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June 29, 2022

Ms. Jennifer Blake
McCall District Ranger
Payette National Forest
102 West Lake St.
McCall, ID 83638
(208) 634-0400

Electronically submitted:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=61668>

RE: Idaho Conservation League's Scoping Comments for the Proposed North Fork Divide Recreation Project

Dear Ms. Blake:

Please accept our scoping comments on the proposed North Fork Divide Recreation project. Since 1973, the Idaho Conservation League (ICL) has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 35,000 supporters, many of whom have a deep personal interest in enhancing wildlife security and creating quality recreation opportunities on public lands.

The increased use of public lands over the past 3 years serves to highlight the need to increase recreation opportunities and provide management and use information at the point-of-use, and ICL concurs with the Forest Service's proposal to augment signage and interpretive information at the proposed parking and trailhead areas. We also support the proposal to designate, sign and/or physically delineate existing dispersed camping sites along National Forest Service Road (NFSR) 50260. We recommend adding language to these information signs that outlines the impacts to wildlife habitat and the forest ecosystem through unauthorized travel or failing to adhere to Leave No Trace guidelines in camping areas.

Regarding the proposal to block motor vehicle access to the meadow south and west of the proposed trailhead at the end of NFSR 50260, we recommend that the Forest Service use materials such as large, immovable boulders or constructing a buck-and-pole fence. These materials would blend into the natural landscape more readily than metal gates or fencing and prove effective as long as opportunities to drive around the barriers are eliminated.

The project area should also be surveyed to avoid any sensitive or endangered habitats and plants. We suggest that during the project, employees or contractors of the Forest Service should also pick up any micro-trash observed. We also recommend that any soils affected by direct or indirect construction activities be mitigated through decompaction and reseeding using native materials, as is proposed in the scoping document. We suggest that the Forest Service require any employees, contractors, or outside entities working on trail reconstruction or parking lot improvements to install silt fences in wetland areas or Riparian Conservation Areas (RCAs) to prevent sediment introduction to nearby waterways.

Adequate signage at trail access points, parking areas, and near the historic Trapper Cabin remains a key tool for combating off-trail use and avoiding impacts to sensitive soils and plants. ICL recommends installing not only trail map kiosks/signs, but including interpretive language that describes the adverse impacts associated with off-trail riding or motor vehicle use that include promoting erosion, the introduction of invasive grasses and noxious weeds, soil compaction, and hydrologic issues. We recommend that signage at the historic Trapper Cabin include information regarding the resource's historic significance and the need to protect these historic resources for future generations to enjoy. We also recommend adding an image of an American flag to all information and interpretation signs/kiosks installed during the North Fork Divide Recreation project as the image promotes a sense of "belonging" and "ownership" and reduces the likelihood of vandalism. An investment in additional public outreach and education will produce positive results for the Forest Service, Valley County, McCall, and all public land users.

We appreciate the Forest Service providing details regarding the use of mechanical equipment during the implementation of the proposed project. Using mechanical equipment during trail reconstruction and parking lot improvement activities increases the chances that hazardous materials can be introduced into the environment through leaks and spills. We recommend the Forest Service develop a project hazardous materials plan that outlines Best Management Practices (BMPs) using mechanical equipment, and to mitigate for potential accidents by having spill/containment packs available during project implementation. We recommend storing fuel and conducting refueling operations 300' from Riparian Conservation Areas (RCAs).

We also recommend that the Forest Service implement BMPs for preventing the spread of noxious and invasive plants and weeds. As a part of the land survey for sensitive plants and animals, the Forest Service should document any noxious weeds. If the area has noxious weeds, only biodegradable chemical herbicide should be used. Parking lots and disturbed areas can serve as noxious weed sources and recreationists can then spread weeds along the trail system and into intact meadows. The Forest Service should regularly treat noxious weeds in the parking lot area, along the trail reconstruction zone, around the historic Trapper Cabin, and at the dispersed camping sites as needed.

Vehicles and equipment can serve as vectors for the spread of noxious weeds when proper inspection and cleaning are not practiced to limit their spread. We recommend that all equipment will be washed prior to entering National Forest lands, and that all equipment must pass inspection by Forest Service officials prior to mobilization. Because disturbed areas can also facilitate the expansion of noxious weeds and erosion, it is important that all areas impacted by this project are stabilized. The project area should be monitored for noxious weeds for three years after the project is completed.

Thank you for the opportunity to submit comments for the proposed North Fork Divide Recreation project. Should you have any questions regarding these comments and

recommendations, please do not hesitate to contact me. We look forward to working with the McCall Ranger District on this and future projects.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Randy Fox", is centered within a light gray rectangular box.

Randy Fox
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