

March 4, 2024

Submitted electronically to: <https://www.fs.usda.gov/project/?project=52079>

Nez Perce-Clearwater National Forests
1008 Highway 64
Kamiah, Idaho 83536

Subject: Dixie-Comstock Community Protection Project

Dear Supervisor Probert,

The Clearwater Basin Collaborative (CBC) reviewed the Draft Environmental Assessment and Finding of No Significant Impact for the subject project, dated February 1, 2024. The CBC understands and is very supportive of the purpose of the project to reduce hazardous fuels to facilitate community wildfire protection proximate to the at-risk community of Dixie, Idaho, and adjacent Comstock area.

We recognize that reducing the fuel loads, and changing vegetative conditions, in and around this area could allow wildfire to occur naturally within the larger fire prone ecosystem while reducing the probability of adverse impacts to the residents, landowners and public in these communities at risk. We also recognize that reducing these risks contributes to the social and economic wellbeing of Dixie and the nearby communities of Orogrande and Elk City.

While we support implementation of this project to reduce future exposure to wildfire, the CBC offers the following comments for consideration in the finalization of this project and future projects in this area.

1. We appreciate the strategy to keep the project streamlined in order to move forward expeditiously. And we recognize this resulted in a decision to limit activity to within the ½-mile Community Protection Zone (CPZ) rather than expanding into the 1½-mile CPZ. However, we question why more activity is not planned within this CPZ at this time.
 - a. It appears that unburned areas exist in the Comstock area and east of road 222 that may benefit the communities through fuels treatment. The CBC would support additional treatments in these areas or would appreciate an explanation why these are not included.
 - b. Likewise, we are concerned about existing burned areas within the CPZ that will add fuels for potential reburn as dead trees fall. We would like to see this project include treatments in burned areas within the CPZ to reduce these fuels and further satisfy the purpose of the project. If you chose not to include these areas at this time, we would appreciate an explanation and consideration for future treatment to address this situation.
 - c. As stated above, we recognize and support the decision to keep fuels treatments within the ½-mile CPZ at this time. However, we believe additional protections to these communities at risk would be provided by additional treatments of burned and unburned areas within the broader 1½-mile CPZ. We feel treatment of fuels in this larger area should be a priority and encourage the Forest to consider this for future treatments.

2. The Dixie-Comstock area is a popular area for year-round recreation including hiking, hunting, equestrian use, summer and winter motorized activities, and as a portal to the roadless back country. The area draws visitors from local and regional communities that support the social and economic vitality of Dixie and nearby communities such as Orogrande, Elk City, and Mackay Bar. Initial planning for the Dixie-Comstock Community Protection Project included consideration to integrate improvements to recreation, wildlife, and heritage sites. We note that inclusion of recreational opportunities and heritage sites are no longer addressed in this project.
 - a. We recognize and support that this project is not over-complicated by the addition of such activities that do not directly address the project objective of community wildfire protection. However, given the opportunity under the Idaho Roadless Rule and the Wildfire Crisis Strategy to address recreation and heritage sites, we encourage the Forest to include these resources in future treatment projects. This might include, but is not limited to, conversion of temporary roads to trails, trail construction between these trails to provide loop opportunities, retaining current recreation access on existing temporary roads, and protection and interpretation of heritage sites.
 - b. We would like to emphasize the need for regular maintenance and improvement of the recreation infrastructure in the area including roads, trails, trailhead facilities, and signage.
3. As you are aware, the CBC is pursuing the possibility of theme changes from Backcountry Restoration to General Forest Area for some Idaho Roadless Areas (IRA) on the Nez Perce-Clearwater National Forests as part of a package that also includes wilderness designation in other areas on the Forest. We believe such a change would be appropriate for some of the Gospel Hump IRA. This change would allow for the establishment of a permanent road system in this area to facilitate restorative work, fire management, and public access. We recognize this is beyond the scope of this project and is under the authority of the Idaho Roadless Commission. However, we add this statement here to reinforce our desire for this change and to emphasize that we believe this would contribute to the safety and social and economic wellbeing of Dixie, Comstock and neighboring communities.
4. This project will bring with it an increase in traffic including log truck, transport of heavy equipment and employee travel on roads through and around Dixie. We believe the Forest Service should provide mitigation for road impacts such as regular watering for dust abatement, surfacing as necessary to maintain road conditions, and signage for public safety.
5. We understand that activities funded under the Good Neighbor Authority (GNA) require temporary roads to be obliterated and do not allow for conversion of these roads to trails.
 - a. The CBC supports the closure of temporary roads, when necessary, through decommissioning rather obliteration, particularly outside of the Idaho Roadless Areas. This could address soil erosion and other related issues while allowing for foot and stock travel, or motorized access as appropriate. However, we also recognize that in certain situations obliteration may be the only way to mitigate resource impacts and support that **as necessary**.
 - b. We would like to know if such routes could be identified during project planning and designated as level 1 system roads, non-inventoried roads, or some other designation, that would allow such development? Conversely, could such route decommissioning and conversion be funded through some other mechanism than GNA in fuels reduction projects?

