



Idaho Rivers United - [REDACTED]

Protecting and Restoring the Rivers and Fish of Idaho

Dear Dave Hogen
Krassel District Ranger
Payette National Forest
500 N. Mission Street
McCall, ID 83638

**Re: East Fork South Fork Restoration and Recreation Access Management Plan
Environmental Assessment**

Dear District Ranger Hogen,

We are pleased for the opportunity to comment on the East Fork South Fork Restoration and Access Management Plan (EFSF RAMP) on the Payette National Forest. Public comment periods are an integral part of public lands management, and providing comments is a high priority of our organization.

Idaho Rivers United (IRU) is an environmental advocacy organization dedicated to protecting Idaho rivers and restoring our native fish populations. Since our inception in 1990, IRU has been working to defend Wild and Scenic rivers, advocate for endangered and threatened aquatic species, reform hydropower policy, and promote enhanced water quality in all of Idaho's rivers. IRU represents over 5,000 members throughout Idaho and beyond. Our members and supporters expect the protection of rivers for their ecological, scenic, and recreational values; accordingly, our mission is to protect and restore the rivers and fisheries of Idaho.

IRU closely monitors any action or activity that may impact water quality, fish habitat, river-based recreation, or riverside recreation in Idaho. As such, the majority of our following comments focus on the project's relation to water quality, sedimentation, and associated impacts resulting from the use of Forest System roads within the EFSF RAMP project area.

Based on careful analysis of the scoping documents, IRU strongly recommends that the Forest select Alternative B with some additional modifications which we have outlined in detail below to maximize potential benefits to sensitive fish species as well as the aquatic and riparian environments found within the project boundary.

Thank you for the opportunity to submit comments on the EFSF RAMP EA. If there are any questions related to our comments or recommendations, please feel free to contact me at any time. We look forward to working with the Krassel Ranger District on this and future projects.



Nick Kunath

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Idaho Rivers United
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Idaho Rivers United's comments for the East Fork South Fork Recreation Access Management Plan Environmental Assessment

1. Big Creek-Yellow Pine Collaborative recommendations

As a member of many collaborative efforts, IRU strongly recognizes and appreciates the Forest Service's attempt to incorporate recommendations from the Big Creek-Yellow Pine Collaborative in this project Environmental Assessment. While IRU was not a member of this effort, we generally support many of the recommendations that stemmed from this collaboration. However, while Alternative C seems to most closely align with the collaborative's recommendations, many unresolved issues would remain on the landscape if this alternative were selected. Most glaringly, this alternative would leave more than 60 miles of unauthorized routes unaddressed nor would it address issues stemming from dispersed campsites.

We strongly recommend the Forest move forward with Alternative B which closely mirrors Alternative C, with a few additional modifications which will be detailed in the following comments. This Alternative expands legal opportunities for motorized use while providing the most robust protection for watersheds and fisheries found within the project area. Additionally, this alternative leaves no unauthorized routes on the landscape which ultimately will reduce further confusion or conflict.

2. Recommended Alternative

Based on our review of section 1.3, Purpose and Need, we strongly recommend that the Forest Service move forward with the selection of a modified Alternative B to further advance resource protection. This alternative provides clarity surrounding pioneered unauthorized routes found within the project area, expands legal opportunities for motorized use, and provides the most protection for watershed health and sensitive fisheries.

We agree with nearly all of the components found within this alternative, but encourage the Forest Service to slightly modify this alternative regarding the designation of the upper Quartz Creek road.

Under Alternative B, the 4.68 miles of unauthorized routes from Quartz Creek Bridge up to and around Red Mountain would be converted to UTV<70" classification. Given that Quartz Creek is one of the major contributors of sedimentation within this watershed, we encourage the Forest Service to adopt the provision of Alternative C which would limit this section to an ATV<50" route. This would still provide ample motorized access while slightly reducing the amount of

sedimentation that could be expected from this route. As noted in the Fisheries Specialist Report, Quartz Creek provides cold water refugia for Bull trout and Westslope Cutthroat Trout (Table 1e) and contains 2.3 miles of road within the Riparian Conservation Area (RCA) (Table 1h). Further, the report indicates that Quartz Creek, among others, “have the most legacy impacts from roads and mining.”¹

3. Sedimentation and Road Decommissioning

To achieve the project's Purpose and Need to improve watershed conditions and fish habitat, the Forest Service should ultimately move forward with a modified version of Alternative B. While it is clear that there is a strong desire for increased motorized recreation within the project area, Alternative B is the **only** alternative that will result in a net negative in terms of projected road-generated sediment delivery to project watersheds. As depicted in Table 19 of the EA, Alternative B will result in 10% less sediment delivery in tons per year per mile. Alternative C and D will result in increasing sedimentation delivery per year in the project area. Despite all alternatives providing clarity and increased legal motorized routes within the project area, Alternative B stands alone when evaluating the potential environmental benefits.

