

Data Submitted (UTC 11): 2/3/2020 6:01:20 AM

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Organization: Yellowpine Resident

Title: Yellowpine Lead Objector

Comments: Merrill Saleen Comments on South Fork RAMP

Effectiveness of Planned actions:

Data shows that the closure of nearly 500 miles of roads in this area for the last 60 years has not had an appreciable improvement in Salmon and Steelhead return rates to the South Fork. Similar low return rates occur in the Wilderness Areas. Do not continue ineffective and costly actions that limit public access and recreation opportunity and has little or no effect on restoring the salmon and steelhead returns. See the Idaho Conservation Leagues website <https://www.idahoconservation.org/issues/wildlife/steelhead/>

Do not spend more money on restoration and deny public access as records show that it has no positive effect on return rates. Spend the decommissioning and obliteration money on upgrading the roads and campsites to mitigate the sediment production and allow more roaded public access.

Landscape Level Fire Impacts

Most of the analysis area has burned at the landscape level within the last 20 to 30 years. Hundreds of thousands of acres have burned. Mass erosion, landslides, streambed scouring, debris slides, and damage to infrastructures, has resulted. Millions of tons of sediment have been deposited in the riverbeds. Yet this impact has not been addressed or accounted for in your analysis. Isolating the potential impact of road sediment to fish habitat and spawning grounds without considering the concurrent impact of fire sediment is suspect of bias and misrepresentation. Please address it in a revised EA.

Available research shows that high intensity, landscape level fire produces large quantities of fine sediment. Your assessment that assumes that road sediment is the primary contributor of fine sediment to spawning habitat condition surveys is wrong. Please revise your analysis and adjust sediment model tradeoffs appropriately. I would expect that the mass quantities of fire sediment would negate the effects of road sediment. See publication: https://www.fs.fed.us/rm/boise/publications/fisheries/abstract_rieman.shtml

Minimum Road System

System roads were not properly identified until after the EA was released. This did not allow for proper analysis. The South Fork RAMP proposal has no alternative for a Forest Service secondary level 2 minimum road system (MRS). Having no Level 2 system of 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 and associated business. Restoration of the Threatened and Endangered species in this area can be mitigated with known sediment control measures. Develop an alternative that uses mitigation to accomplish restoration and provide a system of roads that support compatible full spectrum recreation opportunities. Opening the following level 2 high clearance roads to the public would create this system:
Open 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.

Open the 3-mile Hamilton Bar area road to all vehicles. Construct a trailhead facility.

Open the Elk Creek to Willy Ranch Road and establish trailheads.

Keep the Zena Creek-Blue Lake Road Open to its existing end and construct a parking, turnaround, /campsite at that trailhead location.

Open the Teapot Buckhorn loop Road and develop trailheads.

Open the Buckhorn Bar Road and Flat for a Trailhead and dispersed Camping compatible with Horse use and ATV UTV portal.

Open the Cow Creek Road as a level 2 high clearance road to a location compatible to construct a trailhead facility and turnaround.

Open the Camp Creek/Phoebe Creek system road to near Phoebe Meadows and establish a trailhead at the trail

junction.

Open Dollar Creek Road to Dollar Creek Meadows. Construct a trailhead.

This would total about 35 miles of the 190 miles of roads analyzed.

Having these roads in place would provide fire management barriers and prescribed burn fire lines. Without them, no barriers exist.

Loss of Roaded Dispersed Camp sites:

Limiting dispersed camping to 1 car length from Level 3 and 4 existing roads is unreasonable and unsafe.

Implementation of this limit has greatly discouraged or eliminated dispersed camping use and opportunities.

Implementation has also eliminated the opportunity to use campers and camp trailers at these locations. Sites such as Buckhorn Bar Flat near the mouth of Buckhorn creek was once a well-used trailhead, parking, and campsite. Now, without road access it is rarely if ever used. The same for Krassel, Salmon Point, and Poverty Flat. Please provide dispersed camping opportunities for campers and trailers more than one car length from a road. Support and provide more destination camping opportunities.

The safety of recreation users, especially children, horses, and pets is compromised by this limit. Dust is also a safety concern. Please add these safety concerns to your analysis. Please discontinue this practice and develop sediment mitigation measures to reduce use impacts. Re-open the above-mentioned sites and allow roads to access established dispersed recreation sites more than one car length from the main road.

Keep 33 campsite and Oompaul campsites as is. Re-open Buckhorn Bar Flat, Krassel, Salmon Point, Deadman, Poverty Flat, Lick Creek and Cow Creek dispersed sites. Mitigate impacts.

Impacts to Local Economy

Having only pass through roads and walk in campsites does not support a recreation destination for the public.

Yellow Pine businesses and residents are suffering. Businesses are closed. There are no destination opportunities for UTV's or high clearance vehicles required to provide the most popular and desirable public use. Your proposal supplies no opportunity for this use while demand is high.

The proposal combines with others to limit access to the point of creating an administratively determined wilderness that spreads from Big Creek to McCall. The areas will be left with no "system" of forest service level 2 roads. All alternatives cater to providing an opportunity of wilderness like recreation opportunities regardless of its Recreational Opportunity Setting. This use does not support the local economy and businesses.

This NEPA Process and the Endangered Species Act is being misused to further the exclusive cause of special interest, tribal and radical environmental groups. These groups comprise only a small percentage of the total population but are receiving a majority of the exclusive benefits of this proposal.

Known mitigation measures are NOT being applied to avoid closing of roads to provide public access. Like-minded collaborative members assigned to access management planning throughout the forest are the same for nearly all projects with the same outcome and cumulative effect. A forest wide EIS should be conducted to analyze this biased cumulative effect.

Loss of High Value of Investment and Current Infrastructures:

System roads were not properly identified and evaluated in the collaborative and NEPA process. As a result, the process did not accurately incorporate the components of a scientifically based roads analysis procedure in the planning. One should be done.

Millions of dollars' worth of investment in road engineering, surveying, building, bridges, culverts, gravel, and ditching will be lost. The restoration objective is being accomplished through decommissioning and recontouring roads rather than using mitigation to control sediment and save these investments. No known cost analysis or comparison was provided. Please provide one. The significant investment to build or replace existing roads and bridges is not shown and will be lost. The analysis does not provide proper documentation to assess or support a cost benefit analysis. At no time was I aware that a road engineer was consulted on the options available for rehabilitating these roads to reduce erosion and keep the roads open.

Conversion of the Little Buckhorn road system to ATV trails makes maintenance impractical. Heavy equipment cannot access the area to perform maintenance or for fire protection of infrastructure. The little Buckhorn road system should be maintained as a level 2 road to allow heavy equipment access to control sediment production and protect investments.

Public Support

The proposed action is not responsive to my scoping comments and does not seem to match the will of the local residents, general public and public comments documented in your planning record. Discussions with Yellowstone residents indicate that 80 percent of the residents do not support your analysis. Political leadership and congressional direction is also being ignored and grossly misrepresented.

A local public advisory vote is recommended to be taken before these roads are permanently closed and the proposed action is implemented. I do not believe that the will of the majority of people is being met. This advisory vote would better determine the will of the public and the availability of public access to public lands. Ideally, your proposed action would restore the threatened and endangered species. Realistically it has not and will not. Please add this more realistic and balanced alternative to your analysis, described above.

Merrill Saleen
Yellowpine resident