May 9, 2023

NOTICE OF OBJECTION

Objection Reviewing Officer

USDA Forest Service Intermountain Region

324 25th Street

Ogden, Utah 84401

Responsible Official: Linda Jackson

Reviewing Officer, Rosana Barkawi

RE: USFS Payette Forest New Meadows Ranger District Railroad Saddle Restoration Project

***Transmitted via email and submitted on-line at USFS project site, e-mail to:* objections-intermtn-regional-office@usda.gov**

Dear Forest Service,

Pursuant to 36 CFR Part 218, WildLands Defense (WLD) Lead Objector, and Alliance for the Wild Rockies, Native Ecosystems Council and Yellowstone to Uintas Connection are submitting this Objection to the New Meadows Ranger District Railroad Saddle Restoration Project.

Yellowstone to Uintas Connection is a 501c3 non-profit entity working to restore fish and wildlife habitat including the Regionally Significant Wildlife Corridor connecting the Greater Yellowstone Ecosystem to the Uintas Mountains and Southern Rockies through the application of science, education, and advocacy. Through the years Yellowstone to Uintas Connection and our members have observed the steady destruction and degradation of the natural character, water quality, and wildlife habitat integrity of the Regionally Significant Wildlife Corridor from human developments including energy development, mining, livestock grazing, motorized recreation, and logging on public and private land. 2

Alliance for the Wild Rockies is a 501c3 public interest organization whose mission is to secure the ecological integrity of the Wild Rockies Bioregion through citizen empowerment and the application of conservation biology, sustainable economic models, and environmental law. Alliance for the Wild Rockies is headquartered in Helena, Montana.

Native Ecosystems Council is a 501c3 public interest organization whose staff reviews Forest Service National Environmental Policy Act (NEPA) assessments of logging impacts on wildlife in Montana and Idaho. NEC is headquartered in Willow Creek, Montana.

Wildlands Defense is a 501c3 public interest organization dedicated to protecting and improving the ecological and aesthetic qualities of the wildlands and wildlife communities of the western United States for present and future generations. WLD does so by fostering the natural enjoyment and appreciation for wildlands habitats and wildlife by means of legal and administrative advocacy, wildland and wildlife monitoring and scientific research, and by supporting and empowering active public engagement. Wildlands Defense has offices in Boise and Hailey, Idaho.

Our organization staff and members would be directly affected by this project and past and ongoing actions or inaction by the Forest Service on these lands and watersheds that are vital for biodiversity protection, as well as the consequences of other connected and cumulative actions the USFS has authorized on federal land. The Railroad Saddle project would directly and significantly harm us and our members, who use the Payette National Forest and project area lands in question aforementioned for quiet recreation, enjoyment of the natural world, bird watching, nature photography, scientific pursuits, aesthetic and spiritual purposes. The proposed actions take a sledgehammer to complex already stressed watersheds and species habitats, rather than a careful targeted approach using current scientific and common sense information on the need for biodiversity protection and the knowledge that the types of actions the USFS is proposing are very likely to worsen the very “problems” the EA actions claims to solve. See for example: <https://www.nevadacurrent.com/2023/01/25/scientist-trees-felled-in-vain-in-name-of-fire-control/>

“*A dense, mature forest with high canopy cover “means more cooling shade during the summer, and that means everything on the forest floor stays more moist,” Hanson explains. “More trees, bigger trees, act as a windbreak against the winds that drive the flames.”*

*The vast majority of homes that burn in wildfires – about 90% – are ignited by* [*embers*](https://www.frontlinewildfire.com/wildfire-news-and-resources/wildfire-embers-how-homes-catch-on-fire/)*, carried on the winds, sometimes from miles away in advance of the flames, experts say.*

*Hanson says government efforts would be better spent assisting property owners, at a nominal cost, harden their homes against fire by making them less vulnerable to embers entering the structure, and by creating defensible space around property by removing overhanging branches and other hazards within 100 to 200 feet”.*

And: “*An example, according to Hanson, is the 2021 Caldor Fire, which burned 221,835 acres in the Sierra Nevada and Eldorado Valley over a more than two-month span, destroyed more than 1,000 structures, and prompted the evacuation of more than 50,000 residents.*

*Hanson says large areas south of the town of Grizzly Flats were subjected to commercial logging.*

*“Fire officials told everyone it would stop the fire and protect the town,” he says. “We saw tragic consequences of that. If you look at the other side of the Caldor fire, there was very light touch removal of smaller trees immediately adjacent to homes in the Myers area, and those homes didn’t burn. But that’s not logging.*”

The EA actions will destroy maturing, mature and old growth forests using fire and heavy equipment and chainsaws, to the great detriment of many species our organizations work to preserve – Fisher, Wolverine, native salmonids, migratory songbirds, Flying Squirrels, Sbnowshoe Hare, Flammulated Owl, Dusky Grouse, and many others. The EA actions will thus deprive our members of enjoy8ing, viewing, studying, photographing these beautiful animals and the habitats upon which they rely.

Organizational Interests:

The following Objection is based on wildlife, wild lands, weeds, grazing impacts, climate change impacts biodiversity, sensitive and imperiled species and other concerns raised in our comments on this project.

**OBJECTION ISSUES**

It is very difficult to understand how such large-scale disturbance leveling and/or seriously fragmenting beautiful native forests and shrublands and destroying habitat for a host of decline migratory birds and other wildlife could be considered “restoration”. We believe this project, as described in the EA will instead cause serious and irreparable ecological harm to national Forest lands, watersheds and biota already suffering intensive livestock grazing, disturbance and irreversible flammable weed spread harm, motorized use watershed and habitat degradation, and a huge number of permanent as well as “temporary” routes (the latter are often in reality still used by vehicles and they have inflicted long-standing and often permanent harm to watersheds and habitats for rare and imperiled aquatic species. Climate change stress amplifies the significant harms being caused by both grazing and route disturbances.

Further, this latest logging/thinning/burning and other forms of “treatment” assault on the already greatly battered and fragmented west-side area of the Payette Forest suffers from serious baseline data and analysis deficiencies. For example, in the context of watersheds and aquatic/riparian species habitats and populations

The FS has failed to conduct adequate current detailed sediment, bacteria and other aquatic habitat, water quality and quantity studies across impacted lentic and lotic sites (the EA and reports appear devoid of any lentic-wetland information whatsoever) so that a solid environmental baseline and mitigation and minimization measures can be established for these large-scale treatments and expanded roading and erosion that will impact water quality, quantity and aquatic biota. There is also no baseline flow data and other essential information provided, and no site-specific analysis of how much hotter and hostile to cold water biota the combined activities will make stream and wetland waters, as examples. We Object to these deficiencies.

There are huge failures to examine forest and shrub land upland communities and their current ecological condition and juxtaposition in the landscape, as well as stand tree age classes and important forest sites. Where are all sites that have never been logged or ‘treated” and how many acres di these sites comprise? How much old growth has been logged and/or treated since the 2003 forest plan was finalized? Where is it located? What rare and sensitive species habitats and watersheds were impacted/ What areas of the Forest contained mature and old growth forests and mature and old growth shrublands at the time of the Payette Forest plan completion? What is the current acreage and location of these sites, and how much old and mature forest and shrubland of each type has been “treated” by the USFS, logged, burned in a wildfire or otherwise reduced, diminished or altered? What foreseeable additional projects are proposed, underway or in the planning stages? How was old growth forest or shrubland defined and delineated at the time of the Forest Plan adoption? How is it defined in this EA process? How was a mature forest or shrubland defined and delineated at the time of the forest plan, and how is it defined or delineated now? We Object to the failure to take a hard, honest look at these significant issues. Instead the USFS uses fire fearmongering and old flawed vegetation models to justify its actions.

The USFS has not detailed how the definition, accounting for and application of on the ground management of old growth/old forest habitat may have changed since the adoption of the 2003 Forest plan. Further, the FS not examined how the new forest old growth study by the Biden administration released in April 2023 defines old forest habitats. We object to the lack of all of this detailed analysis and a hard look to determine compliance with NFMA and NEPA.

The USFS also uses the presence of insects impacting trees in the forest in “health” claims, and in part to justify its actions. Yet, it appears to us that the more the Forest logs, treats, thins, and burns, the worse the insect problems become. Just look at Sagehen on the Boise Forest, where a conditions-based management scheme was proposed but a whole series of logging projects were already underway ostensibly to “control” insects. Now the USFS has re-scoped Sagehen and wrings its hands about insects (and fails to mention the proliferation of weeds the logging had already caused) . What did the FS expect there ? Its ongoing logging in various project units or under pre-existing authorizations before the Sagehen EA decision was withdrawn after environmental groups sued over the USFS’s “condition-based management” (akin to what is proposed here in railroad saddle) was killing and injuring trees with skid trails, felling injuries, etc. – and resulting in a major loss of shade creating hotter, drier, more stressed interspersed and adjacent forest lands. The USFS itself was creating ideal conditions for insect and pathogen spread, and chronic ‘forest health” problems. Forest insect outbreaks are often a response to climate change stress and weather conditions, and other factors, and will not be cured by “chainsaw medicine”. In fact, ‘chainsaw medicine” and fire projects such as those proposed in the EA result in hotter, drier, windier and harsher sites that places more stress on adjacent and surrounding remaining forest areas and stands - exerting heat and other stress on the unlogged, “untreated” forest stands. The immense amount of logging thinning, burning, heavy equipment skidding and other mechanical use will also injure and kill vast numbers of remaining or “leave” trees or forest stands in the project area. These injuries that themselves may weaken or kill trees will serve to attract even more insects that the USFS considers to be pests as well as forest pathogens – to the project area. Thus, any claims that there will be significant “leave” trees, patches or forest density and wildlife habitat and watershed protection areas remaining post-treatment cannot be relied upon in the EA. These ramifications and after effects of the barrage of Railroad Ridge treatments staggered over a long period of time will all worsen the ecological conditions, lead to large amounts of unplanned/unassessed/unforeseen forest cover loss. Thus, the amount and quality of imperiled, rare and sensitive species and migratory bird and big game habitat that remains. We Object to the USFS failing to take a hard look at all of these serious ecological, biodiversity sustainability and climate concerns.

The EA has failed to take a current hard science-based and common sense real world look under NEPA at the full spectrum of ecological harms that will result from, and be set in motion by, this major federal action that requires an EIS-level analysis with a reasonable range of alternatives – instead of the absurdity of only looking at the No Action (which suffers from gaping baseline data and analysis deficiencies in the EA and specialist reports) and a sole single ‘action”. A FONSI cannot be signed for a project of this scale and magnitude that would apply so many major new disturbances to remnant areas of less disturbed watershed and aquatic species habitats and sensitive and important wildlife and migratory bird habitats, especially one with such gaping site-specific information and hard look analysis of the full range of ecological stressors and grazing, climate and other disturbances and deficiencies. Further, the specific “treatment” (or series of “treatments” and the baseline surveys for biota and site-specific ecological conditions such as stand composition and presence old growth trees and/or stands, or the volume of wood that will be produced/removed from the forest and other extremely basic forest management information are not provided. Nor is there any specificity regarding the timing sequence of the treatments provided. This is similar to the highly controversial “condition-based management” of the Sagehen project. We Object to this huge amount of uncertainty surrounding the details of the site and projects. One basic purpose of EPA is to obviate uncertainty, and “look before you leap” so effects ca be understood and if the action goes forward, be properly minimized and mitigated. Understanding the basic forest stand features in all areas to suffer “treatments” is also necessary to ensure compliance with climate goals, old growth goals and other federal USFS policy and mandates, as well as to meet the sustainability and species conservation requirements and other elements of the Forest plan.nAll of this essential and basic site information is not considered in the EA. The concerns we raise here must be thoroughly explored and addressed in a new NEPA analysis at the level of an EIS.

