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First name: Craig

Last name: Gehrke

Organization: The Wilderness Society

Title: Director, Idaho Office

Comments: July 14, 2017

Caleb Zurstadt

Krassel Ranger District

500 North Mission Building 1

McCall, ID 83638

RE: South Fork Salmon River Restoration and Access Management Plan

Dear Mr. Zurstadt,

Thank you for this opportunity to comment on the South Fork Salmon River Restoration and Access Management Plan (SFSR plan).

The Wilderness Society's (TWS) mission is the protection of America's wild lands and inspiring Americans to care about them. TWS has been an active participant in numerous resource management issues on the Payette National Forest for over 30 years, including the development of the first and second generation land and resource management plans, travel planning, bighorn sheep restoration, and roadless area protection. TWS is committed to the wise stewardship of the resources of the Payette National Forest.

The proposed SFSR plan contains several commendable restoration activities that TWS appreciates the Payette National Forest undertaking them. Unfortunately, it also includes some actions that TWS cannot support.

The SFSR plan proposes rehabilitation treatments on approximately 160 miles of road in the South Fork watershed. This treatment is consistent with the restoration emphasis for this management area in the Payette National Forest's Land and Resource Management Plan. TWS urges the Forest Service to carefully evaluate the roads prior to treatment. If there is a reasonable expectation that the roads in question do not need work with heavy equipment to achieve restoration objectives, then TWS urges that the agency not try to access them with heavy equipment.

TWS supports decommissioning three miles of the Hamilton Bar road to a single track 2-wheel motorized trail.

TWS supports the development of a hardened visitor use site between the Secesh River confluence and Hamilton Bar for resource protection. TWS urges the Forest Service undertake only the minimum amount of development necessary at this site for resource protection.

Similarly, TWS supports actions to reduce impacts of dispersed camping along the lower Secesh River and SFSR Road and urges the Forest Service to undertake only the minimum amount of development necessary for resource protection.

If the Forest Service installs a bridge over Loon Creek to access the Split Creek Trail and establishes a new, non-motorized trail to the B-23 wreckage site, the agency needs to close both not only to motorized use but also mechanized use. The Loon Lake/Secesh River trail loop from the Secesh Campground is already a motorized/mechanized circuit and this use cannot be allowed to spread into the surrounding area. Hikers already avoid this loop when motorized/mechanized use is highest, and the agency cannot worsen the situation by

allowing it to spread.

TWS supports the rerouting of the 2-wheel motorized trail through Phoebe Meadows to avoid wet meadow crossings. If motorized users continue tearing through wet meadow areas after the rerouting the Forest Service should close the trail and area to motorized use.

If the Forest Service issues a Forest Roads and Trails Act easement to Valley County for the South Fork Salmon River Road, the Forest Service needs to develop and implement a stringent monitoring plan to ensure Valley County's operation and maintenance actions fully protect the SFSR from sediment impacts. The best management practices developed by the Forest Service for Valley County's road work need to be strictly monitored and enforced by the Forest Service. The easement should be issued conditionally, tied to several consecutive years of successful application by Valley County of the best management practices developed by the Forest Service to protect the SFSR from sediment. The easement should be revoked if Valley County fails to follow the BMPs or the BMPs prove ineffective.

If the Forest Service undertakes designation of 11 miles of new ATV trails in the Little Buckhorn Creek drainage, TWS urges that the trail be confined to old roadbeds. TWS strongly discourages any new trail construction off old road beds.

Any reconstruction of trail #076 needs to consider the candidate wild and scenic status of the SFSR. Any actions to upgrade the trail should be done with a goal of resource protection. The idea of allowing ATV access only under special use permit to private lands along the trail is a good one. TWS would also support rerouting of this trail around private land but only if such a reroute can be done without impacts to anadromous fisheries.

TWS final comments on this project will address the proposed conversion of the Martin Ridge trail from non-motorized to 2 wheel motorized. TWS absolutely opposes conversion of a non-motorized trail in a recommended wilderness to a motorized trail. It is TWS's position that such a conversion is not consistent with the Land and Resource Management Plan (LRMP) for the Payette National Forest.

The Payette LRMP provides for the following management direction goals, standards, and guidelines for recommended wilderness on the Payette National Forest:

"WRGO02 - Manage recommended wilderness to protect wilderness values as defined in the Wilderness Act. Activities permitted in recommended wilderness do not compromise wilderness values nor reduce the area's potential for wilderness designation."

"WRST01 - Changes to existing recreational settings (mapped ROS classes) are limited to only those that maintain or restore wilderness characteristics."

"WRGU03 - Non-conforming uses in recommended wilderness should not be promoted."

Conversion of the Martin Ridge trail from non-motorized to motorized use is in contradiction to these goals, standards, and guidelines for recommended wilderness on the Payette National Forest.

