

Boise Forest Coalition



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John Kidd
District Ranger
Lowman Ranger District
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Submitted electronically to:
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RE: North and South Pioneer Fire Salvage and Reforestation Projects

Dear Mr. Peterson and Mr. Kidd,

We are writing on behalf of the Boise Forest Coalition (BFC). The purpose of this letter is to provide scoping comments on the North and South Pioneer Fire Salvage and Reforestation Projects.

The 2016 Pioneer Fire affected over 190,000 acres on the Boise National Forest. The fire burned at various intensities creating a mosaic across the landscape. Although the BFC was not involved in the prior development of this specific proposal, we appreciate the opportunity to offer our comments. The BFC appreciates the timely implementation of Burned Area Emergency Responses as well as removal of hazardous trees from high-priority routes and recreation areas. We also appreciate field trips to tour the project area.

The purpose and need for the proposed salvage and reforestation projects includes mitigating risks of hazard trees to the public along roads, trails and at recreation sites, planting seral tree species in areas that burned at high intensities far from natural seed sources, improving watershed conditions by decommissioning unauthorized routes, and recovering economic value of timber in a timely manner to help fund the safety and reforestation components described above.

The North Pioneer Fire Salvage and Reforestation Project is entirely within the South Fork Payette River drainage. The project involves salvaging approximately 32 mmbf of timber, all of which is within Management Prescription 5.1 (Restoration and Maintenance Emphasis) where commercial harvest is an allowable management tool. The salvage efforts will require an anticipated 7 miles of temporary road. Over 3 miles of unauthorized roads will be decommissioned as part of watershed restoration efforts.

The South Pioneer Fire Salvage and Reforestation Project is entirely within the Boise River drainage. The project involves salvaging approximately 54 mmbf of timber which is also within Management Prescription 5.1. The salvage efforts will require just over 3 miles of temporary road. Over 4 miles of unauthorized roads will be decommissioned for watershed restoration. The BFC is supportive of the purpose and need. We also have some additional recommendations for the Forest Service to consider in our comments below. We appreciate the fact that there will be a draft Environmental Assessment to review and hope that the Forest Service can respond to our recommendations with that analysis. Individual coalition members may submit additional comments. The Coalition members request the Interdisciplinary Team consider these scoping comments in their analysis of the proposed action and alternatives.

Sincerely,

On Behalf of the Boise Forest Coalition

Rachel Vandenburg, Steering Committee Member
Jonathan Oppenheimer, Steering Committee Member
Arthur Beal, Steering Committee Member
John Roberts, Steering Committee Member
Morris Huffman, Steering Committee Member

Boise Forest Coalition comments on the North and South Pioneer Fire Salvage and Reforestation Projects

Purpose and need

The BFC is supportive of the purpose and need for both projects. The fire resulted in significant public safety issues and selective hazard tree removal is appropriate. Some areas with extensive tree mortality are separated by long distances from surviving trees that can serve as seed sources. These areas of high mortality can likely benefit from active reforestation efforts. The fire will impact soil stability within the project area and watershed restoration actions such as decommissioning high-risk, low-use non-system roads will help reduce the impacts. Significant portions of the project area were authorized for timber sale but were burned before harvest was completed and the economic value of these stands is rapidly expiring. By salvage harvesting these and other suitable areas in an environmentally responsible manner, the value of this timber can be captured and used to help offset the other components of these projects.

Salvage operations

We support the Forest Service's criteria to determine hazard trees and salvage locations. We wish to emphasize the time-sensitive nature of salvage harvest operations and encourage the Forest Service to conduct an efficient yet thorough analysis so the project can be implemented in a timely manner. We appreciate the consideration of logging impacts on soils and support the Forest Service's approach to reduce impacts.

Elk security

The Pioneer Fire likely will result in decreased elk security in the portions of the project area for several years. If not properly designed and implemented, salvage logging efforts may further decrease elk security. The Forest Service should analyze the fire's impacts on elk security and design the projects in such a way to avoid, minimize and mitigate any adverse effects from this project. Design features could include adjusting the snag retention guidelines in certain areas with high-value for elk, implementing seasonal road closures during hunting season in strategic areas, or decommissioning additional unauthorized routes that are found as part of field work. We would appreciate having a Forest Service wildlife biologist present at future BFC meetings so we can learn about how elk and other wildlife may be affected by the fire and these proposed projects.

