South Fork Restoration & Access Management Objection

Merrill Saleen – Lead Objector

Representing:	
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Summary of Project Objection

- The proposed action of the Forest Service permanently closes nearly all 190 remaining miles of existing Forest Service secondary roads without properly designating a minimum road system for perpetuity.
- Previously approximately 500 miles of Roads were closed with little or no restoration benefit.
- Only the FERTA protected main access routes for ingress and egress will remain open in the Yellow Pine area with the preferred alternative.
- In the South Fork of the Salmon River Restoration and Access Management Plan (SF RAMP), nearly all of the secondary roads are being recommended for permanent closure, many of which are level 3 and 4 system roads. These roads were well designed and engineered to provide a wide variety of recreation opportunity.
- Trails and Road to Trails conversions are not properly addressed. Trail maintenance is not being preformed and conflicts with land designations are not being resolved.
- Studies that show that "Disturbance events such as landslides actually enhance fish habitat." were not referenced or considered in the analysis.

Scope of the South Fork Analysis is Too Narrow

- Did not address safety issues with entire South Fork Road being a road of concern and requires all motorized vehicles to only use the South Fork Road due to inadequate minimum road system.
- Did not adequately address Recreation, Local Economy, Roads analysis, and effectiveness of actions towards fish recovery.
- Did not address large fire sediment delivery versus the effects of road sediment. Only evaluated road sediment. Ignored effects of massive tons of fire sediment.
- Assumes fish recovery is dependent upon road closures. **Over 60 years of road closures and sediment reduction efforts have not been effective.**
- NOAA states that we are not achieving fish recovery even after all the historic restoration work has been completed..
- Did not link to Geo-regional effects on fish populations such as impacts of Snake River Dams, Native American Fishing practices (gaff & gillnetting), and predation from Orcas, Bull Trout, Sea Lions, etc... To determine where the priority should be to better support recovery.

If funding is available for road decommissioning shouldn't it be available for road opening, maintenance, and mitigation improvements?

Loss of Recreation Opportunities

- EA does not show, and is inconsistent with, ROS setting and compatible opportunities (see Forest Plan Goals and Objectives for Recreation). No **General Forest** designation was assigned - only **Roaded Natural**. But extensive logging took place in the past and over 500+ miles of roads existed in the planning area that is incompatible with Roaded Natural and Roadless Area designations.
- This misleading & inaccurate statement in the EA and was not met or addressed: "*Within the project area, the action alternatives should result in **additional** miles of designated routes open to the public. Many more unauthorized routes would be closed and fully decommissioned to offset new development and ensure long-term resource integrity across the sub-watershed.*"
- Does not analyze the minimum road system necessary to provide for non- wilderness recreation opportunity. The project area does not include any management prescriptions for **roaded recreation or opportunities compatible with the 5 developed recreation sites.**
- The entire area is being managed with a bias towards wilderness character.
  - The recreation analysis refers to 9 Wilderness Study References and does not analyze compatible general forest recreation opportunities.

MINIMUM ROADS TO KEEP OPEN! :

