

March 31, 2016

Keith Lannom, Forest Supervisor
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RE: Middle Fork Weiser River Landscape Restoration Project DEIS

Dear Supervisor Lannom:

Thank you for the opportunity to comment on the Middle Fork Weiser River Landscape Restoration Project. As you know, I am a member of the Payette Forest Coalition representing both the Backcountry Recreation Club and Idaho Recreation Coalition. The comments I am submitting today are my own. The organizations I represent and I support the recommendations of the Payette Forest Coalition.

There were a number of errors in the DEIS:

The project area is in Idaho Fish and Game Hunt Management Area 32A, not 23A.

Page 65. There is heavy snowmobile use in the project area based on personal observations and personal conversations with members of the Donnelly Snowmobile Club.

Page 197. Table 3-28 Alternative 2 Total should be more than 6%.

Page 411. There is no discussion of Alternative 2 road activities.

Page 418. Alternative 2 should be bold to as are the other alternatives.

Page 504. Unemployment in Adams County was above 25% and in Valley County was above 20% during the time period addressed by Figure 3-79 based on information from Idaho Department of Labor.

Appendix 3, Page 17. Boise Cascade no longer owns property in the project area. Potlatch and Potlatch REIT purchased that property.

Appendix 4, Page 13. The DEIS states that monitoring will begin in 2015 and will continue until 2015. I believe it should continue through the project activities and beyond.

I had a number of questions:

How often and where within the project did Native Americans burn?

Are you trying to move towards the Historic Range of Variability or Desired Future Condition? Both terms are used in the DEIS.

Non Commercial Thin – Plantations will leave 70-100 trees per acre. Is that the desired stocking rate? What is the percent mortality expected following prescribed burn? How old are the trees in the plantations? Will that affect their vulnerability to fire? Has that been factored in to the number of trees that will be left and their spacing?

BA/PA Burned Area/Plantations. The project will, “promote early seral species with variable densities.” Will trees be clumped in the plantation stands or left with uniform spacing? What is the desired stocking level following fire?

Page 50. The stated preference to retain trees of high wildlife value may result in slightly higher than desired stocking. Is there a limit to how many trees may be retained for wildlife values?

How many whitebark pine trees do you expect to plant? How many acres?

Page 59. Prescribed Fire Treatments. 24,250 acres over 15-20 years/ Does this account for any repeat burns? Can you burn this much acreage on a 5-10 year average?

What level of decommissioning will occur on roads temp roads? Will any of these roads be needed for future management activities? Will that be taken into account when developing decommissioning prescriptions?

If you did not include miles of road per square mile which Watershed Condition Class would each drainage fall in? I think there is too much emphasis being placed on miles of road per square mile.

Page 343. Figure 3-58. Have similar events occurred in the project area? At similar scale? How much more frequently do these events occur following large fires?

Page 365. Where were BMP’s not implemented earlier?

Page 377. Travel Management Plan. How much of a reduction in sediment delivery to streams was realized with the prohibition of all motorized cross county travel? Has this been offset by the increase in mountain biking in the area? Would a decrease in sediment be realized by converting bike trails to motorized trails and increasing maintenance?

Page 378. “Snow machines cause erosion and ground disturbances.” There have you documented this statement?

Page 393. Physical barrier. Are these natural or man-made barriers? Is Mica Creek lacking LWD because of the Grays Creek Fire?

Page 399. Table 3-95. FUR because of crossings not on National Forest land?

Page 401. Table 3-97. Why are Jungle and Mica Creek FUR for LWD?

Page 404. Why won’t the culvert on Jungle Creek be replaced in Alternatives 2 and 4? It appears to connect approximately 0.5 miles of stream to the system below the existing culvert? What is the quality of habitat in the stream segment?

Page 410. Does Alternative 4 include the 15 acre fuel reduction site on the small tributary to Mica Creek proposed in Alternative 2?

Page 433. Where is the unit with >16% DD? What are the factors that cause the unit to exceed 16% DD?

Page 537. How much of the vegetation reduction resulted from discontinuing Native American burning in the area?

Page 538. Is there documentation that competition is greatest between elk and cattle and the level of competition? There are areas where cattle were excluded and elk also left the area as the quality of feed for elk was reduced. Cattle will feed on dead grasses and improve what is left behind and eaten by the elk.

Appendix 2. Are all roads showing full recontour going to be fully recontoured?

Earlier discussion in the DEIS indicates that spurs have been identified that may be retained for dispersed camping, trailer parking, etc. Is it possible to indicate which road sections are under consideration?

Appendix 3. Grays Creek 2008 and 2009 treatments. Were all of the treatments in the burned area?

How large was the MF Blowdown.

Appendix 4. Page 27. Will CWD be monitored following prescribed burns?

Appendix 5. Page 1. Is Alternative 4 the only alternative that treats inner and outer RCA's of wet meadow aspen stands? This should be expanded to the final preferred alternative.

If we had more sagebrush/bitterbrush range would there be less movement of ungulates to private property during the winter months?

The elk populations in this area are vastly above HRV. This affects the whitetail and mule deer populations.

Are wolves a primary driver of ungulates towards lower elevation private property? How do we improve ungulate hiding cover in close proximity to feed? Wolves neither observe hunting seasons or road closures. This area is already above target elk populations. Increasing elk security areas and potentially increasing the elk population creates a hardship on neighboring property owners. The number of elk on private property has increased significantly over the past 10 years. Does hiding cover from wolves differ from hiding cover from humans? Elk security zones are vastly underrated. They are estimating a ½ miles line of sight from roads. This does not occur in most of the project area.