With every passing wildfire season, the public becomes more aware that that the most fire-prone forests are those that have suffered major thinning or other treatment and human manipulation. The science on grazing causing irreversible and flammable weeds is irrefutable

The Biden administration has very recently issued several recent directives concerning protection of old growth forests. Yet the welter of EA forest disturbance, clearing, reduction and fragmentation actions would substantially diminish both maturing forests on their way to being mature and/or old growth, as well as current old growth.

EA at 134; “Executive Order 14072

Executive Order 14072 – “seek opportunities, consistent with the IIJA [Infrastructure Investment and Jobs Act], to conserve our mature and old-growth forests on Federal lands and restore the health and vibrancy of our Nation's forests by reducing the threat of catastrophic wildfires through ecological treatments that create resilient forest conditions using active, science-based forest management and prescribed fires; by incorporating indigenous traditional ecological knowledge; and by scaling up and optimizing climate-smart reforestation.” Section 2 states “my Administration will manage forests on Federal lands, which include many mature and old-growth forests, to promote their continued health and resilience; retain and enhance carbon storage; conserve biodiversity; mitigate the risk of wildfires; enhance climate resilience; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable local economic development.”

Further, it is now May 8, and this review must be provided to the public and a new Draft EA issued and sweeping changes made to this project to address the large-scale lack of old growth across this and other Region 4 Forests. The Executive Order directs that an inventory of old growth and mature forests on Federal lands is to be completed by April 27, 2023.

See: <https://www.usda.gov/media/press-releases/2023/04/20/biden-harris-administration-announces-new-steps-climate-resilience>

Today, in anticipation of the upcoming Earth Day celebrations, the U.S. Department of Agriculture (USDA) and the Department of the Interior (DOI) announced actions to foster forest conservation, enhance forest resilience to climate change, and inform policymaking on ensuring healthy forests on federally managed lands administered by the USDA Forest Service and the Bureau of Land Management (BLM).

To support these actions, USDA and DOI worked together to develop several reports, as directed by President Biden’s Executive Order on [Strengthening the Nation’s Forests, Communities, and Local Economies (E.O. 14072)](https://www.whitehouse.gov/briefing-room/presidential-actions/2022/04/22/executive-order-on-strengthening-the-nations-forests-communities-and-local-economies/), which he signed on Earth Day 2022. The Executive Order calls for inventorying mature and old-growth forests, setting reforestation targets on federally managed lands, and analyzing reforestation opportunities on state, Tribal and private lands. In addition, the Forest Service is releasing a new tool that illustrates the risks and vulnerabilities of climate change across the landscape along with a call for public input on how national forests and grasslands should be managed for climate resilience.

These actions represent concrete progress on the goals and priorities outlined one year ago in President Biden’s Executive Order, Secretary Vilsack’s [Memorandum on Climate Resilience and Carbon Stewardship](https://www.usda.gov/media/press-releases/2022/06/23/secretary-vilsack-directs-usda-forest-service-take-bold-action), as well as in the [USDA Forest Service’s Wildfire Crisis Strategy](https://www.fs.usda.gov/managing-land/wildfire-crisis), [Climate Adaptation Plan](https://www.usda.gov/sites/default/files/documents/4_NRE_FS_ClimateAdaptationPlan_2022.pdf) (PDF, 26.1 MB), and [Reforestation Strategy](https://www.usda.gov/sites/default/files/documents/reforestation-strategy.pdf) (PDF, 7 MB).

“Our forest ecosystems and communities are struggling to keep up with the stresses of climate change, whether it’s fire, drought, or insect infestations, it is clear that we must adapt quickly,” said **USDA Under Secretary for Natural Resources and the Environment Homer Wilkes**. “The USDA and our federal, tribal, state, local and community partners are working together to meet these challenges, pooling knowledge, sharing resources and discovering new ways to conserve resources, protect communities and ensure future generations can enjoy the countless benefits our forests provide.”

“Healthy, resilient forests are critical to helping us respond to the climate impacts being felt by communities across the country, because they store carbon, provide clean air and water, and sustain biodiversity,” said **BLM Director Tracy Stone-Manning**. “The reports released today will help enhance our work to protect and grow forests by creating a scientific framework for further study and public engagement for effective forest management and protection.”

**Newly Released Joint Reports on Forest Conservation**

The Mature and [Old-Growth Forest report](https://www.fs.usda.gov/sites/default/files/mature-and-old-growth-forests-tech.pdf) defines what mature and old growth forests are, establishes the first-ever initial inventory of those forests, and shows their distribution across lands managed by the USDA Forest Service and the Department of the Interior’s Bureau of Land Management. The initial inventory identified more than 32 million acres of old-growth and around 80 million acres of mature forest across 200 types of forests. The initial inventory found that old-growth forest represents 18% and mature forest another 45% of all forested land managed by the two agencies. Recognizing the many values of mature and old-growth forests, both agencies conducted significant outreach to gather public input from communities, tribes, scientists, and agency professionals in the report’s development.

Like all the nation’s forests, mature and old-growth forests are threatened by climate change and associated stressors. The initial inventory and definitions for mature and old-growth forests are part of an overarching climate-informed strategy to help retain carbon, reduce wildfire risk, and address climate-related impacts, including increased insects and disease.

As directed in President Biden’s Executive Order and laid out in the report, the USDA Forest Service and the Interior Department’s Bureau of Land Management will use these definitions and initial inventory to continue to refine results, assess threats to old growth and mature forest stands, and conduct public engagement. In the near future, the USDA and BLM also plan to incorporate information gathered from the National Aeronautics and Space Administration’s (NASA) Global Ecosystem Dynamics Investigation mission, which will provide forest inventory and analysis plots using space-based laser measurements. These efforts will help the agencies meet the science-based approach required in the executive order as well as develop management policy and strategies to recruit, sustain, and restore mature and old-growth forests.

[Pinyon and juniper woodlands](https://www.fs.usda.gov/sites/default/files/pinyon-juniper-fact-sheet.pdf) are the most abundant forest type in the federally managed inventory of mature and old-growth forests, with nine million acres of old-growth pinyon-juniper across BLM and Forest Service lands and an additional 14 million acres of mature pinyon-juniper. This summer, the Forest Service and the BLM will be co-hosting public workshops focused on sustaining resilient pinyon-juniper ecosystems. The workshops are intended to ensure robust public engagement and scientific expertise and knowledge are underpinning the approaches taken to fulfill the Executive Order and other management strategies for ensuring healthy, resilient pinyon and juniper woodlands.

USDA and DOI are also releasing a [joint reforestation report](https://www.usda.gov/sites/default/files/documents/joint-reforestation-report.pdf) (PDF, 471 KB) which includes reforestation targets, assessments and recommendations for increased capacity for seeds and nurseries.

In response to feedback from stakeholder engagement, the report offers recommendations to conduct seed and nursery operations, improve coordination with non-federal partners, leverage opportunities for innovation with the private sector, and build a reforestation workforce with partners like the Conservation Corps.

To develop targets for reforestation on public lands by 2030, USDA and DOI evaluated recent peer-reviewed assessments and datasets conducted on public lands and identified more than 2.3 million acres in need of reforestation. This report also includes an assessment of more than 70 million acres of possible reforestation opportunities with state, tribal and private landowners, providing valuable insight on how existing partnerships and programs could be focused where they are needed most.

Objectors highlight that there is shockingly little old growth forest left in the US, and this should give the New Meadows RD pause ad prompt it to take a step back and look at what can be done to increase old and mature forests -not reduce them to stumps or ash and weeds - as this project will do.

We Object that instead of pursuing reforestation, the Payette Forest is pursuing large-scale highly uncertain deforestation. Here is a link to the Mature and Old Growth Forests report.

“Although the iconic image of old-growth forest tends to be of moist forests that grow in highly  
productive coastal areas, extensive areas of old-growth forest occur in pinyon-juniper and other  
lower productivity forest types. Table 2 shows nationwide old-growth and mature area estimates  
for FIA forest type groups; the most extensive area of both old-growth and mature forests occurs  
in pinyon-juniper forests, followed by fir/spruce/mountain hemlock and Douglas-fir. Pinyon-  
juniper forest occurs on over 32 million acres of lands managed by the Forest Service and BLM,  
with over 9 million and 14 million acres of old-growth and mature forest, respectively”.

The Railroad Saddle project fails to assess project impacts in light of the concerns over maturing ad old growth forests on the report. The Report highlights how out of step the old Forest Plan may be.

We Object to Forest proposed decision to implement the EA proposed action alternative, including the project design features in Appendix B due to the lack of critical data and analysis necessary to make an informed decision and comply with all applicable laws – NEPA, NFMA, the Clean Water Act, cultural protections, and preservation of maturing and old growth forest and actual climate resilience – rather than stumps of the faux-“resilience’ claims of the EA.

Further, the EA claims the radical multi-level and often severe and overlapping stand and habitat disturbances to be imposed on these fragile watersheds and forest native vegetation communities will:

“*Move vegetation toward desired conditions*

*There is a need to improve the health of forest stands to increase insect and disease resiliency, and to reduce tree densities, alter fuel compositions, and decrease fuel loadings to result in less intense fire behavior and facilitate effective wildland fire response. This would support the following forest plan goals:*

*• \_TRGO01: Manage forested vegetation to achieve (a) conditions that are resilient and resistant to uncharacteristic fire, insect, and disease damage; and (b) conditions that contribute to desired vegetative conditions, including distribution of tree sizes, species composition, and canopy cover (p. III-41);* [Further disrupting natural plant community successional processes and deforesting sites will increase insect and diseases and forest health problem – not to mention causing serious habitat losses for important and sensitive species].

*• \_VEGO03: Maintain or restore vegetation conditions as described in Appendix A to reduce frequency, extent, severity, and intensity of uncharacteristic or undesirable disturbances such as fire, insects, and pathogens (p. III-30).* [As we describe in this Objection, the battery of disturbance treatments may result in increased fires and fire frequency and increased “uncharacteristic” conditions. Further, the 2003 plan is based on out-dated fire return and other information.

*• \_FMGO05: Provide for protection of life, investments, and valuable resources through appropriate vegetation, fuel, and wildland fire management (p. III-38)”.* [If this is the case, then the FS must work on the actual habitation interface, not kill trees many miles away].

USFS also refers to: “Years of fire suppression and other forest management practices”. But the EA repeats many of the very same tree killing and removal processes and habitat destruction, disruption fad fragmentation for forest communities and for a host of sensitive and important wildlife species identical to those which have caused serious ecological problems in the first place. Lands will become less resistant ad resilient as the treatments make them hotter, drier, windier and more weed-prone and cause them to dry put earlier due to lack of shade and lack of wind protection at the local and microhabitat scale. All of this will increase risk of uncharacteristic and frequent fires, and will cause fires to readily flash across the landscape – increasing threats to homeowners. This will also allow livestock to intensively exploit previously less used areas – hindering and/or preventing recovery of desired forest species and essential wildlife habitat components. We Object to the failure of the USFS to address these very important concerns, and failure to conduct analysis of a reasonable range of alternatives - rather than large-scale tree removal and watershed/habitat disturbance – that incorporate current ecological and climate science. WHY in the would the USFS expect the public to believe that creating hotter, drier, windier weedier sites more readily accessed by weed-causing succession-disrupting livestock, using methods -often heaped one on top of the other -that promote spread of forest disease and insects, will “improve” conditions or prevent fires?

The EA’s full-bore native vegetation and sensitive species and migratory bird habitat forest community manipulation in a quest to attain an artificial state based on models with flawed ad out-dated inputs, aggressive mechanized deforestation activity, drastic thinning, “large-scale “prescribed’’ burning and under burning and pile burning, mastication and other disturbance will actually result in very “uncharacteristic” conditions and uncharacteristic more frequent and high severity fires, and will also expand ease of off-road driving and vehicle use. This all will further elevate fire risk from human-caused sources due to increased ease of cross-country or off-route driving and other fire-causing activities in cleared areas, and hotter, drier, windier site conditions that favor ignition spread. We Object to the failure to take a hard look at these significant concerns, and also to fairly analyze the No Action alternative and failure to focus on specific sites in close proximity to habitation to address fire concerns under a reasonable alternative – applying a broad range of recent scientific information on how logging/thinning affect wildlife behavior and spread.

