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Comments: Please accept the attached document as the Idaho Conservation League's comments on the Railroad Saddle Draft EA. If there are any questions regarding these comments and recommendations, please feel free to contact me using the contact information in the attached letter.

Please accept the Idaho Conservation League[rsquo]s comments on the Railroad Saddle Project Draft Environmental Assessment (EA). Since 1973, the Idaho Conservation League has had a long history of involvement with public lands issues. As Idaho[rsquo]s largest state-based conservation organization, we represent over 25,000 supporters who have a deep personal interest in restoring our forests to more resilient conditions and reducing the likelihood of uncharacteristic wildfires. We also work to restore wildlife habitat and improve ecosystem and watershed health.

We support the comments submitted by the Payette Forest Coalition (PFC), of which ICL is a long-time member in good standing. These comments focus primarily on specific recommendations regarding vegetation management treatments and watershed improvements, which are central themes of the project[rsquo]s Purpose and Need.
Payette Forest Coalition Comments
The Payette Forest Coalition (PFC) wishes to express our appreciation to you and the Railroad Saddle Interdisciplinary Team (IDT) for the opportunity to comment on the Draft Environmental Assessment for the Railroad Saddle Project.

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

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

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

The PFC encourages the Forest Service to clearly identify the number of acres that are available for treatment in each vegetation type (PVG) to achieve the stated objectives of the project, e.g., "there are a total of 950 acres of large tree size class stands that could be treated to reduce canopy closure to increase stand resilience to wildfire and reduce insect and disease outbreaks within PFG 5. Of those acres, 510 acres are proposed for treatment primarily because they lie outside of riparian conservation habitat, are not within landslide prone areas and will create the best mix of habitats for wildlife species that depend upon higher density stands."

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

in the vegetation section.

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

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

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

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

Finally, we ask that the Forest Service provide the PFC with ample opportunity to review and comment on future projects, ideally over two regularly scheduled monthly PFC meetings.
Additional Comments
Page 47 of the Draft EA states that the, [ldquo]proposed action would be implemented over an unknown number of years.[rdquo] Although we do expect that implementing a project of this size will take up to 20 years, as has been the case with past similar projects, the EA does not provide a projected timeline for implementation. We recommend that the Forest Service include a projected implementation timeline in the Final EA. This will demonstrate that the agency has considered the effects of implementation throughout the project[rsquo]s lifespan. Further, an implementation timeline proactively demonstrates the Forest Service[rsquo]s response to the need to increase the pace and scale of restoration activities while reducing fuel loads in critical areas.

We also note that the Forest Service refers to 153.4 miles being proposed for decommissioning, including in Table 39. However, the summary on page 52 reports 149.4 miles of road decommissioning. We recommend that the agency reconcile this inconsistent reporting, or more clearly explain the difference between the two reported numbers. For example, the 153.4 miles may include a category of road/route for decommissioning that the summary on page 52 does not include.

Finally, we appreciate the discussion the PFC members and Forest Service staff had on February 3, 2023 regarding the release and/or publication of specialist reports when the Draft EA became available to the public. We understand that the EA reflects the findings of each specialist report. However, sometimes specifics that can help inform the public are often found in the specialist documents. It also allows for the opportunity to better understand data collection methods, results, and inferences made based on the collected data. While it isn[rsquo]t required to release these documents prior to the publication of a final EA, we ask that the Forest Service explore the possibility of publishing draft specialist reports at the same time the draft EA is released for review.

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