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First name: John

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Organization: Idaho Conservation League

Title: Public Lands Director

Comments: July 24, 2017

RE: Scoping for the South Fork Salmon River Restoration and Access Management Plan

Dear Caleb,

Thank you for considering our comments on the South Fork Salmon River Restoration and Access Management Plan (RAMP) scoping. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness[mdash]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 25,000 supporters who support responsible travel management and the protection and restoration of natural resources.

The Idaho Conservation League is a member of the Big Creek - Yellow Pine - South Fork collaborative that developed restoration and access management recommendations that the Forest Service considered in the development of this project. There is a need in the South Fork Salmon River area to improve soil and riparian productivity for Endangered Species Act listed fish species and sensitive species and to improve recreational opportunities. The Forest Service proposes accomplishing these needs by rehabilitating damaged watersheds, managing varied recreational facilities responsibly, and improving motorized and non-motorized recreation opportunities where appropriate.

We understand that the proposed action is a delicate balance between meeting restoration needs and addressing access and recreational issues. We fully support the actions recommended by the collaborative which were incorporated in the scoping document. However, we are very concerned with some of the additional proposed actions, particularly conversion of the Martin Ridge Trail from non-motorized to a 2-wheel motorized route. We do not support further motorized development in recommended wilderness areas as this is contrary to the Forest Plan and Regional direction for management of Recommended Wilderness areas.

We are also supportive of the additional restoration measures described in the scoping document, such as the decommissioning of a portion of the Hamilton Bar road. The scoping document also proposes a FRTA easement. The Forest Service needs to provide additional details and assurances regarding any FRTA easements to ensure that the restoration goals will continue to be met. We believe the current Forest Plan prohibition on transportation of diesel fuel along the South Fork Salmon River Road is a critical component that needs to be continued by Valley County if the FRTA easement proceeds.

As with the Big Creek RAMP, outreach and education are critical components if this project is going to be successful. We recommend that the Forest Service work with local recreation clubs, the McCall community, Valley County, the Idaho Department of Parks and Recreation, and others on education, signage and mapping. We also recommend sending these monitoring reports to members of the collaborative and inviting collaborative members on a post-implementation field trip.

Thank you again for considering our comments. We look forward to working with the Forest Service, our collaborative partners and other members of the public on the final planning and implementation of this project.

Sincerely,

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Idaho Conservation League scoping comments on the South Fork Salmon River Restoration and Access Management Plan

Public access improvements

We support improvement of visitor facilities and impact reduction in riparian areas. We support defining use areas, installing improved permanent user facilities, and decommissioning dispersed camping sites. We are cautiously supportive of a new non-motorized route to view the B-23 Dragon Bomber wreckage at Loon Lake and installation of a bridge across Loon Creek, but are concerned that motorized recreationists could use this route which could lead to recreational conflicts and resource damage. Monitoring, education and enforcement will be critical components for the successful implementation of these projects.

We appreciate the fact that routes greater than one vehicle length to dispersed camping would be managed or decommissioned. We support the installation of tent symbols, adjusting the size of campsites, relocating campsites, and closing sites as appropriate.

We particularly appreciate the conversion of some sites to walk-in campsites as this type of "far car camping" experience is highly sought after by our members.

Outreach, Education and Enforcement

As mentioned above and in our previous comments, the Forest Service should actively partner with recreationists, the ATV community, sportsmen, Valley County, Idaho Department of Parks and Recreation, the Idaho Department of Fish and Game and the Nez Perce Tribe on developing and implementing a comprehensive outreach, education and enforcement plan. This plan should include online information, including printable maps, kiosks, and newsletters, etc. Permanent or seasonal closures should be marked with signs explaining the specific resource reasons for the closure. The Forest Service should invite all the participants of the Big Creek Yellow Pine South Fork collaborative to post their logos on educational material and signage. All signs and display materials in the field should have an American flag decal on them to reduce vandalism.

New Motorized Routes

Consistent with the collaborative's recommendations, we can live with the designation of 11 miles of new ATV routes as proposed and encourage the Forest Service to utilize old roadbeds to the maximum extent possible. We are concerned that some motorized users will not stay on the motorized routes and may be tempted to drive on non-motorized trails. Monitoring, education and enforcement will be critical components for the successful implementation of these projects.

