



State of Idaho

Department of Parks and Recreation

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June 5, 2024

Attn: East Fork South Fork Restoration and Access Management Plan
Payette National Forest, Krassel Ranger District
500 North Mission Street
McCall, ID 83638

Via CARA Project Portal

RE: EFSF RAMP Draft EA
<https://www.fs.usda.gov/project/?project=60889>

Idaho Department of Parks and Recreation (IDPR) is the duly-established executive department under State of Idaho Code, with the stated mission of improving the quality of life in Idaho through outdoor recreation and resource stewardship. Acting under the supervision of the Idaho Park and Recreation Board, IDPR carries out recreational policies and programs of the State. Consistent with its statutory authorities, the Department participates in federal land management planning and project planning to further the public interest in recreational, scenic, and historical/archeological values.

IDPR staff is responsible for managing off-highway vehicle (OHV) recreation throughout Idaho through the Motorized Trail Program. IDPR's Trail Ranger and Trail Cat Programs provide maintenance and construction, and its OHV Education Program provides OHV training and environmental education. Through IDPR's Off Road Motor Vehicle and Motorbike Recreation Funds, grants are awarded to fund trail building and maintenance, and law enforcement activities. The Trail Program's partnerships with the Forest Service results in the maintenance and improvement of hundreds of miles of National Forest Trail each year.

Regarding this current draft EA Plan process, IDPR's recommendations and comments follow, in-summary in this cover letter, then in-detail on the attached pages. This input is based on concerns and interests in the Plan expressed by the Department's recreational stakeholders. They are further informed by the agency's long history in advocating for public lands access on the Payette including extensive involvement in the Travel Management process and within the Big Creek Yellow Pine Collaborative.

Comment summary:

- IDPR Supports Alternative D with proposed modifications
 - Open 51883 as a Trail for 70" and under OHVs
 - Open 503408900 as a Trail for 70" and under OHVs
 - Open Trails 069 and 074, and include 070 to 2-wheeled OHVs, in all Alternatives
- Consider using IDPR Grant Program and Trail Program resources
- Consider Implementation timeliness
- Consider additional information for the Socioeconomic report

Please see the following pages for recommendations and comments in-detail.

We greatly value our partnership with the Forest Service and its staff members and are grateful to have the opportunity to continue that partnership going forward.

Regards,

Land Access Coordinator
IDPR – Recreation Bureau

EFSF RAMP Draft EA Comments in detail:

IDPR supports the proposed Alternative D, with modifications as detailed further below, to form the Final Decision on the EFSF RAMP.

While taking into consideration the recommendations of the Big Creek Yellow Pine (BFYP) Collaborative, of which IDPR was a participant, Alternative D incorporates additional public motorized access desirable to the agency's recreational stakeholders and residents of the Project area. Simultaneously the proposed actions under Alternative D meet desirable resource management outcomes of the Forest. It is notable that with an increase in recreational access pursuant to Alternative D, "sediment deposition watershed condition indicator (WCI) would remain [in the] "functioning appropriately" [category] in all subwatersheds" (DEA pg 57, 3.6.3.5). Significant benefits toward improving conditions of *Debris Slide Hazard* and *Total Soil Resource Commitment* (pg 51, 3.5.3.4) also accrue toward creating additional sustainable public access while still trending outcomes toward desired management conditions.

IDPR request modifications to the Final EA to develop a Preferred Alternative which combines elements of Alternative D and additional public motorized trail access. These proposals may have been either overlooked in error during the scoping process or where of a nature which the Forest previously may not have had enough information or public support to carry forward into the DEA. Details are as follows.

Sugar Creek Road 51883: IDPR recommends an adjustment to designate the historically-public road as a **Special Designation NFS Trail limited to OHVs 70" and under**, rather than opening to the public as an ML2 road as proposed in Alternative D. Doing so will provide a highly-valued access opportunity to UTV and ATV users, reduce impacts from full sized vehicles, and significantly reduce costs of engineering, materials and labor necessary for measures to protecting spawning habitats in Sugar Creek. Installing bridges, AOPs, or hardened fords where appropriate, sized for the smaller, lighter vehicles will attain both access and resource management goals.