The Payette LRMP directs that recommended wilderness areas be managed to protect wilderness values as defined in the Wilderness Act. A review of the definition of wilderness in the Wilderness Act reveals these wilderness values, the most relevant for the matter at hand includes "outstanding opportunities for solitude or a primitive and unconfined type of recreation." Also in the Wilderness Act, perhaps most importantly, is the flat prohibition of "motor vehicles, motorized equipment... no other form of mechanical transport..."

It is unarguable that the Wilderness Act intends to protect the outstanding opportunities for solitude, primitive and

unconfined recreation, and non-motorized, non-mechanical recreation. The commitment of the Payette LRMP to manage recommended wilderness to the standard of values identified in the Wilderness Act means that recommended wilderness areas must be managed for non-motorized, non-mechanized recreation and for solitude and primitive recreation.

Conversion of the Martin Ridge trail to motorized use violates the Payette LRMP:

?The conversion would compromise wilderness values as defined by the Wilderness act.

?The conversion would reduce the area's potential for wilderness designation by allowing the establishment of a non-conforming use.

?The conversion would be a de facto change in the recreational setting from non-motorized to motorized.

?The conversion would promote a non-conforming use by creating a motorized trail in a recommended wilderness area.

The Nez Perce - Clearwater National Forest recently addressed the issue of non-conforming uses in recommended wilderness in the Travel Planning Draft Record of Decision for Recommended Wilderness Areas (July 2016). Several of the findings made by the Forest Service on the Nez Perce - Clearwater National Forest apply to the proposed conversion of the Martin Ridge trail to motorized use.

The Forest Service closed recommended wilderness areas on the Nez Perce - Clearwater National Forest to motorized and mechanized use. Following are relevant passages from the 2016 ROD, signed by Forest Supervisor Cheryl Probert:

Continuing to allow unregulated motorized recreation in RWAs (recommended wilderness areas) would negatively impact naturalness, primitive character, opportunities for solitude.... As motorized use continues to grow, such impacts would become more pronounced and the wilderness character of the areas... when they were recommended for designation, would not be maintained.... Impacts of such uses to wildlife (particularly wolverine) and trail resources would also be expected to increase. Because these areas are large and remote, the Forest Service does not have the ability to effectively regulate the amount of use if they remained open... (ROD pg. 9-10).

Motorized use can affect the naturalness of an area and the feeling of being undeveloped. Because it is a modern form of transportation it can affect the primitive character of the area. Noise associated with motorized use can affect the solitude of an area (ROD pg. 10).

Allowing motorized use in RWAs generally would not maintain wilderness qualities nor would it protect wilderness character. I believe that if I decided to allow motorized use in the RWAs it could preclude future wilderness designation or predetermine decisions that could be made in a wilderness bill (ROD pg. 11)

Eliminating motorized and bicycle travel in RWAs...will best protect wilderness attributes in RWAs (ROD pg. 11).

In the case of RWAs the management direction in the Forest Plan and Forest Service manual is clear: preserve the areas' wilderness potential and protect their wilderness character.... Closing the RWAs to motorized use... eliminates damage to soil and watershed, particularly from potential future increases in use.... Finally, my decision eliminates potential conflict between motorized recreationists and those seeking solitude or non-motorized recreation opportunity (ROD pg. 12).

Motorized and mechanized vehicles continue to increase in capability and popularity and given this trend,

increased pressure on areas recommended for Wilderness seems inevitable unless those uses are restricted. I think that allowing motorized and mechanized use of vehicles in RWAs will reduce the future Wilderness potential of these areas (ROD pg. 17).

Until such time as the Forest Plan is revised or Congress makes a decision to either designate these areas as Wilderness or clearly reject them, management of those areas needs to protect the values that resulted in them being recommended for Wilderness designation in the first instance (ROD pg. 17).

A key factor in the Forest Supervisor's decision to close RWAs to motorized use was the management direction for these areas in the forest plan, which is very similar to the management direction of the Payette LRMP:

The direction for RWAs in the Forest Plan is: "Manage recommended additions to the Wilderness system to prevent changes in character which would be inconsistent in wilderness until Congress makes classification decisions...." These increasing impacts (of motorized recreation) incrementally decrease wilderness character, possibly jeopardizing the areas' recommendations for future Wilderness designation. Therefore, they do not contribute to meeting the direction of the Forest Plan to protect wilderness character (ROD pg. 14-15).

It cannot be argued that the Payette National Forest can meet its forest plan standards of protecting wilderness values and the wilderness designation potential of its recommended wilderness area by conversion of a non-motorized trail to a motorized trail within the area when a national forest slightly over 100 miles to the north concluded the exact opposite: motorized and mechanized use of a recommended wilderness area did not protect wilderness character and did not protect wilderness designation potential.

Thank you for the opportunity to comment on this matter. Please keep this office informed of further developments.

Sincerely,

Craig Gehrke
Director, Idaho Office
The Wilderness Society
950 West Bannock
Suite 605
Boise, ID 83702
208-867-9970
craig_gehrke@twc.org