

November 15, 2021

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Dear Mr. Hogan and Mr. Simpson,

Thank you for the opportunity to comment on the Payette National Forest's ("Forest") proposed East Fork South Fork Restoration and Access Management Project ("Project"). As you are aware, the Big Creek/Yellow Pine/South Fork Salmon River Collaborative ("Collaborative") met and discussed this Project for over two years. The goals identified for the Project were to:

1. Look for 50" motorized recreational opportunities;
2. Look for restoration opportunities; and
3. Provide for outstanding legal rights such as Tribal, mineral, and private property access.

On December 12, 2018, the Collaborative submitted a Draft consensus proposal to the Forest for consideration. We were disheartened to see the efforts of our two-years of work were not the starting point for this scoping document. The Collaborative understands that the Forest added components from the Thunder Mountain Area that were outside of our Collaborative efforts, but we would expect that the proposed actions for the EFSFSR would more closely mirror our recommendations submitted to the Forest. The Collaborative would ask that our recommendations (attached below) would be the preferred alternative for actions in the EFSFSR as this moves forward in the NEPA process.

Sincerely,

Kyle Fend, Rounded

Wes Keller, Resource

Sandra Mitchell, Recreation

# **EAST FORK SOUTH FORK SALMON RIVER RESTORATION AND ACCESS MANAGEMENT PROPOSED ACTION**

## **Background**

This document represents consensus recommendations from the Big Creek/Yellow Pine/South Fork Salmon River Collaborative (“the Collaborative”) to the Payette National Forest regarding proposed actions in the East Fork of the South Fork Salmon River (“EFSFSR”). The project area is located on the Payette National Forest in Management Areas 12 and 13. The Collaborative was formed through the efforts of Senator Mike Crapo and represents interested and affected stakeholders from a broad range of interests, including the environmental community, mining industry, motorized and non-motorized recreation groups, Nez Perce Tribe Watershed Division, regulatory agencies, community residents, and state and county governments. The Collaborative was facilitated by the University of Idaho Extension office in Cascade, ID. The Payette National Forest attended and provided relevant background information.

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## **THE COLLABORATIVE AGREED WITH CONSENSUS TO THE FOLLOWING PROJECTS:**

### **Projects benefiting motorized recreation:**

- Redesign switchbacks on Sheep Creek Trail (# 071) for pack saddle/motorcycle use
- Construct a new ATV loop along unauthorized mining roads on Red Mountain
- Maintain Quartz Creek Road/Trail (# 067) as an ATV trail past the Quartz Creek bridge up to the proposed Red Mountain ATV loop
- Designate Wilson Mine Road as ATV trail
- Designate short segment of Horse Heaven Road for Trail Open to all Vehicle (“TOV”) use

### **Projects benefiting non-motorized recreation:**

- Designate and sign the non-motorized trail to Fish Lake
- Place Salt Creek Trail back on U.S. Forest Service system as a designated non-motorized trail

**Projects benefiting natural resources:**

- Address sediment delivery issues on the Yellow Pine Bar Road (leading to camping) through graveling/resurfacing
- Reroute the McCall-Yellow Pine Road around the Eiguren Ranch & recontour the “Bowling Alley” slide area
- Maintain Missouri Creek Trail (# 031) non-motorized trail status and conduct trail improvements for sediment reduction
- Conduct Storm Damage Risk Reduction (“SDRR”) work around sediment delivery points & fix trail issues on Quartz Creek Road/Trail (# 067)
- Fix culvert issues on East Fork South Fork Salmon River Road hanging culvert and Spring Creek culvert (on Profile Summit Road)
- Decommission Mule Hill Road for resource benefits
- Decommission Sugar Creek Spurs for resource benefits

**No Action Decision:**

- Sugar Creek Road: next time the road is opened would be the time to evaluate opening this road to the public or decommissioning through road recontour

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**DETAILED RECOMMENDATIONS AND MAP LINKS FOR INDIVIDUAL PROJECTS FROM THE PROPOSED ACTION:****Projects benefiting motorized recreation:**

