



Boise Forest Coalition | Meeting Agenda

May 4, 2023 | 10:00 a.m. – 12:40 p.m.

To participate in person: Idaho Department of Lands, 300 N 6th St., Boise, ID 83702

To participate virtually: <https://us02web.zoom.us/j/84747866686?pwd=YTVoMGxZUUYvaFVTUGhJTEdXLzNudz09>

Meeting ID: 847 4786 6686

Passcode: BFC2023

Objectives

- Meet the New Forest Supervisor
- Understand the Forest Service 2023 project plans
- Discuss BFC input for the Sage Hen project
- Update the status of the BFC application for grant funding
- Update BFC budget and create a plan for future needs

Time	Item	Speaker
10:00 a.m.	Welcome, Introductions, and Agenda Review	David Nichols
10:15 a.m.	Introduce the New Forest Supervisor	TJ Clifford
10:20 a.m.	Forest Service Information Sharing & Announcements	FS Staff
10:30 a.m.	2023 Forest Service Project Planning Overview	TJ Clifford
10:50 a.m.	Sage Hen Project Discussion – Past History	John Robison
11:00 a.m.	Sage Hen Project Discussion – Open House Comments	Art Beal Dave Dudley Michael Robinson
11:25 a.m.	Sage Hen Project Discussion – Fish & Game Comments	Steve Dempsey
11:40 a.m.	Sage Hen Project Discussion – BFC Comments Discussion	David Nichols
12:10 p.m.	Collaborative Funding Grant Application Discussion	John Robison
12:20 p.m.	BFC Budget Discussion	Bill Moore
12:35 p.m.	Closing Remarks & Next Steps	David Nichols
12:40 p.m.	Adjourn	David Nichols

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

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

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.

Boise Forest Coalition



PO Box 123, Meridian, ID 83680

Tawnya Brummet and David Francomb
Forest Supervisor/Deputy Forest Supervisor
Boise National Forest
1249 S. Vinnell Way
Suite 200
Boise ID 83709

Mary Farnsworth
Regional Forester
Intermountain Region
Federal Building
324 25th Street
Ogden, Utah 84401

May 13, 2021

RE: Sage Hen project expectations

Dear Tawnya, David, and Mary,

The Boise Forest Coalition (BFC) was formed in September 2010 to bring together diverse interests to craft recommendations for multi-faceted projects on the Boise National Forest. We appreciate your participation in the recent Idaho Forest Restoration Partnership conference and your support for forest restoration collaborative efforts. The BFC Steering Committee is writing to express concerns about how the Boise National Forest and the Intermountain Region have handled the Sage Hen project and mischaracterized the BFC's involvement in and level of support for the project. This current disconnect between the Forest Service and BFC is the exception rather than the norm in that the other collaboratives we are familiar with appear to have more productive relationships with National Forests in Region 4.

The BFC is a strong proponent of increasing the pace and scale of forest restoration on the Boise National Forest. 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.

We have been involved with over 13 Forest Service projects to date and have also been involved with Citizen Science and post-decision support of Forest Service decisions. We believe that integrated projects developed in partnership with diverse collaboratives are the best way to accomplish goals related to forest and watershed restoration, fish and wildlife habitat improvements, rural economic development, grazing management, recreation enhancement, and wildfire risk reduction. The Boise Forest Coalition consists of local representatives championing each of these goals.

The forest products industry in particular has been an important partner in thinning efforts and non-commercial stewardship activities and we believe in keeping this infrastructure intact. We believe that a collaborative process can help provide more certainty for the forest products industry over the long term than the Forest Service proceeding alone. We note that BFC submitted an amicus brief in support of the North and South Pioneer Fire Reforestation and Salvage Projects. When that project was litigated, the Court referred to the collaborative's involvement when affirming the Boise National Forest's decision. We have also seen the importance of integrating recreation infrastructure and management early in project development.

However, the Boise National Forest has consistently not met the Boise Forest Coalition's expectations for collaboration, despite repeated meetings with Forest leadership. We are concerned about the lack of meaningful engagement during the NFMA stage of projects, response to scoping issues, integration of multiple resource issues, degree of public involvement, level of NEPA analysis, and involvement with the BFC in public outreach efforts. We are concerned that the Sage Hen project is an example of the Forest Service moving unilaterally and without local support when there is an urgent need to move forward together in a true collaborative effort to work on the larger landscape.

The International Association of Public Participation (IAP2) has developed a spectrum of different levels of public participation (inform, consult, involve, collaborate and empower). The Boise National Forest has largely restricted the BFC's input to the

“inform” and “consult” categories instead of true collaboration where the BFC wishes to operate.