The FS proposes many road closures., but there is no need to heap these in with a major logging and “treatment” action. Why hasn’t the USFS expanded the alternative range to include a road closure only alternatives while retaining the native forests to moderate site climates resulting in cooler, less windy, less weedy, less fire-prone extant forest stands? We are also concerned that the agency has not demonstrated an ability to actually keep roads closed. We Object to the failure to provide monitoring data on the effectiveness of USFS road closures, and also to provide specific details on route sites and a specific schedule for route closures We are very concerned that a lot of logging will take place, and closures lag. We Object to the lack of a reasonable range of alternatives and the uncertainty associated to the road closures. Further, we are very concerned that over-the-snow use will take place disturbing sensitive native carnivore habitats, and the USFS has not properly detailed many significant and increasing threats to Fisher, Wolverine, Canada Lynx, Gray Wolf in these lands.

**Newly Available Information to the Public in Posted Specialist Reports**

The Railroad Saddle Fisheries Report states:   
*“ … Railroad Saddle Project) to fish and fish habitat. Endangered Species Act-listed fishes (Chinook salmon (Oncorhynchus tshawytscha), steelhead (Oncorhynchus mykiss), bull trout (Salvelinus confluentus), and R4 sensitive westslope cutthroat trout (Oncorhynchus clarkia lewisi) are not found within or downstream of the project area in the Upper West Fork Weiser River, Lost Creek, and Upper Weiser River subwatersheds. These fishes and their respective critical habitat (critical habitat is not applicable to westslope cutthroat trout) are, however, found in the Boulder Creek subwatershed, downstream and outside of the portion of that subwatershed included in the project area. The forest’s aquatic management indicator species is also the bull trout.  
Consistency with land management plan (forest plan) standards and guidelines requires that current fish habitat conditions be maintained or improved if not functioning appropriately. Brook trout (Salvelinus fontinalis) and redband/rainbow trout (Oncorhynchus mykiss) are widespread throughout the project area as well as non-game species such as sculpin (Cottus spp.), dace (Rhinichthys spp.), and redside shiners (Richardsonius balteatus) (FID 2022)”.*

The EA claims the species aren’t present, even though these are headwaters that should be occupied by Bull Trout and other salmonids but that appears top haver been too degraded by human disturbances and especially past “treatments” and logging to support these species. The FS has failed to manage these sites for species recovery and sustainability. The USFS must conduct adequate consultation with USFWS regarding this serious matter and its direct, indirect and cumulative effects. We Object to the lack of consultation.

*“ … anticipated effects of the Railroad Saddle Forest Restoration Project (hereafter referred to as the Railroad Saddle Project) to fish and fish habitat. Endangered Species Act-listed fishes (Chinook salmon (Oncorhynchus tshawytscha), steelhead (Oncorhynchus mykiss), bull trout (Salvelinus confluentus), and R4 sensitive westslope cutthroat trout (Oncorhynchus clarkia lewisi) are not found within or downstream of the project area in the Upper West Fork Weiser River, Lost Creek, and Upper Weiser River subwatersheds. These fishes and their respective critical habitat (critical habitat is not applicable to westslope cutthroat trout) are, however, found in the Boulder Creek subwatershed, downstream and outside of the portion of that subwatershed included in the project area. The forest’s aquatic management indicator species is also the bull trout.*  
*Consistency with land management plan (forest plan) standards and guidelines requires that current fish habitat conditions be maintained or improved if not functioning appropriately. Brook trout (Salvelinus fontinalis) and redband/rainbow trout (Oncorhynchus mykiss) are widespread throughout the project area as well as non-game species such as sculpin (Cottus spp.), dace (Rhinichthys spp.), and redside shiners (Richardsonius balteatus) (FID 2022)”.*

We Object to the failure of the EA to take a hard look at the significant adverse impacts of this project in degrading and not improving habitats for native aquatic species.

The Fisheries Report at 6 states:

*“****This project proposes commercial timber harvest, non-commercial thinning, prescribed fire, (including commercial and non-commercial thinning and prescribed fire treatments in RCAs****), permanent and temporary road construction and road re-construction to support commercial vegetation treatments, road decomissioning, fish passage improvement (culvert replacement and removal), gravel pit use/expansion and designation and construction of a two-wheeled motorized trail (which are described in the Railroad Saddle EA). Removal of trees and vegetation inside of RCAs has the potential to affect stream shading, thus potentially affecting stream temperatures. Likewise, activities removing trees in RCAs have the potential to affect present and future large woody debris (LWD) recruitment to stream channels. Ground-disturbing activities and road activities associated with the proposed action have the potential to affect sediment delivery to stream channels.”*

We Object to the US FS allowing a host of deforestation, burning and mechanical disturbance activities within and near the RCAs in lands that should be conserved and restored for Bull Trout and other ESA-listed and sensitive aquatic species including Spotted Frogs, Redband Trout and/or other native Cutthroat Trout. The composition of the RHCAs is not described on a site-specific basis in the sites where treatments would take place. The extent of existing cover, shade and forest species composition is not provided. Nor is the condition of each stream reach and effects of grazing on riparian ecological condition at each site. Further, the removal of woody vegetation from these areas will increase ease of livestock access that pollutes water, further strips shade beyond the major loss of stream and spring water cooling forest shade from tree removal in the RCA and on adjacent side-slopes. Livestock also deposit waste into and along the streams, and spring margins and trample and collapse streambanks and desiccate and shrink springs and meadows. The combined effects of the logging and grazing will increase water temperatures, and be a death knell for bull trout and other salmonid restoration– especially as the shade reduction of this project interacts with climate change stress yet the FS fails to take a had careful look at these very important inter-linked ecological consequences of the major treatment disturbances to be imposed on watersheds and riparian areas that already may not be providing necessary aquatic habitat conditions as well as riparian habitat conditions necessary to support sensitive and MIS species and comply with the Forest plan and NFMA.

Again, RCAs are designed to protect riparian-dependent resources, and to buffer streams and riparian-wetland areas from adverse disturbance impacts. Fish report Table 3 shows the 240 ft. RCA for perennial streams, and 120 ft RCA for intermittent streams and ponds, and wetlands (we assume springs are wetlands but the EA fails to clarify this) and these do not appear to be depicted in sufficient detail on project mapping. We Object to this uncertainty and to the USFS proposing serious site and water heating and sediment disturbance activities in these critical watershed ad habitat areas.

The Fisheries Report also states:

*“Temperature Water Condition Indicator Stream temperatures are the result of physical factors including insolation, air temperature, relative humidity, groundwater input, substrate composition, discharge rate and reach length (Cross 2002). Cross (2002) regarded the first four as the most important, but all factors work together and uniquely in an individual stream. The primary factor that influences temperatures in the summer is direct solar radiation (Beschta et al. 1987; Chamberlin et al. 1991; Johnson 2004). Riparian vegetation maintains stream  
temperatures and as shade increases, water temperature decreases (Murphy and Meehan 1991).  
Removal of this streamside and overhanging vegetation, including the forest canopy, can increase insolation during summer months, resulting in elevated water temperatures, and conversely the removal of insulating vegetation in the winter can result in colder winter temperatures”*.

The thinning, deforestation and increased ease of livestock access from the combined effects of all the battery of treatment actions would substantially increase insolation, air temperature, humidity and other factors adversely – and the EA does not take a hard look at these serious harmful effects. We Object to this uncertainty and EPA hard look failure. Climate change stress which the FS flawed climate report shows is seriously increasing in the PNF, will amplify and worsen the deforestation and grazing impacts. See Beschta et al. 2012 and 2014, Belsky et al. 1998 describing how grazing riparian impacts describing how livestock grazing makes this even worse. We Object that there is no site-specific hard look analysis at the current level of shade and factors affecting water cooling at riparian wetland-areas within the project site, so there is no way to gauge the adverse effects of the Railroad Saddle project’s significant new ad expanded intentional and associated non-intentional loses of shade. An example, of non-intentional loss is when logging/thinning/prescribed fire-damaged tress succumb to insects or pathogens as a result of injuries or stresses caused by project treatment and “restoration” action disturbances, as well as increased access by livestock that further denude streambanks and trample and compact soils impacting water infiltration into riparian systems.

The Fisheries report at 9 also states: “*Temperatures are functioning at risk in the Boulder Creek subwatershed using the forest plan criteria. Temperatures are functioning at risk in the Lost Creek, Upper West Fork Weiser River and upper Weiser River subwatersheds using the criterion for redband trout (Nelson and Burns 2007). Stream temperatures in the Lost Creek subwatershed were assessed separately upstream and downstream of Lost Valley Reservoir. Lost Valley Reservoir increases stream temperatures downstream of the reservoir. Using the temperature criteria for redband trout (Nelson and Burns 2007), Lost Creek is functioning at risk upstream  
of the reservoir due to temperatures lower than the desired range, and functioning at risk downstream of the reservoir due to temperatures that exceed the desired range (table 7). Therefore, the watershed (in its entirety) was judged to be functioning at risk”*.

We Object to the USFS failing to take an adequate hard look at how the combined effects of the battery of “treatments”, livestock grazing disturbance, roading/trail disturbance, and climate change stress will all interact. Instead, just like in the Sagehen project, the specific site details and actions to take place and sequence of disturbance actions are all to be worked out post-NEPA - thwarting the whole purpose of NEPA. This is particularly alarming, given the potential 20 year time frame of the project when conditions may change drastically – and EA projects will be conducted and phased in under a then 40-year old Payette Forest plan with flawed vegetation community models - by that time likely tremendously out of step with ecological and fire science and recent studies on how wildfires are burning in the West. The minimal info and lack of intensive site-specific surveys – as evidence in the wildlife and other reports of the EA will be seriously out-dated and no integrated current look at the time a project would be conducted will be taken to prevent potential extirpation and/or undue degradation of habitats.

The reports show the various watershed areas are already suffering significant temperature, sediment/turbidity and other stresses on aquatic systems and the biota that inhabit them. The watersheds are Functioning at Risk or Functioning at Unacceptable Risk (FUR) for key water quality and habitat indicators. Lost Creek, Upper Weiser and Boulder are all FUR for sediment/turbidity. We stress that the USFS has already recognized the importance of recovery these watershed areas for native salmonids, as the report describes blowing up an impediment to fish passage in an area in the past.

Temperature is already a big problem across the project area and surrounding lands – as temperature and other degradation problems only worsen downstream and across lower elevations in the highly degraded Weiser and other watersheds at issue here (a cumulative effect that is not examined in the deficient EA). Temperature increases will result from both the deforestation and burning intrusions into the RHCAs as well as adjacent areas. Yet bizarrely, the USFS claims that the project – which worsens temperature and other existing ecological problems including substantial loss of carbon sequestration ability for long periods of time in these watersheds would somehow bring about ”climate adaptation”. All this project will do is fast forward site drying and heating worsening climate stress. It seems to be magical thinking and unreasonable to claim that removing shade in significant amounts and clearing woody veg impediments to livestock loafing along and by streams would not result in a hotter, drier, windier, weedier and drier watershed and these impacts would be made worse by increased temperatures. There is no hard look analysis of how the removal of woody vegetation will increase difficulties with meeting TMDL requirements, and addressing water quality degradation. We Object to all of these deficiencies.

