

**November 12, 2020**

***Sent via email***

**To:** Objection Reviewing Officer  
Intermountain Region, US Forest Service  
324 25<sup>th</sup> Street  
Ogden, Utah 84401  
[objections-intermtn-regional-office@fs.fed.us](mailto:objections-intermtn-regional-office@fs.fed.us)

**RE: SFRAMP**

**Idaho Conservation League Objection and Suggested Remedies to  
the South Fork Restoration and Access Management Plan Draft  
Decision Notice and Finding of No Significant Impact**

**I. General support for the South Fork Restoration and Access Management Plan**

The Idaho Conservation League has been involved with the Big Creek-Yellow Pine-South Fork collaborative since its inception in December of 2012. We are very supportive of the collaborative process as a way to resolve long-standing disagreements between different user groups and often-conflicting goals. The Charter of the collaborative was to formulate a recommendation consistent with the objectives of the Payette Forest Plan for disputed road closures in management areas 12 and 13 of the Krassel Ranger District.

This recommendation was crafted to (i) meet all regulatory requirements, (ii) represent the input from and support of all stakeholders of the management areas as reflected in the collaborative's situation statement and (iii) will support an economically viable Travel Management Plan that includes appropriate roads and road design in the region considering, among others, road maintenance, road restoration, realignment or recontouring, seasonal openings, road-to- trail conversions and road decommissioning to support the following simultaneous outcomes:

- Maintain and improve conditions for TEPCS (threatened, endangered, proposed, candidate, and sensitive) fish, wildlife, and botanical species, or impaired (as defined by the 303(d) section of the Clean Water Act) water bodies;
- preserving or enhancing the area as a (Nez Perce) treaty resource for fishing, hunting and gathering;
- preserving or enhancing effective access for private property;
- preserving or enhancing effective public access;
- supporting effective access for business activities;

The collaborative crafted recommendations for the Big Creek Restoration Access and Management Plan and then further refined these during the objection resolution process which was successfully resolved and implemented.

Following completion of the Big Creek RAMP, the collaborative turned its attention to address a similar set of issues on the South Fork of the Salmon.

The June 2017 South Fork RAMP scoping notice from the Forest Service included the following project description:

Project Description: The project would implement a range of actions relating to watershed rehabilitation, motorized and non-motorized access and improvements of recreation facilities within the South Fork Salmon River (SFSR) watershed (Figure 1). The actions listed below are a combination of recommendations provided to the Forest Service by the Big Creek – Yellow Pine – South Fork Salmon River collaborative group, and recommendations from the Forest Service interdisciplinary team.

The Purpose and Need included the following components:

- Determine the Minimum Road System needed for management of the project area, and what routes will be open for public motor vehicle use
- Improve watershed condition, by decommission or obliterating roads, storm damage risk reduction treatments, improving maintenance of roads and trails and managing dispersed use
- Provide motorized ATV and motorcycle trail opportunities, while minimizing resource impacts
- Reduce resource impacts from dispersed camping and parking while accommodating public access

On Nov. 14, 2016, the collaborative submitted a set of recommendations to the Forest Service to address these goals. These recommendations were the result of years of meetings among collaborative members and the Forest Service and attempt to strike a reasonable balance between conservation goals, recreation interests and access needs as outlined above.

Previously in 2020, the Forest Service approved 14 of the 16 actions considered in the SFRAMP and ICL supported all 14 actions. The two remaining items that were not decided upon at the time were the road decommissioning and new ATV trails in the Little Buckhorn Creek drainage. In the September 29, 2020 Draft Decision Notice #2 the Forest Service has proposed implementing Alternative D to address these two issues as follows:

*Alternative D - Decommissioning treatments would be considered on approximately 143 miles of unauthorized roads, and 50 miles of closed system roads. Five miles of unauthorized road on the McCall Ranger District would be decommissioned. Sixteen miles of closed system road and 20 miles of unauthorized road with dual designation as a trail would be converted to motorized or nonmotorized trails*

*Alternative D - Approximately 14.2 miles of new ATV trail (< 50-inch trail width) would be constructed in the Little Buckhorn Creek drainage. Most of the new trail would be constructed on the alignment of closed system roads, but new trail construction off old roadbeds would be considered where needed to connect old roadbed alignments. System*

*roads would be converted to trail. Decommissioning treatments would be applied to roadbeds prior to construction of ATV trails.*

We are writing to reiterate our support for both the collaborative's original recommendations which are attached below and for **implementing Alternative D**, which we believe best matches the collaborative's recommendations. As such, the Idaho Conservation League is submitting this supportive objection to advocate for these two actions and requests to be part of the resolution process if these components are challenged.

## **II. Official notice of objection**

We are concerned, however, that these two components may not end up being carried through to the final decision and be implemented as proposed. As such, the Idaho Conservation League is officially objecting to specific components of the Draft Decision with suggestions to improve the project record, better support the proposed decision and aid with project implementation.

Pursuant to 36 CFR Part 218, the **Idaho Conservation League (ICL)** files this Objection to the Final Environmental Assessment (dated September 2020) and Draft Decision Notice and Finding of No Significant Impact (legal notice appeared in the Idaho Statesman on 9/30/2020) issued by Payette Forest Supervisor Linda Jackson for the South Fork Restoration and Access Management Plan Draft Decision #2.

The project name is the South Fork Restoration and Access Management Plan and Linda Jackson, Payette Forest Supervisor, is the responsible official. The project is proposed on the Krassel Ranger District, Payette National Forest. The Reviewing Officer is the Regional Forester. The legal notice announcing opportunities to file objections was published on September 30, 2020. Written objections must be filed within the following 45-days or, if the final day fell on a weekend or federal holiday, the next business day. This objection is submitted on November 13, 2020 in a timely manner.

