

# OFFICE OF SPECIES CONSERVATION

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**MICHAEL R. EDMONDSON**  
Administrator

304 N. Eighth Street, Suite 149  
Boise, Idaho 83702-5833

November 19, 2021

Attn: Joshua Simpson  
Krassel Ranger District, Payette National Forest  
500 North Mission Street  
McCall, ID 83638

## **RE: East Fork South Fork Restoration and Access Management Plan Scoping**

Dear Mr. Simpson,

The State, through the Office of Species Conservation (OSC), appreciates this opportunity to provide comments on the Krassel Ranger District's East Fork South Fork Restoration and Access Management Plan (EFSF RAMP) scoping document. The main purpose of this project is to be a companion project to the Big Creek RAMP and South Fork RAMP to complete travel planning per subpart A and complete a new analysis per subpart B to fulfil the settlement agreement. This includes watershed improvement actions such as restoring/rehabilitating old mining roads (Red Mountain, Dewey Mine, Thunder Mountain, etc.) and evaluating motorized access opportunities.

OHV recreation plays an important and beneficial economic role in Valley County and the entire state of Idaho. At the same time, the majority of specified motorized access routes described in the scoping materials are in alpine or subalpine habitat and may have effects on several wildlife species (including but not limited to wolverine, mountain goat, Clark's nutcracker, and whitebark pine) and sensitive habitat types including those which contain species of greatest conservation need. The state recommends that all routes analyze potential effects (singularly and cumulative) on alpine and subalpine wildlife and identify motorized routes with less conflict. The State can assist with identifying those routes, and in the development of BMPs when working on road restoration, particularly related to culvert maintenance or replacement to avoid impacts to ESA and native fish species.

The State looks forward to seeing the level of detail required to adequately evaluate potential impacts to fish, wildlife, and their habitats in the upcoming document. Potential motorized access action items identified in the scoping document are limited in specificity. Idaho Department of Parks and Recreation respectfully requests that there be no net loss of motorized route opportunities occurring from the EFSF RAMP plan action. To help realize that goal, the Forest should clearly define the intent of the project as it relates to net changes (increases or decreases) in the motorized opportunities. This will help the State evaluate the proposed actions and identify early areas of extra coordination between county, State, and Federal partners.

Please contact my Federal Lands Coordinator, Jace Hogg at [jace.hogg@osc.idaho.gov](mailto:jace.hogg@osc.idaho.gov); 208 332 1553 if you have any questions or need additional information.

Sincerely,

Michael Edmondson, Administrator

**Reference:** “Restoration treatments would be considered on approximately 70 miles of mining roads which were abandoned during the last 50 or so years across the project area.” pg. 2

**Comment 1:** In the upcoming environmental analysis, the Forest should include a net gain/net loss of motorized access over the life of the project. Within this analysis, the Forest should identify what routes are currently accessible to motorized users, if they are system or non-system, how the Forest plans to address motorized usage of non-system routes (incorporation or decommissioning), and if non-motorized routes will increase or decrease.

**Comment 2:** In a similar fashion to the net gain/net loss evaluation of motorized access, an analysis should be included for dispersed recreation opportunities across the project area.

**Reference:** “Designate approximately 4.5 miles of new motorized trail open to all vehicles in the Horse Heaven area connecting with the existing Boise National Forest trail access (Figure 4).” pg. 1, 3

**Comment 1:** Some of the new proposed all vehicle motorized access, such as the 4.5 mile Horse Haven trail expansion, have been part of reoccurring discussions surrounding the pending Perpetua Plan of Operation and EIS for the Stibnite mine. The Idaho Roadless Rule Implementation Commission has discussed these routes at great length, and public access near Stibnite is of local concern. Recent Stibnite mine documents discuss plans to provide ATV access from Yellow Pine to the Meadow Creek lookout in the event that the road between Yellow Pine and Stibnite is closed and access (public and private) shifts entirely to the Johnson Creek road. If that is the case, then making a decision about this trail prior to the decision about Stibnite access routes seems premature. Please provide additional details, as well as an analysis of impacts of a new motorized route that includes how those impacts differ under different Stibnite access scenarios, since that decision has not yet been finalized. In addition, clarify if this proposal is for a single new route or if the 4.5 miles of new motorized trail might be made up of multiple new routes providing multiple new points of access to areas such as No Mans Creek and Meadow Creek.

