

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 ML1 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 its conclusion.

Thank you



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Wes Keller
Resource Group

Kyle Feller
Rounded Group

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

May 16, 2019

Payette National Forest
Attn: Anthony Botello
District Ranger
500 North Mission St. Bldg. 1
McCall, ID 83638

Re: DRAFT - South Fork Salmon River Restoration and Access Management Plan

Mr. Botello,

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.

Respectfully the Big Creek – Yellow Pine Collaborative

Representatives of:

Recreation Group: Sandra F Mitchell
Sandra Mitchell

Resource Group: _____
Wes Keller

Rounded Group: _____
Kyle Fend

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

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

The roughly 216,000 acre project area is located principally in the South Fork of the Salmon River drainage on the Payette National Forest. Approximately 16 miles East and South of Yellow Pine, ID and includes 215,945 acres of National Forest System Lands. Table 1 displays the current status of Routes within the Project area and availability of routes for Public Motorized and non-motorized access

Table 1- Current Road Status within the Project Area

Current Road/Trail Status*	Miles	Public Motorized Access
Non-Motorized Trails	185	No
2-Wheel Motorized Trails	151	Yes
OHV Trail open to Vehicles 50 Inches or Less in Width**	7.1	Yes
OHV Trail open to Vehicles 50 Inches or Less in Width* ¹	0.5	No
National Forest Road ²	40.5	Yes
Unauthorized Road(s)	166.5±	No
County Road ²	27.7	Yes
Private or State	1.5	No

**it is noted that current road/trail status are not inclusive of that designation. An example is a 2-wheel motorized trail can be utilized by mechanized users (bicycles) and hikers.*

***trail miles do not include two-wheel motorized trails.*

¹ trail system temporarily closed due to slope stability issues

² the South Fork Road (23.7Miles) and a portion of Lick Creek Road (4 miles) are shared roads (County & National Forest System Road) and is counted in both rows.

Proposed Action - South Fork Salmon River Restoration and Access Management Project (SFSR-RAMP)

The Proposed Action would implement a range of restoration activities, including route decommissioning/rehabilitation, route designation and improvements, stream crossing improvement, and educational/interpretive sign opportunities. Table 2 includes the road/trail prescriptions and road/trail designations that would occur during and following the South Fork Salmon River Restoration and Access Plan of Operation Project. The Actions included in Table 2 are unanimously supported by the Big Creek/Yellow Pine/South Fork Salmon River Collaborative. Those roads/trails identified in Table 6 are being Proposed and Advanced for Consideration without consensus among the collaborative members with specific concerns indicated along with each proposal as to why consensus could not be reached.

The Proposed Action was developed to meet the project's purpose and need. The Proposed Action is based on the recommendations provided by the Big Creek/Yellow Pine/South Fork Salmon River Collaborative. The Collaborative was formed by and represents interested and effected stakeholders from a broad range of interests, including the environmental community, mineral industry, recreation groups, Nez Perce Tribe Department of Fisheries Resource Management, Regulatory Agencies, community residents, and State and County governments. The Collaborative was lead and facilitated by members of the group and Payette National Forest was invited by this Collaborative to participate. Treatments to roads/trails would occur prior to the roads/trails being authorized for use as defined in Table 2 and Table 3. Figure 1 shows the general project area. Figure 2 illustrates the trail routes presented in Table 2 which have consensus from the Big Creek/Yellow Pine/South Fork Salmon River Collaborative. Figure 3 graphically illustrates the approximately 166.5± miles of unauthorized legacy logging/jammer routes and other non-system designated

trails/roads for decommission and obliteration as appropriate. Figure 4 illustrates the trail/road alternatives from Table 6 that the Collaborative is presenting for consideration without consensus.

