

United States Department of the Interior

National Park Service
Lewis & Clark National Historic Trail
601 Riverfront Drive
Omaha, Nebraska 68102-4226



September 11, 2014

Mr. Timory Peel
Forest Planner
Nez Perce-Clearwater National Forests
903 3rd Street
Kamiah, Idaho 83536

Dear Mr. Timory Peel:

The National Park Service (NPS) reviewed the U.S. Forest Service (USFS) notice of intent to prepare an Environmental Impact Statement (EIS) for the proposed Nez Perce-Clearwater National Forest (Forest) land management plan revision. We offer the following comments for your consideration.

The Lewis and Clark National Historic Trail (NHT) was established by Congress in an amendment to the National Trails System Act in 1978 [16 U.S.C. § 1244(a)(6)]. The NPS is charged under this Act with the identification and protection of the historic route, remnants, and artifacts of the Lewis and Clark Expedition (Expedition) for public use and enjoyment.

The Clearwater National Forest contains what is arguably the longest segment of intact Lewis and Clark NHT in the nation. In September 1805, the Expedition was led by a Shoshoni guide from their camp at Traveler's Rest over the rugged Bitterroot Mountains along ancient Indian trails to Weippe Prairie. This 200-mile route, called the Lolo Trail, was designated a National Historic Landmark in 1960 due to its national historic significance and integrity.

The Lolo Trail is part of the Forest, the Nez Perce (Nee-Me-Poo) NHT, Lewis and Clark NHT, and the Nez Perce National Historical Park (NHP). The NPS administers the Lolo Trail, Nez Perce NHP, and Lewis and Clark NHT and the USFS administers the Forest and the Nez Perce NHT. While these overlapping jurisdictions may cause some challenges due to added complexity, it also creates a unique opportunity for our agencies to combine and share resources toward meeting common goals in protecting and providing for the enjoyment of these treasured resources.

The current management plan for the Clearwater National Forest outlines goals for management of the historic Lolo Trail system in a specified management area (Management Area A6). This management area is described as an approximately ½ mile corridor that includes the Lolo Trail, Lewis and Clark Trail, Bird-Truax Wagon Road, and the Lolo Motorway. We did not find similar direction for management of the Lolo Trail system in the Proposed Action. The Lolo Trail system is not listed as a management area in Chapter 3. It is imperative that this corridor continue to be treated as a special management area. Details regarding the desired conditions,

objectives, standards, guidelines, and cooperative management needs of this corridor should be addressed in the plan revision.

The NPS is pleased to see that completion of an historic preservation plan for the Lolo Trail NHL corridor, including the Lewis and Clark and Nez Perce NHT segments, is included on the list of types of actions that are likely to occur under the forest management plan in Appendix E. However, we do not foresee the potential development of this plan as negating the need to address the Lolo Trail system as a management area in the forest plan revision as mentioned above. The NPS encourages expediting development of the preservation plan and thinks it should be made a high priority due to the significance of the Lolo NHL. Please ensure coordination with the NPS on the development of this plan.

It is not clear from reviewing the Proposed Action where national trails fall in the management plan structure. Reference to the Lewis and Clark NHT Comprehensive Plan for Management and Use and administration by NPS is only found in Appendix E—**Possible** (emphasis added) Actions and Management Approaches. The NPS feels strongly that designated/established national trails located fully or partially within the Forest should be identified as Special Areas in Chapter 3 of the Proposed Action. National trails are designated by law and merit special management to meet their purpose. Chapter 3 lists and describes designated and eligible Wild and Scenic Rivers in the Forest along with desired conditions and guidelines, so it is perplexing that designated national trails in the Forest are not mentioned here. It is important to describe the individual national trails in the Forest and define applicable authorities and management direction within the body of the plan. As currently outlined, we found it difficult to understand how the Lewis and Clark NHT will be managed in relation to the rest of the Forest.

Specific comments

Chapter 2, Forestwide Direction for Infrastructure (page 49) or Recreation (page 45): We suggest adding the objective, “Complete a plan for protection of the scenic character values of Highway 12 along the Wild and Scenic River and the Lewis and Clark Trail Auto Route.”

Chapter 2, Forestwide Direction for Lands (page 52): We suggest adding the desired condition, “Land acquisitions and conservation easements are sought to meet forest plan desired conditions and facilitate access to and protection of national historic trails.”

Chapter 2, Suitability of Lands (page 64): We recommend adding national trails to the types of areas shown in Table 20 to help clarify how national trails in the Forest are managed.

Chapter 4, Monitoring Program (page 83): The NPS is interested in partnering with the USFS on development of an inventory and monitoring program for the Lewis and Clark NHT or Lolo Trail System.

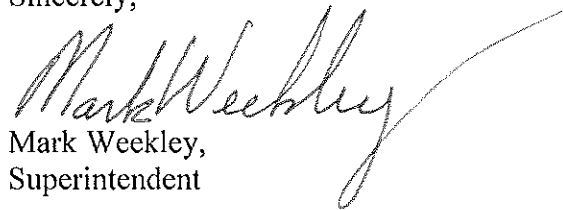
Appendix A: We recommend adding a definition of National Historic Trails.

Appendix D: The miles of Lewis and Clark Trail given in the various ranger district tables does not appear to correlate with our data. Please confer with our office to determine if any corrections are necessary.

Thank you for the opportunity to provide input on revisions to the Forest management plans. We are available to meet and discuss our comments and provide relevant details to assist the forest

planning team as this revision process moves forward. Please contact Dan Wiley, Chief of Resources Stewardship, Lewis and Clark National Historic Trail at 402-661-1830 or at Dan_Wiley@nps.gov with any questions.

Sincerely,



Mark Weekley,
Superintendent

cc:

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