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Comments: Comments to the South Fork RAMP

5/20/2019

First of all, I have to say that I think it is totally unfair that you take several years to develop this project and we only get 30 days to read, digest, and comment on your 294-page document! Then you find another 50 miles of road that was not part of the original scoping and EA. Throw in the fact that you have two different dates for submitting comments - May 20 or May 25 and I have to say it looks like there's a lot of smoke and mirrors in this project!!!!

#### RECREATION:

The EA says the recreation analysis was conducted and based largely on personal observations from field trips and related project experience, some GIS data from inventory and monitoring of roadless area/wilderness resources and general forest inventory, as well as, Google Earth™ observations/analyses. I can't help but wonder how biased the author of the recreation section is towards favoring wilderness.

The Recreation references in the EA Lists a total of 14 references. 50% of these references are focused on wilderness management and the last I knew, the South Fork of the Salmon River is not yet a wilderness although it's obvious from the analysis that many Forest Service managers would like it to become one. Two documents seem to focus on invasive species, and only two focus on Off Highway Vehicles:

1. "Environmental Effects of Off-Highway Vehicles on Bureau of Land Management Lands: A Literature Synthesis, Annotated Bibliographies, Extensive Bibliographies, and Internet Resources. I find it interesting that in Section 2.2.4, Annotated Bibliography for OHV Effects on Soils and Watersheds", the listed bibliography documents were published between 1978 - 2006, with 4 in the 1970's, 4 in the 1980's, 2 in the 1990's and 2 in the 2000's. The oldest was 1976 and the most recent was 2006. All but one of the references was focused on desert soils. The 2006 document was focused on the USFS but it is difficult to determine how much of the study applied to previously roaded (Level 2 and Unauthorized roads) landscapes. Some of these studies are over 41 years old, with the most recent being 13 years old. Looking at the big picture this document seems very outdated and not applicable.

2. The other reference document, "Off-road Vehicle Best Management Practices for Forestlands: A Review of Scientific Literature and Guidance for Managers by T. Adam Switalski; Allison Jones" was more current but it was also difficult to determine if any of their information actually applies to long-term established roads in this area.

The recreation analysis appears to be weak and biased towards wilderness character. It ignores other public forms of recreation including roaded exploration, camping other than in a wilderness area, hikes of short (ex: weekend) duration, and off-road vehicle exploration. I expected to see a lot more discussion on these topics.

#### ROADS AND MOTORIZED USE:

Many of the impacts shown for the roads have resulted from the extreme fire effects of high intensity fire on the landscape. In the case of most routes that access private land, these impacts and responsibility of repair has been required to be performed by the private landowner. But the reality is that poor assessment of values at risk, fire potential, and fire effects coupled with a desire to burn the landscape at any cost is the real culprit. The Forest Service should own it!

#### IN SUMMARY:

The South Fork RAMP proposal, like most of the others has no option for vehicle use roads managed by the Forest Service. Having no full sized vehicle roads open to the public does not provide adequate recreation opportunity as called for in the forest plan and does not achieve the goal of maintaining or enhancing recreation

opportunity. Restoration of the Threatened and Endangered species in this area can be mitigated with known sediment control measures. Implement these opportunities to maintain or enhance recreation opportunity and access.

\*I do not like Alternatives C and D due to the extensive proposal for decommissioning of roads.

\*I can accept the Hamilton Bar Road (Forest Road 50673) proposal in Alternative C for Public full-size motor vehicle access to be provided to the end of the road (approximately 3 miles).

\*I feel that for 33 Bend/Oompaul Dispersed Site Plan, Alternative A, Current management should continue. Do not install barriers to prevent motorized access to the campsite!

\*Former Davis Ranch Road (Trail #076) - I can live with Alternative D: 11.5 miles of the former Davis Ranch Road (Trail #076) would be reconstructed from the end of Forest Road 062 to the old Davis Ranch up to motorcycle and pack and saddle standards. However if you are going to reconstruct the road, please make it available for ATV and side-by-sides greater than 50" use. You do not have enough side-by-side routes on this Forest. I believe you should listen to public comments that were received in support of opening the former Davis Ranch Road to public motorized use including ATVs and full-size vehicles

\*Blue Lake and Tailholt Trailhead (Trail #294) - I agree with alternatives B, C, and D: A turnaround and parking area would be constructed for the Blue Lake and Tailholt Trailhead (Trail #294) at end of Zena Creek Road (Forest Road #361).

\*You need to continue with the intent of The Forest Service in the Proposed Action to intentionally exclude system roads from the suite of decommissioning, including the additional 50 miles of road that you recently discovered have always been system roads!

The Key secondary roads that need to be restored are:

\*Reopen the Buckhorn Road to level 2 high clearance vehicles for approximately 4 miles to the 3-way trailhead Junction near Buckhorn Hot springs. Construct a trailhead facility.

\*Reopen the Jakie Creek/Little Buckhorn loop level 2 high clearance vehicle road to full sized vehicles and develop trailheads and main buckhorn Road until the slide can be reopened.

\*Reopen the Buckhorn Bar Road and Flat for a Trailhead and dispersed Camping compatible with Horse use.

\*Extend the Cow Creek Road to a location compatible to construct a trailhead facility.

\*Open the Camp Creek/Phoebe Creek Road to near Phoebe Meadows and establish a trailhead at the trail junction.

\*Reopen the Dollar Creek Road to Dollar Creek Meadows. Construct a trailhead.

\*Keep Roaring Creek road and the dispersed campsite road open.

\*Re-open the Cougar Creek and Buckhorn Creek trail loop to motorcycle use.