



February 4, 2026

Ms. Dana Harris
New Meadows District Ranger
Payette National Forest
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New Meadows, ID 83654
(208) 347-0300

Electronically submitted:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=68926>

RE: Idaho Conservation League's Scoping Comments for the Proposed Little Round Healthy Forests Restoration Act Project

Dear Dana:

I am writing on behalf of the Idaho Conservation League (ICL) to provide our scoping comments and recommendations for the proposed Little Round Healthy Forests Restoration Act project.

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 30,000 members and supporters. ICL's members and supporters care deeply about protecting and restoring the environment.

The 3,702-acre project area is located 14 miles north of New Meadows, Idaho, and is proposed to encompass 1,753 acres of commercial vegetation treatments. The project area was designated prior to March 23, 2018, in accordance with Sections 602(b) and (c) of the Healthy Forests Restoration Act. We appreciate the opportunity to comment

on the proposed Little Round vegetation management project, and we are grateful for the invitation to tour the project area with New Meadows District silviculture, fuels, and timber department staffers, Idaho Department of Lands representatives, and the New Meadows District Ranger on August 5, 2025. The field trip was very informative and significantly contributed to our general support for this project. We also wish to commend the Forest Service for relying on historic photographs of the project area to help determine previous conditions and set goals for desired results and stocking levels.

The scoping document provides the average quadratic mean diameter (11.7 inches) and average trees per acre (288), and average basal area (156 ft²/acre). However, the document does not provide the desired conditions using these three metrics, beyond average trees per acre, which the scoping document indicates is 10-25 trees/acre for the variable retention regeneration treatments. We recommend for future projects that if the Forest Service provides current metrics, it is often helpful to provide desired conditions using the same metrics. This allows the public to directly compare/contrast current conditions with desired conditions in an apples-to-apples scenario.

We concur with the Forest Service's conclusion that Legacy trees are critical to the health of the forest, and are underrepresented in all species in all stands. We appreciate the agency committing to retaining legacy trees and other key structural elements, such as clumps, snags, large grand firs, and early-seral, fire-adapted legacy trees, such as Ponderosa pine, western larch, and Douglas fir.

Regarding Clearcuts with Reserves (CCR) and Regeneration Treatments Exceeding 40 Acres, we are unclear if the Regeneration treatment acreage is encapsulated in the CCR treatments. First, the Regeneration treatments were not included in Table 2, which describes the proposed commercial vegetation treatments. If the treatments exceeding 40 acres are part of the CCR treatments then this point is moot. If they are their own category, the Regeneration treatments should be included in Table 2 and the treatment totals should be updated to reflect the additional acreage from 1,753 to 2,350.5 acres. We also recommend that the Forest Service approach these treatment units in a manner similar to the regeneration treatment exceeding 40 acres in the Cold July project area. The approach we recommend is to evaluate each unit more closely prior to the implementation cut, perhaps during layout, and more accurately delineate the desired opening. This could result in fewer acres in any given unit needing full regeneration treatments.

Regarding the use of temporary roads and skid trails, we understand that the project could include up to 3.4 miles of new temporary road construction, with 1.1 miles located within riparian conservation areas (RCAs). While none of the maps (Figures 4-8) do not

include the proposed locations of the temporary roads, we are most concerned with the 1.1 miles of road segments proposed for RCAs. Temporary roads should be used only when absolutely necessary, and this is doubly true for those in RCAs as the potential impacts reverberate much longer and have more significant impacts on water quality, fisheries, and aquatic life habitat.

We appreciate the Forest Service addressing Endangered Species Act (ESA) determinations within the project area. While the agency did find a “No Effect” determination for ESA-listed fish, critical habitat, ESA-listed wildlife, and ESA-listed botanical species, we do recommend that the Forest Service use best management practices (BMPs) to prevent any sediment delivery to tributaries that could then transport that sediment to designated chinook salmon and steelhead designated critical habitat roughly 3 miles downstream from the project area.

Thank you for the opportunity to submit scoping comments for the proposed Round Valley Healthy Forests Restoration 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 New Meadows Ranger District on this and future projects.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Randy Fox', is positioned above the typed name and contact information.

Randy Fox
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