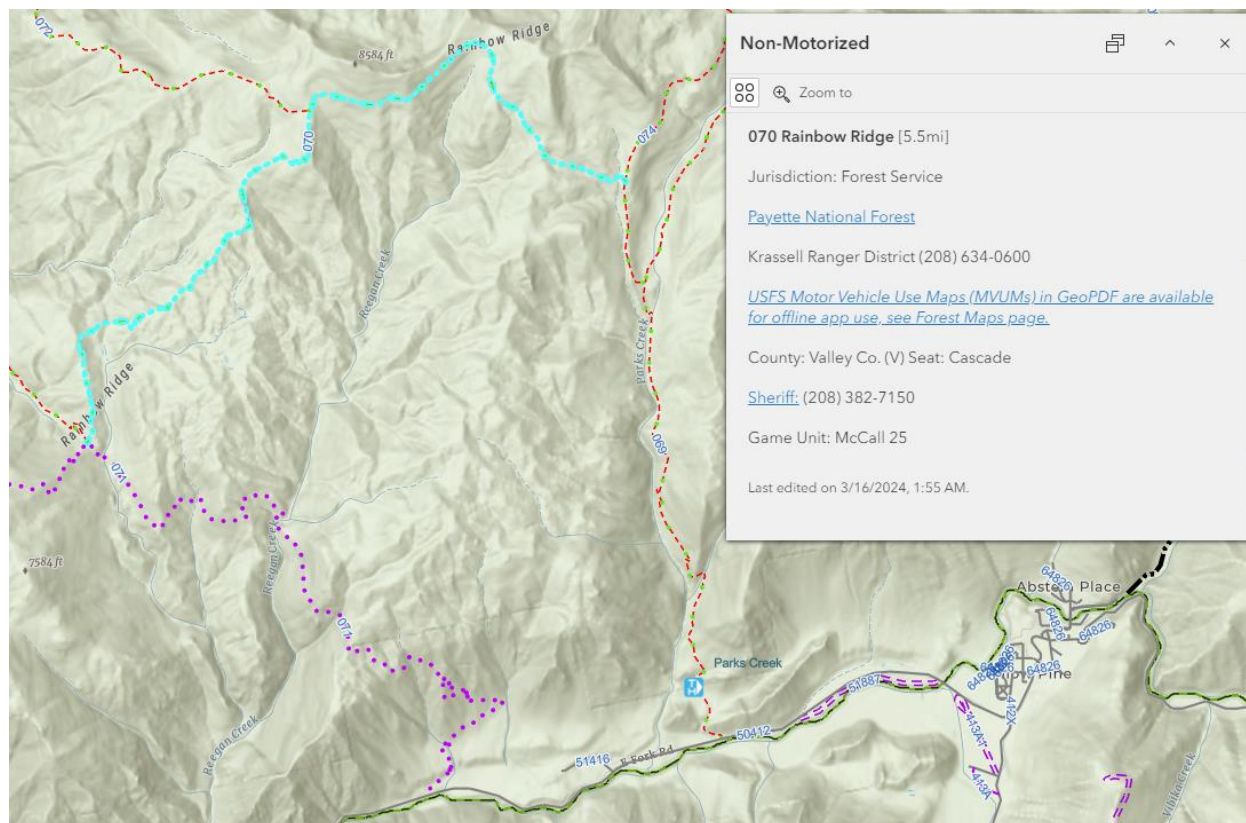
DEA page 45, section 3.3.3.2 cites in reference to the Cinnabar Mine site, "This additional mileage, while increasing available miles of access, is only to a private land boundary, which results in an out-and-back and not a loop opportunity, due to the lack of any easement across or through the private land this road accesses." The value of this route as destination access should not be discounted, as such an out-and-back OHV route would still be greatly valued by users wishing to view the unique mine site. A case in point of multiple successful out-and-back destination routes is seen at IDPR's Bayhorse Mine Site (Land of Yankee Fork State Park, near Challis, Idaho) where the public has the opportunity to travel to multiple abandoned mine sites on designated OHV trails on State of Idaho, BLM, and Forest Service lands. (See <https://arcg.is/0rC4mj>.) But the opportunity to engage the in-holders to obtain an easement to create a looping opportunity should not be dismissed, and IDPR will assist in that effort however possible.