Table 2 SFSR-RAMP Big Creek-Yellow Pine Collaborative Proposed Action with Consensus

Map Label	Proposed Action	Description	Miles of Public Access
1	Krassel Knob Switchback Improvement (FS-089)	Improve problematic two-wheel motorized trail switchback to prevent resource damage and trail degradation	0.1
2	Phoebe Meadows MVUM Update (FS-291)	Update the MVUM to correctly align with the trail currently being utilized that avoids wet meadow sections.	1.8
3	Phoebe Meadows Puncheons Installation (FS-291)	Install puncheons as appropriate on the updated MVUM FS-291 route (indicated above) through wet meadow areas to avoid resource damage (approximately 2 locations).	0.04
4	FS-382 (Jakie Buckhorn ATV Loop) washout repair	Develop a comprehensive plan to rehabilitate the washed out section of the Jakie/Buckhorn ATV loop (trail #382) that allows for ATV use and provides for natural resource protection. The Collaborative realizes that this is a long term project with potential multiple stages as funding allows, but would like to emphasize that this is a priority.	0.50
5	Jakie Creek Short Loop (new)	Construct an ATV trail off of the Jakie/Buckhorn ATV Loop Trail on an existing old roadbed with a short 0.10 mile section of new trail construction as identified upon Figure 2.	1.6
6	Miners Peak Loop (new)	Construct, along existing legacy jammer roads, an ATV trail that closely aligns with the identified route on Figure 2, that is approximately 4.75 miles in length, allows a loop opportunity back onto the existing Jakie/Buckhorn ATV trail.	4.75
7	Miners Peak Extension (new)	Construct a trail extension off of the newly proposed Miners Peak ATV loop trail (as identified on Figure 2) that extends along old jammer road beds for 4.36 miles and extends up Miners Peak ridge and establish a turnaround and vista overview area.	4.36
8	Dispersed Recreation Area	Develop a dispersed recreation site at the confluence of the Secesh and South Fork Salmon Rivers that includes restroom facilities, hardened surfaces to protect resources and signage to explain the cultural and ecological significance of the area. An additional sign displaying trails, both motorized and non-motorized, should be displayed.	0
9	Unauthorized road/trail obliteration.	Evaluate 166.5± miles of currently identified unauthorized legacy logging roads and jammer trails, and any additional unauthorized routes identified prior to scoping, for reclamation, or obliteration/re-contouring as appropriate. This includes old logging roads and jammer trails identified, and not otherwise designated as system roads or trails (or otherwise identified within this proposal), within the Cow Secesh Face area, Zena Creek Drainage, Camp Phoebe Creek Drainage and Jackie/Buckhorn Drainage and as shown on Figure 3.	166.5±

Decommissioning/Obliteration

The Proposed Action recommends the evaluation of approximately $166.5\pm$ miles of unauthorized legacy logging/jammer routes and other non-system designated trails/roads for decommission and obliteration as appropriate. Figure 3 displays those routes that would be considered for decommissioning and obliteration that haven been inventoried currently. In the case where sections of route(s) cannot be reached with equipment or further activities would cause more damage; restoration activities may be less than full obliteration while still meeting desired restoration objectives. Those roads being decommissioned would not be part of the Minimum Road System (MRS) and would be removed from the road atlas if currently included (36 CFR 212, Subpart A). Decommissioning and obliteration of these routes would include: recontouring of the road prism to match surrounding hill slope, demolition, dismantling, removal, obliteration, and/or disposal of the disturbed area created by the road. Portions of a road could remain if they would not potentially contribute to resource impacts or require maintenance. Actions to decommission and obliterate the road could vary from segment to segment and may be accomplished via some or all of the following activities with an overall goal to mimic the surrounding area prior to construction:

