

# Boise Forest Coalition



PO Box 123, Meridian, ID 83680

December 23, 2020

Ms. Katherine Wood  
Emmett District Ranger  
Emmett Ranger District  
Boise National Forest  
1857 Highway 16, Suite A  
Emmett, Idaho  
(208) 365-7000

Electronically Submitted: [katherine.wood@usda.gov](mailto:katherine.wood@usda.gov)

**RE: Boise Forest Coalition Letter of Objection regarding the Sage Hen Integrated Restoration Project Environmental Assessment**

Dear Ms. Wood,

This letter is submitted on behalf of the Boise Forest Coalition (BFC). The purpose of this objection is to provide additional comments and suggested remedies regarding the Sage Hen Integrated Restoration Project Environmental Assessment and Finding of No Significant Impact on the Emmett Ranger District of the Boise National Forest (BNF). The BFC has a long history with the Sage Hen Project. The BFC submitted scoping comments on the Sage Hen Project to District Ranger Katherine Wood on May 14, 2020. Discussions regarding the Sage Hen Project occurred at the following monthly BFC meetings:

- December 2019
- February 2020
- March 2020
- May 2020
- July 2020

- August 2020
- November 2020
- December 2020

The BFC was formed in September 2010 to bring together diverse interests who could craft recommendations for multi-faceted forest projects. The citizen-led group is open to anyone with an interest in Boise National Forest management. The mission of the citizen-led Boise Forest Coalition is to provide the Boise National Forest with management recommendations that:

1. Are developed through consensus decisions involving all members of the Coalition;
2. Address natural resource, economic, recreational, and societal needs;
3. Are compatible with Forest Plan direction including implementation of the Forest's Wildlife and Aquatic Conservation Strategies;
4. Are economically realistic;
5. Promote future collaboration during implementation and monitoring.

The BFC works to advance the following objectives in projects where applicable:

- Restore forest and ecological health
- Reduce forest fuel hazards
- Create economic opportunities
- Produce forest products
- Protect designated Idaho roadless areas
- Enhance bull trout habitat and connectivity
- Maintain and enhance fish and wildlife habitat
- Provide a variety of trail-related recreational pursuits
- Improve management of recreational uses to better address impacts on natural resources
- Provide dispersed camping and wildlife-related opportunities
- Coordinate with adjacent landowners in accomplishing objectives

Over the past ten years, the BFC has worked closely with the Forest Service on the Clear Creek, High Valley Integrated, Williams Creek, Bogus Basin Forest Health, Sinker Creek-Boise Ridge, and Pioneer Fire Salvage projects, to name a few. The BFC seeks to provide consensus-based recommendations for these projects, track projects through implementation, and is committed to working with the Forest Service to achieve joint goals that improve, manage, protect and restore the Boise National Forest.

The Sage Hen Integrated Restoration Project encompasses 67,800 acres on the west side of the Emmett Ranger District of the Boise National Forest, and incorporates additional land owned by the Bureau of Land Management, state, and private entities. This area is highly utilized by a variety of recreation user groups and visitors. Proposed activities are intended to manage and restore vegetative conditions to improve resiliency to uncharacteristic disturbance; maintain and improve aquatic and terrestrial habitat and watershed conditions; improve and manage recreation

opportunities; and support local and regional economies. The Sage Hen Project will be implemented over a 20-year timeframe using a condition-based management approach.

The BFC would like to express our appreciation to the BNF for their regular and consistent attendance at BFC meetings over the course of a year to provide Sage Hen project updates, address project-related questions and concerns, and inform on the status of the analysis. While there are aspects of the Sage Hen project that are strongly supported by the BFC, there are also several outstanding issues of concern expressed below. It should be noted that several BFC members will also be submitting independent objection letters for this project.

We thank you for considering our comments, and we look forward to continuing and strengthening our working partnership through meaningful dialogue and a collaborative spirit. Should you have any questions, or if we can provide any additional assistance or feedback during this process, please do not hesitate to contact us.

Respectfully submitted,

On Behalf of the Boise Forest Coalition

Arthur Beal, Steering Committee Member

Morris Huffman, Steering Committee Member

John Roberts, Steering Committee Member

Rachel Vandenburg, Steering Committee Member

Randy Fox, Steering Committee Member

# The Boise Forest Coalition's Objection Comments for the Sage Hen Integrated Restoration Project

## **Notice of Objection**

Pursuant to 36 CFR 218 Subpart B and § 218.5(a), the members of the Boise Forest Coalition steering committee (BFC) listed in Attachment 1, object to the Sage Hen Integrated Restoration Project, proposed by Boise National Forest (PNF) Forest Supervisor Tawnya Brummet on the Emmett Ranger District.

## **Connection to Prior Scoping Comments**

The BFC submitted scoping comments for the Sage Hen Integrated Restoration Project to District Ranger Katherine Wood on May 14, 2020. Scoping comments were developed through consensus and addressed the following issues: level of detail within analysis; recreation management; timber sale design; grazing; impacts to migration corridors and wildlife; use of appropriate authorities and tools for implementation; hardened stream crossings; assessment of unauthorized routes; and carbon accounting.

The BFC has also provided informal feedback to the BNF during monthly BFC meetings pertaining to the process of analyzing and implementing condition-based management projects. This feedback has included concerns from BFC members pertaining to the level of analysis at which the assessment was completed; level of detail provided in the environmental assessment describing specific treatments, activities, and locations; proposed timeframes for implementation; and lack of formal processes for public review on the draft Environmental Assessment and additional public input throughout the proposed 20-years of implementation.