Red Metals Mine/Crater Lake Road: IDPR recommends adding this route to the MVUM as a Special Designation NFS Trail limited to OHVs 70" and under. A 2015 letter submitted during NEPA comment period for granting private gated access to the unauthorized route 503408900 for an in-holder indicated that a mine property in-holder would be amenable to permitting limited public access across their mine property. This information was not timely revealed for Forest Service to consider, nor to BFYP Collaborative for it to have considered the information to inform a recommendation. or See "Crater Lake Access Road" <https://www.fs.usda.gov/project/payette/?project=46345> and project comments on file (letter copy available from IDPR). Furthermore, a comment from the same in-holder during the 2021 scoping period for the EFSF plan reiterated this offer in stronger terms yet, proposing that an easement could be granted for public access. See <https://cara.fs2c.usda.gov/Public/Letter/2799734?project=60889>.

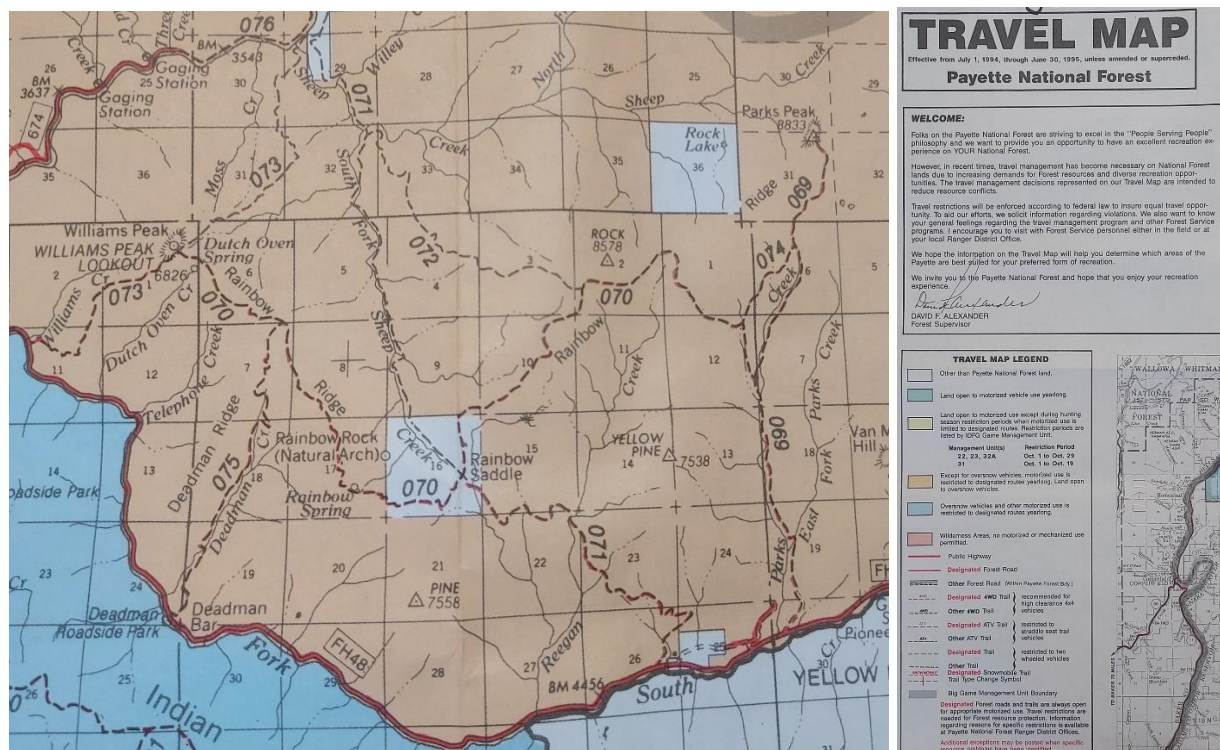
Parks Peak: IDPR requests including in any Final EA, the Action proposed in Alternative D of restoration of 6.88 miles of historically-motorized single-track trail, currently designated non-motorized, to 2-wheeled motorized use. This includes 4.96 miles of Parks Creek Trail 069 and 1.91 miles of Parks Peak Cut-off Trail 074. IDPR Trail Ranger staff reopened these trails, which were naturally-closed by significant downfall in summer of 2008. Resources were invested by IDPR in these trails plus in Tr 070 noted below, in good faith that these trails could perhaps be approved for motorcycle use in the October 2008 Krassel TMP ROD.

