



Erin Phelps
District Ranger, New Meadows Ranger District
Payette National Forest
3674 Hwy 95 PO Box J
New Meadows, ID 83654

September 18, 2020

RE: Trout Unlimited Scoping Comments for Rapid River Travel Management Project

District Ranger Phelps,

Please accept the following comments from Trout Unlimited regarding Scoping for the Rapid River Travel Management Project.

Trout Unlimited is the nation's oldest and largest non-profit coldwater conservation organization with over 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU staff and volunteers have worked toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges. Additionally, we recognize the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes that the actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

In Idaho, TU plays a critical role in watershed conservation, restoration, and rehabilitation on public lands, particularly our public lands. Nine chapters with 2,500 members statewide actively participate in projects with the Forest Service, local communities, and private landowners in order to maintain the larger landscape that is so vital to the social and economic well-being of communities in Idaho. Trout Unlimited's Idaho chapters and staff have long-term relationships with the USFS and partnerships with many stakeholders to develop mutually beneficial solutions to land management problems.

Trout Unlimited would like to commend the Payette National Forest for attempting to resolve long-standing travel management issues in the Rapid River drainage. The Payette National

Forest (PNF) intends to address the travel restrictions and proposed use designations for Trails 177, 183, 184, 187, 188, and 362. This issue arose when the PNF wrongfully designated these trails for motorized travel and recreation within the Congressionally designated Wild Rapid River corridor (USDA Forest Service, 2009). The Hells Canyon National Recreation Area (HCNRA) Act of 1975 (PL 94-199) and its implementing regulations paid special attention to the Rapid River Drainage, its water quality, and its fisheries given the significance of the watershed to the overall anadromous fish populations of Idaho as well as Bull trout.

We would agree with the following proposals from the scoping documents:

- Trail 177: non-mechanized and non-motorized use because the entire trail is within the bottom of the wild river corridor and to align with 36 CFR292.44(b)(2)
- Trail 362 (both within and adjacent to the corridor): non-mechanized and non-motorized use because of the short length of the trail (one mile) and to align with 36 CFR292.44(b)(2)
- Sections of trails 183, 184, 187, and 188 within the wild river corridor: non-mechanized and non-motorized use to align with 36 CFR 292.44(b)(2)

However, Trout Unlimited has concerns with the following proposal made in the scoping documents. It reads:

Sections of trails 183, 184, 187, and 188 adjacent to the wild river corridor: mechanized and motorized use to align with the 2009 snow free travel plan (USDA Forest Service 2009).

We offer the following arguments to support our concerns.

- Our biggest concern is enforcement. The Rapid River Canyon is a very remote area. Having a trail that ends within site of the Rapid River and turnarounds on the other side of the river will only serve to entice users to adventure beyond turnaround areas and into the Wild and Scenic boundary. From our understanding, the Payette National Forest has only one Law Enforcement Officer for the entire Forest. With the Payette National Forest being a popular recreation destination with numerous campgrounds, trails and other activities in the front country, it is hard to imagine that one enforcement officer will have any time to check into such a remote area with any type of frequency. Violations could occur and not be recognized for months.
- When Congress established the HCNRA, designating the mainstem and West Fork of the Rapid River as Wild under the Wild and Scenic Rivers Act, it did so with the intent to protect water quality and fisheries habitat associated with anadromous fish species like Chinook salmon and steelhead, and native Bull trout. All three species have since been listed as Endangered, Threatened, or Sensitive since the Wild Rapid River was established, making this unique landscape even more critical for habitat conservation and water quality protection. The Forest should take a hard look as to the affect that any changes in travel management would have on the outstandingly remarkable values the Rapid River provides.
- The Rapid River drainage covers Idaho Fish and Game's Game Management Unit 23 where hunting tags for deer and elk are still available over-the-counter. This is a true backcountry hunting experience that hunters can participate in year after year. In the past, many units in Idaho have had to move to controlled hunt draw areas once motorized use

is developed within the unit. Trout Unlimited would like to see the values of this unique backcountry hunting experience protected.

- The Rapid River Inventoried Roadless Area (IRA) encompasses 78,522 acres, split between the Payette National Forest and the Nez Perce-Clearwater National Forest. With only 5.8 miles of unclassified road and 0.1 mile of classified road within the IRA boundary, the natural integrity and appearance of the area remains high. This remote IRA retains its natural complexity and wild character. Amending the Rapid River Travel Management Plan to allow for single-track motorized/mechanized travel and recreation within the IRA and Rapid River watershed would effectively diminish these attributes, creating additional management challenges for an agency with ever decreasing and limited capacity.
- The proposed action is a not a thoughtful solution to travel management because it does not result in the kinds of loop opportunities that motorcyclists and mountain bikers often seek, it mixes rather than consolidates uses across the landscape and ensures that user conflicts and travel management violations will result.

We encourage the Payette National Forest to start a dialogue with all stakeholders that could lead to a better solution for the Rapid River and protect its unique characteristics. Trout Unlimited does not oppose motorized activities that are designed and designated in a thoughtful manner. Numerous trail opportunities exist, outside of the Rapid River drainage, that could be looked at for motorized designation without threatening the unique values of the Rapid River.

We appreciate the opportunity to comment on the forests plans to manage travel in this unique and spectacular landscape.

Sincerely,
Michael Gibson

A handwritten signature in black ink that reads "Michael T. Gibson". The signature is written in a cursive, flowing style.

Idaho Field Coordinator
Trout Unlimited