We are opposed to the conversion of the Martin Ridge Trail #301 from non-motorized to 2-wheeled motorized. As the scoping document mentions, the trail is located in the Needles Recommended Wilderness Area (RWA). We are very concerned about increased motorized use in an area specifically managed for wild land preservation. In

addition, this proposal contradicts the recommendation of the 2008 Travel Management Plan (TMP) adopted by the Krassel Ranger District. As the Record of Decision (ROD) states:

"Trail #98 and trail #301 will go from 2-wheeled motorized designation to a non-motorized designation. This change in designation is due to a review the Forest did on the trails in this area to see which trails provided for the best motorized and non-motorized use opportunities, including opportunities for the development of loop trails. We looked at the use they received, the condition of the trail, type and degree of maintenance needed to keep the trail open to motorized use, and if the same general area could be accessed using another open trail. The lower, southwest end of trails #98 and #301 cross meadows and riparian wet areas, the middle sections are located on granitic soils, which are highly susceptible to erosion. Several sections of the trails are within winter avalanche chutes that cause the trails to slide each spring. It is very difficult to maintain an 18-inch trail tread for 2-wheeled motorized opportunity. Trail #100 will continue to provide motorized access from the Kennally Creek area over to the South Fork Road.¹"

The ROD outlines many of the concerns we share about designating Trail #301 as 2-wheel motorized. The trail crosses sensitive riparian areas, is difficult to maintain, causes erosion, and is a redundant route. Additionally, this was not an action recommended by the collaborative. We have previously stated our concerns with inconsistencies in Forest Service policy on motorized use in recommended wilderness areas, outlining our position in a 2011 document on the issue.² The suggested action is also in conflict with the desired condition for recommended wilderness, as outlined in the 2003 Payette National Forest Land and Resource Management Plan (LRMP):

"People visiting recommended wilderness within the National Forest can find outstanding opportunities for primitive and unconfined recreation, including exploration, solitude, risk, and challenge. The area is primarily affected by the forces of nature with man's imprint substantially unnoticeable. The unique wilderness character of the area is preserved until Congress acts on the Forest Service recommendation.³"

We are concerned that opening the Martin Ridge Trail #301 to motorized use would degrade the wild character and increase "man's imprint" in the Needles RWA. The switch in trail use also goes against the purpose and need of the project, which specifically calls for "maintain or improve watershed condition" and providing loop opportunities for ATV recreationists. The Krassel Ranger District should remove this component from further consideration in the RAMP analysis.

Forest Roads and Trails Act (FRTA) Easements

The collaborative did not review FRTA easements are part of our discussions. We recognize the value of partnerships with Valley County and other entities regarding road maintenance responsibilities and funding. We also appreciate the mention of adhering to Best Management Practices for road maintenance. However, several uncertainties remain. As currently proposed, the 30 miles of proposed road easements represent greatly increased uncertainty regarding the duration of the watershed improvements. The Forest Plan direction for Management Prescription

1 McCall and Krassel Ranger Districts Snow-free Season Travel Management Plan Record of Decision, Payette National Forest, October 2008. Pages 10-11.

2 In Need of Protection: How Off-Road Vehicles and Snowmobiles Are Threatening The Forest Service's Recommended Wilderness Areas, Idaho Conservation League, 2011.

3 Revised Land and Resource Management Plan, Payette National Forest, July 2003. Page III-73.

Category (MPC) 3.2 emphasizes Active Restoration. We recommend that the Forest Service provide additional

information on the structure, design and contingencies related to the easement. This description should address the following topics:

- [bull] Certainty that the management of this road will be consistent with Forest Plan direction for Management Prescription Category (MPC) 3.2.

- [bull] The maintenance level of these routes

- [bull] The prism width and type of vehicles allowed on these routes

- [bull] Clarification of monitoring and enforcement responsibilities

- [bull] Triggers by which both the Forest Service and Valley County agree that responsibility will revert to the Forest Service. These could include relevant metrics for Watershed Condition Indicators such as sedimentation, soil compaction from dispersed camping and social trails, etc.

- [bull] Restrictions for dispersed camping in sensitive RCAs with signage directing recreationists to hardened sites or areas with fewer resource concerns

- [bull] Restrictions on fuel haul along the South Fork Salmon River

Season(s) of Use

The 2005 Travel Management Rule also requires the responsible official to designate a system of roads, trails and areas "by vehicle class and, if appropriate, by time of year." 36 CFR [sect] 212.51(a). As necessary to protect resources, the Forest Service should consider limiting use of these trails to a specific season of use as provided by the Rule. In particular, off-road vehicle use may need to be closed during the spring when trail prisms are saturated with moisture and susceptible to damage. Use of the proposed trails can be allowed after the trail prisms have firmed up.

Seasonal designations may also be necessary for wildlife. For example, seasonal designations should be considered where habitat security is needed seasonally for reproduction, use of specific habitats for a portion of the year, etc. Seasonal designations should utilize consistent start and end dates from year to year to promote consistency in implementation and to ensure that the public is accustomed to these rules. Seasons of use should apply to both motorized and non-motorized recreationists.

