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1805 Highway 16
Room 5
Emmett, ID 83617

March 2, 2020

Re: Idaho Conservation League comments on the Idaho Transportation Department Facility at Banks Special Use Permit

Dear Terre:

Thank you for considering our scoping comments on the Idaho Transportation Department Facility (ITD) at Banks Special Use Permit. The Forest Service is proposing to use a Categorical Exclusion to renew the Special Use Permit for the ITD's Maintenance Facility:

The Emmett Ranger District, in coordination with the Idaho Department of Transportation, is seeking to issue a new special use authorization for a new term to replace expired authorization EMT100131 which authorized the operation and maintenance of a building and storage area for the State of Idaho Department of Transportation—known as Banks Maintenance Shed No. 3114. This facility is used to house road maintenance equipment and the associated material require to fuel and maintain the equipment such as diesel, gasoline, and lubricants. Magnesium chloride and road deicing material (a combination of salt and salt and sand) is also stored on site. All required safety and hazardous material spill prevention devices and protocols are in place at the site for the substances stored there. There will be no changes to the scope or intensity of the authorized use, no changes to the authorized facilities, and the holder is in full compliance with the terms and conditions of their expired authorization. This new issuance would occur in FY20. The term of this permit would be for 20 years. -Forest Service scoping notice

The Idaho Conservation League has a long history of involvement with Wild and Scenic River protections, riparian restoration, recreation management and transportation infrastructure. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air, and public lands—values that are the foundation for Idaho's extraordinary quality of life. ICL works to protect these values through public education, outreach, advocacy, and policy development. As Idaho's largest state-wide conservation organization, we represent over 25,000 supporters who want to ensure that Idaho's eligible and suitable Wild and Scenic Rivers are afforded the protections they deserve until Congress takes steps regarding the designation. Banks is one of the focal points for river recreation in Idaho. We

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always look for ways to improve the environment surrounding Idaho's rivers and better protect water quality.

Idaho Rivers United (IRU) is an environmental advocacy organization that is dedicated to protecting Idaho rivers and restoring our native fish populations. Since our inception in 1990, IRU has been working to defend Wild and Scenic rivers, advocate for endangered and threatened aquatic species, reform hydropower policy, and promote enhanced water quality in all of Idaho's rivers. IRU represents over 5,000 members throughout Idaho and beyond. Our members and supporters expect protection of rivers for their ecological, scenic, and recreational values; accordingly, our mission is to execute thorough river preservation and conservation work to ensure environmental integrity of all of Idaho's rivers. We have successfully advocated for and defended Wild and Scenic designations and protections in the Owyhee Canyonlands and the Lochsa-Clearwater River corridor, among many others, and helped protect numerous rivers and watersheds throughout the regions from harmful mining and extraction impacts.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 50,000 supporters, 6,000 dues-paying members, and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates.

We were surprised to learn that this Special Use Permit expired in 2018 and very disappointed to hear that the Forest Service is proposing to extend it for another 20 years with a Categorical Exclusion. A close reexamination of the Special Use Permit represents the best opportunity to improve the Outstanding Remarkable Values of this river corridor, better serve the interests of the local community, improve river-related recreational experiences, expand the capacity of the Idaho Transportation Department, and implement the Forest Plan.

Instead of automatically renewing this permit for another 20 years, we are asking the Forest Service to issue a Special Use Permit for only three years. We are also asking the Forest Service to commit to initiating an Environmental Assessment before the permit expires again. During this time, the Forest Service needs to take a hard look at alternative sites and work with the public and ITD to develop a relocation plan for the ITD maintenance facility.

We would appreciate the opportunity to meet with the Forest Service and Idaho Transportation Department later this spring and discuss potential next steps.

Sincerely,



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Prioritization

We understand that the Boise National Forest and Emmett Ranger District have several high-priority projects such as advancing forest and watershed health goals within the Governor's Shared Stewardship Priority Area, and developing the Sage Hen Project, among many others. The Idaho Conservation League shares these priorities with the Boise National Forest. While reassessing the Banks area and Idaho Transportation Department facility are less urgent in comparison, these issues are only going to get more complex and difficult to resolve in the future. We note that the Forest Plan contains guidelines for timely resolution of matters such as this one:

Priority for modifying existing authorizations should consider the current and potential negative effects on human health and safety and resource values that may be affected. LSGU08.