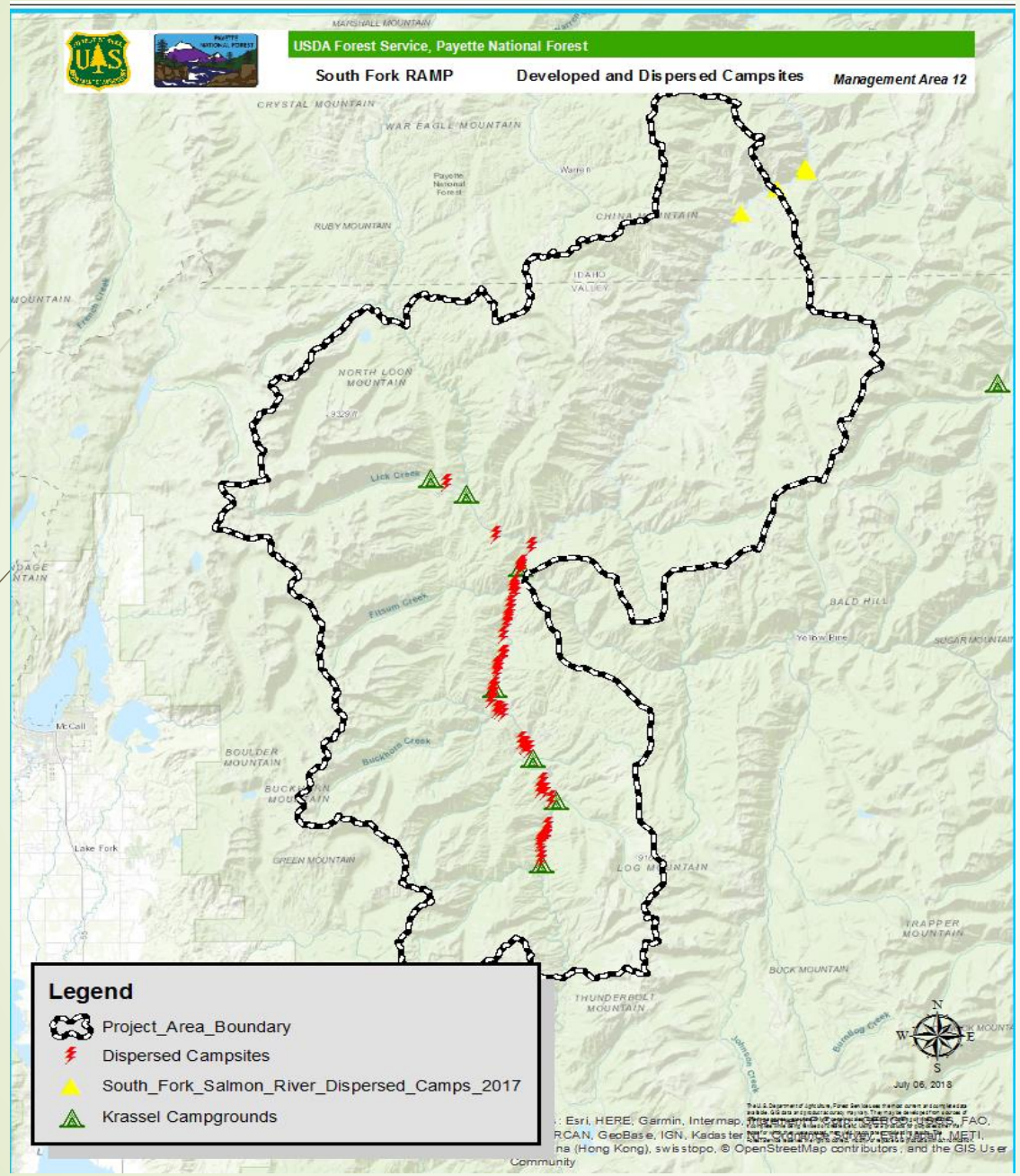
Need to provide **KEY open system road access** through previously logged areas. Especially to Roadless area trailhead portals. All of which provide a wide range of recreation opportunities compatible with ROS settings. All of these are in close proximity to developed campgrounds and day use opportunities.

Buckhorn Creek Road – accesses 5 different trailheads within 5 miles, a hot springs and many high mountain lakes.	**Little Buckhorn Loop and Teapot Roads** – accesses 2 trailheads, and provides a loop to Buckhorn Ck. Road.
Zena Creek Road – Trailhead (8 miles up the road) accesses back country roadless. Would be daunting to hike 8 miles just to get to trailhead.	**Dollar Creek Road** – provides access to Blackmare trail system and to a large elevational range of ecosystems. Opportunites include berry picking.
Three mile - South Fork Road – accesses 2 trailheads, private property and river recreation.	**Davis Ranch Road** – accesses many trailheads, private property, Outfitter trails, river corridor, and provides roaded recreation for senior citizens.
Camp Creek Road –accesses 3 different trailheads.	**Cow Creek – Fitsum Creek Road** – accesses 4 different trail heads.

Loss of all Off-Road Dispersed Campsites

- The safety of the public, especially children and pets, is compromised when visitors are required to park & camp **within one car length of a level 4 road**. This was not addressed or analyzed.
- Not allowing dispersed RV camping further than one car length from the road greatly discourages use by most recreation visitors. Allowing only walk in tent camping eliminates dispersed recreational vehicle camping opportunities.
  - Tent campers make up a very small percentage of the recreating public.
- Many more dispersed sites were shown in the recreation report then addressed in the EA or collaborative process. The impact of closing this many sites to recreation opportunity was not known or able to be analyzed, discussed, or mitigated.
- The need for trailhead facilities, parking and turnarounds was generally ignored.