- c. Some previously used temporary roads currently exist and serve as trails that are used by residents and visitors for recreational purposes. Whether these road prisms are used in this project or not, the CBC would like these existing trails to remain open rather than obliterated after this project.
 - d. Additionally, we believe existing and constructed road infrastructure should be assessed for its future needs for timber harvest or other vegetative treatments, fire access, and public access prior to decommissioning or obliteration.
6. The CBC recognizes that impacts to visual quality are a consideration in restorative and fuels reduction activities. We also recognize that projects such as this fuels reduction project have the primary objective of reducing the potential for adverse fire impacts to communities. This project offers mitigation through vegetative screening along system roads. We question whether this is sufficient to mitigate visual impacts and reduce fire vulnerability to this area. In our scoping comments we offered an alternative of incorporating visual reserves in identified locations. We are also aware of other practices used on the Forest such as diagonal skid trails and strip logging, shaded fuel breaks and removing ladder fuels while retaining more overstory. We would like to know if such practices were considered and why they may be more or less effective in meeting the project objective while minimizing impacts to the visual quality of the area.
7. We appreciate the inclusion of aspen protection and enhancement in this project as it is a rare but key component in the area and provides some level of fire protection and wildlife benefits.
8. We understand that Forest Plan requirements for old growth cannot be met with implementation of this project due to vegetation conditions in the area. In light of this, the CBC supports an exemption to the old growth Plan requirement in order to implement this project. We also support the actions to prioritize the establishment and retention of fire-resistant species in treatment areas which would facilitate establishment of old growth forest in the future.
9. The CBC appreciates and supports the aquatic restoration components of this project and believe such activities should be included in future fuels management projects where the opportunity exists.
10. The CBC prefers the use of traditional harvest systems that would meet the purpose of the project and mitigate resource impacts while meeting the operational and economic feasibility of the proposed vegetative treatments.

Thank you for the opportunity for the Clearwater Basin Collaborative to engage in the development of the Dixie-Comstock Community Protection Project and the opportunity to offer these additional comments. We strongly support the objective of this project and believe it will be effective in providing additional wildfire protections to the Dixie and Comstock area. We look forward to its expeditious implementation.

Sincerely,



Tera R. King, Co-Chair
Idaho Forest Group



Eric Crawford, Co-Chair
Trout Unlimited

Clearwater Basin Collaborative Member Organizations:

Associated Logging Contractors
Clearwater County Board of Commissioners
Community Members At-Large
Empire Lumber
Framing Our Community
Idaho County Board of Commissioners
Idaho Department of Lands
Idaho Fish and Game
Idaho Forest Group
Idaho Parks and Recreation
Idaho Recreation Council
Idaho Wildlife Federation
Mining Interests
Public Land Access Year-round
Rocky Mountain Elk Foundation
Trout Unlimited