The previous ITD Special Use Permit may have been grandfathered if it was issued before the 2003 Forest Plan, but the Forest Plan made a commitment to the public that new permits will be consistent with the Forest Plan direction:

All permits, contracts, and instruments for use or occupancy of the Forest **must conform** to the revised Plan's direction. However, because some existing permits and leases are already committed, they will remain in effect until they can be adjusted to accommodate direction in the revised Forest Plan. The Record of Decision for the revised Forest Plan provides the Responsible Official's direction concerning transition of the permits, contracts, and other uses to reflect direction of the revised Plan. IV-1 (emphasis added).

The lack of proper prioritization of this issue and lack of communications have resulted in ITD recently investing funds and expanding the facility based on the faulty assumption that the Special Use Permit had already been approved.

The Forest Service has abundant expertise in analyzing and implementing complex projects at different time scales. We urge the Forest Service to put a study of alternative uses and locations for the ITD facility in the three year planning and budgeting timeframe.

Historical context

The North and South Fork Payette Rivers used to support sockeye salmon, Chinook salmon and steelhead. The confluence of the North and South Fork Payette Rivers was a significant cultural site for the Shoshone Paiute Tribes. These fish runs have been extirpated as a result of the construction of the Black Canyon dam.

It is our understanding that the ITD facility has been in place since the 1950s. When the previous permit was last up for consideration, there were piles of gravel and salt at the put in area. As part of the permit renewal, the Forest Service had the ITD relocate these piles to allow for access to the river.

Forest Plan direction

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The long term continuation of the ITD facility is inconsistent with a number of Forest Plan goals, objections and standards. The Banks area is at the intersection of Management Area 17, North Fork Payette River, and Management Area 9, Harris Creek. Management objectives, standards and guidelines were designed to be achieved within 10-15 years, while desired conditions and goals are more timeless in nature.

The Main Payette, South Fork Payette and North Fork Payette have such outstandingly remarkable recreation values that this river corridor is eligible for protections under the Wild and Scenic Rivers Act. The eligible Wild and Scenic river segments include 12.5 miles on the North Fork of the Payette north of Banks, 1 mile of the South Fork Payette River east of Banks and 1 mile of the Main Payette south of Banks. Banks is the epicenter of these three Wild and Scenic eligible sections.

The Payette River has one segment in this area with a classification of Recreational. It is an estimated 12.5 miles, with a river corridor area of 4,000 acres. The North Fork is considered eligible for Wild and Scenic River status because of its outstandingly remarkable recreational values. Boise Forest Plan III-323

And

ORV: Recreation. The river corridor corresponds with the Payette River Scenic Byway Corridor, a State designation that indicates outstanding scenery-viewing recreation opportunities. The river is also within the Payette River System, which is nationally known for its excellent rafting and kayaking opportunities. The river is internationally known because it has one of the longest sections of continuous Class V rapids in the country. Wild and Scenic Rivers Review, Wild and Scenic Eligibility Study D-12. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5394050.pdf

Payette River. Recreation. River corridor includes the Banks River Access Site, which is a very popular put-in and take out spot and is within the Payette River Scenic Byway corridor. The Payette River is nationally known for its excellent rafting and kayaking opportunities.

Forest Service resource specialists considered several factors when defining recreation/interpretation Outstandingly Remarkable Values, including the following:

- Whether or not recreation opportunities are or have the potential to be distinctive enough to attract visitors from outside the Region of Comparison (Columbia River Basin);
- If visitors are willing to travel long distances to use the river resources for recreation purposes.
- Whether or not the river may provide, or have the potential to provide settings for national or regional usage or competitive events. D-5.

For several years now, the North Fork of the Payette has been the site for the “North Fork Championships” kayaking event.

The Boise Forest Plan calls for maintaining or enhancing river-related recreational experiences when possible. This direction is particularly relevant in this eligible [Wild and Scenic River corridor](#):

Manage the North Fork Payette River eligible corridor to its assigned Recreational classification standards, and preserve its ORVs and freeflowing status, until the river undergoes a suitability study and the study finds it suitable for designation by Congress, or releases it from further consideration as a Wild and Scenic River. General Standard 1701.