Very young trees are less fire resistant than older trees. At what age do Douglas fir, ponderosa pine, larch and aspen become less susceptible to death following prescribed fire?

Lodgepole pine is very susceptible to death by fire. 25% scorched bark usually results in mortality. If mortality doesn't result from direct fire effects, it often results from greater susceptibility to bark beetles. How will you manage fire in lodgepole pine stands to avoid excess mortality?

Lodgepole pine seedlings are very susceptible to death from rusts. They need large openings to allow sunlight and wind to dry the seedlings before rust can penetrate their bark. How do you plan to create adequate openings to encourage the growth of lodgepole pines?

Appendix B. Page 2 PVG 10. What is the average life span of lodgepole pine in the project area?

What is the primary habitat for snowshoe hares in this area? Will we be improving hare habitat?

Page 4. What is TEST15?

Is any of the potential lynx habitat in WUI? Lack of treatment in potential lynx habitat will impact the spread of fire into WUI.

The number of snowshoe hares is of prime importance to suitable lynx habitat. Is this area at, below or above the desired number of snowshoe hares?

Following are my comments:

All road miles are counted the same. 2-wheel motorized trails are treated the same as 2 lane, poorly maintained routes. This should be disclosed in the discussion about miles of roads in the project area.

Firewood gathering opportunities should be maximized wherever possible within the project area.

Please explain the use of indicator species. The DEIS keeps stating that white headed woodpecker habitat will be improved. The goal of the project is not to improve to white headed woodpecker habitat. The goal of the project is to improve habitat for a range of species. White headed woodpeckers will be used to measure how well this improvement has been attained since they are a species very tied to large ponderosa pine habitat. I hear a lot of complaints from people who do not understand why we are improving habitat for a species for which this is the far eastern edge of their range. They would prefer improving elk habitat so that their hunting success can be improved. They do not understand that elk are generalists and can survive in many habitat types. I think a better explanation of the habitat type that is being restored will help people better understand what you are trying to accomplish with this project.

Log landings within 300' of roads should be analyzed for dispersed camping potential prior to decommissioning where dispersed camping is allowed. These sites are generally quite level. Snags have been removed due to OSHA regulations, a hardened surface is in place and trees have been thinned. Many provide ideal locations for group camp sites away from RCA's. The log landing we frequently stop at on Mill Creek field trips would have been the ideal dispersed camp site if it would have been left in place following logging.

You should look at the potential for a pole sale in the project area. Where poles were harvested prior to WUI treatments in the Secesh area net costs were reduced and far less vegetation had to be burned. Less smoke was generated.

Please try to schedule burns so as not to adversely affect grazing permittees.

I understand, logistically, why most burning will occur in the spring. Historically, Native Americans burned in late fall. Will you be shifting species? How will desired species react to spring vs fall burning? Will you do any monitoring of reproductive point emergence prior to spring burns? This can drastically impact seed production if the reproductive points have emerged prior to burning.

Road miles for decommissioning should not be approximate. No roads not listed in the EIS should be decommissioned without further opportunity for public input.

Driveable dips are preferable over water bars.

Page 121. Routes should be open to snowmobiles between Christmas and New Year's Day. Snowmobile use in the area is especially high during that time period and is very important to the economy of

Council and the Donnelly area. You may not see many snowmobilers starting from the Council side, but there are large numbers coming into the area from the Donnelly side.

Page 363 Sediment reduction doesn't take into account reducing risk to large fires which would result in large releases of sediment.

Page 382. Proposed vegetation treatments should be structured to have little to no effect on LWD. Treatments are occurring 1-2 tree lengths from streams. Since we are increasing tree size in the long term and are decreasing risk from large, higher intensity fires, there should be a positive movement in LWD.

Please consider treatments in current LAU's. There will be a 40-60% reduction in acres actually treated vs acres proposed for treatments. If there is only a 40% reduction in acres treated the project will be within 2% of the vegetation coverage recommended by the *2000 Canada Lynx Conservation Assessment and Strategy*. This is statistically insignificant and there will most likely be a higher reduction in the number of acres treated.

Roads that might be used in Alternative 4 and decommissioned following treatment should not be obliterated until treatments can be accomplished. If Alternative 4 treatments are not completed as a part of this project, leave the roads in place. You may be able to accomplish the treatments in the future when the 2013 Canada Lynx Strategy is adopted.

Road 198 should remain open to motorized travel from Cabin Creek. It is a historical route, leads to other trails and is a historically important route of travel both for recreation and grazing permittees.

The value of Elk Security Areas should be reevaluated. I realize this is the job of Idaho Department of Fish and Game. Hunters who have spent many years hiking in the project area state that there are as many elk outside the locked gates as behind the locked gates. IDF&W should be made to prove that they are improving elk security before more roads are closed to hunters. There should be more provisions made to allow access for handicapped hunters to access the areas behind locked gates. Elk security areas are vastly underrated. You are assuming a ½ mile line of sight from roads which elk can be spotted in. Even if you can spot elk ½ mile away, how many can shoot an elk at that distance? You cannot see past the ridge nearest the road. You cannot see ½ mile through the existing vegetation. A half mile is a very long distance to sneak up on an elk. There needs to be a more scientific evaluation of what constitutes elk security.

As you are fully recontouring roads, please keep in mind that many of the trails and roads in our area started out as game trails. As you are blocking passage to man, you are also blocking passage to wildlife. If too much debris is left on former roads and trails you will be forcing wildlife and people out of areas.

Please let me know if you have any questions regarding my comments.

Sincerely,

A handwritten signature in cursive script that reads "Becky Johnstone".

Becky Johnstone
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