## **Statement of Reasons**

The BFC has invested significant time and effort with the Sage Hen Project. We want to see the project analyzed in a manner consistent with the law and successfully implemented in a timely manner and in such a way that projected benefits are realized and negative effects are successfully avoided, minimized, and mitigated.

We appreciate that the Forest Service adequately addressed some of the issues identified by the BFC during scoping, including concerns with proposed temporary road density and stream crossings. However, there are still several outstanding issues that the BFC has strong objections to. Given the current forest conditions within the project boundary, the BFC hopes to see restoration activities occur quickly. Because the BNF has disregarded several major concerns voiced by key stakeholders, the BFC fears that this project could be delayed if objections are not successfully resolved. As such, the BFC is providing a number of suggested remedies to resolve outstanding issues.

Should other objectors raise additional concerns or bring additional information to the Forest Service's attention, we hope to use the objection process to review this information and offer our perspective on any needed project modifications.

## **Suggested remedies**

### *Areas of Support*

The BFC has identified several issues that we wish to see carried forward in any eventual remedy the Forest Service adopts as this project proceeds. The BFC is in strong support of the forest health and watershed improvement goals associated with this project and agree that in order for proposed activities to have a meaningful impact, treatments must be analyzed and implemented at the landscape level. The BFC has no direct experience with condition-based management but is generally supportive of adaptive management tools to address changing conditions caused by insect, disease and fire. The BFC agrees that there is a need to increase the pace and scale of treatments and continues to encourage the BNF to use the tools and authorities available to them to accomplish this, such as the Good Neighbor Authority and Shared Stewardship agreements.

### *Level of Analysis/Ability to Comment on Impacts*

While the BFC membership did not come to a consensus recommendation on the level of NEPA that the Sage Hen project should be analyzed through, we agree that the current description provided in the environmental analysis is insufficient for the BFC and members of the public to fully understand potential impacts and provide concrete, meaningful input. While we recognize that the Forest Service has the authority to open the public comment period at any point during project development, the decision to host this during scoping period meant that the Forest Service had not yet analyzed and disclosed the actual environmental effects of the project. We understand that data collection will continue through the design of timber sales and other restoration activities. However, because there are no further opportunities for the public to provide input at the project level for any of these activities, the current level of analysis prohibits a meaningful opportunity to address specific areas and resources of concern. Of most significance to the BFC is the lack of a clear and formal process for soliciting and responding to public input once a decision document is signed. While verbal assurances have been made to the BFC that there will be communication and coordination throughout project implementation, we are concerned that this sentiment could easily be lost over the 20-year implementation time frame due to changes in staff and administrative priorities at the BNF. As such, we request the Forest Service reexamine its decision about hosting a formal public comment period on the draft Environmental Assessment itself.

### *Meaningful Alternative Development*

The BFC believes that a strong analysis of the potential impacts of a project of this size requires a review of more than one action alternative. For landscape-scale restoration projects, final decisions are often a blend of key components of multiple alternatives, allowing for the most

durable and sound approach to be identified. The development of multiple alternatives has been a critical component of project development to better meet the Purpose and Need and respond to issues and public comments. We note that on the Payette National Forest, the Middle Fork Weiser River Project, Lost Creek Boulder Creek Project, and Huckleberry Project all had multiple alternatives and that the selected alternatives were a blend of key components from multiple alternatives.

### *Sense of Urgency*

In order to ensure that critical, time-sensitive salvage logging can occur in stands most impacted by the recent Tussock Moth infestation, the BFC encourages the BNF to remove the most time-sensitive timber salvage sales from the Sage Hen project and complete these projects through categorical exclusions to ensure that this critical work is not delayed while objections to the Sage Hen EA are resolved. These three sales include Antelope Swale, Joe's Creek and Southside GNA. The Payette National Forest encountered a similar situation when a time-sensitive insect and disease salvage issue arose within the larger Granite Meadows Project. Because the Payette National Forest decided to analyze the 70,000-acre integrated Granite Meadows Project with a Draft Environmental Impact Statement which had a longer timeline, the Forest Service decided to move ahead with a categorical exclusion for the Little Red Goose Project. The Forest Service authorized up to 3,000 acres of treatments within insect and disease-affected stands within the 8,700-acre project area:

The Little Red Goose Forest Resilience Project is within the Weiser-Little Salmon Headwaters Collaborative Forest Landscape Restoration Project (CFLRP) area, and incorporates input provided from the public and the Payette Forest Coalition on previous CFLR projects, including those provided for the ongoing Granite Meadows project. Areas that receive commercial vegetation treatment under the Little Red Goose project would not be considered for additional commercial vegetation treatments under the Granite Meadows Project. The overlapping area could, however, be analyzed for other treatment activities per the purpose and need of the Granite Meadows Project, including but not limited to watershed restoration activities and recreation management activities, which would not be precluded by actions included in this project.

<https://www.fs.usda.gov/project/?project=56833>

Cumulative effects for the Little Red Goose Project were analyzed by specialists as part of each proposal and there were no notable individual effects from the proposed action and no significant cumulative effects. The analysis for the Granite Meadows Project will factor in any cumulative effects from the Little Red Goose Project. The Payette Forest Coalition submitted letters of support for both the Little Red Goose Project and the Granite Meadows Project.

*Removal of Sensitive Areas from Project Boundary*

At the December 2020 BFC meeting, proposed options for the north slope of Squaw Creek, Buck Canyon, and Lava Gulch were presented to reduce impacts to bull trout critical habitat and big game winter range habitat. The BFC recommends that these three areas be withdrawn from the Sage Hen Project in order to reduce adverse impacts of the project to wildlife species and reduce sedimentation to the third fork of Squaw Creek from temporary road construction.