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5394161.pdf

Manage the North Fork Payette River and Payette eligible corridors to their assigned Recreational classification standards, and preserve their ORVs and free-flowing status until the rivers undergo a suitability study and the study finds them suitable for designation by Congress, or releases them from further consideration as Wild and Scenic Rivers. General Standard 0901.

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5394146.pdf

Emphasize the following in managing eligible and suitable Wild and Scenic Rivers:

- a) Maintaining or enhancing the outstandingly remarkable values;
- b) Maintaining the free-flowing character;
- c) Maintaining or enhancing values compatible with the assigned classification; and
- d) Accommodating public use and enjoyment consistent with retaining the river's natural values. Objective WSOB01.

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5394129.pdf

The ITD facility, adjacent to the Banks River Access Site, is currently located within the ¼ mile river corridor of the North Fork Payette. While ITD plays a crucial role in providing public transportation, the maintenance facility does not have to be located in that exact location. The area that this facility occupies is not in a natural state, is not open to public access, is not being considered for restoration or interpretation, and will not be for the next 20 years according to the proposed action. The adjacent area is an internationally-known destination for river recreation and the public would benefit from this area being managed consistent with Wild and Scenic Rivers Act, Forest Service Directives, and with other components of the Forest Plan.

The Forest Service should describe what support services ITD provides in the current location and any fees and cost recovery that ITD pays to the Forest Service for the use of this area. The Forest Service should also examine the opportunity costs or losses in terms of ecosystem services (erosion control, native vegetation, protection of cultural resources, lost opportunities to enhance Wild and Scenic River values) by reissuing the Special Use Permit as proposed.

One of the Desired Conditions in the Forest Plan is that conflicts between authorized special uses and other uses and resources are mitigated or eliminated (III-54).

The Forest Service has direction from the Boise Forest Plan to work with ITD to investigate alternative locations for the ITD facility, consider alternate uses for the Banks site and develop a relocation plan for the ITD facility if a suitable permanent location can be located:

Objective 0943 Evaluate relocating the State of Idaho Maintenance shed to provide additional parking for recreation needs. If the evaluation identifies viable alternatives to the current location, develop a relocation plan.

The ITD facility does meet the basic goals for special use authorizations:

Special use authorizations are issued for uses that: a) Serve the public, b) Promote public health and safety, c) Protect the environment, and/or d) Are legally mandated. LSGO05. III-55.

However, the Forest Plan also includes a goal that Special Uses should be consistent with the direction for other National Forest resources and should be permitted only if they cannot be accommodated off the National Forest:

Proposed special uses of National Forest System lands—such as hydroelectric development, communication sites, water developments, and utility corridors—are considered that meet public needs, are consistent with direction for other National Forest resources, and cannot be accommodated off the National Forest. Goal LSGO04: Special Uses.

The ITD facility is not consistent with the direction for other National Forest resources. The ITD maintenance facility is with the Riparian Conservation Area (RCA) of the North Fork of the Payette.

According to the scoping notice, the ITD shed has contained and will contain hazardous materials such as petroleum products:

This facility is used to house road maintenance equipment and the associated material require to fuel and maintain the equipment such as diesel, gasoline, and lubricants. Magnesium chloride and road deicing material (a combination of salt and salt and sand) is also stored on site.

The scoping notice goes on to state that this material will be safely stored with required safety measures in place:

All required safety and hazardous material spill prevention devices and protocols are in place at the site for the substances stored there.

However, the ITD maintenance facility is still with the Riparian Conservation Area (RCA) of the North Fork of the Payette. The Forest Plan is quite clear that the placement of hazardous material in Riparian Conservation Areas is not allowed unless there are no other alternatives:

Do not authorize storage of fuels and other toxicants or refueling within RCAs unless there are no other alternatives. Storage of fuels and other toxicants or refueling sites within RCAs shall be approved by the responsible official and have an approved spill containment plan commensurate with the amount of fuel. Forest Plan Standard SWTS11.

We note that this is a non-discretionary Forest Plan standard.

