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First name: John

Last name: Robison

Organization: Idaho Conservation League

Title: Public Lands Director

Comments: May 20, 2019

RE: South Fork Salmon River Restoration and Access Management Plan Environmental Assessment

Dear Keith,

Thank you for considering our comments on the South Fork Salmon River Restoration and Access Management Plan (RAMP) Environmental Assessment. Since 1973, the Idaho Conservation League 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 25,000 supporters who support responsible travel management and the protection and restoration of natural resources.

Since its initiation, the Idaho Conservation League has been a voting member of the Big Creek - Yellow Pine - South Fork collaborative which developed the restoration and access management recommendations that the Forest Service considered in the development of this project.

Several members of the public had successfully challenged the Forest Service's 2012 Travel Management Planning decisions and Motor Vehicle Use Map. The Court did not enter final judgment but invited the parties to see if they could reach an equitable resolution using a collaborative process. The collaborative includes diverse representation from stakeholders representing restoration, recreation, private property owners and other interests.

The Settlement Agreement states that the Payette National Forest will undertake motorized travel management planning consistent with 36 C.F.R. Part 212, Subpart B and consistent with the requirement for public involvement pursuant to NEPA. As part of this process, the Forest Service needs to identify the minimum road system within the project area that meets resource and other management objectives, meets applicable statutory and regulatory requirements, reflects long-term funding expectations, and minimizes adverse environmental impacts. 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.

The Payette National Forest Forest-wide Travel Analysis Report and maps are an important component in this decision-making process. It is important to note that the Travel Analysis Report is not a decision document and that the Forest Service can make different determinations provided that the agency can justify these decisions. Recommendations from the collaborative that factor in improvements in watershed conditions may be one way to justify any departures:

The TAP is a "living" document and therefore will be updated regularly. Line officers and Interdisciplinary Teams will continue to consult the TAP as they are planning future projects. Since the TAP presents opportunities for change and makes no decisions about the transportation system, future projects will continue to receive public input that pertains to the Forest transportation system and may recommend decisions which are not consistent with the TAP. Modifications to the TAP's recommendations as a result of final decision will be incorporated, after

the appropriate National Environmental Policy Act procedures have been completed. -Payette National Forest.

The group successfully collaborated on the Big Creek Access and Resource Management Plan which resulted in both restoration and recreation improvements now being implemented. A key element to our group's success was active participation among diverse interests and agreement to develop a process that worked for the group. Collaborative participants agreed on a charter, formalized a decision-making process, and communicated with Forest Service staff.

Collaborative partners came with impressive, site-specific, on-the-ground knowledge of recreational trails as well as expertise in natural resource issues. To address the Forest Service's restoration requirements for this area, our group's proposals had to provide a net benefit for watersheds which allowed the Forest Service to use these "restoration offsets" to officially add recreational routes to the travel plan. GRAIP data has been an important tool in determining which road sections are most in need of maintenance or improvements and which ones are stable and low-risk.

We appreciate the Forest Service including the collaborative's recommendations in one or more of the alternatives. We note that the Forest Service is attempting to strike a balance between meeting restoration needs and addressing access and recreational issues.

We stand with our collaborative's recommendations - which were reached by consensus. While the Forest Service is presenting Alternative B as largely representing collaborative recommendations, there are significant differences between the collaborative's recommendations and the full suite of actions proposed in Alternative B. As such, the selection of Alternative B in its entirety would not be an accurate reflection of the collaborative's consensus recommendations.

We are focusing comments in this letter to issues where the collaborative reached consensus.

Here are the collaborative's consensus recommendations which ICL fully supports:

The Big Creek-Yellow Pine Collaborative (Collaborative), a multi interest group of Valley County, Yellow Pine and Big Creek Residents, local business, recreationists and conservationists have worked together, in cooperation with local Payette National Forest (PAF) Staff, and other cooperative agencies over 2+ years to provide a written recommendation upon which the South Fork Salmon River Restoration and Access Management Plan (SF RAMP) was based. The Collaborative recognizes the work and alternatives presented in the Draft SF RAMP by the PAF but would like to provide the following comments below.

It has come to the Collaboratives attention that approximately 55 miles of previously identified unauthorized roads were actually ML1 system roads. Instead of the PAF interpreting the Collaborative's intentions regarding unknown ML1 roads in Alternative B, we request the FS evaluate newly discovered ML1 roads and unauthorized roads in the Buckhorn and Zena Creek Areas for resource impacts and implement appropriate decommissioning or obliteration so that the full range of recreation and restoration opportunities can be implemented as presented in the proposal. Additionally, the Collaborative recommends that those ML1 roads that do not represent a resource impact be retained as ML1 roads within the Forest Service and more specifically the Krassel Ranger District minimum road system.

The Collaborative would like to emphasize its original proposal and is resubmitting its original recommendation with this letter as an attachment. As a point of clarification; where the Collaborative recommends decommissioning or obliteration of unauthorized roads let it reflect that now it is in reference to both unauthorized and ML1 level roads where resource issues exist.

[see attachment]

The Forest Service is also proposing a number of other actions that the collaborative did not consider or that the collaborative did not reach consensus on and we will address those in a separate letter.

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,

John Robison, Public Lands Director