An integral goal of the Collaborative charter was to find motorized recreation opportunities to preserve or enhance effective public access within Management Areas 12 and 13. The Collaborative believes the following projects help achieve this goal:

**Sheep Creek Trail:** This 2-wheel motorcycle trail has two switchback sections that are continual steeped and too tight for stock and motorcycle access. The trail needs to be rerouted to have fewer and wider switchbacks that will accommodate a broader variety of visitors and be more sustainable than existing alignment. Redesign switchbacks and reroute as necessary for safer use by pack stock and motorcyclists (~1.1 miles). Decommission the old trail that will no longer be used. Map: <https://arcg.is/0u0H1b>

**Quartz Creek Road/Trail (# 067):** After leaving Yellow Pine and starting at the junction of the Abstein Road and Quartz Creek Road (after crossing the bridge over the EFSFSR), the road designation for the public for FS # 067 will remain TOV up to the location of the old Tungsten Mine, providing a wide area for a vehicle turnaround. From the old Tungsten Mine, the designation will become ATV (<50 inch) for the rest of the Quartz Creek trail up to the newly proposed Red Mountain ATV trail (~0.73 miles) with the expressed intention that the existing road footprint not be narrowed to <50 inch and be kept at existing width. Map: <https://arcg.is/yn5nn>

**Red Mountain ATV loop:** A new ATV trail (~2.96 miles) will be designated on existing, unauthorized road prisms on Red Mountain. This ATV loop will continue from the portion of the Quartz Creek Road/Trail re-designated for ATV use as part of this Proposed Action. There are numerous short spur roads off the newly designated ATV loop trail that should be closed by rocks or gates (if mineral access is needed) or scarification to encourage staying on the main trail. Again, it is noted that the existing road footprint not be narrowed to <50 inch and be kept at existing width. Map: <https://arcg.is/DTSrW>

**Wilson Mine Road:** There is an existing road prism currently being used as an unauthorized route, to the north and west of the Wilson Mine private property boundary. The Collaborative recommends designating this existing use trail as an authorized ATV trail (~0.9 miles). Close off side roads using rocks or gates (if mineral access is needed) so that unauthorized motorized use does not occur on private property. Create turnaround at an appropriately wide location and place rocks around turnaround so no new trail development occurs. Map: <https://arcg.is/1TLTyP>

**Horse Heaven Road:** Designate short segment of the Horse Heaven Road for TOV use, all the way to top of the ridge (~0.8 miles). Add boulders or other appropriate controls to facilitate a turn around and overlook area. Map: <https://arcg.is/1jST9G>

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#### **Projects benefiting non-motorized recreation:**

In an effort to preserve or enhance effective non-motorized recreation public access within Management Areas 12 and 13, the following opportunities have been identified:

**Fish Lake Trail:** Designate the Fish Lake Trail as a non-motorized trail (~1.8 miles). Construct a pull out on the Profile Road for parking and install an informative and pack in / pack out sign at the trailhead. Conduct minor trail improvements as necessary. Map: <https://arcg.is/14Sibn>

**Salt Creek Trail:** There is currently a trail prism that starts at the confluence of Salt Creek and the EFSFSR. This proposal would designate the Salt Creek Trail as a non-motorized trail (~4 miles). Conduct minor trail improvements as necessary. Map: <https://arcg.is/0b4OO0>

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#### **Projects benefiting natural resources:**

An important aspect of this Collaborative recommendation is to maintain and improve conditions for Endangered Species Act-listed fish and wildlife. When the word decommissioning is used in this document, it is referring to full recontour of the road prism to match the surrounding hill slope.