To our knowledge, the Forest Service has not taken a hard look to determine that there are no other alternatives as required; they have simply deferred to the ITD and have accepted their conclusion. The Forest Service has not done its due diligence in investigating alternative sites with ITD and has instead deferred to ITD on this search process.

The Forest Plan contains this additional direction:

General Standard 0901 Manage the North Fork Payette River and Payette eligible corridors to their assigned Recreational classification standards, and preserve their ORVs (outstandingly remarkable values) and free-flowing status until the rivers undergo a suitability study and the study finds them

suitable for designation by Congress, or releases them from further consideration as Wild and Scenic Rivers.

Objective 0943 Evaluate relocating the State of Idaho maintenance shed to provide additional parking for recreation needs. If the evaluation identifies viable alternatives to the current location, develop a relocation plan.

Goal 0922 Emphasize river-related recreation opportunities and experiences in the management of recreation resources within the Payette River corridors.

Goal 0924 Continue to coordinate management and operation of Recreation Fee Demo sites with the BLM.

Objective 0925 Improve river access near Banks by expanding parking areas and improving changing rooms to enhance recreation experiences and increase opportunities.

Objective 0926 Evaluate Banks Beach area for potential expansion and improvement to enhance river-related recreation opportunities and experiences. Expand existing facilities to accommodate increasing use if possible.

Objective 0927 Cooperate with the BLM to develop a river corridor management plan to guide management and development of river-related recreation resources.

Objective 0929 Complete vegetation management plans for Banks River Access, Banks Store and Café, Banks Beach, and high-use dispersed sites.

Objective 0930 Work with adjacent landowners and partners to develop a management strategy for off trail/road use.

Objective 1736 Identify and evaluate opportunities along the Highway 55 corridor to increase recreation opportunities and improve experiences through development of additional recreation facilities as well as improvements to and expansion of existing recreation facilities

Objective 1737 Facilitate and participate in the development of a Scenic Byway Corridor Management Plan for the Payette River Scenic Byway with local government agencies and other partners.

By prioritizing ITD's needs over additional public interests, the Forest Service has not fulfilled Standard SWG01 in terms of minimizing conflicts and complementing priorities where possible:

Federal, state, county, tribal, and regulatory agency priorities should be considered early in the process of subbasin review, fine- and site/project-scale analyses, and restoration priorities to help ensure priorities complement each other where possible, or at least minimize conflicts. Forest Plan III-23.

Furthermore, reissuing the permit for another twenty years as currently proposed would require a Forest Plan amendment:

The need to amend the plan may result from:

Determinations by the Forest Supervisor that existing or proposed projects, permits, contracts, cooperative agreements, or other instruments authorizing occupancy and use are appropriate, but not consistent with elements of the Plan's management direction. IV-22.

Alternative locations for ITD Maintenance facility

The Idaho Transportation Department provides a critical public service by maintaining Highway 55 and they need to continue to be able to provide this service into the future. However, the location next to the river is not ideal.

We would like to gain a better understanding of ITD's needs for the site (location, access, acreage, power, etc), the extent to which ITD and the FS have already looked into other areas, and what the hurdles have been.

We have had some initial conversations with ITD and learned that the Department had investigated a location in Garden Valley but determined that the site was not suitable because it was located in a floodplain. We also learned that ITD had also done some initial investigation at alternate sites, including several miles up the Banks-Lowman Road and at a site the Department already owns in Horseshoe Bend, which appears to be outside their desired operating range. We would like to have additional discussions with ITD to get a better understanding of their facility requirements and long-term needs for servicing this area.

There also may be other locations on Forest Service lands with easy access to Highway 55 that could be suitable, as long as they are located outside the RCA:

New authorized facilities shall be located outside of RCAs wherever possible. When new facilities must be located in RCAs, they shall be developed such that degrading effects to RCAs are mitigated, through avoidance or minimization. Standard LSST07. III-56.

Do not authorize storage of fuels and other toxicants or refueling within RCAs unless there are no other alternatives. Storage of fuels and other toxicants or refueling sites within RCAs shall be approved by the responsible official and have an approved spill containment plan commensurate with the amount of fuel. Forest Plan Standard SWTS11.