**Comment 2:** This area is in the middle of multiple wolverine occurrences. It provides contiguous roadless habitat at the northern end of the Johnson Creek Rd corridor that seems to hold wolverines consistently. Impacts to wildlife and vulnerability to harvest should be evaluated.

**Reference:** Watershed Improvement Actions, pg. 2

**Comment:** The State looks forward to a more detailed layout of proposed watershed improvements (ex: number and location of culverts on county and FS routes being considered), how these improvements/rehab will impact ESA listed aquatic species in the project area. The project likely will require Stream Channel Alteration Permits (IDWR/USACE joint permit) as it relates to replacing, repairing, and removing culverts associated with perennial streams. In particular, the Krassel District should develop work windows for any work that has the potential to impact streams to avoid impacts during sensitive seasons (spawning, egg development, and emergence).

**Reference:** Purpose and Need for the Project #5, pg. 2

**Comment:** The State looks forward to more detail surrounding which project activities would constitute a forest plan amendment.

**Reference:** “Determine the Minimum Road System (MRS) needed for administrative, public, and private access under Subpart A of 36 Code of Federal Regulations 212 (36 CFR 212), and if necessary, revise the travel management plan for routes open to public motorized travel under Subpart B.” Pg. 1

**Comment:** In 2012 IDPR commissioned the University of Idaho to conduct a statewide economic study evaluating the positive economic benefit recreational users brought to the state of Idaho. According to the results of the study, OHV recreational users contributed 2.1 million dollars in combined trip and capital expenditures to Valley County. Statewide, OHV users contributed 434 million dollars to the Idaho economy. This study evaluated the economic impact of registered OHV users in the state of Idaho. It should be noted that OHV registrations in Idaho have only increased since 2012. In 2012, there were 137,262 OHV registrations. In 2020, there were 157,108 registrations: a 14.5% increase. The economic benefit of users to Valley County and to Idaho statewide have most likely increased accordingly.

**Reference:** “Designate the Quartz Creek Road/Motorized trail #067 as a system road to the Quartz Creek Bridge...a new motorized trail open to all vehicles that incorporates 3 miles of mining roads up to the Red Mountain mining area... Designate approximately 1 miles of new motorized trail in the Wilson Mine area near Profile Summit ... Designate approximately 1 mile of system road in the Thunder Mtn. Area to provide access to the Marble Creek and Lookout Mtn Trailheads” Pg. 1

**Comment:** These areas referenced above are within modeled wolverine habitat (as defined in the 2014 IDFG Management Plan for the Conservation of Wolverines), but there are no records of wolverine occurrence. It is also unclear what some of the proposed new routes will accomplish (new looping opportunities, other forms of added value, etc.), and what geographic extent is covered by the “Thunder Mountain Area”.

**Reference:** "Designate the Missouri Creek road as ML2 from the Warren Profile Gap Road to the trailhead to incorporate the loop road." pg. 2

**Comment:** Our understanding is that a road designation of “ML2” means roads would be open to high clearance vehicles, please clarify this designation. This trail is currently a non-motorized route and provides access into the area with the highest local density of mountain goats. Mountain goats are known to be sensitive to disturbance. Other alpine species (wolverine, Clark’s nutcracker, black rosy finches) may also be affected. Please clarify the location of the referenced trailhead and “loop road.”

### **Additional Materials**

- 1) Economics of Idaho Off-Highway Vehicle Registration
- 2) OHV Registration Data