- Block access using boulders or other suitable materials.
- Retain a trail clearing and small bench in the road prism to facilitate walking traffic.
- Scarify/rip the route to a depth of up to 18 inches depending on the degree of compaction.
- Restore the road cut/fill to the original contour by pulling the fill slope back and providing additional fill as needed to establish a slope contour similar to the original slope.
- Stream crossing:
 - Remove culverts, if present, and reestablish the natural stream course.
 - Dig to original streambed.
 - Lay back streambanks to a more natural setting.
 - Armor to limit erosion during the temporary/short term using woody debris and rock.
 - Complete riparian plantings to obtain a roughly 80 percent ground cover.
- Following the recontouring of the slope some or all of the subsequent activities would take place on the disturbed area (obtain a roughly 50 to 80 percent ground cover):
 - Distribute minimal slash and large wood material, where trees exist, by using dead and downed trees adjacent to and within the road in an effort to replicate only the amount of slash found on adjacent forest land.
 - Place plugs, using a backhoe, of adjacent native vegetation randomly throughout the disturbed area.
 - Mulch the surface using a weed free straw or other suitable material.
 - Fertilize the scarified surface with BioSol or similar fertilizer.
 - Seed with native seed mixture appropriate for the elevation and habitat.

Table 3. Miles of Road Proposed for Potential Decommissioning and Obliteration

SFSR-RAMP (Miles)
166.5±

Rehabilitation

The Proposed Action would rehabilitate a total of 1.8 miles of authorized two-wheel motorized routes. Table 2 and 4 and Figure 2 display those routes that would be rehabilitated. Actions to rehabilitate the trails could vary from segment to segment and may be accomplished via some or all of the following activities with an overall goal to mimic the impacts to the surrounding area prior to construction:

- Improve problematic two-wheel motorized trail switchback on the Krassel Knob Trail to prevent resource damage and trail degradation.
- Update the MVUM to correctly show the trails currently used in the Phoebe Meadows Research Natural Area, while minimizing resource impacts.

- In the Phoebe Meadows Research Natural Area, install punchcons, as appropriate, through wet meadow sections of existing trails to avoid resource damage.
- Specifically for Trail 382, is to develop a comprehensive plan to rehabilitate and stabilize the washed out section of the Jakie/Buckhorn ATV loop, that allows for ATV use and provides for natural resource protection.

Table 4 Miles of Trail Rehabilitation

SFSR-RAMP (Miles)
1.8

Trail Open to OHV (trails open to vehicles 50 inches or less)

The Proposed Action would designate 10.7 miles of unauthorized routes as a National Forest System (NFS) trail and manage the public use on the MVUM as an OHV trail open to vehicles 50 inches or less. These routes would not be part of the Minimum Road System (MRS) (36 CFR 212, Subpart A). These routes would be added to the MVUM for motorized public access and designated on the MVUM as an OHV trail open to vehicles 50 inches or less (36 CFR 212, Subpart B). These trails would be open to vehicles 50 inches or less, would be maintained at a minimum trail tread width of 50 inches, and meet Trail Class 2 standards for four-wheel drive vehicles less than 50 inches in width, as defined in FSH 2309.18 – Trails Management Handbook, Chapter 20, Section 23.22. These trails would have a variety of actions completed to properly maintain the trail. Table 2 and 5 and Figure 2 display the trails that would be designated.

Actions to maintain the trail could vary from segment to segment and would be accomplished via some or all of the following activities:

- Install signage with the trail number and where needed provide signage with necessary trail number corresponding to the MVUM and education user information. Educational information would include rationale for any closure or protection issue (i.e. watershed and fisheries), participation of the Collaborative in crafting recommendations, historical setting information, and other informative outreaches.
- Provide user controls where needed to restrict potential off road travel. Controls could include, but are not limited to, rock placements, fencing, strategic gate placement, parking barriers, and/or carsonite/wood signs.
- Brush the minimum area to maintain the trail tread.
- Where feasible, given the constraints of the location, reduce erosion at all points with GRAIP predicted sediment delivery and erosion points missed by GRAIP but identified by Forest Service specialists. Give priority and emphasis on sites where the GRAIP model has identified 0.6 tons/year or greater of sediment delivery. Activities could include, but are not limited to, some or all of the following.
 - Install critical dips at stream crossing.
 - Harden stream crossing and approaches by placing aggregate.
 - Spot treat with aggregate where necessary to reduce surface erosion from trail.
 - At fish bearing streams with ESA-listed species, install structures capable of providing Aquatic Organism Passage (AOP). Other stream crossings that may be occupied with fish would be surveyed and AOP structures would be installed if present.
- Upgrade, remove, or maintain culverts as needed. Culvert maintenance could include straightening culvert ends, removing debris/sediment, and installing energy dissipaters at the outlet (most likely large rock).
- Maintain ditches or convert insloped ditches to water bars or drivable dips. Ditch maintenance could include cleaning accumulated material and armoring where appropriate.

