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Title: West Central Idaho Director

Comments: ATTN Objection Review Officer, please accept the attached document as the Idaho Conservation League's objection to the Granite Goose Landscape Restoration Project.

Objector's Notice, Statement of Reasons, & Suggested RemediesI. INTRODUCTION

Notice of Objection

Pursuant to 36 CFR 218 Subpart B and [sect] 218.5(a), the Idaho Conservation League objects to the Granite Goose Landscape Restoration Project, proposed by Payette National Forest (PNF) on the New Meadows and McCall Ranger Districts, and approved by the project's Deciding Official, Forest Supervisor Matthew Davis. The 39,918 acre project includes 12,000 acres of thinning (made up of commercial, non-commercial, shaded fuelbreak, and removal of subalpine fir affected by the balsam wooly adelgid), 300 acres of meadow encroachment treatments, 1,900 acres of whitebark pine treatments, the installation of 2 aquatic organism passage culverts, decommissioning 67.9 miles of non-system and/or non-contributing unauthorized routes, recreation enhancements, and 4.9 miles of temporary roads to implement the project. The project dropped 69 acres of treatments in Roadless Primitive areas.

We support all of the final actions in the Decision Notice, but are concerned that the whitebark pine treatments are not being monitored per best management practices. We suggest resolving our objection through the inclusion of a whitebark pine treatment monitoring plan. A plan is important because we see the potential need for additional whitebark pine treatments in the future. A monitoring plan is needed to allow for adaptive management for this project and to tailor future projects for maximum effectiveness. This is a supportive objection and we intend to use the objection process as a means to strengthen the project record, offer suggestions for improving the project implementation activities, to participate in any objection resolution discussions with other objectors, address any remaining issues of uncertainty, and update the adaptive management approach to better guide project implementation as needed.

Connection Between Prior Specific Comments

The Idaho Conservation League engaged in discussions and deliberations on this project for approximately 6 years, going back to the project's original inception as the Granite Meadows Landscape Restoration Project, developed under the Collaborative Forest Landscape Restoration Program (CFLRP). We want to see the project successfully implemented in a timely manner and in such a way that projected benefits are realized and any negative effects are successfully avoided, minimized, and mitigated. We toured the project area, discussed implementation objectives and methods in the Payette Forest Coalition (PFC), and submitted comments in response to the Draft Environmental Assessment (EA). The PFC is a group of organizations and individuals which formed to work with the PNF on planning and executing large-scale forest landscape restoration projects. The goals of the PFC during this time period were to improve the forest's resiliency to wildfires, enhance access for recreation, resource management and safety; improve watershed health and water quality, improve habitat for terrestrial and aquatic species, and bring economic benefits to surrounding communities. ICL participated in numerous discussions about the project on several occasions, both during PFC meetings and in individual meetings with PNF line officers.

ICL also posted a blog to our members describing the impacts of the balsam wooly adelgid that is impacting subalpine fir stands on the PNF. We have appended 3 screenshots of the blog to this objection for agency reference. This was done to educate our members about the insect and the impacts to subalpine fir, and as a partner with the PFC and PNF to inform our members and supporters about the Granite Goose project and the decisions that must be made to improve forest health while reducing wildfire risk.

The PFC failed to reach a consensus recommendation regarding the Granite Goose Draft EA in early 2024,

despite numerous discussions with Forest Service staff and line officers. Because the coalition could not reach consensus regarding support for the project, each organization was free to address project issues through comment and recommendations. ICL elected to continue engaging on the Granite Goose Landscape Restoration Project, and submitted comments and recommendations for the project's Draft EA on February 2, 2024. ICL stepped away from PFC membership in September, 2024, but has maintained professional connections with Forest Service staff on the Granite Goose Landscape Restoration Project.

Pursuant to 36 CFR 218.8, the Objector states that the following content of this Objection demonstrates the connections between the Objectors' comments for all issues raised herein unless the issue or statement in the EA or Draft Decision Notice/Finding of No Significant Impact (DN/FONSI) arose or was made after the opportunity for comments, as detailed herein. Pursuant to 36 CFR 218.8(b), Objectors' previous comments dated December 20, 2019, are hereby incorporated by reference.

II. OBJECTION ISSUE

This section raises specific objection points to issues that the Objector first raised in the Draft EA comments and recommendations submitted on February 2, 2024, and that were not satisfactorily addressed in the EA, DN/FONSI, or in the Forest Service's responses to the Objector's comments:

A. Absence of meaningful monitoring protocol for whitebark pine treatments

The Forest Service based whitebark pine treatments in the proposed Granite Goose Landscape Restoration Project on the most up-to-date and currently available science, specifically Tomback et al. 2022. We found that the Draft EA did not contain a monitoring plan, a critical component of any restoration plan and specifically identified in Tomback et al. as essential. In our Draft EA comments, ICL recommended that the PNF, "develop a robust monitoring program that examines the efficacy of treatments on a 3/5/10-year timeline, and adjust treatment methods and protocols based on the results of the monitoring program," (ICL Draft EA comments, p. 5). Tomback et al. calls for, "a monitoring and adaptive management plan for each kind of restoration treatment. Monitoring efforts are essential for determining whether treatment objectives have been met," (2022, Table 2, emphasis added). The researchers recommend integrating monitoring into project planning and management, and to use monitoring outcomes to adjust treatment for successful restoration and conservation. Further, the researchers state that measurable descriptions of what treatments are intended to accomplish (for example basal area of competing conifers), the amount and direction of change, and timeframe in which objectives are to be met.