The most recent example of this shortfall is the Sage Hen project. We take issue with the way the Forest Service has characterized the involvement with the BFC and support of the BFC for the Sage Hen project. Here is how the Forest Service characterized engagement with the BFC in the Decision Notice:

The Boise National Forest has proactively engaged with the Boise Forest Coalition on this project development since the coalition’s inception in 2009. The coalition has participated in six Sage Hen project field trips since 2012 and multiple meetings during which they provided input on the project. These discussions, along with goals and objectives outlined in the Boise National Forest Land and Resource Management Plan (forest plan) and current conditions on the ground, informed management objectives for the project area. Decision Notice, p. 9.¹

This description does not fit our own experiences. The Boise National Forest first initiated discussions with the BFC about the Sage Hen area in 2012 but then asked the BFC to focus on the High Valley area because additional NFMA work was still needed in the Sage Hen area. When the Boise National Forest returned its attention to the Sage Hen area, the focus quickly shifted to emergency salvage operations associated with tussock moth mortality and soliciting input from the BFC as part of the NEPA process rather than the NFMA phase as we had requested.

The BFC submitted scoping comments on the Sage Hen project to District Ranger Katherine Wood on May 14, 2020 and objected to the project on December 21, 2021. ICL submitted more extensive scoping comments on May 14, 2020, and objected to the project on December 24, 2020. The BFC reviewed the Forest Service’s Objection Response letter and the Decision Notice.

While the Sage Hen decision notice did include some project changes and provided some additional information regarding the use of Condition Based Management, most of these changes occurred only after the BFC and 80 other parties objected to the project. Throughout the year-plus of project planning, stretching from October of 2019 to the objection resolution call on March 4, 2021, the BFC had recommended that the Boise National Forest make these same changes and these components should never have been carried forward into the EA. Moreover, subsequent analysis indicates the withdrawn portions of the project should never have been included as part of the proposed actions from the beginning. The Boise National Forest also failed to address the other substantive

¹ https://www.fs.usda.gov/nfs/11558/www/nepa/112141_FSPLT3_5618170.pdf

issues the BFC had raised, including the level of NEPA analysis, the development of alternatives, and a public comment period on the environmental analysis. The situation is concerning enough that should the Sage Hen project be litigated, the Forest Service should not expect support from the Boise Forest Coalition in defense of the project. We do have an interest in continuing a dialogue with the Forest Service as they move forward with the project, seeing how the Forest Service keeps the public and BFC informed through the coming years, and learning how Condition Based Management informs project implementation.

This project is being advanced with the expectation that it may be funded through the Collaborative Forest Landscape Restoration Program under the West Central Idaho Initiative (WCII) application. The Sage Hen project is also being presented as a flagship project under the Shared Stewardship Agreement for the Southern Priority Landscape Area. Both the BFC and Payette Forest Coalition submitted letters of support² for the WCII and later testified in support of the WCII proposal before the CLFRP FACA committee. Further, BFC steering committee members contributed toward drafting the CFLRP WCII application. The BFC expressed strong support for the WCII and Shared Stewardship in our supporting letter:

....The Forest Service and adjacent private property owners need to do more to coordinate efforts, and leverage resources and create partnerships for hazardous fuels reduction and watershed improvement efforts. This CFLR would allow for a truly comprehensive approach to reducing the fire risk in the Wildland Urban Interface and improving watersheds.

...The 2.3-million acre Shared Stewardship landscape area encompasses high priority areas for restoration and the CFLR funding would provide the means for the Coalitions and affected communities to assist the Forests in reaching their goals.

...The Coalition members believe that experiences gained in forest restoration collaboratives can help inform and improve the Shared Stewardship program. Should the West Central Idaho Initiative receive CFLR funding, the Shared Stewardship program would provide a unique forum for complementary actions across multiple ownerships, potentially extending the forest and watershed benefits far beyond the CFLR and Shared Stewardship boundaries. The Coalitions support the application for the West Central Idaho Initiative and look forward to the opportunity to work with the Forest Service and other partners toward the restoration and sustainable management of our forests and watersheds. Attachment E – Letter of Commitment from Collaborative

² https://0201.nccdn.net/1_2/000/000/0fe/b61/WCII-ProposalWithAttachments.pdf#RDAM25030678

Members/Partners³

The Shared Stewardship Agreement between the State of Idaho and the Forest Service outlined several important goals:

II. The Forest Service and Idaho Department of Lands Shall:

Jointly work with other stakeholders — federal, state, tribal, non-governmental organizations, communities, and universities — to help identify land management priorities and desired outcomes, using all available authorities and active management tools.