For nearly all species of concern, early seral forests are not an issue – yet these are what the project will produce, and it will take hundreds of years to ever recover a mature forest and longer for old forest. The EA does not take a hard ad systematic look at whether sufficient mature and later seral forest will remain to provide for the needs of viable populations of sensitive species, MIS species, and species of concern. The EA admits that Fisher decreases with fire. Yet the USFS proposes substantial “prescribed” fire including in the rapid river roadless area. And the logging, thinning and other treatments will result in a loss of mature and maturing forests, and the habitat characteristics required by Fishers. The USFS refers to Canada Lynx vulnerability with reduced snowpack, but fails to take a critical and hard look at how this project will affect snowpack. Also See recent Utah watershed studies showing logging and thinning do not increase water flows.

The USFS admits that Northern Idaho Ground Squirrels face threats from loss of snow, droughts, ‘overgrazing’ - yet there is no hard look analysis in the EA and reports on the current effects of grazing on all NIGs habitats in the project area, the use standards applied, the time periods of grazing, actual use vs. permitted use, the type of monitoring of grazing use that would take place, etc. there is no data provided on tree density, canopy cover, species etc. in and surrounding NIGs meadows. Nor is there data and analysis on desiccation and exotic species invasion of NIGs meadows. Significant additional basic information is needed to develop a reasonable range of alternatives and address treatment and grazing disturbance inter-linked impacts on NIGs habitats. Isn’t bulbous bluegrass replacing native species a significant concern for this species. Bulbous bluegrass and other annual weeds thrive in disturbed sites, and largely choke out native species and prevent native herbaceous pant recovery.

Climate Report as stated above, beyond providing important graphs of ever-increasing temperatures in the PNF, the climate report fails to take a probing hard look at the inter-relation to disturbance stresses and the loss of ability to buffer or recover from grazing disturbance and other harms.

We Object to the poor analysis of carbon storage implications of the many and at times overlapping woody vegetation destruction actions of the EA that will release carbon and other climate gases into the atmosphere, as well as result in the loss of maturing and mature forest and larger trees that significantly absorb carbon.

The USFS treatments serve to pit the habitat needs of the White-headed Woodpecker against those of Pileated Woodpecker, and MIS species that inhabit mature and old growth forests – yet the FS has inadequate habitat quality and quantity and population data for both at the local and regional level. Further, the EA does not factor in all the new and additional losses to these species in Region 4– such as from newest Sagehen scoped project. Note that these “supporting documents” were not available to the public for comment on the initial draft EA for this project.

**Wildlife Report Information and EA Analysis Flaws**

The USFS specialist reports only available to the public with the latest EA version --- thus representing new information ---go to great lengths to claim the battery of treatments and disturbance on this stresses already over-logged and over-treated region of the USFS, will not have significant adverse impacts on habitat quality, quantity, connectivity and population persistence, sustainability and viability on the RD and PNF.

USFS wrongfully discounts adverse impacts to Wolverine, in claiming “*There would not be measurable impacts to wolverine individuals or their habitat as denning habitat is not available, and foraging habitat (e.g., deer and elk) numbers that serve as potential carrion are at, or above, Idaho Department of Fish and Game objectives. The RRS Project would have no impact …*”. Why is denning habitat “not available”? Have all old trees been destroyed already? What is the status of the Wolverine population across the PNF? The USFS has not provided substantial site specific information and analysis to support the claim that there would not be measurable impacts to winter or denning habitats.

The USFS has not addressed the significant controversies over logging and treatments in the Lost Creek and Boulder Creek area, and other places in this already very logged and logged-out area of the Forest. As media associated with the Lost-Boulder Creek project reported:

As reported in *The Smokey Wire*:

<https://forestpolicypub.com/2018/08/13/federal-court-stops-85000-acre-forest-service-logging-and-burning-project/>

*“The principal reason bull trout habitat is trashed on the west side of the Payette Forest is Forest Service mismanagement through logging, road-building and overgrazing,” said Ron Mitchell of Idaho Sporting Congress. “This project continues the Forest Service tradition of irresponsible habitat destruction in spite of the fact that the agency’s former fisheries biologist, Dave Burns, wrote in the first Forest Plan that trout habitat on the west side is 50 percent below habitat capacity. The new roads and clearcutting would have reduced remaining habitat even further.”*

*“Much of the ‘mitigation’ promised by the Forest Service in the form of road-closures after the logging,” Mitchell said. “But the Payette has no record of successful road closures and no reliable monitoring system. We checked their top ten road closures and eight of them were wide open while the other two were easily driven around.”*

We are concerned that the USFS in the Railroad Saddle project writes off headwaters and elements of a Bull trout stream system: “Boulder Creek is a tributary to the Little Salmon River and the headwaters of the West Fork of the Weiser River and the area is designated Critical Habitat for bull trout recovery.”

The plan for logging this much area will have thinned the forest so much it will no longer provide critical habitat elements for elk, deer, wolverine, many sensitive migratory birds northern goshawk and a host of other sensitive and important wildlife species.

Also regarding the former Lost Creek-Boulder Creek project in these same watersheds: “The Coalition claims the logging would have thinned the forest, not cut big trees. What they aren’t telling you is that most of the big trees in this part of the Payette National Forest have already been logged so all that’s left to log are the smaller trees that are left”.

But the small-diameter logging and thinning would also have removed essential habitat for snowshoe hare and red squirrels. These are primary food sources for numerous forest predators including bobcats, mountain lions, lynx, pine martins, fisher, wolverine, coyotes, goshawks, great grey owls, and boreal owls that all lose.

<https://apnews.com/article/44ad5d45f11746f8bdf9595c72ed30db>

Objectors stress that all of these inter-connected species and the forest web of life and forest plan deficiencies in these watersheds that would be logged thinned, and burned by this 2023 project were also at stake in the past iterations of logging/treatment projects in this are

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We are very concerned that the FS writes off headwaters and elements of a Bull trout system: “Boulder Creek is a tributary to the Little Salmon River and the headwaters of the West Fork of the Weiser River and the area is designated Critical Habitat for bull trout recovery.”

The plan for logging this much area will have thinned the forest so much it will no longer provide critical habitat elements for elk, deer, wolverine, many sensitive migratory birds Northern Goshawk and a host of other sensitive and important wildlife species.

Further, regarding the past and linked Lost Creek-Boulder Creek project: “*The Coalition claims the logging would have thinned the forest, not cut big trees. What they aren’t telling you is that most of the big trees in this part of the Payette National Forest have already been logged so all that’s left to log are the smaller trees that are left”.*

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<https://apnews.com/article/44ad5d45f11746f8bdf9595c72ed30db>

Objectors stress that all of these very same inter-connected species and web of life that would be logged thinned, and burned by this 2023 project, and the full scale of serious harms to their habitats and population persistence is glossed over in the deficient EA and supporting documents for Railroad Saddle.

Reporting on a previous Lost-Boulder project in these watersheds explains the on the ground situation:

*“The Coalition [promoters of logging and parties profiting from logging] claims the logging would have thinned the forest, not cut big trees. What they aren’t telling you is that most of the big trees in this part of the Payette National Forest have already been logged so all that’s left to log are the smaller trees that are left”*. Is this why the 2023 USFS wildlife report claims there are no Wolverine denning sites? If this is the case, then removal of any existing forest and woody cover would further retard recovery and restoration of maturing, mature and old growth forest, and writes off impacts to Wolverines? Further the USFS mischaracterizes many aspects of the wolverine diet and analysis fails to provide current complete and hard look at Wolverine occurrence, potential and occupied habitat, and the broad spectrum of threats to this species. Stripping forest cover in the Railroad Ridge project will provide much easier snowmobile access and other human harassment to Wolverine habitat, a species which faces huge threats form climate change stress ad decreased areas with snow as well as constant USFS chopping away at protective forest habitat in an endless series of “treatments”.

Clearly there are wolverines in the region and the USFS must consult with USFWS on this species as the most recent efforts to prevent listing were over-turned by a federal court. This project is well known, and was featured on *Outdoor Idaho* on TV.

<https://www.facebook.com/outdoor.idaho/videos/wolverines-near-mccall-from-working-for-wildlife-airing-thursday-at-8/1558254637716318/>

See also articles on McCall Wolverine project -such as this demonstrating the vast distances the species may travel:

<https://www.roundriver.org/wolverine-named-olive/>

This (and past or other foreseeable and potentially segmented projects in this area and region) and their series of logging, thinning, burning and overlapping series of disturbances would remove small-diameter essential habitat for snowshoe hare and red squirrels. These are primary food sources for numerous forest predators including bobcats, mountain lions, lynx, pine martins, fisher, wolverine, coyotes, goshawks, great grey owls, and boreal owls that all lose. We Object that the EA provides minimal information on the current status of populations and population viability of all of these species and the impacts of its past projects including on the west side of the Payette Forest. There is a serious data void on the current habitat extent and habitat quality and quantity – including lacking a cogent analysis of the degree and impacts of existing habitat loss and fragmentation both within the porrect areas as well as in surrounding lands, across the New Meadows RD, and across the Payette Forest areas. The population status of the native animal species that inhabit the forest and other vegetation community areas in this landscape is not critically examined. Many of the most critical habitat areas and remnant mature and old growth communities these species require will be lost or torn apart by large-scale vegetation treatments, including this one. The enormity of the habitat loss that has taken place, and is planned, has not been addressed under NEPA, and we object to this.

Despite the severity of and magnitude of the treatments, the USFS fails to conduct a hard look NEPA analysis based on current systematic site-specific pre-decisional baseline inventories for sensitive and important species and migratory birds. The USFS has greatly failed to assess and address the role of the livestock grazing levels, management practices and facilities authorized at high levels with minimal controls on use that is taking place in and surrounding the project landscape. Livestock grazing/trampling/browse disturbance causes and exacerbates forest health problems, prevents and hinders “desired” post-treatment species and watershed recovery and native vegetation re-establishment; causes flammable and other irreversible weed invasion and spread; contributes substantially to water quality problems and exceedances of water quality standards and causes pollution of Bull trout and other native aquatic biota habitats. Clearing and substantial thinning and burning of trees and shrubs also makes more land areas - now free of denser woody vegetation – become more readily accessed by livestock. This is often particularly damaging and destructive to springs, seeps and headwater stream areas (including those inhabited by native salmonids and amphibians and ESA-listed species) and remnant better condition riparian/mesic/wetland areas (which can also include sensitive and rare native plants). We Object to the failure of the EA and FONSI to adequately address these very significant ecological impacts and concerns related to the Railroad Ridge project.