- Cut and fill slopes along the length of the trail would be stabilized and vegetated where needed using a native seed mix, shrub/tree seedlings, mulch, and/or fertilizer. In the most severe cases stabilization may include grid structures or rock buttressing of unstable slope.
- Install waterbars or drivable dips at proper intervals.
- Harden drivable surfaces as needed with aggregate or through other suitable means to reduce the surface erosion and potential for watershed sedimentation.

Table 5. Miles of trail designated as OHV open to vehicles 50 inches or less

SFSR-RAMP (Miles)
10.7

Recreation Management and Access to Dispersed Camping

The Proposed Action would designate a semi-developed dispersed recreation site at the confluence of the Secesh and South Fork Salmon Rivers that includes restroom facilities, hardened surfaces to protect resources and signage to explain cultural and ecological significance of the area. An additional sign displaying trails, both motorized and non-motorized would be displayed at this location and at the entrance to FS-775.

Similar to all roads on the Krassel Ranger District, forest users with motorized vehicles would not be authorized to drive off of designated motorized roads on the MVUM more than a vehicle length. Driving a motor vehicle greater than a vehicle length off designated roads to dispersed camps would only be allowed where signed on the ground with a camping symbol. Outside of designated camping areas, cross country motorized travel from roads would not be authorized.

The Proposed Action would provide user controls, where needed, to restrict motorized travel at locations currently providing off road access for dispersed camping and proposed new locations. Controls could include, but are not limited to, rock placements, fencing, strategic gate placement, parking barriers, and/or carsonite/wood signs.

Where feasible, given the constraints of the location, reduce erosion at all points with GRAIP predicted sediment delivery and erosion points missed by GRAIP but identified by Forest Service specialists. Give priority and emphasis on sites where the GRAIP model has identified 0.6 tons/year or greater of sediment delivery. Activities could include, but are not limited to, some or all of the following:

- Spot treat with aggregate where necessary to reduce surface erosion from road.
- Install waterbars or drivable dips at proper intervals.

Proposed actions without Consensus from the Big Creek – Yellow Pine Collaborative

The Proposed Actions presented below had partial support from the collaborative but had some unresolvable issues that would not lead to consensus. These three proposals are summarized in Table 6 below and on Figure 4.

Davis Ranch Road/Hamilton Bar-3-mile Road: the proposal below was approved by members of the collaborative, excluding two individuals within the rounded committee and was endorsed by Wayne & Karen Forrey. The primary objection from the two individuals objecting from this proposal is disallowing Public ATV access on the reconstructed Davis Ranch Road/Trail which was not a supportable action by a larger portion of the collaborative.

- a. Reconstruct the Davis Ranch Road to Pack-Saddle Standards that is open to the public as a non-motorized trail while available for use, via a special use permit, as a “trail open to vehicles 50” or less in width” for access to private property by landowners.
 - i. Forest Service funds should be utilized to construct the trail to pack-saddle standards; however, no Forest Service funds should be utilized in upgrading to such a standard as to accommodate

ATV travel. If additional funding is required to enhance the Pack-Saddle trail to a standard with which to accommodate ATV travel, those funds should come from alternative sources-private funds, grants, partnerships etc.

