

OFFICE OF SPECIES CONSERVATION

BRAD LITTLE
Governor

MICHAEL R. EDMONDSON
Administrator



P.O. Box 83720
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304 N. Eighth Street, Suite 149
Boise, Idaho 83702-5833

February 8, 2023

Attn: Railroad Saddle Restoration Project
PO Box J, 3674
New Meadows, ID 83654

RE: State of Idaho Comments on Railroad Saddle Project Draft EA

Dear District Ranger Harris,

The Idaho Governor's Office of Species Conservation (OSC) is dedicated to planning, coordinating, and implementing the State's actions to preserve, protect and restore species listed as candidate, threatened, and endangered under the federal Endangered Species Act (ESA). This work is done in coordination with the State's natural resource agencies and input from the citizens of Idaho, while taking into consideration the economic vitality of the State.

The State of Idaho, coordinated through OSC, appreciates the opportunity to provide comments on the Payette National Forest's (PNF) Railroad Saddle Restoration Project Draft EA. The State provided comments during the scoping period for this project back in May of 2022. These comments largely centered around additional detail on the University of Idaho north Idaho ground squirrel (NIDGS) study site, Lower Butter, treatment schedule, what NIDGS habitat improvement opportunities were available within the unidentified treatment acres that were included during scoping, what treatments were available to improve white headed woodpecker habitat, as well as comments related to road densities, road to trail conversions, and user created route to Forest System road or trail recreation opportunities.

After reviewing the draft EA, it is clear that the State's comments and concerns were heard and incorporated into the analysis. The summary of findings under 'Wildlife' outlines how the treatments meet the Payette National Forest Plan Standard 0339 that the State referenced in our scoping letter. Additional design features based on the latest science and input from the NIDGS Technical Working group are incorporated, ensuring protections for NIDGS while allowing treatments to be carried out in and around occupied NIDGS habitat. Additionally, the State had requested non-system and inventoried non-public routes identified for decommissioning instead be considered for conversion to public recreational trail, which the draft EA identifies multiple new recreation opportunities.

Attached are additional comments from the State based on the review of the draft EA. If you have any questions about these comments, please reach out to our Federal Lands Coordinator, Jace Hogg jace.hogg@osc.idaho.gov; 208 332 1553.

Sincerely,

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

/s/ Mike Edmondson
MIKE EDMONDSON
Administrator

Recreation

IDPR's Motorized Trail Program has agreements with USFS Regions 1 and 4 to assist in the maintenance of all OHV trails under 50 inches in width on National Forest lands across the State of Idaho. IDPR's interest is the protection of any capital and labor investments expended over the years maintaining good conditions of OHV trails across the state. While the Trail Program does the ground works to assure continued access to exiting motorized trails, IDPR will advocate for the addition of new trail miles to the system wherever possible, for the benefit of its approximately 165,000 OHV registrants who fund the activities of the Program.

Under its agreements with USFS Region 4, IDPR pledges its continued commitment to assist the New Meadows Ranger District in providing high-quality motorized trail experiences, by supporting implementation of the new trail proposal however possible. IDPR resources remain available to the FS such as trail-building expertise of Trail Program staff, the Trail Cat Program, and the Grant Program.

Reference: Proposed Action, "Road and trail management and watershed restoration activities", pg. 13

Comment: The State encourages the Ranger District to investigate, in separate future land use scoping, creation of looping opportunities with the new trail by connection to trails in other nearby drainages.

Reference: Table 4: Proposed Road Management Activities, pg. 14

Comment: The State supports the proposal to add and designate for public use, 10 miles of new single-track motorized trail in the Railroad Saddle Project high above the Lost Creek watershed.

Whitebark Pine

Reference: Table 9: Endangered Species Act determinations

Comment: *Pinus albicaulis* (whitebark pine) was listed as Threatened on the Endangered Species Act in December of 2022. This table, as well as anywhere else the whitebark pine is mentioned, should be updated to reflect the new listing status of the species.

North Idaho Ground Squirrel

Reference: Proposed Action, "Northern Idaho ground squirrel habitat treatments" – pg. 10

Comment: The second paragraph in this section ends abruptly. It is unclear if the section was supposed to conclude after the last sentence (starting with "Coarse woody debris...") or if there is supposed be additional content here.