



August 7, 2017

To: Keith Lannom, Payette Forest Supervisor  
 From: Marla Fox, WildEarth Guardians

**Re: Middle Fork Weiser River Landscape Restoration Project Objection Resolution Proposal**

Unauthorized Roads

The following is a combination of information from Table 1 in the FEIS Appendix 2 (Roads Treatment Table) and the 2013 TAP maps available on the project webpage. For the reasons stated in the table below, we urge the Forest Service to eliminate the portion of the project that would add unauthorized roads to the road system. In the alternative, we suggest the Forest Service explain why it is adding these unauthorized routes to the road system in its Road Treatment Table, addressing the benefits (needs), risks, and funding expectations to maintain these roads.

Rd Number	Owner	Road Type	Status	2013 TAP	Alt 5	Miles
502061000	FS	Unauthorized	Unauthorized	Map 7: add to connect 50206 to 502061000	Add to system	0.27
502061000	FS	Unauthorized	Unauthorized	Map 7: adds new system road with 2 stream xings	Full recontour	1.55
502061010	FS	Unauthorized	Unauthorized	Map 7: 2 new system segments add 2 stream xings; first segment connects to 502061000; 2 <sup>nd</sup> segment with 2 xings goes nowhere	Full recontour	0.48
502061050	FS	Unauthorized	Unauthorized		Add to system	0.10
502061060	FS	Unauthorized	Unauthorized		Full recontour	0.26

The roads listed above provide access to 51301 (see Map 5), which can already be accessed from the north on 51301 (partially private, partially Forest Service existing system road that currently closed with proposal for no change under Alt. 5). We urge the Forest Service not to add these routes to the road system. In the alternative, we suggest explain its decision to add these roads

based on an assessment of risks, benefits, and long-term funding expectations that will allow for proper maintenance of these roads. We also suggest the Forest Service consider offsetting the addition of these roads to the system with the decommissioning of other unneeded roads.						
502113510	FS	Unauth orized	Unauth orized	Map 8: connects 502113500 with 502113562 new spur road with stream xing	Add to system	0.11
502113510	FS	Unauth orized	Unauth orized	Map 8: (same as above)	Add to system	0.03
502113510	FS	Unauth orized	Unauth orized	Map 8: 4 stream xings	Spot treatment	1.05
502113560	FS	Unauth orized	Unauth orized	Map 8: 2 stream xings	Add to system	0.60
502113560	FS	Unauth orized	Unauth orized	Map 8: adding to system and new with 2 stream xings; parallel to numerous roads	Full recontour	0.23
502113562	FS			Map 8: adding to system and new stream xing; spur road parallel to 502113575 and 502113580 that have no stream crossings	???	???
502113570					???	???
502113575					???	???
502113577	FS	Unauth orized	Unauth orized	Map 8: connects 502113562 spur road to 502113575 spur road	Add to system	0.56
502113580	FS	Unauth orized	Unauth orized		Spot treatment	0.39
We urge the Forest Service not to add the unauthorized roads identified above to the road system. For example, 502113500 (map 8) is already accessible from the north by numerous roads. In the alternative, we suggest explain its decision to add these roads based on an assessment of risks, benefits, and long-term funding expectations that will allow for proper maintenance of these roads. We also suggest the Forest Service consider offsetting the addition of these roads to the system with the decommissioning of other unneeded roads.						
502183500	FS	Unauth orized	Unauth orized	Map 2	Add to system	0.22
502183500	FS	Unauth orized	Unauth orized	Map 2	Spot treatment	2.99
502183570	FS	Unauth	Unauth	Map 2: runs parallel	Add to system	0.53

		orized	rized	to 502183560; both are spurs		
502183570	FS	Unauth orized	Unauth orized	Map 2: (same as above)	Full recontour	0.10
The roads identified above are spur roads and run parallel to several other roads.						
502187000	FS	Unauth orized	Unauth orized	Map 3: (see below)	Add to system	0.05
502187000	FS	Unauth orized	Unauth orized	Map 3: At least 4 stream xings	Full recontour	1.21
502187010	FS	Unauth orized	Unauth orized	Map 3: two stream xings	Add to system	0.53
The roads identified above have numerous stream crossings in the headwaters of Jungle Creek.						
512982000	FS	Unauth orized	Unauth orized	Map 2: crosses No Business Canyon Creek; connects to 51298 that is recommended for decommissioning under the 2015 TAR (numerous stream crossings).	Add to system	0.35
513061000	FS	Unauth orized	Unauth orized	Map 2: spur with stream xing.	Add to system	0.05
513061010	FS	Unauth orized	Unauth orized	Map 2: no stream crossings.	Add to system	0.19
513061020	FS	Unauth orized	Unauth orized	Map 2: no stream crossings.	Add to system	0.34
We urge the Forest Service not to add 512982000, 512982, or 513061000 given the numerous stream crossings over No Business Canyon Creek. In the very least, the Forest Service should decommission these roads after use in the project. In the alternative, we suggest explain its decision to add these roads based on an assessment of risks, benefits, and long-term funding expectations that will allow for proper maintenance of these roads. We also suggest the Forest Service consider offsetting the addition of these roads to the system with the decommissioning of other unneeded roads.						

Considering 2015 Travel Analysis Report Recommendations

The following rows excerpted from Table 1 of the FEIS Appendix 2 (Roads Treatment Table) show changes to the road system under this project that are inconsistent with recommendations from the Payette’s 2015 forest-wide Travel Analysis Report (final column on the right). This information was included in our objection letter. We suggest the Forest Service address the inconsistencies in and its justification for the final road decision in a new column in its Road Treatment Table, or something similar (i.e., see example from Willamette National Forest that provided more of a summary).