Rainbow Ridge: If Trails 069 and 074 can be reestablished as open to motorcycles, to complete a valuable looping opportunity IDPR would further request the re-designation to motorized of currently non-motorized section of the eastern section of Rainbow Ridge 070 between Trails 074 and 071 S/F Sheep Creek. Consideration of the status of this trail appears to be an oversight from the DEA as the trail was included in the Scoping map in 2021. A portion of the trail is inside the Project area, and the rest of the trail meanders across the northern Project boundary near the ridge with the adjacent drainage. Rainbow Ridge Trail has been characterized as a "World Class" single-track trail which will be a highly-desirable destination trail for its remarkable characteristics of remoteness and outstanding scenic values. Reference map <https://arcg.is/0y98yn0> and illustration below.

(Motorized access, to Trails 069, 074, and the above-noted portion of 070, was not approved in the October 2008 McCall/Krassel TMP ROD. Page 39 of the ROD cited a 2000 public process to remove the motorized designation as the reason why these were not reopened to motorized access in the 2008 Decision. IDPR has been unable to find any record of that process such as a Categorical Exclusion or a Forest Order, to give evidence of the process of and reasoning for the closure to motorized use. Subsequently these trails were excluded from the Forest-wide Travel Management Planning process restarted in 2005 under the 2005 Travel Planning Rule. BCYP Collaborative records show that these three trails were considered for recommendation to the Forest to restore motorized access to them.)



Highlighted route is 070 Rainbow Ridge, currently designated non-motorized. Trails 070, 069, & 074 were motorized single-track trails per 1994-1995 Payette NF Travel Map but were redesignated as non-motorized per the 2008 Krassel TMP. Trail 070 lies mainly on the boundary of the EFSF RAMP Project area. If Trails 069 & 074 are restored to motorized status, the non-motorized portion of 070 should also be restored to motorized status to create a valued looping opportunity with Trails 071, and 073 & 075 to the west.



Designated 2-wheel motorized trails per 1994-1995 Payette NF Travel Map: 069, 070, 071, 073, 074, & 075.

As is always our partnership pledge to our Forest Service colleagues, IDPR will assist the Forest with **Grant Program** and **Trail Program resources** to see trail-based project through to success. And when trails are available to the public for motorized use, the Trail Program can offer light maintenance performed by Trail Rangers upon annual request of the Ranger District to the IDPR Trail Program. These resources would generally not be available from IDPR for any route designated as an NFS Road or non-motorized trail. IDPR also pledges to foster the relationships necessary to secure the interest and cooperation of in-holders affected by restoration of public access to these prized recreational routes and historic destinations.

Project Implementation timeline and timeliness: Implementing public route access throughout the scope of this project should not be contingent first on total completion of any decommissioning scope. That approach can undesirably defer implementing planned public access improvements for years. Doing so does not accomplish the resource management goals of the Plan since the low hanging fruit of applying measures to mitigate sediment delivery from existing unmanaged tread would be delayed.

The **Socioeconomic report** contains terms of assumption in the absence of direct studies as to the local economy. The report proposes in the absence of quantitative facts that there will be no net impact on the local economy from motorized recreation. (Page 7 “It is not anticipated that total expenditures in Yellow Pine by Forest visitors would be measurably different regardless of alternative selected or the time scale considered.”)

To the contrary, members of the BCYP Collaborative and community residents have expressed concerns to IDPR about the economic viability of the Yellow Pine community relative to the prospects of maintaining recreational access to not just the EFSF Project area’s trails but to notable destinations. They believe that without restoring motorized access to key attraction sites such Crater Lake and Cinnabar Mine, which experiences were previously available until public-use road closures were implemented, non-resident visitation may be diminished which in turn impacts the economic prospects of the community. Economic impairment may result in limitation of availability of goods and services to both resident and visitor alike. These assertions are also assumptions in the absence of temporal visitation and spending studies, such as figures from before and after the roads to the sites were closed. But citing these concerns and the potential of increased visitation if these sites were available, would make for a fair counterpoint in the report for the Deciding Officer to consider. Simply put, residents’ points of view come directly from an interest in preserving the economic vitality of the Yellow Pine community through the promotion of recreational visitation.