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First name: Sandra Last name: Mitchell

Organization: Big Creek Yellow Pine Collaborative

Title: Lead Objector

Comments: January 31, 2020

Objection Reviewing Officer Intermountain Region USFS

324 25th Street, Ogden, Utah 84401

objections-intermtnregional-office@fs.fed.us

RE: Collaborative Objection to the Draft decision notice for South Fork Salmon River Restoration and Access Management Plan

Dear Objection Reviewing Officer,

The Big Creek-South Fork Salmon-Yellow Pine Collaborative (Collaborative), a multi interest group of Valley County, Yellow Pine and Big Creek Residents, the Nez Perce Tribe, local business, recreationists and conservationists have worked together, in cooperation with local Payette National Forest (PNF) 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) is based. The Collaborative recognizes the work and alternatives presented in the Draft SF RAMP by the PNF but would like to provide the following comments below.

We have reviewed the Draft Decision Notice and the Collaborative appreciates the authorization of 14.2 miles of ATV trails in the Little Buckhorn Creek drainage that followed our recommendation. The Collaborative also submitted a restoration plan identifying a sufficient number of unauthorized and/or MII roads to be decommissioned. The restoration plan is critical to providing the needed offsets to allow for trail construction.

However, the Draft Decision defers the ATV trail construction until the development of additional restoration plans at some unidentified future date:

"Prior to constructing the ATV trail in the Buckhorn Creek sub watershed, a plan will be developed that identifies the location and extent of restoration treatments, which may include system road decommissioning, necessary to show long term improvements..." (SF RAMP DN p. 4).

We are concerned that these deferred restoration plans will not provide the needed offsets for trail construction, allow for trail construction and restoration activities in a timely manner, or allow for public and Collaborative review of this plan. Implementing the decision as currently proposed would also be inconsistent with the project's stated purpose and need:

"The Forest Service also agreed to consider in good faith, written recommendations for travel planning and other actions (e.g., watershed restoration) from the Big Creek-Yellow Pine Collaborative (Collaborative)." (SF RAMP EA p. 4).

Remedy:

It has come to the attention of the Collaborative that approximately 55 miles of previously identified unauthorized roads were actually ML1 system roads. Instead of the PNF 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.

Rec, Resource, and Rounded groups worked with the Collaborative to draft the opinions found in this objection letter. The County also reviewed this objection letter and supports it conclusion.

Thank you

Sandra F. Mitchell Lead Objector

501 Baybrook Court

Boise, ID 83706

smitchel@a lscott.com

Wes Keller Resource Group

Kyle Feller Rounded Group

Attachment: South Fork Salmon River Restoration and Access Management Proposed Action & Purpose/Need