<b>Rd Number</b>	<b>Owner</b>	<b>Road Type</b>	<b>Status</b>	<b>Alt 5</b>	<b>Miles</b>	<b>Travel Analysis Report Recommendation</b>
50165	FS	NFSR	Open	No change	1.55	Improve
50165	FS	NFSR	Open	No change	1.55	Improve
50166	FS	NFSR	Open	No Change	0.13	OML 2, improve
50166	FS	NFSR	Open	No Change	0.34	OML 2, improve
50192	FS	NFSR	Closed	LTC [ML1]	0.55	OML 2, improve
50192	FS	NFSR	Open	No change	0.42	OML 2, improve
50197	FS	NFSR	Seasonal	No change	2.19	Improve
50197	FS	NFSR	Seasonal	No change	1.84	Improve
50203	FS	NFSR	Seasonal	No change	0.23	Improve
50205	FS	NFSR	Closed	No change	1.5	OML 2
50207	FS	NFSR	Open	No change	0.97	IDT evaluate
50219	FS	NFSR	Closed	Full recontour	0.45	Decommission
50240	FS	NFSR	Closed	Full Recontour	0.89	Decommission (part)
50240	FS	NFSR	Closed	Implement BMPs	1.61	Decommission (part)
50243	FS	NFSR	Open	No change	2.51	Improve
50249	FS	NFSR	Closed	No change	0.87	IDT evaluate
50249	FS	NFSR	Open	No change	0.50	IDT evaluate
50256	FS	NFSR	Closed	Full Recont.-PC	0.56	Decommission
50258	FS	NFSR	Closed	Full Recont.-PC	0.72	Decommission
50261	FS	NFSR	Closed	OML1 to OML2	0.43	OML1
50266	FS	NFSR	Seasonal	Full Recont	0.76	Decommission
50266	FS (PVT)	NFSR	Seasonal	No change	0.03	Decommission
50270	FS	NFSR	Seasonal	Full Recont.	0.12	Decommission
50293	FS	NFSR	Closed	Full Recont.	0.43	Decommission
50489	FS	NFSR	Closed	Full Recont.-PC	1.76	Decommission
50496	FS	NFSR	Closed	Full Recont.	0.66	Decommission
50538	FS	NFSR	Closed	Full Recont.	0.17	Decommission
50552	FS	NFSR	Closed	Full Recont.	0.29	Decommission
50553	FS	NFSR	Closed	OML1 to OML2	0.32	OML1
50556	FS	NFSR	Closed	Full Recont.	0.24	Decommission (part)
50566	FS	NFSR	Closed	No change	2.52	Decommission (part)
50701	FS	NFSR	Closed	OML1 to	2.21	OML1

				OML2		
50702	FS	NFSR	Closed	OML1 to OML2	0.28	OML1
50703	FS	NFSR	Closed	OML1 to OML2	0.38	OML1
50704	FS	NFSR	Closed	OML1 to OML2	0.10	OML1
50705	FS	NFSR	Closed	OML1 to OML2	0.23	OML1
50706	FS	NFSR	Open	Full Recont.	0.48	Decommission
50707	FS	NFSR	Closed	Full Recont.	0.47	Decommission
50798	FS	NFSR	Closed	Full Recont.	0.49	Decommission
50798	FS	NFSR	Closed	OML1 to OML2	0.03	Decommission
50798	FS (PVT)	NFSR	Closed	OML1 to OML2	0.08	Decommission
50849	FS	NFSR	Closed	Full Recont.	0.23	Decommission (part)
50849	FS	NFSR	Closed	No change	0.24	Decommission (part)
50849	FS (PVT)	NFSR	Closed	No change	0.01	Decomm (part)
51054	FS	NFSR	Closed	Full Recont.	0.43	Decommission
51054	FS	NFSR	Open	Full Recont.	0.08	Decommission
51142	FS	NFSR	Closed	OML1 to ML2	0.09	OML1
51143	FS	NFSR	Closed	OML1 to ML2	0.15	OML1
51144	FS	NFSR	Closed	OML1 to ML2	0.01	OML1
51298	FS	NFSR	Closed	Full Recont.	1.26	Decommission
51299	FS	NFSR	Closed	Full Recont.	0.15	Decommission
51305	FS	NFSR	Closed	No change	2.30	Decommission
51305	FS	NFSR	NA	New temp road	0.57	Decommission
51305	FS	NFSR	Closed	Spot treatment	0.95	Decommission
51517	FS	NFSR	Closed	Full Recont.	0.83	Decommission
51517	FS	NFSR	Closed	No change	0.33	Decommission
51540	FS	NFSR	Closed	OML1 to ML2	0.28	Decommission
51541	FS	NFSR	Closed	No change	0.58	Decommission
51541	FS	NFSR	Closed	Spot treatment	0.11	Decommission
51549	FS	NFSR	Closed	Full Recont.-PC	0.30	Decommission
51763	FS	NFSR	Open	Convert to	3.37	OML2

				trail		
51785	FS (PVT)	NFSR	Open	No change	0.83	IDT evaluate
51786	FS (PVT)	NFSR	Open	No change	0.05	Decommission
51790	FS (PVT)	NFSR	Closed	No change	0.29	IDT evaluate
51792	FS	NFSR	Closed	OML1 to ML2	0.39	OML1
51895	FS	NFSR	Closed	Outslope 20%	0.35	Decommission
51896	FS	NFSR	Closed	Outslope 20%	0.19	Decommission
51899	FS	NFSR	Open	No change	0.84	Improve
52001	FS	NFSR	Open	No change	0.11	Not analyzed in TAR-?
52002	FS	NFSR	Open	No change	0.19	Not analyzed in TAR-?
51763	FS	NFSR	Open	Convert to trail	1.11	OML2