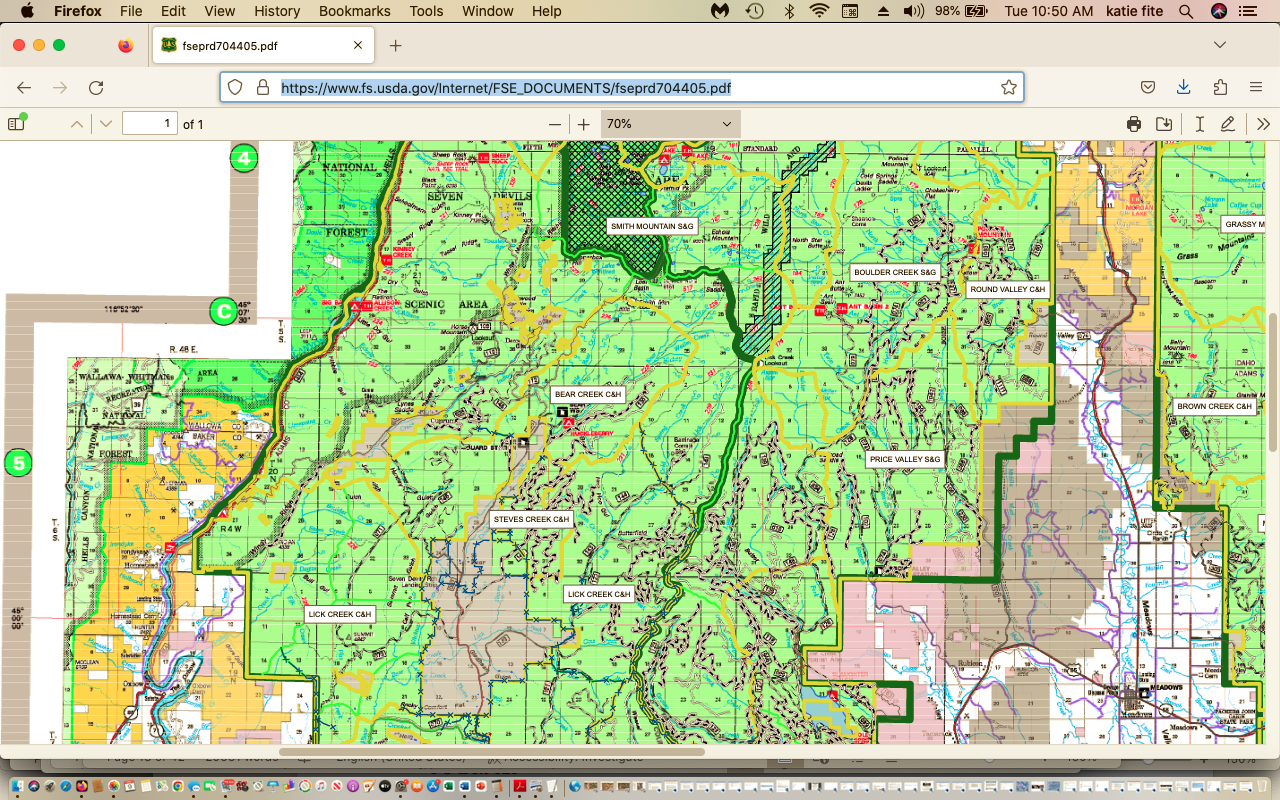
How much old growth and/or old forest of all veg community types is left in the project area? In the affected watersheds? Across the New Meadows RD? How much mature veg community area of all type remains in the project area and across the RD? Where are all these vegetation communities located? Please provide detailed mapping and analysis. How does the FS define mature vs old growth forest/old forest vs. earlier successional communities, and how do these actions comport with forest plan mature and old growth forest objectives? We object to the lack of site-specific mapping and analysis of these significant issues. As the USFS is aware, mature and old growth trees are very important for carbon sequestration and for biodiversity conservation, and provide habitat for nearly all the sensitive species and species of conservation concern on the PNF.

The EA provides insufficient information on the very heavy recreational use much of this area gets, which already places a significant strain on Forest watersheds and native animals. It provides almost no information on the adverse ecological footprint of the very heavy livestock grazing burden and livestock-caused watershed and habitat impairment of these watersheds and habitats. We Object to both these project analysis deficiencies.

The document is not adequate for fostering informed public comment on complex vegetation communities, wildlife habitats and populations, wild lands values and many other aspects of this sprawling project. The USFS should re-scope this project and provide much more basic biological inventory and other information to the public that thoroughly details the status and habitat condition of the animal species who currently occupy the communities the USFS deems “unhealthy” or in need of often destructive and weed-causing “treatments”.

We are concerned about the FS use often by use of artificial categories and vegetation and fuels models that rely on long out-dated fire return and disturbance intervals and fuels modeling that ignores how fires are being documented to behave in a series of recent studies that show fires rapidly spread and may burn with higher intensity in thinned and heavily manipulated and exploited forest areas. Yet the USFS continues to use these stale disturbance/fire claims that appear designed to justify extensive manipulation and put the mark of death on native vegetation because they are found to be “uncharacteristic” under these flawed models. After reading the document, it appears that the Forest is not really satisfied with any existing vegetation community. How many unmanipulated acres of all vegetation types remain at present across this landscape, and across the New Meadows Ranger District, which is very heavily logged and disturbed? How fragmented has the landscape become from the effects of past disturbance and manipulation, and what are the impacts on all FS sensitive and MIS species? What is the current viability of all populations of species of concern, and how will this project impact species numbers and persistence across the project, area, RD and Forest? Are current Forest plan goals met for these species? Where is monitoring data that shows this? We Object to the USFS failing to address these significant issues we raised in comments with a probing hard look analysis and site-specific data as required under NEPA and to ensure compliance with sensitive and MIS species mandates under NFMA.

USFS lands here are suffering significant deleterious grazing impacts. No current NEPA and FRH or land health analyses related to grazing impacts have been conducted in many areas. The poorer condition that lands are in prior to a disturbance, the greater risk of weed and other problems following vegetation treatment disturbance – especially these large-scale treatments that will result in hotter, drier windier weedier sites and likely resulted in significant use of toxic chemical herbicides for which the FS does not appear to have adequate current risk assessments and NEPA analysis of these chemicals toxic impacts on terrestrial and aquatic species and human users of the Forest. We Object to the lack of a hard look at weed and herbicide risks.



See: <https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd704405.pdf>

The public is not provided with monitoring data for grazing impacts here, the use standards that must be met, and if they are met, any current ecological assessments of grazing impacts, type of animals being grazed – are these lands grazed by sheep/goats or cattle or both? Will this deforestation increase risk of bighorn exposure to domestic sheep diseases by removing denser forest obstacles to deadly disease contact? Does predator killing/trapping/snaring by Wildlife Services occur - to purge Forest lands of predators for grazing permittees, and if so, how may it impact negative sensitive carnivore species use and populations on these lands? What is the status of the Gray Wolf population here, and how might the extensive manipulation and woody vegetation clearing impact this species and its vulnerability to human persecution? We Object that the wildlife report provides minimal information on issues important to biodiversity protection and wildlife sustainability.

This project includes areas of steep, rugged terrain where control of fire may be difficult, and where soils bared by the battery of treatment disturbances may be highly vulnerable to erosion. These risks will be increased by continued chronic high levels of livestock grazing pressure. Clearing trees may expand the areas of livestock impact and give livestock access to areas previously less impacted – further expanding weeds, erosion and degradation. How will the massive treatments alter grazing capability? Please provide detailed livestock monitoring information for riparian and upland sites, data on actual use, stocking per pasture or unit, grazing schemes, etc. We Object to the information void ad lack of a hard look.

There is no information on the grazing-caused level of riparian-aquatic and upland habitats and watershed areas. The degree of degradation and impairment must be fully examined in an EIS for this project. This is necessary to determine of any continued grazing use on these treatment-stressed deforested lands A complete current livestock current capability and suitability analysis must be provided including data on weed production. We Object to the failure of the USFS to address the capability and suitability of lands and watersheds – especially here where water ad aquatic species habitat quality parameters are known to be significantly degraded and failing to comply with Forest goals and objectives. We Object to failure to address capability and suitability, and to address the foreseeable adverse impacts of the host of “treatments” providing livestock access to previously inaccessible areas – including those that may be on shallow highly erosion-vulnerable soils -resulting in grazing of non-capable lands, loss of protective biotic soil crusts that help prevent erosion and also sequester carbon, and causing significant runoff and erosion and reductivity losses to forest soils and vegetation. This may also result in livestock accessing rare plant populations that were previously less accessible.

There are also significant land areas in adjacent Forests and state and private lands neighboring and across the RD, with large-scale habitat losses and watershed degradation and weed infestations occurring as well. There have been many past logging, and other treatments across land ownerships. USFS land condition is often highly degraded as a result of past logging, thinning, or other actions based on failed management paradigms. Please provide detailed mapping and analysis of all past logging, thinning, vegetation treatment projects across the New Meadows RD for all periods of time, and detail projects conducted and/or proposed in the past 20 years. Please provide monitoring of wildlife habitat and population use and levels, and analysis showing whether the RD and forest are meeting forest plan goals for wildlife species, and the impacts of the USFS fuels and logging “treatments” on these goals and objectives – as this is critical to understanding cumulative effects of this and other foreseeable “treatments’, deforestation, thinning, and fire use. What has post-treatment watershed condition been, how have treatments impacted habitat quality and quantity for sensitive and important biota of concern, and how have fish and wildlife populations and rare plants responded in these treated areas? Please also provide complete baseline weed inventories. We Object to the failure of the EA to include this critical information.

This project would impact a very large area of weed-susceptible wild lands and the critical aquatic species and wildlife habitats and the recreational uses they provide in the headwaters of several key watersheds. By drastically reducing protective forested vegetative cover, the project will reduce the ability of the land to retain snow cover. It will remove shading vegetation that helps retain moisture on the site so it is slowly released to provide sustainable perennial flows. Not only will this shading and cooling moisture-trapping protection be diminished by the project, conditions will become even harsher due to increased temperatures and other weather changes resulting from climate change stress. Carbon sequestration will be harmed, This all combined will amplify and worsen the adverse effects of climate change stresses. We Object to the failure of the EA to take a hard look at the significance of the climate impacts of the treatments proposed, and their harmful effects on site “resilience” and “resistance” as well – since the USFS uses this terminology – where is a candid analysis of project impacts?.

An EIS must be prepared to examine the host of adverse and other direct, indirect and cumulative impacts of this significant proposed project disturbance to the area watersheds, to streams and springs and their replenishment, to soils and protective microbiotic crusts (mosses, algae, lichens that help protect lands from weeds, sequester CO2, and prevent soil erosion), to diverse and complexly interspersed native vegetation communities, to sensitive and rare plant and animal communities and populations, to very important Inventoried Roadless Area (Rapid River – which also to suffer treatment disturbance and unnatural fire) and other wild land natural and scenic values, irreplaceable cultural sites, and other values. There are unexamined grazing schemes, and stocking rates (including under actual use of livestock here) that will exacerbate and worsen the stresses of climate change. See Beschta et al. 2012, 2014. Grazing makes lands LESS resilient and less able to recover from such severe vegetation disturbance stresses as the FS seeks to impose here – on top of already damaged watersheds. We Object to the failure of the USFS to prepare an EIS to address all of these ecological concerns and ensure sustainability of Forest values. We Object to the use of the self-serving EA and its single mega-treatment alternative.

**What is the Full Footprint of USFS Treatment Disturbance Harm to Important and Sensitive Biota and Watersheds**

These treatments and road network significantly fragment and destroy migratory bird species habitats, and migratory birds face a grave and growing crisis across the US. See Rosenberg et al 2019 describing the loss of 3 billion birds from North Americas. Not only is the USFS destroying protective forested cover and maturing mature old growth forest areas here, many other projects are underway in the Boise and Payette Forests and across Region 4 that will have cumulative adverse effects on sustainability of fish and wildlife habitats and populations, and recreational and wild land uses and enjoyment. The cumulative and synergistic effects of all of these projects must be fully examined in an EIS that takes a hard look at the sustainability of forest vegetation types in a time of Climate Crisis, at irreversible weed invasion risks that may be caused by the severe project treatment disturbances, at the condition of sensitive wildlife species habitats and population viability and persistence, at migratory bird habitats and population viability and persistence, and at other important species habitats and population viability and persistence across this landscape. We Object to the Failure to do so. Yet the USFS in Railroad Ridge fails to conduct necessary site-specific pre-decisional surveys and analyses of the current baseline presence and abundance of important migratory birds, or to detail the birds using specific forest community types that will be drastically altered. There is no way to conduct credible analysis of the full scale of impacts or for the USFS to be able to sign a FONSI until it does so.

Not only is the USFS destroying protective forested cover and maturing mature old growth forest areas here, many other projects are underway in the Boise and Payette Forests and across Region 4 that will have cumulative adverse effects on sustainability of fish and wildlife habitats and populations, and recreational and wild land uses and enjoyment. The cumulative and synergistic effects of all of these projects must be fully examined in an EIS that takes a hard look at the sustainability of forest vegetation types in a time of Climate Crisis, at irreversible weed invasion risks that may be caused by the severe project treatment disturbances, at the condition of sensitive wildlife species habitats and population viability and persistence, at migratory bird habitats and population viability and persistence, and at other important species habitats and population viability and persistence across this landscape. We Object to the Failure to do so.

