



May 23, 2014

Objection Reviewing Officer
Intermountain Region USFS
324 25th Street
Ogden, Utah 84401

Via e-mail: objections-intermtn-regional-office@fs.fed.us

Re: Lost Creek-Boulder Creek Landscape Restoration Project Objection

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council files this objection to the proposed decision for the Lost Creek-Boulder Creek Landscape Restoration Project (herein referred to as "LCBC"). Payette National Forest Supervisor Keith Lannom is the responsible official. The LCBC project occurs on the New Meadows Ranger District.

Objector

American Forest Resource Council

[Redacted]

Objector's Designated Representative:

Irene Jerome

[Redacted]

Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC during scoping and in response to the draft EIS which are hereby incorporated by reference.

- 1. The LCBC project does not meet the Purpose and Need for improving habitat for specific wildlife species of concern such as the northern Idaho ground squirrel and the white-headed woodpecker, and promoting large tree forest structure, early seral species composition.**

[Redacted]

The Purpose and Need for the LCBC project includes the statements below:

The **purpose** of the Lost Creek-Boulder Creek Restoration Project is to:

- 1) Move vegetation toward the desired conditions defined in the Forest Plan and consistent with the science in the Forest's draft Wildlife Conservation Strategy (WCS DEIS), with an emphasis on:
 - a) Improving habitat for specific wildlife species of concern such as the ESA listed northern Idaho ground squirrel and species dependent on dry coniferous forests (for example white-headed woodpecker), while maintaining habitat for other sensitive and listed species;
 - b) Maintaining and promoting large tree forest structure, early seral species composition (for example aspen, western larch, ponderosa pine, and Douglas-fir) and forest resiliency; (FEIS Summary p. S-1)

The preferred alternative, Alternative B, does not restore as much large tree and low canopy habitat for the white-headed woodpecker in the short-term as Alternative D. Alternative D restores 14,193 acres while Alternative B only restores 12,296 acres. Short term restoration is an emphasis area for the white-headed woodpecker in the draft Wildlife Conservation Strategy (WCS). (FEIS Summary Table S-11). Alternative B does not restore as much medium tree and low canopy that will become habitat in the next five to thirty years (long term) as Alternative D. (FEIS Table S-12).

Alternative B does not restore as much priority #2 habitat acres for the northern Idaho ground squirrel (NIDGS) as Alternative D. Alternative D restores 8,909 acres while Alternative B only restores 8,824 acres. (FEIS Table S-14).

Potential vegetation groups (PVGs) 1, 2, 3, 5 and 6 would all be improved more by Alternative D than Alternative B, which in turn will help maintain and promote large tree forest structure, early seral species composition, and forest resiliency. (FEIS Table S-23).

In summary, Alternative D improves the white-headed woodpecker habitat and potential vegetation group acres (short and long term combined) by +1,648 percent while Alternative B only improves this habitat by +1,536 percent (FEIS Table S-23) as well as improving more NIDGS habitat.

2. The LCBC project does not meet the Purpose and Need for restoring connectivity in streams in the subwatersheds in the project area.

The Purpose and Need for the LCBC project includes the statements below:

The **purpose** of the Lost Creek-Boulder Creek Restoration Project is to:

- 2) Move all subwatersheds within the project area toward the desired condition for soil, water, riparian, and aquatic resources and improve the Boulder Creek subwatershed from the Class-3 category to the Class-2 category as described in the Watershed Condition Framework (WCF) with an emphasis on:
 - a) Restoring habitat connectivity, especially in streams occupied by ESA listed fishes (Chinook salmon, steelhead and bull trout) and in their respective Critical Habitat. (FEIS p S-2).

Alternative D restores more total miles of connectivity by subwatershed than the preferred Alternative B. Alternative B only restores 162.4 miles of connectivity while Alternative D restores 172.6 miles. (FEIS Table S-9).

3. The LCBC project does not best meet the Purpose and Need for contributing to the economic vitality of communities adjacent to the Payette National Forest.

The Purpose and Need for the LCBC project includes the statement below:

- 4) Contribute to the economic vitality of the communities adjacent to the Payette National Forest. (FEIS p-S2).

The preferred alternative, Alternative B, applies commercial thinning treatments to 23,900 acres while Alternative D applies commercial thinning treatments to 27,200 acres. The two alternatives both would implement 18,000 acres of noncommercial thinning activities in the LCBC planning area.

Alternative D will provide an annual employment contribution of 77 while Alternative B only provides an employment contribution of 63. (FEIS Table S-16) Annual labor income for Alternative D is projected to be \$2,351 while Alternative B only contributes \$1,865 on an annual basis. (FEIS Table S-17).

The present value of Alternative D is projected to be \$4,285,714 while the present value of Alternative B is projected to be \$2,897,751. (FEIS Table S-31).

Resolution Requested

AFRC requests that Alternative D be selected as the preferred alternative. Alternative D restores more habitat and generates significantly more revenue than Alternative B which will provide the forest with significantly more opportunities for restoration of riparian and aquatic areas, recreation improvements, and road improvements.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple

Objection Reviewing Officer

May 23, 2014

Page 4

objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held as soon as possible with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Irene Jerome, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Partin". The signature is written in black ink and is positioned above the printed name.

Tom Partin
President