ADD DISPERSED SITES NEAR THE KEY ROADS TO ACCOMMODATE OFF ROAD CAMPING, TURN AROUNDS, AND USE OF RECREATIONAL VEHICLES (RVs).



This map displays all of the dispersed recreation sites that are going to have access limited to <u>one car length from open roads</u>!!

Application of "*National Visitor Use Monitoring Results*" *U.S.F.S.* to this EA:

- **Only 5% of Visitor use is in Wilderness***
- The recommended alternative will convert the area to quasi-wilderness. Consequently only 5 % of the potential recreation visitors will use this project area.
- Does not provide opportunities for the remaining recreation visitors to pursue their chosen activities.
- There is a strong preference for roaded recreation especially among older public.*
  - Road access is necessary to provide for this variety.
- The analysis requires that previously logged areas that had over 500 miles of roads, are now considered quasi-wilderness (Roadless) and are proposed to not be accessible by road?
- **The EA proposal requires that most users need to hike and walk over 5,000 vertical feet over 8 miles of closed roads with a 60 lb. pack before getting to unroaded wilderness like trailhead destinations.**

**from "National Visitor Use Monitoring Results" Forest Service*

Effect on Local Economy

- Economic analysis was weak & non quantifiable. It did not use the national standard format.
- Lumped together all communities in Valley County and did not recognize the extreme impact to the village of Yellow Pine which is the most affected community adjacent to the project area.
- The analysis did not quantify the potential effects of losing 95% of the visitor use outside this proposed quasi-wilderness (South Fork analysis area).
- Over the past 20 years, rural public lands have been recognized as increasingly important tourist destinations that bring visitors to the region.
- The expenditures of these visitors support local businesses and bring income and jobs to the region.
- The alternatives provides no destination interest outside wilderness:
  - Secondary Roads nearly eliminated,
  - ORV opportunity severely limited and shared with other primary road users,

National Forest Visitor Spending Averages & the Influence of "Trip-Type" and Recreation Activity

- "Estimates of National Forest recreation visitor spending serve as inputs to regional economic analyses and help to identify the economic linkages between national forest recreation use and local forest communities." **These were not used in the analysis.**
- The EA limits or eliminates "Trip Types" (no roads to drive, can't cut firewood, can't drive off-road vehicles, can't access huckleberry picking, can't even make it to mountain lakes due to excessive mileage from closing roads, eliminates opportunities for senior citizens).
- Recreational spending will be greatly reduced but is not quantified in the EA.
- The local economy is suffering from these restrictions and decisions.
- The EA should provide an economic analyses that quantifies the loss of Business due to extreme limitations placed on public use and access.

Minimum Road System

- Millions of dollars previously invested in sediment control, infrastructure, road design and construction standards are not identified or analyzed, & will be lost forever.
- Little or no secondary roads (Level 2 or better) which is the No.1 public preference is provided.
- The EA did not identify the construction level of the roads analyzed – only listed as generic Level 1. Many are constructed to Level 3 and 4 as shown in the recently available Road Report.
- The inappropriate labeling of these roads as Level 1 makes them applicable to exclusive FP standard 1270 - used to justify historic closures of most Forest Service roads.
- Limiting roads to less than 40 inch vehicles eliminates future road maintenance and fire protection capability. No quantifiable sediment reduction was identified or studies referenced to support the benefit of 40” wide vehicles.
- ***Authorize and add the KEY Forest Service system roads to the minimum road system for full size vehicles and fund mitigation and maintenance for perpetuity.***

Need for Environmental Engineering

- Should be the basis of mitigation for roads and campsites.
- New approach and new professional specialty.
- Being successfully performed on State and private lands.
- Highlighted in “Outdoor Idaho” and Fish and Game website.
- Exclusive clauses in the Forest Plan have not applied this Engineering approach.
- Example: The EA promotes closing a road due to the sediment production potential - which may or may not be detrimental to fish. Environmental engineering can reduce that sediment by many different techniques to reduce sediment and the road can remain opened to the public.