Alternative uses for the Banks site

There are a variety of alternative uses for the Banks site and we recommend reexamining the Forest Plan, current and future needs, and seeing if there is a configuration that does a better job protecting Wild and Scenic River values, meeting the Forest Plan, and serving the local community and members of the public.

Hazard assessment and remediation needs

The Forest Service should be aware that several ITD facilities utilized Motor Vehicle Waste Disposal Wells to dump waste generated from motor vehicles into the sand, gravel and rocks underneath these facilities. The State had listed an active Motor Vehicle Waste Disposal Well at the Banks location. This was of concern to us as waste generated by motor vehicles can be extremely toxic to groundwater resources. Disposal wells such as the one at Banks were discontinued in 2016 following a settlement with the Idaho Conservation League. We spoke with ITD and heard that there was not extensive contamination and that contaminated materials were removed. The Forest Service should work with ITD to make sure to assess any groundwater contamination issues.

Integrated approach

The Forest Service should take this opportunity to see how the ITD site fits into an integrated approach to improve safety and resource management issues in the Banks area, including Banks Beach. We are well aware that the intersection at Banks is highly congested on summer weekends and understand that there have been local community efforts to address the traffic and related safety issues. Any alternative use at the Banks site should ensure that the traffic congestion and safety issues at this intersection are not made worse.

Assessment of resource capabilities

The Forest Service should reassess resource capabilities. While the Boise Forest Plan contemplates an expanded parking area at the Banks site, we are concerned that this could increase traffic congestion across the Forest Service bridge and think that there may be better uses for this site. We recommend developing alternatives that focus more on restoration and interpretation:

Where the recreation demand exceeds resource capabilities or significantly changes the recreation experience available to users, alternative management strategies should be evaluated and management should be adjusted as appropriate. Forest Guideline REGU03. III-66.

One alternative could be converting the ITD site into a day use area with shade trees and an interpretive trail describing the area's natural history and cultural heritage.

Visual Quality

The North Fork Payette River corridor has an objective designed to protect visual quality. The VQO for the North Fork of the Payette's eligible Recreational status is partial retention.

In addition, State Highway 55 is a state and federal scenic byway:

Recognized for its outstanding scenic and historic attributes, the Payette River National Scenic Byway was designated an Idaho Scenic Byway in June 1977, and a National Scenic Byway in 2005. It extends 112 miles along Idaho 55 between Eagle and New Meadows, is one of the most beautiful and heavily-used roadways in Idaho. It accesses some of Idaho's most beautiful scenic and recreational areas in and near the Payette and Boise National Forests. The route offers views of mountains, forests, lakes, valleys, and the famous whitewater rapids visited by rafters, canoeists, and kayakers from around the world.

<http://payetteriverscenicbyway.org/>

In examining alternate uses and locations for the ITD facility, the Forest Service should look for opportunities to improve the visual quality of this site and the corridor:

Management activities and facility development in Scenic Byway corridors with management plans should be sensitive to the goals contained within the corridor management plans. Guideline REGU05. III-66.

Cultural Resources

When examining alternative uses for the site and locations for the ITD facility, the Forest Service should consult with the Tribal governments:

Consider areas and resources important to American Indian tribal cultures when planning management activities or development proposals and resolve adverse effects to those sites. TROB02. III-73.

Work with designated tribal representatives during project planning to develop protection or mitigation measures for resources important to the tribes. TROB03. III-73.

Coordinate with tribes to identify Traditional Cultural Properties and recommend for establishment Cultural Special Interest Areas. Traditional Cultural Properties and Cultural Special Interest Areas may include areas of important cultural and spiritual use, reservoirs of cultural plants or resources, or important cultural features. TROB04. III-73.

Use of a Categorical Exclusion may be inappropriate

The Forest Service should be aware that the holder may not have been in compliance with the terms and conditions of their expired authorization with regard to utilizing a motor vehicle waste disposal well in violation of state and federal law on National Forest system lands. While we are happy to report that this situation appears to have been resolved, if the Forest Service is planning to reauthorize the permit for more than three years, we do not believe that a Categorical Exclusion and Decision Memo are appropriate. Instead, we recommend utilizing an Environmental Assessment and Decision Notice to reissue this permit.