**Yellow Pine Bar Road:** Gravel the Yellow Pine Bar Road that leads to campsites along the EFSFSR (~0.9 miles). This could be done the next time the county gravels the EFSFSR road. Map: <https://arcg.is/0bWe1C>

**McCall-Stibnite Road:** Reroute a section of the EFSFSR road to improve conditions for fish habitat and human safety. Decommission the existing road through the “Bowling Alley” slide area by full recontour (~0.8 miles) in an effort to reduce sediment delivery to streams. Construct a new road on Forest Service land, farther from the EFSFSR, to bypass the “Bowling Alley” and improve safety conditions. Please refer to the letter previously sent by the Collaborative (on \_\_\_\_\_) to the Forest Service and Valley County concerning the recommendations for this road. Map: <https://arcg.is/0CD4b9>

**Missouri Creek Trail:** After the Missouri Creek fire, fire crews conducted some trail work on the Missouri Creek Trail. Additional trail maintenance that keeps water off the trail (e.g., water bars) would reduce the amount of fine sediment entering Missouri Creek. Conduct trail improvements, addressing water drainage issues (~3.4 miles). Map: <https://arcg.is/H5bG>

**Quartz Creek Sediment Reduction:** Quartz Creek has been identified as having the highest sediment delivery to streams of all roads in the EFSFSR drainage. Significant sediment reduction can be obtained by road/trail gravel lifts, water bar construction and maintenance, in-sloping, and general SDRR work at sediment delivery points identified through Geomorphic Road Analysis and Inventory Package (GRAIP) surveys (~1.4 miles). Map: <https://arcg.is/1vimKi>

**Culvert Fixes:** Two culverts on National Forest System roads need repair in the project area. 1) One problem culvert exists on the old EFSFSR Road, above the current EFSFSR Road (approximately mile marker 3.1) (<https://arcg.is/1XmaDS>). During spring flows, water passing through this culvert has the potential to cause road damage and sediment delivery to the stream. The Collaborative recommends removing this culvert and creating a small section of stream channel. 2) Another problem culvert exists on the Profile Creek Road, along Spring Creek. This culvert is undersized and needs to be modified for increased capacity or replaced with an appropriately sized culvert. Map: <https://arcg.is/jSP8a>

**Mule Hill Road:** Decommission the Mule Hill Road through full recontour and restore stream crossings during the decommissioning process (~2.1 miles). Map: <https://arcg.is/08mqz8>

**Sugar Creek Spur Roads:** Decommission Sugar Creek Spur roads through full recontour (~3.9 miles). Map: <https://arcg.is/10qLXy>

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**No Action Decision:**

**Sugar Creek Road:** The Collaborative reached consensus to defer any decision on the Sugar Creek Road until the next time the road is opened through significant road modifications using a Special Use Permit. At that point, the Sugar Creek Road should be evaluated for opening to the public or decommissioning through road recontour.

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**Discussion points regarding Cinnabar Mine access outside of the Collaborative recommendations and process:**

Although outside the charter of the Collaborative, individual members of the Collaborative have been working with private property owners and the State of Idaho to establish an alternative public motorized access to Cinnabar that is primarily on private property. This effort currently has support from Midas Gold and the Oberbillig Family Trust but will require some minimal assistance from the Payette National Forest because the route crosses a few very short sections of National Forest Service land in-between large blocks of private land (See Figure 1 below). Efforts to secure this access route will take place outside of the Collaborative and do not represent the Collaborative. Some members of the collaborative reached consensus regarding the Sugar Creek recommendations based on their expectation that this proposal will be implemented.

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**Additional information:**

The Collaborative requests that if previously undetermined or unauthorized roads are identified, in reality, as maintenance level one (ML1) system roads that the following be considered:

- We request the FS evaluate newly discovered ML1 roads and unauthorized roads for resource impacts and implement appropriate decommissioning or obliteration so that the full range of recreation and restoration opportunities can be implemented as presented in the proposal. We would ask that the FS evaluate these roads as part of initial scoping so that the Collaborative is aware of any significant departures from this proposal.
- The Collaborative recommends that those ML1 roads that do not represent a resource impact be retained as ML1 roads within the Forest Service and more specifically the Krassel Ranger District minimum road system.