Collaborate on mutually agreed upon projects and other work within priority landscapes identified through federal and state planning documents, such as National Forest land management plans and the Idaho State Forest Action Plan, that reduce fuels and wildfire risk to communities, create and sustain jobs, and improve forest health and resiliency.

By 2025, the partners will work to double the annual acres treated through active management on National Forests and promote cross-boundary work on other lands within priority landscapes that reduce fuels and wildfire risk to communities, produce additional fiber, create and sustain jobs, and improve forest health and resiliency.⁴

In terms of fulfilling this vision of Shared Stewardship, despite this project being within the 2.3 million acre Southern Priority Area jointly identified by the Forest Service and Idaho Department of Lands, the Sage Hen project falls short with respect to Shared Stewardship goals of working in partnership across multiple boundaries in an all hands, all lands approach.

Public outreach to private landowners in the area was limited and the Forest Service took the remarkable step of not hosting a public comment period on the draft EA. The Forest Service should have done far more to work with surrounding communities on an all hands, all lands approach, particularly if it is being promoted as a Shared Stewardship project. Instead, the agency chose to rush forward in an attempt to address tussock moth mortality in a relatively small portion of the project area rather than take the time necessary to develop a solid landscape-scaled project supported by the collaborative.

³ https://0201.nccdn.net/1_2/000/000/0fe/b61/WCII-ProposalWithAttachments.pdf#RDAM25030678

⁴ <https://www.idl.idaho.gov/wp-content/uploads/sites/2/forestry/stewardship/2018-1218-usda-fs-idl-shared-stewardship-final-agreement.pdf>

The Sage Hen project also falls short of the vision provided in the Forest Service's WCII application:

Cooperative efforts would help improve watershed and forest health and resilience, reduce threats to communities and watersheds from catastrophic wildfires, and create more jobs and economic benefits. (WCII application, p. 9).

The Forests will continue to work with the collaborative groups and other stakeholders in the identification of other tools/methodologies, such as livestock grazing management for invasive species/weed reduction and the utilization of biomass as local markets are developed, using the best available science to achieve ecological restoration goals. (WCII application, p. 9).

The WCII-CFLRP restoration goals and methods are aligned with recommendations from the BFC and PFC, and they are consistent with our NEPA documents (WCII application, p. 10).

One of the goals of working collaboratively with stakeholders through the Southern Idaho Shared Stewardship priority area is to prioritize, plan, and implement landscape scale treatments with an emphasis on WUI treatments, which would allow the Forests to co-manage risks across broad landscapes and ownerships and engage stakeholders in managing fire for resource benefits at the right time and in the right place to achieve ecological, economic, and social goals. (WCII application, p. 11).

Cross-boundary work is being accomplished using the Wyden Authority, which allows USFS to enter into cooperative agreements with willing Federal, Tribal, State, and local governments; private and nonprofit entities; and private landowners to benefit resources within watersheds on NFS lands. GNA and Shared Stewardship will also aid in planning and implementing cross boundary work. The Forests will continue to prioritize projects within the West Central Idaho Initiative – Collaborative Forest Landscape Restoration Program Proposal boundary with our Idaho/Wyoming POD, State agencies, PFC and BFC, and our other partners, leading to successful planning and implementation. (WCII application, p. 11-12).

Social goals of the WCII-CFLRP include increased collaboration with partners, restoration of the Forests to ensure sustainable use by the public and building stronger and more resilient communities within and adjacent to the WCII-CFLRP area through economic growth and community engagement. (WCII application, p.

12)

Some members of the BFC believe the Sage Hen project as presently crafted is not consistent with the WCII application and should not be available for CFLRP funding compared to other projects in the WCII area that do meet these commitments. Should the West Central Idaho Initiative be funded as we hope, we will be recommending that these funds be used for projects that have collaborative support.

With respect to the community wildfire risk reductions referenced in the WCCI CFLR application and Shared Stewardship Agreement, the Sage Hen project as designed does little to address community wildfire risk or work with adjacent private property owners:

The project is not designed to create fire-adapted communities...A need related to fire-adapted communities is identified in the EA, but is not stated as an objective of the project. Associated treatments or locations of this area have not been mapped or articulated within the EA or the Vegetation, Fire and Fuels Specialist Report...The project is not tied to a wildfire protection plan because it is not designed for the purpose of protecting or mitigating fire risk to a community. However, activities proposed may result in improving community resilience to wildfire. Sage Hen Decision Notice, p. 9.

We stand in support of the Shared Stewardship program and believe it would be detrimental for the success of the program if the Forest Service and Idaho Department of Lands refer to the Sage Hen project as a Shared Stewardship Project moving ahead.

