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May 9, 2022

Linda Jackson  
Forest Supervisor  
Payette National Forest  
500 North Mission Street  
McCall, Idaho 83638

Electronically Submitted Through Project Webpage:  
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=61229>

**RE: Idaho Conservation League's Scoping Comments for the Proposed Railroad Saddle Project**

Dear Ms. Jackson:

Please accept the Idaho Conservation League's scoping comments for the proposed Railroad Saddle Project. Since 1973, the Idaho Conservation League has had a long history of involvement with public lands issues. As Idaho's largest state-based conservation organization, we represent over 35,000 supporters who have a deep personal interest in restoring our forests to more resilient conditions and reducing the likelihood of uncharacteristic wildfires. We also work to restore wildlife habitat and improve ecosystem and watershed health.

We appreciate the details included in the scoping notice and the interactive story map that the Forest Service developed for the project. ICL understands that the Cold July Project retains a vegetation management and watershed improvement focus as we begin to redesign and appropriate resources to accomplish Forest Service and Payette Forest Coalition goals in the Lost Creek/Boulder Creek area, and we generally support these efforts.

We support the general comments submitted by the Payette Forest Coalition (PFC), of which ICL is a long-time member in good standing. Included in our comments are some specific recommendations that we believe should be considered in the Railroad Saddle Environmental Assessment and incorporated into the proposed actions. These comments focus primarily on specific recommendations regarding vegetation management treatments and watershed improvements, which are central themes of the project's Purpose and Need.

We do have concerns, however, about the increased amount of regeneration harvests compared to that approved in the Lost Creek Boulder Creek (LCBC) decision. We recommend that the Forest Service clearly outline the justification for the vegetation management deviation from the

original LCBC prescription treatments. This should include changes in the project area that support using regeneration harvests and how the Forest Service will analyze each polygon for actual sizing and implementation. We also have concerns with the proposed recommissioning of 3.2 miles of road previously decommissioned, believing this proposed action represents a potential poor use of limited resources. Further, we believe that the Forest Service could be opening itself up to unwanted critique regarding road decommissioning and best use of limited capacity and resources. Therefore, we recommend that the agency reconfigure treatment units in a way that alleviates the need to recommission these roads. If that is not possible, the Forest Service should clearly explain why these roads will be needed now and in the future, and what the agency will do to prevent a situation like this from arising in the future. Our detailed comments and recommendations on these topics, and others, are found in the attached document.

Thank you for the opportunity to submit comments for the proposed Railroad Saddle Project. Should you have any questions regarding these comments and recommendations, please do not hesitate to contact me. We look forward to working with the New Meadows Ranger District on this and future projects.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Randy Fox".

Randy Fox  
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Idaho Conservation League  
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# Idaho Conservation League's Scoping Comments for the Proposed Railroad Saddle Project

## Payette Forest Coalition Aligned Comments

The Idaho Conservation League (ICL) concurs with the comments submitted to the Payette National Forest (PNF) by the Payette Forest Coalition (PFC), an organization committed to building diverse community support for forest restoration projects. ICL retains an active role within the collaborative and is a member in good standing. The PFC's specific comments and recommendations are:

- The majority of the road/route treatments occur in subwatersheds that do not have anadromous and sensitive fish species present. We believe the project area could be expanded to cover a larger portion of the Boulder Creek watershed. The PFC understands this may not be feasible in this project, so we recommend that the Forest Service pursues a project in the near future that includes this area to benefit salmon, steelhead, and bull trout.
- The PFC believes the Payette National Forest should provide an in-depth discussion of the road and route treatments as to how these management actions will contribute to meeting the desired conditions outlined in the Forest Plan. The rationale should include topics such as watershed condition, fisheries, and big game security.
- Road and route considerations and treatments should be consistent with the April 22, 2021 PFC Roads and Recreation Subcommittee recommendations for projects within the former Lost Creek-Boulder Creek area. The PFC would appreciate an opportunity to review the specific road proposals and work with the Forest Service on an acceptable path forward for road actions (treatments, conversions, closures, decommissioning) in this project area.
- While the PFC understands the rationale for focusing primarily on vegetation management and watershed improvements/restoration, we encourage the Payette National forest to consider additional actions, such as recreation enhancement, while still in the project development stage. Due to the high recreational use around Lost Valley Reservoir, as well as past PFC support for recreational opportunities nearby, it makes sense to analyze motorized and non-motorized opportunities through actions such as road to trail conversion.
- The PFC provided vegetation management recommendations on April 22, 2021 that were applicable to all of the former Lost Creek-Boulder Creek area projects. The proposed action for Railroad Saddle appears that the vegetation treatments are similar to the Cold July project. We believe our April 2021 recommendations can be applied to this project as well, with the adjustments we supported for the Cold July Project.
- The proposed action identifies the need for additional non-commercial thinning in patch cut areas 10-20 years after initial treatment. The project should retain sufficient access to these areas for the future management actions needed.
- While the ePFC understands the desire to retain legacy trees to the greatest extent practicable, we believe there are limited cases where removal may be necessary. The proposed action currently states that no legacy trees will be removed associated with aspen treatments. The action alternative(s) should be modified to provide flexibility and state that legacy trees will only be removed in instances where it is necessary to achieve other management objectives such as aspen regeneration or road/trail and public safety.
- On page 12, there is a discussion of coordinating prescribed fire with resource specialists. Range specialists should be included in this section. Range specialists and

permittees should be part of the coordination of prescribed fire planning.