In order to be consistent with collaborative's balanced recommendations, it will also be important to work with access and recreation advocates to ensure that any seasonal designations are developed and implemented in a way that also addresses access and recreation issues.

Game Retrieval

The Travel Management Rule provides exceptions to travel designations for dispersed camping or big game retrieval under 36 CFR [sect] 212.51(b). Under this subpart, responsible officials may provide for dispersed camping and game retrieval within a specified distance of a road or trail designated for motor vehicle use.

However, realizing that abuse of this discretion would defeat the purpose of the new Travel Management Rule, the Chief of the Forest Service supplied additional direction in a letter dated June 8, 2006. The letter states:

Such designations represent site-specific decisions associated with specific roads and trails or road and trail segments, rather than a blanket exception to the rule. Designations under 36 CFR 212.51(b) will be applied

sparingly to avoid undermining the purposes of the rule and to promote consistency in implementation.

Throughout Idaho, individual units of the National Forest System have elected not to make any exceptions to the Rule for the use of off-road vehicles to retrieve game. We encourage the District to be consistent with other Units by not making any exceptions for game retrieval.

Route Closures and Decommissioning

As mentioned, we support the package of route decommissioning and designations that the Forest Service has proposed. The proposed actions would reduce sediment production, increase visitor safety, and improve wildlife habitat throughout the project area.

If unneeded roads are already self-decommissioned and revegetated, additional soil disturbance may be counter productive. However, there may be routes where mechanical work is needed to recontour slopes. Culverts of obliterated roads should be removed and drainage elements restored to reduce the effects to hydrologic function, water quality, and soil productivity

The Forest Service should conduct a site-specific review of each road segment to determine the level of active decommissioning needed.

Where roads are removed, care must be taken to minimize sedimentation, remove noxious weeds, revegetate the area with native plants, and strictly enforce road closures. The obliterated road should be gated, signed, and patrolled to prevent incursions by ORVs. Given the challenges associated with enforcing road closures, measures should be considered that would minimize this potential. Steps such as obliterating the first $\frac{1}{4}$ mile or $\frac{1}{2}$ mile section of roads, (when the remainder of the road may only be abandoned), placing large rocks and/or other structures to prevent unauthorized use or other methods should be considered to realize the full benefit of decommissioning and restoration.

While route obliteration will undoubtedly improve water quality in the long term, road obliteration and reconstruction will inevitably entail soil disturbance and short-term increases in sediment. Additional mitigation measures, such as stream bank stabilization upstream and downstream of the site, placement of straw wattles and bales may be needed to minimize short-term increases in soil disturbance or sedimentation in the watershed. All culverts should be removed from obliterated roads.

We also support the additional 3 miles of road decommissioning proposed in the scoping document for the Hamilton Bar/Three Mile Road. This additional restoration work will enhance the restoration component of the project while allowing agreed upon designation of routes for access and recreational needs. The removal of culverts and installation of trail bridges as proposed in scoping should be particularly beneficial for resources. We particularly appreciate the fact that all open routes will be officially authorized and maintained.

To address access for private property owners, we can support motorized access managed on the Davis Ranch Road through a special use permit. This arrangement has been used successfully in designated wilderness areas in the Owyhees. We can also support non-motorized recreation along this route but cannot support motorized recreational access here due to conflicts with Recommended Wilderness. We note that additional motorized recreation here would be inconsistent with the Forest Plan as it would lead to conflicts with recreationists seeking non-motorized experiences as well as increased resource damage.

Maintenance and Monitoring

It will also be critical for the Forest Service to design and maintain these routes to avoid resource problems. Long-term road maintenance is critical for routes that are retained on the system. The Forest Service, Valley

County, business entities and others involved in these issues should develop a maintenance plan for all routes in the project area following the project. A schedule for maintenance of retained culverts (on reconstructed roads) should be implemented. Culverts that are not maintained may lead to blocked drainages and eventual blowouts. Inappropriately sized culverts should be replaced with culverts that are designed to sustain a 100-year flood, at a minimum. In addressing the importance of long-term maintenance, the forest should review and consider the Forest Service document: "Rightsizing" the Forest Service Road System Part 1: Road Trend Analysis" (Moore, 2007).

Furthermore, monitoring the condition of these routes over time will be very important to demonstrate that motorized use of the routes does not lead to resource issues. We recommend that a GRAIP analysis be conducted following project implementation to see if the resource issues have been adequately addressed. The Forest Service also needs to monitor trail usage and compliance with the road closures to assess if the education and enforcement program is working successfully.

We also recommend sending these monitoring reports to members of the collaborative and inviting collaborative members on a post-implementation field trip.