Interim mitigation measures as part of terms and conditions

Since the public expectation was that the site would be available for river and recreation-related improvements when the last Special Use Permit expired, there is a gap in meeting these services for as long as ITD occupancy continues. We are asking the Forest Service and ITD to make some on-site operational improvements and provide interim mitigation measures. Incorporating a mitigation program into the Terms and Conditions is well within the authority of the Forest Service:

As a federal land management agency, the Forest Service has limited authority to influence certain activities or uses—such as mining and hydropower development—on its administered lands. However, the agency does have authority to require reasonable terms, conditions, or measures to minimize or mitigate the effects of some of these activities or uses. In the Forestwide management direction, these activities or uses are typically addressed by guidelines rather than standards, to reflect the Forest’s limited authority. In such cases, the Forest remains committed to minimizing or mitigating effects from these activities, where they cannot be avoided or eliminated. Forest Plan III-4.

And

Where opportunities to mitigate special use authorized facilities and practices causing degradation have been identified, consider mitigating through measures such as relocation, closure, and changes in management strategy, alteration, or discontinuance. LSGU18. III-59.

And

During fine-scale analyses in areas where special use authorization facilities are identified as a potential concern or problem contributing to degradation of water quality, aquatic species or occupied sensitive or watch plant habitat, evaluate and document where the contributing facilities are and prioritize opportunities to mitigate effects. LSOB12. III-55.

Mitigation measures could include the following:

- ITD provides in kind-donations of staff, engineering, equipment and operation for facility improvement work at various river access points, tree plantings and for streambank stabilization projects. For example, the takeout site at Beehive Bend could benefit from a new ramp configuration that improves access and also protects the large Ponderosa pine from disturbance.
- ITD assists with additional funding could be used for expanding the Payette River Ranger program. Additional rangers and extended seasons could allow for additional public contacts, safety services, monitoring and enforcement, and interpretation about the Wild and Scenic River corridors and cultural and natural history of the area.
- ITD conducts additional actions to reduce sediment in the river corridor. We note that Forest Objective 1718 calls for coordinating with the State of Idaho to reduce sediment from State Highway 55. According to the Forest Plan, aquatic habitat is functioning at risk due to accelerated sediment.
- ITD staff use existing volunteer hours on riverside and road clean up efforts.
- ITD provides financial or in-kind support for existing the Invasive Species Inspection stations.
- ITD regional and state-wide communications and Public Service Announcements relay messages about protecting water quality, stopping Invasive Species, and recreating safely, and responsible stewardship of Idaho's public lands and rivers.
- ITD assists with noxious weed control measures.

These are preliminary ideas and there are likely other ways that ITD can contribute to enhancement efforts. Once these mitigation efforts are determined, they should be incorporated into the terms and conditions of the Special Use Permit. The longer the permit is extended, the greater the mitigation efforts should be. These mitigation efforts should be additive to existing and planned efforts.

Assistance

The Forest Service should look at additional resources to assist with developing alternative ITD locations and site uses such as the BLM Boise District Resource Advisory Council (RAC). The RAC has helped review the Demo Fee Program that was later adopted into the Federal Lands Recreation and Enhancement Act as the Payette River Pass System:

The Payette River Pass System is a unique system of recreation sites provided along the river to enhance your experience on the Payette River! The system is managed jointly by the Bureau of Land Management and the Forest Service and with the help of the County Sheriff. The Forest Service does most of the daily operations and maintenance, while the Bureau of Land Management performs most of the construction activities. This system has been operating as part of a Fee Program that began in 1996 and 1997 as a demonstration project. Now it is formally adopted into the Federal Lands Recreation Enhancement Act as a Fee System. <https://www.fs.usda.gov/detailfull/boise/passes-permits/?cid=stelprdb5038826>

A RAC subcommittee could potentially be reconvened to help advance these discussions, help engage outfitters, members of the public, and help develop alternatives. I served on the Boise District BLM RAC from 2003-2009 and helped review the River Access Fee Demo Program. During my time on the RAC, we were told that the Forest Service and ITD were going to look into alternate sites but that this process was still several years out.