Reforestation and other plantings

We support the proposed plantings, including ponderosa pine, whitebark pine and riparian restoration plantings. Douglas fir should also be considered. In addition to these plantings, the Forest Service should consider partnering with the Idaho Department of Fish and Game and other organizations to plant native shrubs and forbs to benefit wildlife. Planting desired species such as bitterbrush may help slow the spread of invasive species and provide forage for big game and other wildlife. We are particularly concerned about the spread of noxious weeds in the project area. Invasive species such as a rush skeletonweed are already well established in much of the area.

Hazard tree removal

We understand that trees within 200 feet of roads and trails may be considered hazard trees and be marked for felling and removal if suitable. We support the Forest Service's general

assessment that removal efforts should target trees that are on the uphill side of a road or trail and are more likely to fall.

Riparian Conservation Areas

We support the Forest Service's plans to remove hazard trees within RCAs in a way that best protects both the public and riparian resources.

Additional restoration opportunities

Based on field reviews, the Forest Service may find additional restoration opportunities that could be considered for this project. These could include replacing undersized or damaged culverts, decommissioning high risk unauthorized roads or trails, stabilizing abandoned mines, and hardening dispersed recreation sites. The Forest Service should consider these restoration actions as opportunities allow. Watershed restoration activities such as culvert replacements and riparian restoration should be prioritized in areas with bull trout habitat.

Yurt rebuilding and relocation

The South Pioneer Project area is popular with recreationists who utilize yurts operated by the Idaho Department of Parks and Recreation and managed by a Special Use Permit with the Forest Service. We understand there is strong public interest in rebuilding yurts that were damaged or destroyed in the area and in relocating yurts from high-severity burned areas to areas with more intact vegetation. We are supportive of these efforts but feel it is not clearly within the scope of this salvage, safety and restoration effort. As such, we recommend that the Forest Service consider these proposals separately.

Snags

We support the snag retention guidelines and believe they should be protective of snag-dependent wildlife. As part of the EA, the Forest Service should describe the differences in snag retention criteria between green trees and burned trees. The Forest Service should also describe what percent of the project area will remain unharvested and how the overall snag diameters in these areas compares to snag diameters in harvest areas. Particularly important snags for wildlife should be marked as wildlife trees so firewood cutters do not remove them. These snags should be monitored to ensure they are retained on the landscape.

Firewood

Where suitable, we recommend that contractors deck any wood material that is not commercially viable and that is not needed for nutrient cycling and leave it for the public to utilize. We recommend that the Forest Service clarify which areas are open and closed to firewood cutting in firewood permits and by signing specific areas and increasing outreach efforts. We are concerned that firewood collectors may remove snags and felled trees that should remain in Riparian Conservation Areas. We are also concerned about increased unauthorized motorized use, particularly with regard to firewood collecting. The Forest Service should emphasize the need to follow motor vehicle use maps in outreach and education efforts.

Cumulative effects

We understand that the North and South projects were separated based on watersheds and we support this decision. However, some issues cross-watershed boundaries and need to be analyzed in the cumulative effects analysis. These cross-boundary issues include terrestrial wildlife, birds,

recreation, and economic and social impacts. By addressing these issues in the cumulative effects sections of both documents, the Forest Service can meet NEPA and NFMA requirements so the project can be implemented in a timely manner.

Monitoring

We recommend that the Forest Service consider supporting an independent, citizen-led, monitoring committee for each project. These committees would conduct visual monitoring regarding the implementation and effectiveness of each of these projects with respect to the primary goals. Members of the Boise Forest Coalition may be interested in participating in these efforts so please keep us informed.

Research efforts

There are several research efforts proposed in the project areas. Boise State University and College of Idaho are proposing to study post-fire erosion in select watersheds. The Pacific Northwest Research Station and the University of Washington are proposing to study the effects of salvage logging and developing fire resilient forests, historic wildfire effects on forest structure and wildfire behavior. The BFC supports all the proposed research efforts and would appreciate updates on the research findings.

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