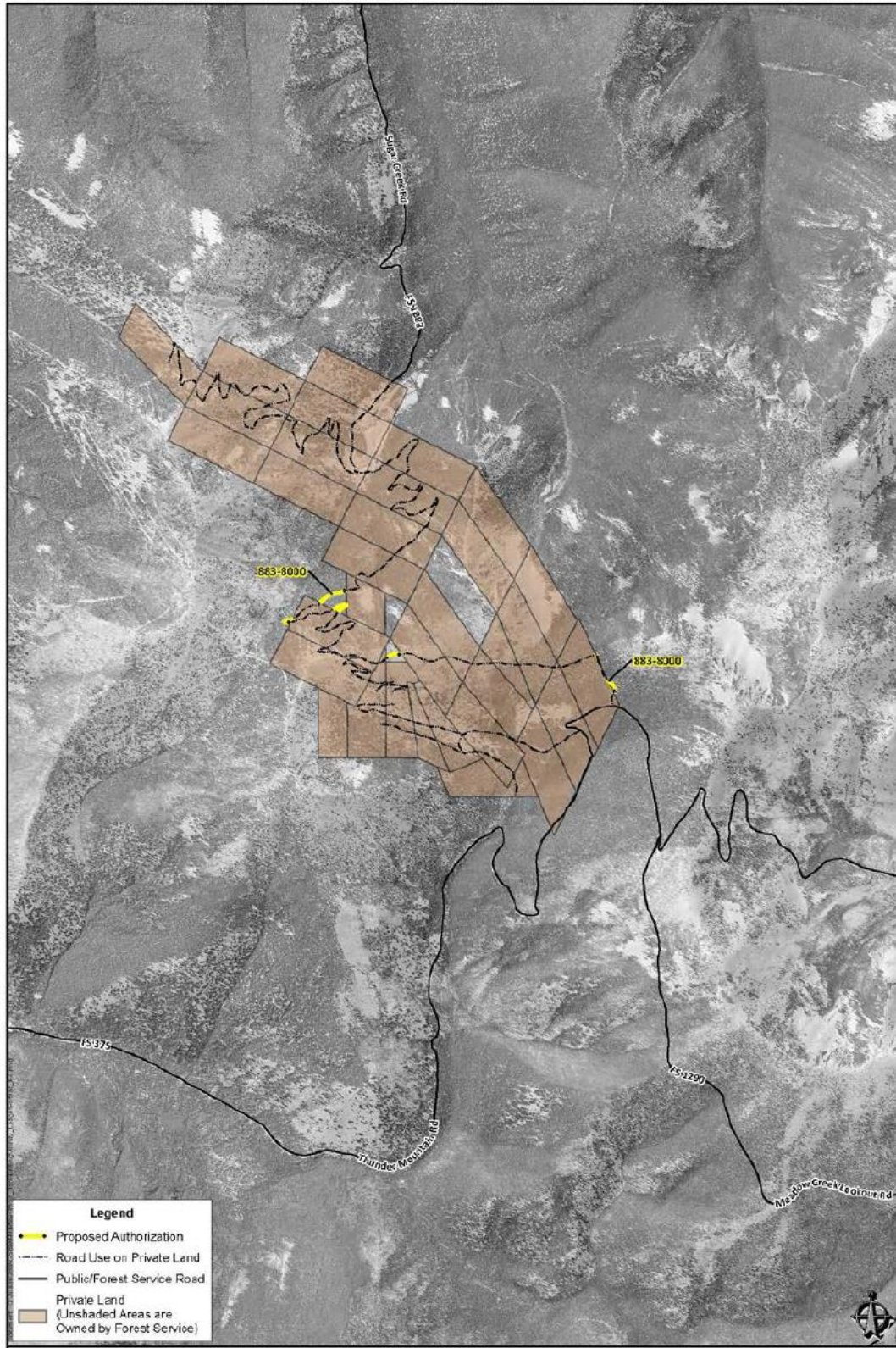


Figure 1