Forests across Region 4 - from the Dixie Forest in southern Utah to the Payette Salmon-Challis Forest in the north - are proposing a huge amount of deforestation projects and “treatments” that will destroy and fragment forest habitat, and migratory bird habitats. These massive treatments are the dead opposite path a federal agency should be on as climate change stresses are bearing down on the land, waters, watersheds and habitats for native biota. Loss of forested cover must be considered cumulatively, as it will impact populations of precipitously declining migratory birds at a West-wide level, including during migration. An analysis of the loss of forested habitats for each of the vegetation habitat community types the USFS proposes to “treat” or deems to be unhealthy must be provided. The Forest must determine the amount of habitat loss that has taken place in recent decades, and that is foreseeable for species of concern/sensitive species. See:

A screenshot of a computer

Description automatically generated

From Bad Fire, as an example of the scale of planned burning of migratory bird and sensitive species habitats across Region 4: <https://www.counterpunch.org/2022/03/11/bad-fire/>

The USFS has failed to full and thorough baseline inventories for all important and sensitive animals, rare plants and migratory bird species of concern across the project area and surrounding lands to serve as a necessary baseline for project impacts. The aggressive USFS deforestation, logging and other treatment projects may drive serious population losses and/or may extirpate sensitive species across the region, along with cumulative impacts from BLM and private lands projects also taking place.

Large fires have burned in many areas of the Region and in the Payette Forest - whipping right through intensively logged, thinned and “treated” areas, and data and analysis and review of current science is not provided here. This also represents significant loss of forested habitat cover for sensitive species of concern. Many lands also have suffered significant early settlement era human impacts including deforestation for wood products, and the use of promiscuous burning from livestock grazers setting the range afire, and other human deforestation and disturbance. Thus, in many areas, the forests are still recovering from significant past human disturbance, which the agency vegetation and fuels models and assumptions do not take into account. They may in fact have suffered much greater disturbance than the Forest claims has occurred, or that is used in disturbance interval models to justify the projects’ massive intervention and clearing.

Forest conditions are getting harsher and less resilient under climate change stress. Surface water is becoming more limited with reduced snowpacks that decrease sustainability of perennial flows. Snowpack is essential to provide water to springs and streams. Deforestation will result in hotter, drier sites prone to more rapid ad erosive runoff and resulting degradation. Ubiquitous livestock grazing further degrades and depletes springs and streams and riparian habitats. Belsky et al. 1999.

Cheatgrass, bulbous bluegrass and other flammable invasive exotic weeds are already exploding across the lower elevations of this region. The Forest must carefully examine and map this landscape to determine the extent to which cheatgrass, bulbous bluegrass and other weeds are already present, or where they are likely to expand to – determining sites that may be dominated post-treatment. This project is made even more risky due to potential planned use of aerial fire ignition devices or other flammable materials to unnaturally burn areas including in spring when birds are nesting. In aerial ignitions, these, ping pong balls with napalm-like highly flammable material are spit out of spinning device on helicopters. This type of ignition can have devastating impacts to forests. Please see photos and info Objectors submitted illustrating the severe and highly damaging impacts of aerial ignitions in “prescribed” fires. Objector WLD observed the damage caused by aerial ignition in rugged mountainous terrain in the Juniper Mountain area of Idaho. Ancient trees and groves of old growth arid forest were destroyed after the napalm ping pong balls ignited the forest. Many of the EA logging and other projects also include burning, increasing weed infestation risk, and cause elevated wildfire risk. We Object to the lack of hard look analysis at treatment impacts including on sensitive species habitats and watersheds and the Rapid River Roadless area.

We Object that the project will also irreversibly alter forest communities with effects lasting for centuries or permanently of limited recovery takes place, amid heavily used recreational areas and scenic wild lands. The essential migratory bird and wildlife habitats currently present in these forests and the currently often diverse vegetation communities will be harmed and simplified as the USFS attempt s to “groom” and manicure lands into an artificial state based on sketchy models. This current proposal (and many of the other USFS projects taking place or foreseeable) will alter this scenic and biodiverse area of Idaho for hundreds of years or longer – and that’s if cheatgrass or other irreversible weeds do not invade and truncate plant succession, which is a very real possibility. Cheatgrass/flammable weeds/noxious weed invasion and ensuing site dominance is especially likely given unassessed damaging large levels of livestock grazing the Forest allows to take place here.

This proposal would inflict a huge battery of highly uncertain mechanical (heavy equipment and chain saw) treatment disturbances, and also impose prescribed burning, or burning in the aftermath of other treatments. But the specific project treatment sites are not delineated and site inventories are not provided. There would also be many opportunities for fire to escape, kill non-target vegetation, scald soils, and result in expanded weed problems, given all the types of fire use proposed.

Insects are a natural part of the forest ecosystem. Standing dead trees are not a fire risk. They provide soil stabilization and structure to moderate site conditions as well as provide shade to cool the site. The deforestation project is likely to increase tree injury and disease, as sap from cut trees lures in insects, and as “leave” trees are injured. It will make matters worse, not better.

The USFS must provide full and detailed very site-specific mapping of tree age classes in all forested areas and adjacent vegetation communities of all types. Where are all old growth and mature forests/sage/mountain shrub/aspen veg communities located? Detailed information on stand characteristics and wildlife habitat values and wildlife use of the site must be provided based on current site-specific inventories and inventories across this landscape. This further discussed below on comments.

**Avian Species in Wildlife Report**

The effects determination and analysis for Flammulated Owl admits nest cavity loss for the project but provides no analysis of the status of the local and regional population and hard look data to understand how severe the losses may be.

Great Gray Owls require high conifer canopy juxtaposed by meadows. Yet the EA does not identify meadows, and not distinguish areas of high canopy from other sites. The massive treatments would of course drastically reduce canopy cover – as would the unplanned increases in mortality from tree injury and associated insect and pathogen problems. The project would also certainly cause significant new harm to northern Goshawks by drastically reducing cover in many areas. The relation of specific treatments and amounts of canopy and forest loss in and near high value Goshawk nesting sites (FS describes: nests close to trunk of large diameter trees, has 5900 acre home range, responds Negatively to openings on forest) and territories is similarly not assessed. The Fs also states that White-headed Woodpeckers rely on 25 to 50% canopy cover. We Object to all of these serious deficiencies in EA analysis and site-specific information and surveys necessary to predict the magnitude and severity of project impacts to these species – as well as cumulative impacts from other treatments across the Forest and region. The FS states there are 9 known Goshawk nests, but the area of land could support 40 breeding pairs. So why doesn’t it? The Goshawks and of the mature and old growth forest species will depart as the Forest destroys and fragments their habitats under false claims of forest “departure” from flawed modeled idealized community. Pileated Woodpeckers are an MIS species that require dense, tall forest and a closed canopy. WHERE is all potential Pileated Woodpecker habitat – and how much will it be diminished by this EA project: How much potential habitat is good habitat? A report figure modeled Pileated Woodpecker habitat, and it would decrease. The FS attempts to excuse this away by absurdly claiming the population would increase as medium density forest areas mature. But many of these areas are to be treated, too and will also suffer pathogen or insect or prescribed fire mistake mortality, too. The FS claims the losses would be short term. We Object to the very biased reports and EA analysis that go to great lengths to cover up the harms the project will cause. The report also failed to make any “effects’ determination for Pileated Woodpeckers.

Regarding migratory birds the USFS fails to provide any substantial information to ensure compliance with MBTA. The project SOPs and BMPs are greatly inadequate to protect nesting migratory birds – as prescribed fires and logging disturbance can occur year-round wantonly destroying nests, eggs an d chicks. The USFS has failed to conduct pre-decisional systematic surveys to determine the extent of habitat and population losses that will be caused at the site-specific level under this uncertain “condition-based” type EA logging/manipulation scheme. We Object to these deficiencies.,

We Object to the FS reducing security cover for elk.

**Costs of Project**

We Object that the USFS fails to address the costs to the public of the welter of environmental damage and losses that would take place under the proposed actions. These will pose a significant drain to taxpayers, as well as harm or destroy recreational uses and enjoyment, and sustainability of clean water and other resources. Further, as the serious damage and destruction from the proposed activities is carried out, taxpayers will bear many uncalculated costs – from toxic chemical herbicide costs to costs to try to restore species whose populations are pushed to very low levels due to the project impacts.

**Alternative Action for Land Health**

Preventing expansion of ecosystem-dooming flammable annual grasses and other weeds should be paramount for ensuring forest health.

The USFS ignores **passive restoration to protect native vegetation communities and to recover native understories, shrubs and microbiotic crusts**, a primary and essential element of preventing weeds from choking public lands and of reducing future fires. Passive restoration, (letting lands naturally heal from disturbance and maintaining native cooling forests ), helps ensure that public lands are in good condition and better able to withstand fires, insects and other disturbance and able to recover from fire events. It also helps to buffer ever-growing climate change stress. As cheatgrass and other weeds spread due to continued harmful levels of livestock grazing exacerbated by climate change stress (see Beschta et al. 2012), all sagebrush communities are extremely sensitive to grazing and other exploitive disturbance.

The EA failed to provide comprehensive current mapping of current bulbous bluegrass/cheatgrass/annual grass/noxious weed infestation areas at all percentages of infestation so the enormity of the problem can be understood.

We Object that the USFS did not consider this as, at a minimum, part of separate alternative actions.

**Concerns about FS Veg Models**

Federal agencies are increasingly using modeling that create an alternate vegetation reality. The info in scoping documents appears to be very similar to the Forest Service and TNC methodologies and models that critiqued in this article about a Pine Valley Utah Project. <https://www.counterpunch.org/2019/12/20/voodoo-vegetation-modeling-dooms-native-forests-and-wildlife-habitat/>

Comments on the Pine Valley Project are germane here. The Forest uses various disturbance intervals, FRCC categories and devices to artificially categorize and segregate plant communities to elevate commodity use exploitation. The models are often divorced from real world ecological processes. Complex native and other vegetation communities are greatly threatened by livestock grazing and disturbance-caused weeds. Modeling may also be used to justify maximizing grazing exploitation and depletion for commodity purposes. These models are also used to justify manipulating lands in veg treatments (ostensibly for fuels suppression or forest health – but in reality the treatments often make sites more likely to burn, and generate more grass by killing off woody vegetation for livestock forage grass production purposes).

Climate change stress disrupts ecological processes. The NEPA analysis must accurately explain and provide data for how various veg communities that are the supposed desired outcomes and explain how models used take into account large climate driven wildfires. Please provide info on the ecological condition of lands subjected to livestock grazing here. The condition of lands prior to a treatment including a fire often determines how effective recovery will be and helps to limit weed dominance following fires and other disturbances. This means that agency must provide full and detailed data and analysis of current land health and actual on the ground ecological conditions and factors such as a plethora of livestock facilities and high stocking levels that are causing expanded cheatgrass, weeds and degradation. We Object to the failure to do this.

**Motorized Use Damage and Disturbance**

We Object to the failure of the EA to provide information and analysis critical to understanding the road and trail situation at issue here, as we raised in previous comments. This includes:

* Maps of all existing routes or their descriptive categories/route types.
* Current travel plans and analysis of their accuracy and enforcement. How many routes haves sprung up since the Payette FP was finalized, for example? how many routes were initially constructed for logging/treatment purposes?
* Travel plan enforcement and compliance information for the RD and Forest.
* Current inventory of routes ad trails (including unauthorized ones).
* Specific info on driving or motorized use or mechanized use (mountain bike) impacted sensitive species seasonal habitats and wildlife habitat use disturbance; projected severity of vehicle impacts to soils and microbiotic crusts; to vegetation and increased weed spread risk, to watersheds and water quality.
* Data on wildlife seasonal habitats that project access routes will traverse and/or that are present in all areas where driving may occur.
* Data on the extent of noxious and other weed infestations on the interspersed and other BLM, state and private lands where vehicles (and livestock) may be entering the project area from and then spreading weeds onto and across public lands.