Example of an Exclusive Standard - ML 1 Roads - Forest Plan Standard 1270 quoted:

- *"Do not reopen classified roads in Level 1 maintenance status or Level 2 roads that have become impassable unless it can be demonstrated through the project-level NEPA analysis and related Biological Assessment that:*
  - *For resources that are within their range of desired conditions, reopening these roads for use shall not result in degradation to those resources unless outweighed by demonstrable short - or long-term benefits to those resource conditions;*
  - *and for resources that are already in a degraded condition, re opening these roads shall not further degrade nor retard attainment of desired resource conditions unless outweighed by demonstrable short - or long-term benefits to those resource conditions;*
  - *and adverse effects to TEPC species or their habitats are avoided unless outweighed by demonstrable short - or long-term benefits to those TEPC species or their habitats.*
  - *Where reopening these roads cannot meet these constraints, consider decommissioning. An exception to this standard is where reopening Level 1 or 2 classified roads is required to respond to reserved or outstanding rights, statute or treaty, or respond to emergency situations (e.g., wildfires threatening life or property, or search and rescue operations)."*
- **Designating ML1 roads is not NEPA supported. District Rangers have been making this designation without compliance to NEPA!!!**
- **The use of exclusive clauses coupled with non-NEPA ML1 roads precludes Recreational consideration and use.**

Wildfire Overwhelming Effects of Sediment Production

- The analysis **does not address the estimated millions of tons of sediment** produced from past landscape fire and landslides.
- The entire South Fork drainage has burned and caused massive erosion within the past 20+ years.
- Should the 70 to 90 tons of sediment produced from the 190 miles of roads be the primary consideration and justification to close nearly all roads
- If the habitat condition models and surveys are not meeting standards, can it reasonably be attributed to just road sediment? What about wildfire and landslide sediment?
- How can the road sediment have any impact or be isolated from the fire and landslide impact?
- In addition, fire erosion has damaged nearly every road and stream crossing in the analysis area - causing millions of dollars in bridge replacement and repair that the County has performed.

Cumulative Effect of Forest-wide Road Closures

- Appears to lack input from qualified environmental road engineers when recommending road mitigation measures, closures, or obliteration.
- Lack of consideration of more recent studies that may negate road sediment damage to local fish populations have not been applied.
- Permanent secondary road closures from decommissioning and obliteration will remove most of the public road access for visitor use as proposed.
- EA does not do a quantifiable analysis on the effects on the local economy.
- Cumulative effect from all Forest road access management decisions close most roads.
- Public road access and recreation opportunity will be **significantly** reduced.
- ***Needs an Environmental Impact Statement Study!***

The Collaborative's ML-1 Roads Majority Opinion (NOT a consensus)

- Stated "*The Collaborative requested the FS evaluate newly discovered ML1 roads and unauthorized roads in the Buckhorn Area 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*."
- Above statement is **mutually exclusive**, you cannot have a full range of recreation opportunities without having a system of roads compatible with the Recreation Opportunity Spectrum. No roads were identified that did not represent a resource impact.
- 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 ML 1 level roads where resource issues exist.
- **A full range of recreation opportunities could not be implemented.**
- **The ability to mitigate impacts and keep roads open was not allowed by Forest Plan Direction and is a possible violation of NEPA.**

Nez Perce Tribe Exclusive Use and Impacts

- The SFRAMP is located entirely within the Tribe's aboriginal territory and is subject to the rights that the Tribe reserved, and the United States secured, in the Treaty of 1855. Tribe's area of exclusive use and occupancy is being questionably applied.
- Tribal impact to Salmon and Steelhead recovery is not controlled or expected to be sustainable.
  - Study results indicate that Tribal members who consume fish at the 95% percentile consume approximately 30 averaged-sized salmon. 30 fish per the 3500 tribal members equates to 105,000 fish. Tribal fish harvest is not limited to hatchery fish and consumption rates do not provide for sustainable fish populations.
- Chinook Salmon 10 yr. returns to Idaho is 110,046 and 54,552 in 2020.
- The 10 year average return leaves 5,046 for the 1.7 million non-tribal Idahoans, and to sustain the species.

