working with the Payette National Forest on this and future projects.

Respectfully submitted,

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Idaho Conservation League's Comments on the Resilience and Fuels Reduction Prescribed Fire Project, Payette National Forest

ICL supports the use of prescribed fire across the Payette National Forest (PNF) to restore fire adapted ecosystems and recognizes the importance and timeliness of this project. The best way to ensure good project design and implementation is through comprehensive analysis, robust public involvement, and close coordination with partners. Because the Resilience and Fuels Reduction Prescribed Fire Project (Rx Fire Project) is a true landscape-scaled proposal and because the proposed actions are intended to apply Forest-wide, ICL appreciates that the PNF is analyzing the project using an Environmental Assessment (EA). If at any point during project implementation the Forest Service identifies impacts in a particular area beyond the scope of this analysis, or an issue that should drive an additional alternative, ICL recommends that the Forest Service conduct a site-specific analysis of these activities, tier it to this larger analysis, and customize treatments to address those issues. ICL understands that the project does not include commercial timber harvest or road construction, and would only authorize prescribed burning and removal of small trees and associated actions such as site preparation and handline construction. Where commercial tree harvest and additional activities might be needed before prescribed burning can be implemented, the Forest Service will conduct additional analysis. ICL appreciates the additional refinement of the design elements in the EA (Appendix B) to increase project effectiveness and avoid, minimize and mitigate impacts. We commend the Forest Service for addressing the potential spread of invasive and/or noxious weeds and plants through Design Features BT-2 and RNG-4. We recommend that the Forest Service add a Design

Feature that directly addresses the potential spread of invasive weeds along hand-constructed firelines. Specifically, we suggest that this additional Design Feature lays out monitoring of rehabilitated firelines for invasive plants and include treatment and/or plant eradication before unwanted colonies become established and harder to remove from the landscape. The Implementation Plan (Appendix C) and Specialist Reports in the Supporting Documents are also helpful in understanding the project. ICL appreciates that the PNF has proposed acreage treatment limits for each Section 7 watershed (Aquatics Specialist Report, p. 53, Table 10) on an annual basis, based on the recently completed forest-wide programmatic biological assessment (USDA Forest Service 2020), and supports the use of riparian buffers to protect watershed resources. Although ICL understands that the Forest Service is considering a range of land and aerial application tools, we did not identify any description of these options in the Rx Fire Project EA. While these are likely outlined in the programmatic analysis, we believe that the addition of a brief summary of ignition methods would be helpful for the public to understand how project implementation will occur. ICL recommends emphasizing aerial application whenever possible due to increased efficiency. Cross-boundary coordination with other partners is critical for this project's success. The importance of cross-boundary coordination was highlighted in a recent study¹ of 22,000 cross-boundary (CB) wildfires over a 27-year span. The study found that the majority of cross-boundary wildfires were human caused, with more than 60% originating on private property and spreading to National Forests and 28% starting on National Forests and burning onto private property. This study offers the following conclusion: Federal agencies like the USFS can provide capacity, analytics, and funding, but given that private lands are where most high-value assets are located and where most CB fires originate, communities and private landowners may be best positioned to reduce losses from CB wildfire.² ICL encourages the Forest Service to work with the Idaho Department of Lands (IDL), Valley and Adams Counties, Volunteer Fire Departments, the Southern Idaho Timber Protective Association (SITPA) and other partners and communicate with homeowners on the importance of cross-boundary fuel reduction work. These state, federal, and local agencies should describe what tools and resources are available for complementary work on private properties from willing landowners. Early community outreach regarding smoke management will be very important so that vulnerable members of the community can take steps to protect their health from any temporary decreases in air quality. In advance of prescribed burning, ICL recommends that the Forest Service coordinate closely with state agencies and local public health services to ensure that vulnerable members of the public have abundant advance notice and communities have the necessary infrastructure such as smoke shelters with proper air filters. ICL appreciates that the Forest Service will first approve a Prescribed Fire Plan to address air quality and timing of burning operations, public safety, and incorporate risk management. The Forest Service should err on the side of too much public outreach rather than too little.

We appreciate the Forest Service providing detailed maps in Appendix A of the EA, and throughout the various Specialists Reports related to this project. However, we believe the addition of maps that include recently identified Firesheds, any Community Protection Zones, and other potentially substantive issues that might affect treatment opportunities or lead to unintended effects will strengthen the project and the project record. For example, the Southwest Idaho Fireshed map is an important map to include. We note that the PNF has already begun adding recently completed prescribed fire burn polygons and non-commercial thinning projects to this resource and we applaud the effort. In addition, the Southwest Idaho Resilient Landscape (SWIRL) project implementation page could be used to post photographs and reports of project implementation and effectiveness for burns conducted within this priority landscape. ICL also recommends that the Forest Service provide updates on the implementation and effectiveness of the Rx Fire Project on the PNF website, newsletter, and social media outlets. These updates could include notifications of areas scheduled to be treated and photos of recently treated areas. To demonstrate the effectiveness of certain design features such as fireline rehabilitation, the Forest Service could take photos of the ground before fireline construction, during prescribed fire operations, and following fireline rehabilitation. ICL understands that the project may result in some adverse effects to whitebark pine but that the overall project activities will also help restore suitable habitat that had been lost by expansion of competing conifers. ICL recommends that the Forest Service work closely with the US Fish and Wildlife Service on any additional design features or project modifications that can minimize harmful impacts. In suitable whitebark pine habitat, ICL recommends tailoring prescribed burns to optimize benefits to whitebark pine. The Forest Service may also wish to coordinate a citizen science or volunteer effort to plant rust-resistant whitebark

pine seedlings in suitable areas. In 2021 for the Bald Mountain Forest Restoration Project on the Sawtooth National Forest, citizen volunteers planted rust-resistant whitebark pine seedlings at the highest elevations of Bald Mountain. https://www.mtexpress.com/news/environment/plant-a-tree-on-bald-mountain-this-friday/article_6242e104-4406-11ed-8221-d39d0d1a5224.html ICL requests that the Forest Service reach back out to the public regularly throughout project implementation and report out on project implementation and effectiveness and any adaptive management steps that have been taken. Lastly, let us know if ICL can play a role in helping educate members of the public about this project and how to engage in the public process. During our review of the Resilience and Fuels Reduction Prescribed Fire Project EA and related supporting documents, we identified a few unintended typographical errors that we are pointing out with the intent of making the project's documents stronger.

* Fisheries Specialist Report, p. 17, first full paragraph, the last sentence does not make sense. We recommend revisiting this sentence and clarifying the statement.

* Wildlife Technical Report, p. 22, first paragraph, 5th sentence reads, "do not quality,"; should this be "qualify"?

* Fire, Fuels and Air Quality Resources Report, p. 12, second paragraph, line 2 should read, "variability due to several factors."

* Botany Biological Evaluation and Botanical Report, p. 13, the yellow note reminder highlight is still in place.

* Botany Biological Evaluation and Botanical Report, p. 2, first paragraph, last line, capitalize A and F in "Appendix A, Figure 2".

FOOTNOTES: 1 William M. Downing et al, Human ignitions on private lands drive USFS cross-boundary wildfire transmission and community impacts in the western US, Scientific Reports (2022). <https://www.nature.com/articles/s41598-022-06002-32> Ibid.