Furthermore, the Boise Forest Coalition is reconsidering how the collaborative approaches the Forest Service given how the Sage Hen project was handled. Since a partnership with a collaborative is a requirement for a CFLR project, it is unclear if a project can be still available for CFLR funding if a collaborative no longer wishes to be associated with a project or a National Forest. The West Central Idaho Initiative was developed in partnership with the Payette National Forest, the Payette Forest Coalition, the Boise National Forest and the Boise Forest Coalition. If one of these partners is not meeting expectations, this disconnect could undermine the entire CFLRP proposal, CFRL extension requests and future CFLR applications.

The Boise National Forest appears to be replicating many of the mistakes with the Sage Hen project with up and coming projects. The Boise Forest Coalition was recently informed that the Clear Creek project would be scoped but we were not given an opportunity to work with the Forest Service in the NFMA stage as we had requested. We also learned that the Boise National Forest intends to skirt public comments again on the

environmental analysis which is troubling given the importance of public involvement for this important WUI project.

The Sage Hen Decision Notice included the addition of a vault toilet at the Renwyck trailhead and initiating designs for trailheads and reconstructing a campground, but we feel missed additional opportunities to address recreational opportunities and issues. Access to high quality recreational opportunities is of tremendous interest to the public and an inherent part of the quality of life in Idaho. Recreation is the biggest use on National Forests and last year and the Boise National Forest was overwhelmed with increased recreational pressure. This trend is likely to continue. We understand that the Boise National Forest is considering convening a new collaborative to address recreational opportunities and issues. We would like to note that the BFC includes representatives of motorized and non-motorized recreational interests and would like to continue to serve as a resource for the Forest Service on recreation management issues. The objectives of the Boise Forest Coalition include providing a variety of trail-related recreational pursuits, improving management of recreational uses to better address impacts on natural resources, provide dispersed camping and wildlife-related opportunities.

We support the Boise National Forest taking proactive measures to address recreation, but have seen that recreation projects often have taken a backseat to vegetation management projects and recreation management is all too often an afterthought. For example, despite communications that Jonathan Oppenheimer with the BFC had with the Boise National Forest in 2015 about the need to incorporate recreation management in Grimes Creek with nearby vegetation treatment projects, recreation issues were not addressed at that time and the Forest Service had to issue an emergency closure in Grimes Creek in 2020. We were also disappointed to learn at our last BFC meeting that the Boise National Forest has not yet replaced a key recreation position.

A more efficient way to make progress on the ground and for public stakeholders may be to integrate recreation issues early in the development of CFLR, Shared Stewardship and vegetation management projects, including Clear Creek. We encourage the Boise National Forest to work with the BFC and other stakeholders to incorporate recreational management considerations during the NFMA and NEPA planning stages for projects.

We ask that the Forest Service take the following steps:

- Clarify in future internal and external communications that the BFC does not support the Sage Hen project as currently designed as a model Shared Stewardship project since it is lacking the important cross-boundary component

- Do not plan to utilize CFLR funds for Sage Hen project implementation as the BFC objection for the project remains unresolved and those funds are intended to be used for collaboratively designed and supported projects
- For future projects, involve the BFC in the NFMA stages where the BFC can play a meaningful role in developing the purpose and need, integrating other objectives into project design, and incorporating Shared Stewardship goals
- Adjust the planning effort for Clear Creek project to incorporate public comment periods and alternatives as needed on the draft Environmental Analyses
- Work with the BFC to incorporate recreational considerations during the NFMA and NEPA planning stages for projects. The Forest Service should consider increased recreational opportunities and enhancements as well as measures to avoid, minimize and mitigate undesired impacts to other resources.

Working collaboratively can be difficult and is not always possible. However, the Boise Forest Coalition has a proven track record and experience finding a zone of agreement among its diverse membership. A recent study⁵ from the University of Idaho found that collaboratively developed projects were the most efficient way of restoring our landscapes in terms of acres treated per planning day. It is unfortunate that the missing component here appears to be coming from the Forest Service.

We would appreciate hearing what steps the Forest Service is willing to take to address our concerns with this and upcoming projects on the Boise National Forest.

Sincerely,

Arthur Beal, BFC Steering Committee Member
 Randy Fox, BFC Steering Committee Member
 Morris Huffman, BFC Steering Committee Member
 John Roberts, BFC Steering Committee Member
 John Robison, Idaho Conservation League and BFC Member
 Rachel Vandenburg, BFC Steering Committee Member

cc:

Lynn Oliver
 Linda Jackson
 Ara Andrea
 Craig Foss
 Dustin Miller
 Tim Garcia
 Pete Gomben
 Christopher Moyer

⁵ <https://academic.oup.com/forestsscience/article/67/1/49/6080199?login=true>