### **Road Management and Watershed Restoration**

We appreciate the Forest Service committing to replacing four (4) existing culverts with aquatic organism passage and removing one (1) culvert for the same, and ICL supports these actions. We also recognize the value that LIDAR provides for determining road/route locations and conditions, and we appreciate the Forest Service incorporating its use while determining the extent and condition of the project area's system roads and unauthorized routes. ICL recommends the Payette National Forest use language and terminology consistent with the Forest Plan and the Forest Service Manual which was updated on March 22, 2022. There is still some confusion regarding the difference between unauthorized routes, which are formally recognized in both the Forest Plan and Forest Service Manual, and undetermined routes, which are not covered or defined in either document.

Regarding non-system unauthorized routes, the Forest Service Manual states, "If unauthorized routes are not designated, motor vehicle use and OSV use on these routes is prohibited (36 CFR 261.13, 261.14). Consider addressing restoration and decommissioning of unauthorized routes when making travel management decisions," (Forest Service Manual, March 22, 2022, Chapter 10, page 26). ICL supports the use of the Travel Analysis Plan and Travel Analysis Report (TAP/TAR) for this project, and given the controversial nature of route removal, we recommend the agency fully explain this analysis process in the project's Environmental Assessment, complete with linkage to the current conditions, the effects to hydrology and watershed function. We believe that any decisions the agency makes should have a strong scientific basis that provides common understanding. While this may take more effort to include in the forthcoming EA, we believe that any proactive work the Forest Service completes during the analysis process will contribute towards producing a better project for the agency and the public.

ICL concurs with the agency's proposals to remove nearly 130 miles of "undetermined" routes from the landscape, while rerouting another 18 miles of system roads to avoid Riparian Conservation Areas (RCAs). However, with an existing road ratio of 9 miles per square mile in the project area, even with these proposed significant reductions that will lower the density to a 6:1 ratio, the watershed health indicators will continue to remain well above a Functioning at Acceptable Risk level. Therefore, we encourage the agency to continue identifying cherry stem roads that provide little for access and recreation that could be removed from the landscape during the course of the project. We also recommend that the Forest Service consider placing seasonal or administrative closures on the 27.4 miles of "undetermined" routes being proposed for inclusion in the National Forest System Roads, and if any of those segments can be permanently decommissioned without affecting management access or posing significant impacts to recreation, we encourage the agency to fully decommission and obliterate those sections.

Given the high road density in the project area combined with the absence of any reference to temporary roads in the scoping documents, we are led to believe that the agency does not require temporary roads for project implementation. If this is the case, ICL believes that it is in the agency's best interest to clearly state that no temporary roads are proposed for the Railroad Saddle project. If this is not the case, we ask that the Forest Service include an estimated mileage and temporary road location and update the story map accordingly.

### **Wildlife, Fisheries, and Botanical Resources**

ICL appreciates the Forest Service providing a list of all Endangered Species Act (ESA) listed fish, wildlife, and plants found within the project area. However, the list does not include mussels, which are found in some of the project area streams and creeks. We recommend that the forthcoming EA include all information regarding the presence or absence of mussel species within the PA, and adjust vegetation treatment prescriptions accordingly to ensure that habitat and species requirements continue being met. However, we did note that the Western pearlshell mussel (*Margaritifera falcata*) is not included in the list of sensitive species. While the species remains widespread in the northwestern United States, regional and localized declines are occurring, with documented localized and watershed level extirpations being common. Idaho, along with Oregon, California, and Montana, all consider the species either potentially at risk or at risk due to limited or declining population numbers. We recommend the Forest Service include this cold water mussel species in the Railroad Saddle analysis and report on the presence, absence, and current condition of available habitat.

### **Prescribed Fire**

ICL recognizes the need to return fire to the natural system, and supports the use of prescribed fire in the Railroad Saddle project area, including the 540 acres of the Rapid River Inventoried Roadless Area. However, following two summers of intense smoke in the Payette region, primarily coming from large fires in California, Oregon, and Washington, local tolerance for additional smoke and prescribed burning appears to be low. We recommend the Forest Service include a section of the EA that covers the benefits of prescribed burning, the need for returning fire to the natural system, and the benefits of burning during the spring/fall seasons. We believe the agency could host informational meetings or events that cover the benefits of prescribed fire, and we recommend the Payette National Forest enlist the help of the PFC and its members to help tell this important story.