- b. With the above being authorized and implemented Wayne and Karen Forrey will relinquish their full size vehicle access rights on the Hamilton Bar / 3-mile Road.
- c. The Hamilton Bar / 3-mile Road, from the gate to the end of the road, would be decommissioned to a 2-wheel motorized trail with the remainder of the existing roadbed stabilized and reclaimed to prevent runoff and degradation.
- d. This proposal will in no way prevent any future landowner in the area from working with the Forest Service in obtaining a special use permit for full sized vehicle traffic at their own expense.

The following two items are being proposed to the Payette National Forest for Consideration without the full support of the Collaborative. The Recreation Committee emphasizes the importance of the recreational opportunity that these trails would provide for a shrinking two-wheel motorized trail system.

Cougar Creek Trail: Re-designate the Cougar Creek Trail as a 2-wheel motorized trail: This was proposed by the Recreation Committee.

Martin Ridge Trail: Re-designate the Martin Ridge Trail as a 2-wheel motorized trail: This was proposed by the Recreation Committee.

The Rounded and Resource Committees could not come to consensus with the two proposals above primarily for the following:

- Both of these trails are in Management Prescription Category 1.2 (Recommended Wilderness), as such they would require a forest plan amendment.
- The resource group does not want to support a proposal that would jeopardize the potential for future wilderness designation.
- There are resource concerns with the trails, particularly Cougar Creek that has 4.4 miles in RCA's and has 10 stream crossings.
- Both of these trails would require extensive trail work to get them up to 2-wheel motorized standards.
- This project falls outside of the goals of the collaborative (as agreed upon by the entire collaborative)
 - 1. Look for 50" trail opportunities
 - 2. Look for restoration opportunities
 - 3. Provide for legal outstanding rights.

The following potential conflicts with the Forest Plan guidelines were identified for Martin Ridge and Cougar Creek Trails. The Recreation Committee does not interpret the guidelines as in conflict with the proposal as these two trails have been, in the recent past, designated as two-wheel motorized trails.

- Standard WRST01: Changes to existing recreational settings (mapped ROS classes) are limited to only those that maintain or restore wilderness characteristics.
- Guidelines: WRGU03: Non-conforming uses in recommended wilderness should not be promoted
- WRGu04: State Off-Road Motor Vehicle capital investment funds should not be solicited or used in recommended wilderness.
- WRGU05: Mechanical transport in recommended wilderness where it currently exists may be allowed to continue unless:
 - a) it degrades wilderness values
 - b) resource damage occurs, or
 - c) user conflicts result.

Table 6 Proposed actions without Consensus

Proposed Action	Existing Condition	Proposed Condition
<p>1) Reconstruct the Davis Ranch Road to pack-saddle standards that is open to the public as a non-motorized trail while available for use, via a special use permit, as an ATV Trail for access to private property by landowners.</p> <p>a) Forest Service funds should be utilized to construct the trail to pack-saddle standards; however, no Forest Service funds should be utilized in upgrading to such a standard as to accommodate ATV travel. If additional funding is required to enhance the Pack-Saddle trail to a standard with which to accommodate ATV travel, those funds should come from alternative sources-private funds, grants, partnerships etc.</p>	Non-Motorized	Non-Motorized*
2) With the above being authorized and implemented Wayne and Karen Forrey will relinquish their full size vehicle access rights on the Hamilton Bar / 3-mile Road.	Special use – Full Size	2-wheel Motorized
3) The Hamilton Bar / 3-mile Road, from the gate to the end of the road, would be decommissioned to a 2-wheel motorized trail with the remainder of the existing roadbed stabilized and reclaimed to prevent runoff and degradation.	2-wheel Motorized	2-wheel Motorized
4) This proposal will in no way prevent any future landowner in the area from working with the Forest Service in obtaining a special use permit for full sized vehicle traffic at their own expense.	N/A	N/A
Re-designate the Cougar Creek Trail as a 2-wheel motorized trail	Non-Motorized	2-Wheel Motorized
Re-designate the Martin Ridge Trail as a 2-wheel motorized trail	Non-Motorized	2-Wheel Motorized

*Non-motorized with Special Use Permit for private landowners for vehicles 50” or less in width.