**Public Concern Over Lack of EA Hard Look at Project Direct, Indirect and Cumulative Effects on Declining Migratory Birds**

Objectors provided BLM with Alarming Scientific Information on the Decline of North American Avifauna – Management Must Conserve and Recover Habitat of Both Sensitive and Plummeting Common Species to Conserve Avian Biodiversity

There is great concern about avian declines across North America. All Railroad Ridge project impacts (direct, indirect and cumulative) must be considered in view of this large-scale loss of sustainability of species habitats and populations. Rosenberg et al. 2019 recently described the staggering decline of the North American Avifauna:

<https://science.sciencemag.org/content/366/6461/120>

<https://www.nytimes.com/2019/09/19/science/bird-populations-america-canada.html>

The US and the Payette Forest faces is a “bird emergency”. <https://patch.com/colorado/across-co/bird-emergency-big-declines-u-s-including-colorado>

Forest and grassland inhabiting birds are one of bird groups documented as suffering the steepest declines. The EA has failed to fully consider and take a hard look at a reasonable range of alternatives and minimize the full spectrum of adverse ecological impacts of any project treatment activities here, and failed to take a hard look at conditions in the existing disturbed areas of forest and the impacts of the grazing burden and past logging/treatments/routes on sensitive species and migratory birds (including the use of habitat for birds “refueling” during energy-consuming migration). We are alarmed at all the project burning including to destroy understory ‘brush” that may provide nesting habitat, insect food, and fruits, berries during spring/fall migration periods. This project must fully examine the relative scarcity of species habitat at the local and regional level, and the effects of logging, thinning, fire and other treatments as well as grazing degradation and habitat harms, along with these specific vegetation treatments, may have on population viability and persistence of declining forest-dependent migratory bird species.

**Alarming Information on the Biodiversity and Climate Crises That Must Be Considered**

This project threatens biodiversity and will make the biodiversity crisis worse. The Global Biodiversity Crisis is inter-twined with the Climate Crisis:

<https://www.un.org/sustainabledevelopment/blog/2019/05/nature-decline-unprecedented-report/>

*The five direct drivers of change in nature with the largest relative global impacts so far. These culprits are, in descending order: (1) changes in land and sea use; (2) direct exploitation of organisms; (3) climate change; (4) pollution and (5) invasive alien species.*

*The Report notes that, since 1980, greenhouse gas emissions have doubled, raising average global temperatures by at least 0.7 degrees Celsius – with climate change already impacting nature from the level of ecosystems to that of genetics – impacts expected to increase over the coming decades, in some cases surpassing the impact of land and sea use change* and other *drivers.*

Given scientific information on climate change stress impacts now underway and foreseeable across western public lands, an analysis for this Railroad Saddle project must fully consider how hotter temperatures, less precipitation falling as snow (and hence earlier snowmelt and runoff and longer snow-free periods), more extreme weather events such as drought or weather whiplash, will have on any hoped -for outcomes of this project, and the site’s ability to recover. This must be fully assessed along with the role of livestock grazing in degrading increasingly less resilient lands and hindering recovery. Unknown and unassessed chronic levels of grazing disturbance to be imposed will further slow or preclude any native or crust recovery.

The USFS has failed to provide detailed monitoring data, actual use data, permitted use, compliance records and current land health assessment data so that a fair consideration of the full effects of grazing disturbance on top of treatment disturbance can be obtained, and so that the proposals’ full range of direct, indirect and cumulative threats to species habitat and to conservation and recovery of native vegetation communities can be fully understood. We Object to this.

**New Studies on the Cheatgrass/Annual Grass Threat with Continued Grazing Disturbance**

New scientific papers describe the serious threats of cheatgrass and annual grasses to arid western ecosystems, including Pondersoa pine and arid forest and shrub communities. Mountains are becoming treeless – as these grasses that thrive in the wake of fires and grazing. This project and high levels of grazing on USFS lands exacerbate and elevate the threat of weeds like cheatgrass.

This Railroad Saddle proposal will increase disturbance to veg communities, soils and protective microbiotic crusts and create hotter, drier, windier, weedier sites that not only fast forward climate change effects, they also pave the way for the weedy “little arson grasses” like cheatgrass, medusahead and bulbous bluegrass to dominate ever-larger areas and be transported by cow/sheep vectors into adjacent uninfested sites.

See 2019 Fusco et al. paper on cd. Mountains may become treeless as a result.

<https://ktla.com/2019/11/04/little-arson-grasses-non-native-grass-species-making-california-wildfires-more-frequent-study-finds/>

*“Invasive species are spreading more because of climate change as warmer weather moves into new areas, said study lead author Emily Fusco, also of the University of Massachusetts.*

*The study in Monday’s journal Proceedings of the National Academy of Sciences looks at the connections between a dozen species of invasive grasses and fires nationwide, finding fires occur more often in places with the non-native grasses …*

The profligate use of fire in this project and constant burning of understories will foster and promote these weeds. This project promotes more intensive and extensive disturbance which will foster expanded weed problems. We Object to the failure to take a hard look at how the project heightens fire danger by greatly disturbing large areas of the Forest distant from habitats or any actual ‘urban interface”.

See also: <https://link.springer.com/article/10.1007/s10530-019-02120-8>

*Fire, livestock grazing, topography, and precipitation affect occurrence and prevalence of cheatgrass (Bromus tectorum) in the central Great Basin, USA.* Matthew A. Williamson, Erica Fleishman, Ralph C. MacNally, Jeanne C. Chambers. Bethany A. Bradley David S. Dobkin. David I. Board. Frank A. Fogarty. Ned Horning. Matthias Leu. Martha Wohlfeil Zillig.

*Our novel time-series data and results indicate that grazing corresponds with increased cheatgrass occurrence and prevalence regardless of variation in climate, topography, or community composition, and* ***provide no support for the notion that contemporary grazing regimes or grazing in conjunction with fire can suppress cheatgrass.***

**Studies Show Significant Benefits of Removing Grazing for Vegetation Community Health**

We Object that the USFS failed to assess reductions in livestock grazing to aid in forest health. We provided the USFS with evidence from Poessel et al. 2019 and others describe the very significant benefits of removing livestock grazing disturbace for recovery of native vegetation communities and associated bird diversity. Prolonged rest must be fully considered in this project following any treatment disturbance, and in place of treatments including to recover aspen stands.

*Removal of cattle grazing correlates with increases in vegetation productivity and in abundance of imperiled breeding birds* Sharon A. Poessela, Joan C. Hagarb, Patricia K. Haggertyb, Todd E. Katznera

*Livestock grazing is the most prevalent land use practice in the western United States and a widespread cause of degradation of riparian vegetation. Riparian areas provide high-quality habitat for many species of declining migratory breeding birds. We analyzed changes in vegetation and bird abundance at a wildlife refuge in southeastern Oregon over 24 years, following cessation of 120 years of livestock grazing. We quantified longterm changes in overall avian abundance and species richness and, specifically, in the abundances of 20 focal*

*species. We then compared the local responses of the focal species to population-scale trends of the same species at three different large spatial scales. Overall avian abundance increased 23% during the 12 years after removal and remained consistent from then through year 24. Three times as many species colonized the survey sites as dropped out. Of the focal species, most riparian woodland-tree or shrub dependent, sagebrush obligate, and grassland or meadow taxa increased in abundance or remained stable locally. As these species were generally of*

*conservation concern, the population increases contradicted regionally declining or stable trends. In contrast, most riparian woodland-cavity nester species decreased in abundance locally, reflecting disruption of aspen stand dynamics by decades of grazing. Avian nest parasites and competitors of native species declined in abundance locally, matching regional trends. Restoring riparian ecosystems by removing livestock appeared to be beneficial to the conservation of many of these declining populations of migratory birds.*

**Microbiotic Crust Literature – Analysis Failed to Assess the Pivotal Ecological Role of Intact and/or Recovering Crusts, and the Damage the Project Will Cause to Crusts**

A new study by Root et al. 2019 highlights the tremendous role crusts play in protecting lands from invasive flammable weeds.

*Abstract. Exotic invasive plants threaten ecosystem integrity, and their success depends on a combination of abiotic factors, disturbances, and interactions with existing communities. In dryland ecosystems, soil biocrusts (communities of lichens, bryophytes, and microorganisms) can limit favorable microsites needed for invasive species establishment, but the relative importance of biocrusts for landscape-scale invasion patterns remains poorly understood. We examine the effects of livestock grazing in habitats at high risk for the invasion to test the hypothesis that disturbance indirectly favors exotic annual grasses by reducing biocrust cover. We present some of the first evidence that biocrusts increase site resistance to invasion at a landscape scale and  
mediate the effects of disturbance. Biocrust species richness, which is reduced by livestock grazing, also appears to promote native perennial grasses. Short mosses, as a functional group, appear to be particularly valuable for preventing invasion by exotic annual grasses. Our study suggests that maintaining biocrust communities with high cover, species richness, and the cover of short mosses can increase resistance to invasion. These results highlight the potential of soil surface communities to mediate invasion dynamics and suggest promising avenues for restoration in dryland ecosystems.*

Living soil crusts in arid lands stabilize soils, protect them from erosion, sequester carbon dioxide and are a frontline defense against cheatgrass and other invasive species. See other research info:

Beymer et al 1992. Harmful effects of cattle grazing on microbiotic crusts. The project’s clearing trees gives cows access to previously ungrazable sites with crusts that have been protected by tree limbs. Such sites are very often 100% covered by mosses, lichens and native grasses. The high level of grazing use and veg treatments across this landscape will strip this protective cover, and greatly increase watershed erosion and bare soil areas for weed colonization.

Bowker et al. 2008. Crusts serve as soil function indicators. Yet the project ignores and completely sacrifices crusts –exposing sites to even more intensive cow impacts such as weed-causing soil/crust trampling, deposition of weed-causing manure, cows eating and beating down plants protecting crusts.

Bortherson et al. 1984. This describes adverse effects of long-term livestock grazing on crusts.

Concostrino-Zubiri et al. describe effects of exposure and livestock grazing on crusts - example Bryophytes (mosses).

Deines et al. 2007. Lichen cover resulted in significant decreases in cheatgrass. Livestock trampling tears apart and/or pulverizes crusts.

Evans and Belnap 1999. Effects of loss of nitrogen from crust lost in soils in arid communities.

Fernandez et al. 2007. Results show that areas used by domestic livestock have 20% less plant cover and 100% less soil organic carbon and nitrogen compared to relict sites browsed by native ungulates. In actively grazed sites, domestic livestock grazing also appears to lead to clustered, rather than random, spatial distribution of soil resources.

Kettering 2009. Soil crusts were not totally recovered from disturbance following 40 years. This also impacts crusts carbon sequestration ability.

NRCS 2007. This describes microbiotic crusts and disturbance impacts.

Ponzetti and McCune 2007. This describes adverse effects of soil disturbance and increased incident radiation, increased heat load, and topographic position in crust recovery.

Rosentreter et al. Field Guide. Lichens and mosses typical of the region. Which species have been found, and where, in the project area and surroundings?

Serpe et al. crusts. 2008. Crusts tend to reduce the spread of invasive species. The project will harm and/or destroy or lead to greater cow-caused destruction of crusts.

USDI BLM Belnap et al. 2001. Tech. Ref. on Biological Crusts. Describes grazing and mechanical impacts to crusts, and their vital role in the ecosystem protecting soils from erosion in wind and water and other ecological functions.

These crusts will be highly degraded, disturbed and destroyed by the series of vegetation treatment, cross country heavy equipment operation, and large-scale fire use. The USFS has failed to provide a baseline analysis of project area biocrust types, extent and occurrence here, and take a hard look at the increased weeds, soil erosion, hillslope runoff sedimentation into streams and other harms caused by the project’s major disturbance to these essential ecological components.