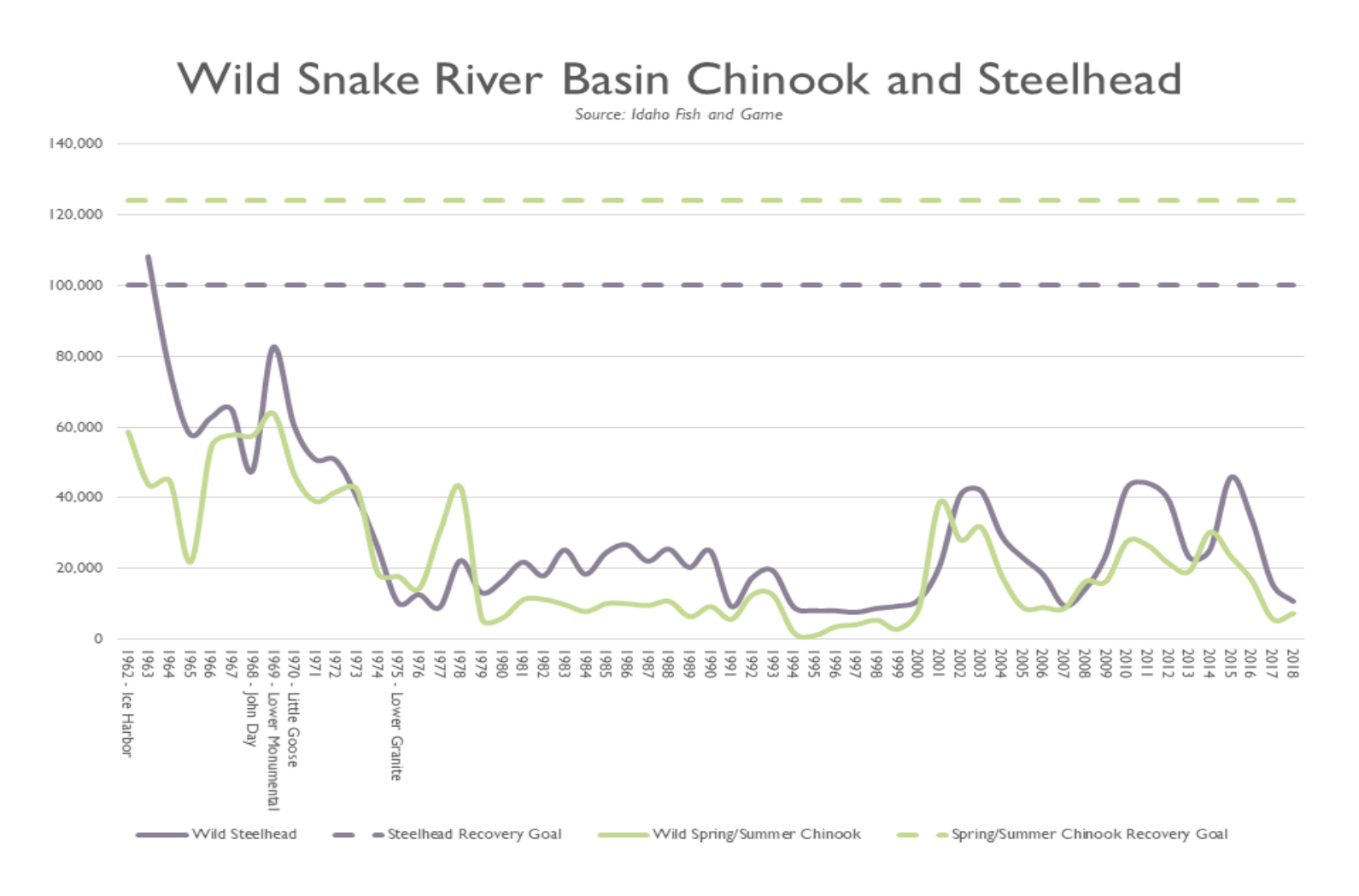
Data from *the Fish Passage Center fpc.org*

- *In 2017 the fish returns at Lower Granite dam are **down for all categories** compared to both the 10 year average and 2016. These numbers have not improved over time.*
- *Total salmon and steelhead that returned to Lower Granite Dam in 2017 saw a 35% reduction from 2016, which followed a 33% reduction from 2015 to 2016.*
- *These precipitous declines should come as no surprise. They were predicted in the 2015 Salmon White Paper which was distributed to Pacific NW state representatives as well as federal agency representatives.*
- *Five-year reviews by NOAA show **minimal improvement** in the risk-status of ESA-listed salmon and steelhead **despite a billion taxpayer dollars being spent** on system improvements.*
- ***Current NOAA recovery plans are predicted to NOT achieve fish recovery.** Pacific NW state fisheries reports show that smolt-to-adult ratios have not improved either and still show Snake River fish returns are not meeting criteria for species survival.*

