

The South Fork Restoration and Access Management Plan

The South Fork Restoration and Access Management Plan Specialist Reports have educated me on the exclusive nature of Forest Plan Standards. The application of Standard 1218 & 1222 (USDA Forest Service 2003, page 3-252) and Resource Area Road Standard 1270 & 1271 (USDA Forest Service 2003, page 3-256), negated all other standards, guidelines and goals of the Forest Plan. Alarming, when applied, these exclusive standards become the Forest Plan. They are being interpreted and applied to exclude the ability to mitigate, negotiate, and provide Recreational road access to the National Forest. As an example, Forest Plan Management Direction for Roads, Goal FRGO01 *“Provide and maintain a safe, efficient Forest transportation system that meets resource management and access needs, while mitigating degrading resource effects”* could not be applied. No recreation or roads mitigation measures were allowed or identified in the collaborative process or your Environmental Analysis by District Ranger direction.

The historic temporary closures of the Forest Service roads in the analysis area have not been effective in restoring the T&E species in the South Fork. Five-year reviews by NOAA show minimal improvement in the risk-status of ESA-listed salmon and steelhead. There has been no long-term improvement despite a billion taxpayer dollars being spent on restoration improvements over a 60-year period. Current NOAA recovery plans are predicted to NOT achieve fish recovery.

The collaborative and Environmental Assessment process is controlled and limited by these exclusive standards. These clauses are extremely beneficial and unfairly favor Wilderness, Special interest groups, Tribal representatives, State Fish and Game, NOAA, the National Fish and Wildlife Service, and Forest Service Leadership. They all know these standards by heart and reference them to stop all attempts to mitigate or negotiate maintaining open Forest Service roads. **A significant recreation impact results as nearly all Forest Service Roads have been or will be closed by applying these standards.**

In contrast, the Forest Service exempted itself from having to comply with these standards for administrative roads in the SF RAMP. The forest service should be required to apply the same standards to its actions as required for public road access.

The administrative process of designating ML 1 roads is uncontrolled and biased towards these standards. A District Ranger can designate any road as ML 1 for any reason. Roads cannot be reopened by Standard 1270. This administrative process bypassed NEPA and public involvement.

Here are examples of exclusive standards as written in the Payette National Forest Plan:

Standard 1218

Road construction or reconstruction may only occur where needed:

a) To provide access related to reserved or outstanding rights, or b) To respond to statute or treaty, or c) To address immediate response situations where, if action is not taken, unacceptable impacts to hydrologic, aquatic, riparian or terrestrial resources, or health and safety, would result.

Standard 1222

Road construction or reconstruction may only occur where needed:

a) To provide access related to reserved or outstanding rights, or b) To respond to statute or treaty, or c) To support aquatic, terrestrial, and watershed restoration activities, or d) To address immediate response situations where, if action is not taken, unacceptable impacts to hydrologic, aquatic, riparian or terrestrial resources, or health and safety, would result.

Standard 1270:

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:

a) 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

b) 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

c) 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).

Standard 1271:

New roads shall not be built except to replace existing roads in RCAs or directly repair human-caused damage to TEPC fish habitat in streams unless it can be demonstrated through the project-level NEPA analysis and related Biological Assessment that 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.

Summary:

Your project does not provide a system of roads and trails for the recreational use of the public. Forest Plan Standards and Guidelines need to be applied that require mitigation and establishes the rights of the **public** to access public lands on a system of roads appropriate for many uses and compatible with the Recreation Opportunity Spectrum. If necessary, apply the exception to these standards by reopening the roads identified as **HIGH PRIORITY RECREATION OPPORTUNITY ACCESS ROADS** (Exhibit 1). These roads should also be open as 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).

Roads should only be designated as ML 1 by NEPA process. Roads designated by any other means should be shown in the NEPA analysis process at the level for which they were engineered and constructed. The South Fork RAMP does not properly show the constructed and engineered level of

roads in the roads inventory or the investment made to construct these roads to address sediment and fish habitat protection. Decommissioning permanently destroys these investments without properly identifying the loss of resource protection, investment, and recreation opportunity.

I also recommend that all EXCLUSIVE clauses be ruled in violation of NEPA and required to be removed from your Forest Plan and consideration in this process. In addition, all NEPA processes that applied these standards should be ruled invalid. The NEPA processes that used these standards should be re-analyzed using road and recreation standards, guidelines, and mitigation and addressed in an Environmental Impact Statement.

Thank you for your consideration,

Merrill L. Saleen

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Lead Objector

Exhibit 1

HIGH PRIORITY RECREATION OPPORTUNITY ACCESS ROADS.

Buckhorn Creek Road	Little Buckhorn Loop and Teapot Roads
Zena Creek Road	Cow Creek – Fitsum Creek Road
Three mile - South Fork Road	Dollar Creek Road
Camp Creek Road	Davis Ranch Road