A key factor in reduction of sedimentation throughout the project area stems from the decommissioning of unauthorized routes. These routes were never constructed to Forest Service standards and many are located in areas with high or moderate debris slide hazard, resulting in persistent sedimentation, and are the largest contributors of sediment within the project area. As such, regardless of the alternative, the Forest Service plan to incorporate the decommissioning of all unauthorized routes that may exist on the landscape after any necessary conversions have been implemented.

a. Sugar Creek Road

Throughout the project area, there are several important creeks and watersheds which provide critical habitat and spawning grounds for ESA-listed salmonids, bull trout, and Westslope Cutthroat Trout. including Sugar Creek. As noted within the Fisheries Specialist Report, Sugar Creek often accounts for roughly 10% of all Chinook salmon redds within the EFSF and its tributaries which the Fisheries Report rightly identifies as one of the most important spawning areas for Chinook spawning² within the entire project area.

Given the status of Chinook salmon, bull trout, steelhead, and their sensitive nature, we strongly support the conversion of the main Sugar Creek road to ML1 and the associated decommissioning that is outlined in Alternative B. Based on the prescriptions within Alternative B, “[m]odeled sediment delivery in the Sugar Creek subwatershed...predicts a 50% reduction in sediment delivery if Alternative B were fully implemented.”³

¹ EFSF RAMP – Fisheries Specialist Report pg 79

² *Id* pg 4

³ EFSF RAMP Draft EA - pg 44

The conversion of the primary Sugar Creek road to ML2AP in Alternative C is also generally acceptable, as it will generally reduce sedimentation associated with public use. However, there are significant unauthorized routes that would remain on the landscape and continue to serve as a primary source of sedimentation within the watershed after this project is complete. For this reason, we again urge the Forest Service to select an alternative that will not result in unauthorized routes remaining on the landscape permitting one of the primary sources of sedimentation and resource degradation to remain until a later date.

Under Alternative D, the Sugar Creek road will be converted into a ML2 road, open to the public. This option will not only result in an increase in modeled sediment delivery, given the number of stream crossings along this road, there is also a strong likelihood that there will be additional negative impacts on steelhead, bull trout, and Chinook salmon who utilize this creek for spawning and rearing. While there is decommissioning associated with this alternative, the EA makes it abundantly clear that “the 16 miles of decommissioning of closed and vegetated routes in the Sugar Creek watershed is not sufficient to offset” the predicted increase in sedimentation associated with opening this road to the public.

We believe that under no circumstances is it warranted for this road to be open to the public considering that the Thunder Mountain road will remain open and provide access to the Cinnabar area for recreational purposes into the future.

b. Dispersed Campsites

While dispersed campsites may represent a smaller overall impact on sedimentation and other negative environmental impacts, we strongly support the proposed actions outlined within Alternative B. By restricting access with boulders, moving firepits, improved signage, and other prescriptions outlined, there will be numerous protective measures present that currently do not exist.

Additionally, we are pleased to see the Forest’s plans to implement Roundtable Meetings throughout the duration of the project. While mentioned in Feature 4 of Table 12, we strongly encourage consultation with consulting Tribes to ensure that any planned campground decommissioning, or other prescriptions, do not negatively impact important cultural or historical sites that may exist within the project area.

4. Fisheries Impacts

The South Fork of the Salmon River and the East Fork of The South Fork have long been recognized for their importance related to ESA-listed salmonids and other fisheries. Accordingly, we strongly recommend that the Forest move forward with Alternative B which will result in stronger resource protections related to fisheries, the aquatic environment, and associated riparian areas.

Selecting Alternative B will also align with the 2003 National Marine Fisheries Service Biological Opinion for the current Forest Plan which included a condition to revise the sedimentation

related to WCIs for the SFSR. Since Alternative B is the only alternative that will result in a reduction, this is the only Alternative which appears to be in alignment with this condition.

As mentioned above, we urge the Forest Service to place additional scrutiny on any proposed actions that will impact Sugar Creek. As mentioned within the Fisheries Specialist Report, Sugar Creek is particularly important for multiple species and typically accounts for approximately 10% of all Chinook redds within the EFSFSR tributaries and has “less margin” in relation to any increases in sedimentation.