Data from *the Fish Passage Center, fpc.org*

- **Snake River wild steelhead are on a decline to levels not seen in 20 years.**
  - Adult returns in 2017 will mark the second steepest 5-year trend since the 2009-2013 trend.
  - The third worst 5-year trend will be from 2002-2006 adult counts.
  - *This recent 5 year trend is so low that it will hit a trigger point in the 2014 biological opinion.* The BiOp states that the agencies must implement a solution within 12 months. However, the downward trend is not the only problem; the actual number of wild steelhead is now so low that the only solution or recovery action that can be implemented quick enough to prevent virtual extinction is the breaching alternative in the existing EIS for the 4 Lower Snake River dams. Run declines of other species point to 2018 breaching as well.
- **From the *2016 and 2017, NOAA Recovery Plan for Snake River Spring/Summer Chinook Salmon & Snake River Steelhead, National Marine Fisheries Service, West Coast Region***
  "Over $1 billion has been invested since the mid-1990s in baseline research, development, and testing of prototype improvements, and construction of new facilities and upgrades."
  "NMFS estimates that recovery of the Snake River spring/summer Chinook salmon ESU and steelhead DPS, like recovery for most of the ESA-listed Pacific Northwest salmon and steelhead, could take 50 to 100 years." But further states: "This recovery plan contains an extensive list of actions to move the ESU and DPS towards viable status; however, **the actions will not get us to recovery**."

https://www.idahoconservation.org/issues/wildlife/steelhead/ *Fish are not recovering.*



"*Stream Restoration in the Pacific Northwest: Analysis of Interviews with Project Managers*"

- **Hundreds of millions of dollars per year are spent on river restoration in the Pacific Northwest (PNW), but *little is known about the effectiveness of this effort.***
- Analyzed a database containing 23,000 projects at 35,000 locations in the region.
- Findings suggest establishing a connection between effectiveness monitoring and project implementation is not a usual component of Project Design.
- Consequently can only asses benefits in a few isolated projects.
- Cannot quantify cumulative benefits of restoration on larger scale.
- Findings highlight need for:
  - Planning prior to implementation of restoration projects that account for monitoring design
  - **Coordinated effectiveness monitoring to assess cumulative effects of restoration**
  - **Management and maintenance of projects based on real measures of project performance**

"*Effectiveness of Planned actions: Restoring Rivers One Reach at a Time: Results from a Survey of U.S. River Restoration Practitioners*"

- **Despite expenditures of more than 1 billion dollars annually, there is little information available about project motivations, actions, and results for the vast majority of river restoration efforts.**
- Confidential telephone interviews with 317 restoration project managers from across the United States showed that less than half of all projects set measurable objectives for their projects, but nearly two-thirds of all interviewees felt that their projects had been "completely successful."
- Ecological degradation typically motivated restoration projects, but post-project appearance and positive public opinion were the most commonly used metrics of success.
- Projects classified as highly effective were distinct in that most had significant community involvement and an advisory committee. Interviews revealed that many restoration practitioners are frustrated by the lack of funding for and emphasis on project monitoring.
- Quote; "To remedy this, we recommend a national program of strategic monitoring focused on a subset of future projects. Our interviews also suggest that merely conducting and publishing more scientific studies will not lead to significant improvements in restoration practice; direct, collaborative involvement between scientists, managers, and practitioners is required for forward progress in the science and application of river restoration."

"Effects of fire on fish populations: landscape perspectives on persistence of native fishes and nonnative fish invasions"

- Abstract: *Our limited understanding of the short and long-term effects of fire on fish contributes to considerable uncertainty in assessments of the risks and benefits of fire management alternatives.*
- A primary concern among the many potential effects of fire is the effects of fire and fire management on persistence of native fish populations.
- The challenge for providing better management guidelines will be to add solid empirical data and models to assess the relevance of emerging concepts and theories, and provide a sense of where and when fires pose significant risks and/or benefits to fishes.

Nearly all the analysis area has been burned by wildfires within the last 20-30 years. Wildfire affects landslide sediment production.

Massive sediment and debris flows have commonly occurred in the area.
Dramatically changing the stream channel sediment structure.
Monitoring cannot differentiate between wildfire and road sediment.

Debris flows and blockages are common.

Causing changes in stream channeling and braiding.

Many of which are erroneously attributed to roads.

Quantities of wildfire-produced sediment far exceeds that of roads, negating the 70 to 90 tons of road sediment.