A simple word search determined that "monitoring" is mentioned a single time in the Draft EA document, and that in the title of a reference document. Appendix I (Response to Comments) of the Draft EA, Section 10 (Botany) acknowledges a request that monitoring be included, and states that, "Monitoring of whitebark pine within treatment areas is included as part of the proposed action (Plants 13)," (Draft EA, Appendix I, p. I-16).

ICL staff examined the Project Design Features, found in Appendix C, in order to determine the parameters of the monitoring protocol for whitebark pine recovery, ultimately finding that Plants 13 does not incorporate monitoring protocols. Plants 13 reads:

Damaging or killing plus and elite or reasonably certain phenotypically-resistant whitebark pine trees will be prevented and avoided to the maximum extent possible. If damage or removal of plus, elite, or phenotypically-resistant whitebark pine trees cannot be avoided, the cones, scion, pollen, or other genetic material will be collected for future restoration efforts before the known or potential plus, elite, or phenotypically-resistant whitebark pine is damaged or killed. If collection cannot occur, the action agency will contact the U.S. Fish and Wildlife Service to explore additional options.

However, Plants 12 does provide a brief reference to whitebark pine monitoring:

A botanist, silviculturist or appropriately trained staff will conduct surveys prior to implementing any proposed treatments or activities, starting in areas with modeled suitable habitat of more than 60 percent suitability

(Villwock 2023) to determine presence or absence of whitebark pine. Where present, survey will document the population boundary, population demographics and distribution, and threat exposure (mountain pine beetle, white pine blister rust, fuel loading). Use this information to minimize damage to healthy whitebark pine individuals and populations. Monitor following implementation of treatments and activities. Botany, silviculture and fuels specialists will coordinate to re-evaluate prescriptions to improve survival, regeneration, and overall resilience of whitebark pine stands (emphasis added).

III. REMEDY

This single line is the sole reference to whitebark pine monitoring, and fails to describe or reference monitoring protocols, trigger points for adjusting restoration activities, or measures of success. ICL finds the single line inadequate and believes that in order to align with the most recent science and understanding regarding whitebark pine recovery, the Forest Service must develop a monitoring protocol for whitebark pine treatments associated with the Granite Goose Landscape Restoration Project, or describe existing monitoring protocols that the Forest Service can apply to this activity.

If the Forest Service continues to rely on best available science and practices for whitebark pine recovery, Tomback et al. 2022 identify three general categories of monitoring relevant to whitebark pine: implementation monitoring, efficacy monitoring, and effects monitoring. Implementation monitoring might include answering a series of questions, such as: were the proposed activities carried out as described, were there any impediments to implementing the plan, was it done at the correct time and in the correct amounts? Answering those questions will allow for the Forest Service to adapt strategies to fit specific geographic needs. Efficacy monitoring should include protocols that describe how well the implementation activities are working. This could include photo monitoring incorporated into a database spreadsheet. Questions the Forest Service could incorporate into efficacy monitoring include: are Clark's nutcrackers utilizing the created spaces to cache whitebark pine seeds, has creating gaps and spaces between stands reduced the spread of blister rust, and if so, what is the spread dimension. Effects monitoring should also focus on how well implementation activities are working through a lens focused on the near and distant future to determine whether proposed restoration activities are working, identify areas that were less successful and adapt future activities to reflect the new information gathered during all monitoring phases. We recommend that the Forest Service planners return to the guiding research to address this monitoring shortfall in the Granite Goose Landscape Restoration Project EA and Draft DN/FONSI.

We ask that the Forest Service develop and implement a monitoring and adaptive management protocol based on a 3/5/10-year timeframe to determine the efficacy of treatments within the project implementation period. The Granite Goose Landscape Restoration Project's whitebark pine restoration treatments primarily center on reducing competition, removing vegetation impacted by insects/disease, opening areas for seed caching, and replanting. Therefore, we recommend PNF silviculturists identify metrics of success for each of these categories and evaluate implementation efficacy through the monitoring program. This can include documenting successful seed caching in newly created spaces, spread of balsam woolly adelgid to previously healthy whitebark pine stands or trees, and successful germination rates (both in areas affected by prescribed fire and areas that are not included in a prescribed fire burn plan).

IV. CONCLUSION

In conclusion, as detailed above and in the previous comments submitted by the Objectors, the EA and Draft DN/FONSI fail to outline or detail a meaningful whitebark pine restoration monitoring protocol. While not a violation of federal law or Forest Service regulations, it does represent a departure from recommendations found in the most current and up-to-date available science. ICL generally supports the Granite Goose Landscape Restoration Project, and we firmly believe that the inclusion of a whitebark pine restoration monitoring protocol will improve the project. If there are objections to any other project components, ICL requests that we be included in resolution discussions. A monitoring protocol will allow for identifying successful treatment activities, as well as less successful undertakings, and provide the Forest Service with opportunities to adjust restoration work to meet the needs of whitebark pine stands with individual micro-climates or other location-dependent attributes.

V. REFERENCES

Tomback, D.F., and Eric Sprague. 2022. The National Whitebark Pine Restoration Plan: restoration model for the

high elevation five-needle white pines. *Forest Ecology and Management*. Volume 521, October 1, 2022, 12024.

Tomback, D.F., Keane, R.E., Schoettle, A.W., Sniezko, R.A., Jenkins, J.B., Nelson, Cr.R., Bower, A.D., DeMastus, Cr.,R., Guiberson, E., Krakowski, J., Murray, M.P., Pansing, E.R., and Shamhart, J. 2022. Tamm review: Current and recommended management practices for the restoration of whitebark pine (*Pinus albicaulis* Engelm.), an imperiled high-elevation Western North American forest tree. *Forest Ecology and Management*. Volume 522, October 15, 2022, 119929.