We Object that the USFS has failed to analyze project impacts on may sensitive species, and had provided BLM the USFS with information on several species such as Brewer’s Sparrow and Vesper Sparrow that inhabit mountain big sagebrush or low sagebrush sites.

There are also downward trends in shrub‐steppe indicates continuing problems with the health of this community. Likewise, many riparian species also had downward trends: killdeer, violet‐green swallow, warbling vireo, yellow warbler, lazuli bunting, savannah sparrow, song sparrow, yellow‐headed blackbird, Brewer’s blackbird. Downward trends in riparian species are indicative of continuing deterioration of riparian habitat*s.*

Landscape‐scale conservation is a critical component of ICBEMP assessments (see Wisdom et al. 2002). Agencies are required to follow ICBEMP science under a multi-agency MOU. Lands in this Owyhee region were identified by ICBEMP analyses as Source Habitats for Terrestrial vertebrates dependent on sagebrush in Wisdom and other analyses. (Dobkin and Sauder 2004). Interior’s *State of the Birds* have documented large-scale declines.

**Beschta Climate Stress Info – Analysis Ignores Climate Stress and Lack of Land Resilience**

The Abstract from Beschta et al. 2014 includes:

*“ … legacy [grazing] effects to western ecosystems were indeed significant and contemporary livestock use on public lands generally maintains or exacerbates many of those effects; (2) livestock grazing has been a major factor affecting fire frequency, fire severity, and ecosystem trajectories in the western US for over a century; and (3) the removal or reduction of grazing impacts in these altered ecosystems is the most effective means of initiating ecological recovery. Svejcar et al. (Environ Manage, 2014) offer no evidence that livestock use is consistent with the timely recovery of grazing-degraded uplands, riparian areas, or stream systems. We thus conclude that public-land ecosystems can best persist or cope with a changing climate by significantly reducing ungulate grazing and related impacts.*

This demonstrates the need to fully consider the impacts and stresses posed by legacy and ongoing livestock grazing if the USFS wants to restore resiliency and resistance; take a hard look at impacts of grazing on fire frequency/severity and ecosystem trajectories, and consider benefits of removal and/or significant reductions in grazing.

*“Contemporarygrazingimpacts(asdescribedinBeschtaetal.2013)compound“legacy effects, including: altered fire regimes; biological soil crust loss, soil loss, and compaction; altered composition, structure, and function of upland, riparian, and stream biological communities; altered streamflow regimes; and reduced food-web support and physical habitat for terrestrial and aquatic biota (Blackburn 1984; Belsky et al. 1999; Kauffman and Pyke 2001; Belnap and Lange 2003; Fleischner 2010). Combined legacy and current grazing effects have left many streams with degraded riparian vegetation, accelerated bank erosion, widened and/or incised stream channels, and altered water quality (increased temperatures and sediment loads).*

From the 2014 Beschta et al. article text:

*Livestock grazing also has widespread effects on the frequency and distribution of native grasses, forbs, and shrubs, and native wildlife species dependent upon those plants [e.g., sage-grouse (Centrocercus urophasianus); Manier et al. 2013]. Livestock grazing is not a viable tool for reducing fuels and wildfire effects. Livestock grazing in western US landscapes altered natural fire regimes by decreasing the frequency of low-severity fires beginning in the early 1900s (Swetnam and Betancourt 1998), making large areas prone to invasion by woody species and, in turn, more susceptible to high- severity fires (Chambers and Pellang 2008). Furthermore, cheatgrass (Bromus tectorum), an annual exotic, spread rapidly throughout the Intermountain West as a result of livestock  movement and overgrazing (Mack, 1986), contributing to more frequent burning. Cheatgrass dominates nearly 70,000 km2 in the Great Basin and is a component on an additional 250,000 km2 (Diamond et al. 2012). Reisner et al. (2013) found that: livestock grazing increases cheatgrass dominance in sagebrush steppe, reduced grazing may be one of the most effective means of conserving and restoring imperiled sagebrush ecosystems, and livestock grazing is not likely a viable tool for reducing cheatgrass dominance because it promotes cheatgrass invasion. Although livestock grazing has complex ecological consequences, large-scale reductions in grazing effects are likely to reduce cumulative ecosystem degradation. Recognizing the complexity of grazing issues was central to the synthesis and recommendations included in Beschta et al. (2013). Our analyses provided an integrative view of that complexity: we discussed three classes of ungulates (domestic, feral, wild), drawing examples from diverse vegetation types (shrub steppe, desert, conifer forest) and ecological attributes (such as water quality, hydrology, riparian areas, soils, hydrology, biodiversity). Nevertheless, compelling reasons exist to single out livestock as a cause of ecological harm to native plant communities, terrestrial and aquatic habitats, and watershed processes (Belsky et al. 1999; Kauffman and Pyke 2001; Belnap and Lange 2003; NRC 2002). Livestock use is a principal cause of desertification in arid and semi-arid landscapes (Swetnam and Betancourt 1998; Belnap and Lange 2003; Fleischner 2010). It has the most extensive land-use footprint on western public lands (Beschta et al. 2013), and it continues at major public expense (Vincent Livestock production also contributes directly and indirectly to greenhouse gases, raising increasing concern about its climate effects (Ripple et al 2014). The cessation or removal of factors that cause degradation or prevent recovery is the most effective and robust approach to ecological restoration (Kauffman et al. 1997). Unlike many stressors, livestock use is subject to human control.*

Beschta et al. 2012. Adapting to Climate Change on Western Public Lands: Addressing the Ecological effects of Domestic, wild and Feral Ungulates.

This Abstract includes:

*Historical and contemporary livestock production—the most widespread and long-running commercial use of public lands—can alter vegetation, soils, hydrology, and wildlife species composition and abundances in ways that exacerbate the effects of climate change on these resources.*

*Removing or reducing livestock across large areas of public land would alleviate a widely recognized and long-term stressor and make these lands less susceptible to the effects of climate change. Where livestock use continues, or where significant densities of wild or feral ungulates occur, management should carefully document the ecological, social, and economic consequences (both costs and benefits) to better ensure man agement that minimizes ungulate impacts to plant and animal communities, soils, and water resources. Reestablishing apex predators in large, contiguous areas of public land may help mitigate any adverse ecological effects of wild ungulates.*

*Climate-related changes can not only affect public-land ecosystems directly, but may exacerbate the aggregate effects of non-climatic stressors, such as habitat modification and pollution caused by log- ging, mining, grazing, roads, water diversions, and recre- ation (Root and others 2003; CEQ 2010; Barnosky and others 2012).*

*One effective means of ameliorating the effects of cli- mate change on ecosystems is to reduce environmental stressors under management control, such as land and water uses (Julius and others 2008; Heller and Zavaleta 2009; Prato 2011).*

*Climate change and ungulates, singly and in concert, influence ecosystems at the most fundamental levels by affecting soils and hydrologic processes. These effects, in turn, influence many other ecosystem components and processes—nutrient and energy cycles; reproduction, sur vival, and abundance of terrestrial and aquatic species; and community structure and composition. Moreover, by altering so many factors crucial to ecosystem functioning, the combined effects of a changing climate and ungulate use can affect biodiversity at scales ranging from species to ecosystems (FS 2007) and limit the capability of large areas to supply ecosystem services (Christensen and others 1996; MEA 2005b).*

*Climate induced increases in wildfire occurrence may aggravate the expansion of cheatgrass (Bromus tec torum), an exotic annual that has invaded millions of hectares of sagebrush (Artemisia spp.) steppe, a widespread yet threatened ecosystem. In turn, elevated wildfire occurrence facilitates the conversion of sagebrush and other native shrub-perennial grass communities to those dominated by alien grasses (D’Antonio and Vitousek 1992; Brooks 2008), resulting in habitat loss for imperiled greater sage-grouse (Centrocercus urophasianus) and other sage- brush-dependent species (Welch 2005). The US Fish and Wildlife Service (FWS 2010) recently concluded climate change effects can exacerbate many of the multiple threats to sagebrush habitats, including wildfire, invasive plants, and heavy ungulate use. In addition, the combined effects of increased air temperatures, more frequent fires, and elevated CO2 levels apparently provide some invasive species with a competitive advantage (Karl and others 2009).*

*By the mid-21st century, Bates and others (2008) indi- cate that warming in western mountains is very likely to cause large decreases in snowpack, earlier snowmelt, more winter rain events, increased peak winter flows and flood-ing, and reduced summer flows. Annual runoff is predicted to decrease by 10–30 % in mid-latitude western North America by 2050 (Milly and others 2005) and up to 40 % in Arizona (Milly and others 2008; ITF 2011). Drought periods are expected to become more frequent and longer throughout the West (Bates and others 2008). Summertime decreases in streamflow (Luce and Holden 2009) and increased water temperatures already have been docu-mented for some western rivers (Kaushal and others 2010; Isaak and others 2012).*

*Livestock use effects, exacerbated by climate change, often have severe impacts on upland plant communities*

*Simplified plant communities combine with loss of vegetation mosaics across landscapes to affect pollinators, birds, small mammals, amphibians, wild ungulates, and other native wildlife (Bock and others 1993; Fleischner 1994; Saab and others 1995; Ohmart 1996). Ohmart and Anderson (1986) suggested that livestock grazing may be the major factor negatively affecting wildlife in eleven western states.*

*Livestock grazing and trampling can damage or eliminate biological soil crusts characteristic of many arid and semiarid regions (Belnap and Lange 2003; Asner and others 2004). These complex crusts are important for fer-tility, soil stability, and hydrology (Belnap and Lange 2003). In arid and semiarid regions they provide the major barrier against wind erosion and dust emission (Munson and others 2011).*

Intensified grazing harms drainage networks and watersheds, and the full range of harms - direct, indirect and cumulative from all the radical soil/veg community/biocrust disturbance due to the Railroad Saddle Project must be assessed with eyes wide open to the combined detrimental effects of grazing. See also Belsky et al. 1999 riparian grazing impacts paper. Such direct, indirect and cumulative impacts were not assessed in the 2023 EA in a hard look EPA analysis, and we Object to this.

The USFS failed to address the cumulative and indirect impacts of its breaking up its former Lost Creek-Boulder Creek project and also the Granite Creek project in the New Meadows RD into several smaller and/or adjacent projects – and we wonder are smaller projects being segmented in? We Object to a full discussion of planned ad/or foreseeable or linked projects.

See: <https://casetext.com/case/all-for-wild-rockies-v-us-forest-serv>

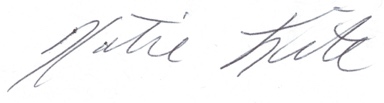
violated the National Forest Management Act (NFMA) when it created a new definition for "old forest habitat" and designated certain land to be managed for landscape restoration, as opposed to commodity production, contrary to the terms of the 2003 Payette National Forest Plan. The Circuit identified the central failure of the agency to be a failure to explain how the Project would meet the goals set forth in the 2003 Plan as required by NFMA.

The Circuit held that the 2003 Forest Plan - and specifically the Plan's Vegetation Guideline VEGU01 - "instructs the Forest Service to manage the Plan's vegetative components in a manner that moves all components toward their desired conditions in the long term." Id. at 1115. But the Plan "does not permit the Forest Service to abandon desired conditions in favor of different conditions entirely, without consideration of effects in the long term."

Without taking a hard look at grazing degradation, shifted and intensified grazing impacts following treatments, and various forms of deforestation and shrub loss, and how all the combined effects of this project will move all components toward desired conditions under the forest plan. We Object to the failure of the EA to do so.

We request the USFS withdraw the EA and embark on systematic thorough baseline sensitive and MIS species studies in the railroad Ridge landscape, as a basis for developing an EIS with reasonable range of protective alternatives.

Sincerely,



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