Fire intensities are extreme. Studies suggest that the impacts on fish from sediment production are uncertain. The reason for recent declines in fish population suggest a possible link.

More examples…

"*Adaptation to Wildfire: A Fish Story*" (Recent and more current FS Research)

Excerpts:

- *Over the past century, dams, roads, and timber harvest practices have contributed to the decline in the amount and complexity of salmon and trout habitat in the Pacific Northwest.*
- *New research indicates that wildfire suppression adjacent to streams also may have inadvertently reduced the quality of aquatic habitat.*
- ***The accumulation of forest fuels also has set the stage for higher-than-normal fire intensity, and perhaps larger fires that may cause extensive damage to local fish populations.*** *This poses a significant problem for isolated and vulnerable fish populations such as bull trout.*

Is the decline attributable to sediment from *landslides* as indicated in sediment modeling, compliance with Forest Plan Standards, and the EA decision? See next slide:

“Adaptation To Wildfire: A Fish Story”

Reeves agrees. “These landscapes and environments are very dynamic, but regulatory and management agencies often take a more static view, thinking these systems are very homogeneous. Disturbance events such as landslides actually enhance fish habitat; this is a shocker to many people.”

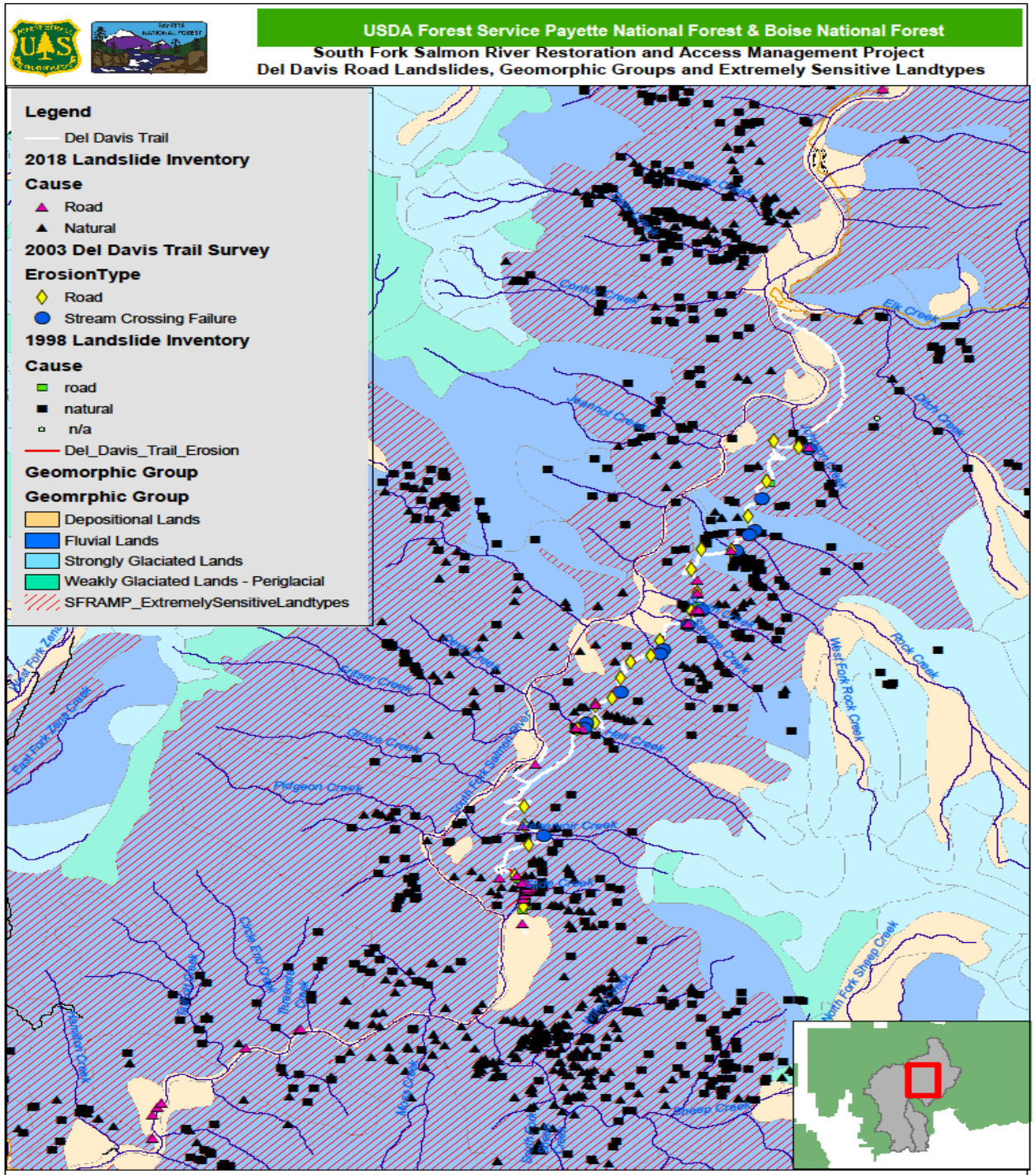
Landslides:

The existing road is going to be closed due to a small number of landslides (shown in red).

Meanwhile hundred of natural caused landslides dominate the entire watershed.

The recent USFS Landslide study states that Resource Specialists and Managers need to rethink and apply the positive effects of landslides on restoration.

This opinion mitigates Forest standard 1270 and opening roads does not further degrade nor retard attainment of desired resource conditions.



Takeaways From the Collaborative Membership Process:

- Special interest groups dominate the process. At-large public members are worn down before the project is finished (they must pay for travel, food, time, printing, etc. while those associated with special interest groups are on salary & per diem).
- The goals of consensus, give & take, balance, mitigation, and mutual respect were not achieved in the collaborative process.
- Extreme interpretation of the Exclusive Standards in the Forest Plan negate the effectiveness of the Collaborative and application of all other goals, objectives, and standards of the Forest Plan. Examples of these standards are 1218, 1222, 1270, and 1271.
- Meanwhile, recreation has **no** standing. The process of establishing a minimum road system is flawed and ineffective.
- Errors in accuracy were identified in the EA but not corrected. Example is the number of miles of motorized trails in the proposed wilderness and Roadless areas identified in the Recreation Report.
- Specialist reports were not made available for the collaborative and EA process. This was new information that better supports our objection.

Summary

- Assure that direct, collaborative involvement between scientists, managers, and practitioners is required for forward progress in the science and application of river restoration.
- Need to provide KEY Forest Service road and trail access. Especially through roaded areas to Roadless Area and trailhead portals as called for in a Forest and Unit Recreation Plan.
- The scope of the project should be increased.
- Redirect the spending of money and effort on recovery. Current NOAA recovery plans are predicted to NOT achieve fish recovery.
- Direct a solution to open existing KEY Forest Service system roads to full size vehicles and fund monitoring and maintenance. **MITIGATE TO RECREATE**
- Add solid empirical data and updated models to assess the relevance of emerging concepts and theories, and provide a sense of where and when ***fires and roads*** pose significant risks and/or benefits to fisheries. Especially landslides.
- The ability to restore fisheries to the South Fork should require further analysis and revision of the Forest Plan. An Environmental Impact Study is desperately needed.

The EA far exceeds our limits of acceptable change.

Conducted our Own Public Meetings

- We conducted a review of our draft with those appellants in the Yellow Pine community.
- Other community members were invited to attend.
- All documented responses favor leaving roads open in the South Fork RAMP.
- Results show that the vast majority of residents and land owners support NOT closing any roads.

References

- Adaptation To Wildfire: A Fish Story (USFS publication), Science Findings is online at: http://www.fs.fed.us/pnw/publications/scifi.shtml
- “Stream Restoration in the Pacific Northwest: Analysis of Interviews with Project Managers”
- Effectiveness of Planned actions: Restoring Rivers One Reach at a Time: Results from a Survey of U.S. River Restoration Practitioners
- Restoring Rivers One Reach at a Time: Results from a Survey of U.S. River Restoration Practitioners, Abstract
- Effects of fire on fish populations: landscape perspectives on persistence of native fishes and nonnative fish invasions J.B. Dunhama,*, M.K. Youngb , R.E. Gresswellc , B.E. Riemana
- National Visitor Use Monitoring Results - Forest Service www.fs.fed.us › recreation › programs › nvum
- Over the past 20 years, rural public lands have been recognized increasingly as important tourist destinations that bring visitors to the region (e.g., Douglas and Harpman 1995, Donnelly et al. 1998, and English et al. 2000).
- Effects of fire on fish populations: landscape perspectives on persistence of native fishes and nonnative fish invasions