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Comments: Please accept the attached document from the Idaho Conservation League, which contains our comments and recommendations regarding the proposed Dixie Comstock Community Protection Project.

March 5, 2024

Ms. Cheryl Probert, Forest Supervisor

Nez Perce-Clearwater National Forest

1008 Highway 64

Kamiah, ID 83536

(208) 935-2513

Electronically submitted:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=52079>

RE: Idaho Conservation League's Comments for the Dixie Comstock Community
Protection Project Draft Environmental Assessment

Dear Supervisor Probert:

I am writing on behalf of the Idaho Conservation League (ICL) to provide our comments and recommendations on the Dixie Comstock Community Protection Project Draft Environmental Assessment (EA).

Founded in 1973, the mission of ICL is to create a conservation community and pragmatic, enduring solutions that protect and restore the air you breathe, the water you drink, and the land and wildlife you love. ICL's seven strategic initiatives include confronting climate change, recovering Idaho's wild salmon and steelhead, cleaning up the Snake River, protecting public land, restoring abundance and diversity of Idaho's wildlife, safeguarding North Idaho lakes and waters, and reducing pollution. ICL achieves these goals through public outreach and professional advocacy. With offices in Boise, McCall, Ketchum, and Sandpoint, the organization is a consistent, statewide voice for conservation in Idaho and represents more than 26,000 members and supporters. ICL's members and supporters care deeply about protecting and restoring the environment.

We appreciate that the Forest Service mapped and clearly identified the 12-mile Community Protection Zones (CPZ) associated with the Dixie and Comstock communities, and for keeping the bulk of the proposed treatments within these areas.

We further appreciate the agency removing several treatment units centered around Idaho Conservation League's Blowout Ridge from the project's proposed actions, conserving the agency's limited resources and capacity to focus on Dixie-Comstock ingress/egress routes.

While we also appreciate that the Forest Service proposes only hand thinning within Riparian Habitat Conservation Areas (RHCAs) (EA, Table 1; p. 10), we recommend that the Forest Service remove all vegetation treatments within RHCAs from the project's proposed actions. Given the size of the proposed treatment units, particularly those west of Dixie, we believe that the inherent benefits derived from RHCAs outweigh the limited impact vegetation treatments within riparian areas would have for wildfire protection. Riparian areas provide well documented wet natural fuel breaks, with the combined overstory/understory vegetation contributing to the reduction of water temperatures by providing shade and cover. Further, live riparian vegetation reduces the risk of streambank erosion in the event of significant flood events and/or land/mudslide events associated with post-fire erosion. Should the Forest Service choose to move forward with hand thinning in RHCAs, we recommend leaving the downed material in situ to bolster large woody debris contributions.

We note that the Forest Service reduced the proposed temporary road miles from 36 total during project scoping to 15 in the proposed action. We appreciate that the agency has committed to decommissioning and recontouring these road templates within 3 years of project completion (p. 13). In the interim, the Forest Service must ensure that these roads remain closed and inaccessible to the general public as open travel routes through signage and some form of physical closure including, but not limited to large

rock barriers or gates placed in locations that discourage drive-around opportunities. The rapidly advancing technology associated with off highway vehicles (OHV) has essentially rendered traditional blocking methods (such as Kelly humps or "tank traps") ineffective. While most unauthorized routes are created by a small number of OHV recreationists, the impacts to soils, water, and the remarkable outstanding qualities associated with the IRAs remain significant and ongoing, and the Forest Service should make every effort to ensure the components of this project to not contribute to or exacerbate the issue.

A clear demonstration of this is found in the existing fireline located on the major ridge east of Dixie, which has attracted unauthorized use and resulted in additional user-created routes and impacts to said IRA ORVs, total soil commitment, erosion, and sediment delivery. The Forest Service must have a strategy to discourage and reduce unauthorized use that may result in the implementation of the project actions.

We appreciate the Forest Service removing all but one stream crossing, located north-northwest of the Dixie Work Center, in the proposed action, and we encourage the Idaho Conservation League's Forest Service to further reduce temporary road construction in the project area during project implementation.

We understand that consultation with the U.S. Fish and Wildlife Service is ongoing (p. 83) and we recommend that the Forest Service extend this consultation with the National Marine Fisheries Services as many of the streams in the project area support designated bull trout critical habitat.

Thank you for the opportunity to submit comments on the proposed Dixie Comstock Community Protection Project Draft EA. Should you have any questions regarding these comments and recommendations, please do not hesitate to contact me. We look forward to working with the Red River Ranger District on this and future projects.

Respectfully submitted,

Randy Fox

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