The FEA and Draft DN/FONSI are available on the Forest Service webpage for the South Fork Restoration and Access Management Plan at:  
<https://www.fs.usda.gov/project/?project=51257> (last viewed November 12, 2020).

The contact person for Objector ICL is: John Robison, ICL Public Lands Director, PO Box 844, Boise, ID 83701, 208.345.6933; Street Address: 710 N 6th St., Boise, ID 83702.

### *Connection between prior specific comments*

The Idaho Conservation League is a member of the Big Creek-Yellow Pine South Fork Travel Plan collaborative that developed the original recommendations for the Forest Service to consider in the development of this project and that has also submitted additional letters and constructive objections in support of implementation of the collaborative's recommendations. Objector ICL filed comments on the Draft EA and proposed Forest Service actions on May 20, 2019, scoping comments on July 24, 2017, an objection and suggested remedies on Monday, Feb. 30, 2020 and a letter supporting the project on April 30, 2020.

Pursuant to 36 CFR 218.8, ICL states that the following content of this Objection demonstrates the connections between the July 2017 scoping comments and the May 2019 comments on the draft EA (collectively “previous comments”) for all issues raised herein, unless the issue or statement in the FEA or DN/FONSI arose or was made after the opportunity for comment on the Draft EA closed, as detailed herein. Pursuant to 36 CFR 218.8(b), the previous comments submitted by ICL are hereby incorporated by reference.

#### *Use of the objection process*

We intend to use the objection process to provide suggestions to improve the project record, better support the proposed decision and aid with successful project implementation. Should an objector propose further modifications that are not supported by the collaborative or this analysis and do not strike the proper balance for the various interests that crafted the original proposal, ICL intends to use the objection process to resolve these discrepancies.

If the Payette National Forest is committed to selecting and implementing Alternative D as currently proposed, the Idaho Conservation League would be willing to withdraw those relevant sections of this objection.

It is important to note that the Idaho Conservation League does not purport to represent other collaborative members or the entire collaborative in this objection; we are simply one member. However, we hope to use the collaborative process to resolve outstanding issues. We believe that all the issues raised below can be addressed through the objection review process.

As part of the objection process, ICL intends to seek the counsel of other collaborative members (and the entire collaborative, if possible) if additional remedies are needed to resolve a particular issue. For example, if an objector seeks an additional design feature and this feature that may adversely impact a key issue for one of the collaborative members, the Idaho Conservation League would like to bring this issue before the collaborative to seek ideas for rebalancing the project or developing additional offsets.

We recognize the Forest Service’s authority in making the final decision. We also believe that the collaborative can be an important resource during the objection process in resolving specific objection points and balancing any further modifications.

Significant modifications from the Collaboration’s original recommendations proposed by other objectors will need to be offset to ensure that forest resources and various public interests are adequately protected. Should these modifications and offsets meet NFMA, NEPA and ESA requirements, we would be willing to withdraw our objection. We intend to invite collaborative partners to any Objection Resolution discussions to discuss any discrepancies and propose resolutions to any other objectors and the Forest Service.

### **III. Statement of Reasons**

We have concerns about the timing of road decommissioning and trail construction and the length of time until both of these goals are accomplished. We also have concerns that the Forest Service

does not have the resources to maintain these trails to standard, to educate members of the public about which trails are open and which ones are closed and why, to monitor compliance and enforce these travel management decisions. If these issues are not addressed, the project will not live up to its promise.

## **E. Suggested Remedies**

We recommend that the Forest Service create an implementation schedule for road decommissioning and construction of the 14.2 miles of trails, similar to the implementation plan for the Big Creek RAMP. This information could be posted on the Forest Service website and on the SF RAMP project page. A calendar could show the weeks when road decommissioning and trail construction is expected to occur for all of the various routes addressed in Decision #2. The calendar could also show when trails are officially opened.

We also recommend that the Forest Service incorporate new kiosks, maps, and other information about the new trail opportunities and reasons to not drive motorized vehicles on decommissioned routes. Maps in kiosks should have American flags posted on them. Paper maps of the designated routes in the South Fork RAMP and Big Creek RAMP could be delivered to businesses in Cascade, Donnelly, Lake Fork, McCall, New Meadows and Yellow Pine. These maps could also include logos of the organizations that were involved in the Big Creek South Fork Yellow Pine RAMP if these organizations were amenable to that.

The Forest Service should also reach out to user groups who are interested in trail maintenance and see if these new trails could be placed on their maintenance schedule. The Forest Service should also take steps to see that the necessary partnership agreements and trainings are in place. Volunteers should also be told which trails are closed.

The Forest Service could also post the results of regular monitoring efforts on the Forest Service website or project webpage to show if closed routes have been effectively rehabilitated, if closures are effectively deterring unauthorized motorized uses, and if soil, vegetation and watershed recovery is proceeding as planned. This monitoring should be part of the existing monitoring program with the added step of posting the information on the website.

The Forest Service should also establish a “trigger” for additional actions if the project purpose and need are not being met. For example, if monitoring shows that a certain percentage of trails were not meeting stated goals for trail maintenance, watershed improvements, or compliance with the travel plan, the Forest Service would take additional specific steps. These steps should be described in advance so the Forest Service knows what steps to take when and before a problem becomes too difficult to address.

We look forward to participating in the Objection Review Process to review our objections and work with our collaborative partners to discuss potential remedies so the project can proceed.



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John Robison  
Public Lands Director  
Idaho Conservation League  
P.O. Box 844, Boise, ID 83701  
710 N 6th St., Boise, ID 83702  
208.345.6933x13  
jrobison@idahoconservation.org