

OFFICE OF SPECIES CONSERVATION

BRAD LITTLE
Governor



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MICHAEL R. EDMONDSON
Administrator

304 N. Eighth Street, Suite 149
Boise, Idaho 83702-5833

May 9th, 2022

Attn: Railroad Saddle Project
New Meadows Ranger District
PO Box J
New Meadows, ID 83654

RE: Railroad Saddle Project Scoping Period

Dear District Ranger Harris,

The State, through the Idaho Governor's Office of Species Conservation (OSC), appreciates this opportunity to provide input to the New Meadows Ranger District's Railroad Saddle project scoping period. The proposed action includes vegetation management activities, including commercial timber harvest, non-commercial thinning, and prescribed fire, and watershed restoration and road management activities.

OSC and the Idaho Department of Fish and Game sent a letter to the Payette National Forest (PNF) dated 2/18/22 requesting that treatment of Lower Butter site be accomplished in 2022 to facilitate U of I research into post-treatment effects on northern Idaho ground squirrel (NIDGS). We commend the PNF for including this treatment in this EA to ensure its completion. However, it is clear from the timeline of this EA that this treatment will not occur in 2022. We recommend the forest evaluate options for accomplishing treatments at this site sooner, and work with University of Idaho researchers to determine how to continue facilitating research if this is not possible.

Within the project, it seems like there may be more opportunities for NIDGS and white-headed woodpecker (WHWO) habitat improvements within the acres of regeneration harvest that have yet to be identified, as well as managing and improving motorized recreation opportunities. The State looks forward to an opportunity to assist in those evaluations.

Below are comments and questions identified by OSC, Idaho Department of Fish and Game (IDFG), and Idaho Department of Parks and Recreation (IDPR) during our review of the scoping document. If you have any questions regarding these comments, please contact OSC's Federal Lands Coordinator Jace Hogg at 208 332 1553; jace.hogg@osc.idaho.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Edmondson".

/s/ Mike Edmondson
MIKE EDMONDSON
Administrator

Road Densities and Management

Reference: “Road management activities are proposed to support the project’s SWRA objectives and desired conditions in the forest plan, as well as move the area towards a more efficient transportation system, as shown in table 5.”- pg. 13, Proposed Action

Comment: Reducing road density from the current 9 mi/mi² to 6 mi/mi² will help achieve improved watershed conditions for native redband trout, especially managing roads that are within RCAs. The PNF should also consider managing or identifying areas within the New Meadows Ranger District that can:

- Contribute to elk habitat security in the form of 250 + acre blocks, ½ mile away from roads, and are untreated or minimally treated. (Vavra et al. 2005)
- Have routes not needed for vegetation or fire management be converted to a recreational designation (motorized trails, looping opportunities, dispersed camping access, etc.).

Reference: Table 5, pg. 13, Proposed Action

Comment: The PNF should specify in the upcoming analysis what designation the 27.4 miles of undetermined routes added to the NFSR will have. IDPR requests that the Forest Service give consideration to designating some of these routes as official motorized routes available for the public to utilize, as well as continuing to evaluate if other existing unauthorized routes can be added to the National Forest Road System for public use.

Reference: “The Idaho Department of Transportation (IDT) completed a transportation analysis for the project area to inform the development of this portion of the proposed action.”- pg. 13, Proposed Action

Comment: In the upcoming environmental analysis, the PNF should provide more background and detailed information on IDT analysis. What process(es) did IDT use for their analysis, were local recreation groups consulted with?

Northern Idaho ground squirrel, White-headed woodpecker

Relevant NIDGS Forest Plan Sections: Chapter 3, Management Area 3: Weiser River:

Goal 0331: Restore northern Idaho ground squirrel habitat quality, abundance, and connectivity to promote recovery of the species.

Standard 0339: The northern Idaho ground squirrel will receive priority consideration for all management activities that occur within their known occupied habitat. The intent of this standard is not to exclude all other activities within this habitat, but rather to reduce or minimize potential impacts to this species while emphasizing habitat improvement within and *adjacent to known sites*.

Reference: Purpose and Need 1c

Comment: One stated purpose and need for project is: “...improving habitat for wildlife species of concern, including NIDGS and WHWO.” However, only mention of improving habitat is at one site (Lower Butter) for NIDGS. Please detail other anticipated habitat improvement projects or other potential benefits to both NIDGS and WHWO.

Reference: NIDGS Study Site, pg. 11, Proposed Action

Comment: While the scale of maps provided with scoping package is helpful for visualizing the vegetation treatment areas and road management activities, it makes assessing treatment types and location relative to NIDGS sites extremely difficult. The State respectfully requests that the PNF provides IDFG and OSC with GIS files of project boundary, proposed treatments, and road recommendations for clearer analysis of potential effects on NIDGS and other wildlife.

Reference: NIDGS Study Site, pg. 11, Proposed Action

Comment: Outside of the Lower Butter site, there may be other opportunities for NIDGS habitat improvement that can be included in the upcoming analysis. The scoping document states that there are still 1,070 acres that have an undetermined regeneration harvest prescription. The University of Idaho post treatment research to examine NIDGS response to thinning and burning, mentioned above, has a target of <15% canopy cover for treated sites (Allison et al. 2020). It should be recognized that the proposed treatments for Railroad Saddle (in their current form) are likely would improve habitat for their main competitor, Columbian ground squirrels, in addition to, or instead of, NIDGS. Suitable NIDGS habitat occurs primarily on southeast, south, and southwest aspects. Treatments on other aspects provide little benefit to NIDGS. Therefore, the State recommends:

- Evaluating how many acres within the 1070 undetermined acres that are near occupied NIDGS sites that are on southeast, south, and southwest facing aspects that could reduce canopy cover to <15% while following applicable Weiser River Management Area goals and objectives outlined in the Forest Plan.
- Adopting the Wildlife Project Design Features 1-8 from the Cold July EA.