



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

Dear Supervisor Jackson,

The Payette Forest Coalition (PFC) wishes to express our appreciation to you and the Railroad Saddle Interdisciplinary Team (IDT) for the opportunity to comment on the Draft Environmental Assessment for the Railroad Saddle Project.

Coalition members received an overview of the Draft Environmental Assessment at our January 19th, 2023 meeting. Forest Service staff also outlined how the Draft Environmental Assessment addresses specific comments that the PFC provided during the scoping period.

The PFC has reviewed the vegetation treatments contained in the Railroad Saddle Draft EA, including the outcomes displayed within the tables in Appendix D. While it's possible to deduce which commercial treatments would be occurring in which vegetation type, i.e., which PVG, from the information provided in the Draft EA, we feel it would be beneficial to understanding the intent of the commercial treatments to show the proposed treatments by PVG along with the desired outcome of the treatment in terms of ecological or wildfire management benefit.

For example, if 300 acres of free thinning are proposed within PVG 5, why not state so and also identify the anticipated outcome of those treatments, e.g., "to create an additional 300 acres of low to moderate canopy closure large tree size class stands that will be better able to withstand low to moderate intensity wildfires and be less susceptible to insect and disease outbreaks. The proposed treatments would reduce the acres of large tree size class stands with high canopy closure by 7% (from 46% to 39%) immediately following treatment."

The PFC encourages the Forest Service to clearly identify the number of acres that are available for treatment in each vegetation type (PVG) to achieve the stated objectives of the project, e.g., "there are a total of 950 acres of large tree size class stands that could be treated to reduce

canopy closure to increase stand resilience to wildfire and reduce insect and disease outbreaks within PFG 5. Of those acres, 510 acres are proposed for treatment primarily because they lie outside of riparian conservation habitat, are not within landslide prone areas and will create the best mix of habitats for wildlife species that depend upon higher density stands."

Also, if the non-commercial and/or prescribed fire treatments are anticipated to have a significant effect on the vegetation objectives, such as tree size class or stand canopy closure, we recommend those effects be identified in the vegetation section.

These changes would help the PFC and the public assess the parameters that would best allow them to understand what's being proposed and why, as well as to make informed comments on this and future projects proposed by the agency.

In light of the recent listing of white bark pine, the Coalition recommends the PNF limit the use of prescribed fire where white bark pine exists. We encourage the use of existing livestock grazing programs for the fine fuels management in those areas.

In general, the PFC supports the proposed action and believes it will move the landscape closer to desired conditions. However, the Coalition fears that the anticipated incremental changes are not significant enough to reduce the probability of uncharacteristic wildfire immediately following treatment. We encourage the Forest Service to maximize the impact of these vegetative treatments to reduce canopy closure in medium and large tree stands within Potential Vegetation Groups (PVGs) 1-5 as well as modify the mix of tree size classes in PVGs 5 and 6.

We urge the Forest Service to adequately sign temporary road closures that may be part of the project in order to prevent unauthorized entry.

Finally, we ask that the Forest Service provide the PFC with ample opportunity to review and comment on future projects, ideally over two regularly scheduled monthly PFC meetings.

We thank the Forest Service line officers and specialists for your participation and engagement with the Coalition. We look forward to continuing our engagement with the Payette National Forest throughout the NEPA process.

Thank you once again,
PFC Steering Team