

September 14, 2020

Frank Schwartz

Payette National Forest, New Meadows District  
Attn: Erin Phelps, District Ranger  
P.O. Box J  
New Meadows, ID 82654

Dear Ranger Phelps,

Thank you for the opportunity to provide scoping comments on the Rapid River Travel Management Project. This trail system is important to the surrounding communities and the various recreational and other users that come to the area. Properly resolving the matters addressed through the 2010 temporary emergency order is important.

I am very familiar with this Rapid River country. I have family that has recreated and traveled through this country since the 1930s, and I have personally been hunting, fishing and exploring this area since the 1960s. My friends and family have used motorized vehicles to access and enjoy the river corridor and surrounding areas for as long as I can remember. The area has social importance to the local population, and these people respect and appreciate the area for its rich history as well as natural resource value. Without proper access, these local cultural traditions will not continue. Additionally, there is very little in the way of economic contributions from this area to the county and local communities. Recreation in this area does provide some economic benefit, and grazing should be continued both for vegetation management and local economic benefits. Please do not further impact these local rural economies by further limiting access to and use of these areas.

The following are more specific comments.

1. While it is important to address the trail segments proposed in this scoping document, it is important to address the relationship of these segments to the overall travel management system for this area. The current proposed scope is too narrow. For example, trails 178 and 191, along with the system of roads and trails that feed into these trails, should be addressed in order to provide a more complete analysis of the action. If you check historical surveys and maps (for example, the original 1906 survey of T 22N, R1W, GLO record number 39277), you will find that this perimeter trail system was referred to as the trail to Seven Devils. Trail 178 (as presently designated) was part of this Seven Devils trail system and was identified on maps as the Trail to Seven Devils, Divide between Rapid River and Little Salmon River. These roads and trails have historically had both mechanized and motorized use.
2. While it is recognized that the HCNRA wild river designation would prohibit motorized and mechanical use in the wild river corridor, the fact is that this trail system within and adjacent to the designated wild river corridor has historically had mechanized use dating back to the late 1800s, and motorized use from the early 1900s through 2010. This use predates the designation of Rapid River as a wild river. The period of mechanized and motorized use is more than 100

- years while the period prohibiting this use is only within the last 20 years. The wild river designation was not proper given the historic motorized and mechanized use in this area.
3. Since the Rapid River Wild River corridor and road/trail systems within and adjacent to the corridor are on both the Payette and Nez Perce National Forests, and these road/trail systems are interconnected, any proposed action for this river corridor should address the entire area within and adjacent to the corridor. Boundaries between national forests are not NEPA boundaries. The request for scoping comments includes a statement that "Management of other trails in the area is not included...but may be considered in the future as separate projects." Based on these two facts, it would appear that the current NEPA strategy is in fact segmentation. Since the NEPA process is expensive and time consuming, please address the matter of roads and trails in this area in a single action.
  4. Given all of the catastrophic fire (both natural and poorly planned prescribed burns gone bad) that this upper Rapid River country has seen in the last thirty years, it is important to keep access to this area for land management activities, such as grazing, properly planned and managed prescribed fire and other vegetation management actions. That area went from one of beauty and plentiful wildlife to the land of standing and downed matchsticks due to the fires. Travel management needs to include proper access.
  5. The roads and trails in that upper Rapid River country provide access to areas of historic value as well as private property. A very, very small percentage of our nation's population will ever have the opportunity to see the HCNA wilderness or wild rivers. A larger percentage will visit these areas if motorized or mechanized access is allowed for access. These areas are rich in history, but without proper access, most people will never have the opportunity to see or appreciate these historic areas, or the surrounding countryside and rivers. Please keep in mind that continuing to expand the lands of no use does not meet the standard of providing the greatest good to the greatest number. Providing mechanized and motorized access to the wild river corridor boundary will provide at least some opportunity for access to this area.
  6. Trail number designations on the Figure 1 map are not consistent with historic maps of the area, and this issue must be reconciled. For example, see trails 187 and 328 in T21N, R1W, Sections 5, 6, 7, 18, and 19 and Trails 323 and 328 in T22N, R1W starting in Section 18. The map is unclear in the vicinity of the head of Rapid River (for example, where is trail 229?). Time and care must be taken in the Forest's documentation and analysis to assure the scoping and analysis properly identifies the complete network of trails in this area to support a decision.
  7. Please refer to original/early surveys of Townships 20N, 21N and 22N, Ranges 1W and 2W for documentation of existing roads, trails cabins, houses and properties in existence in the 1898 – 1937 timeframe. This documentation is important for the Forest Service to make proper decisions related to travel management for this area. This documentation is available in the BLM Government Land Office records system. Records you need to review consider in your decision include GLO DM IDs 276332, 39265, 39277, 412192, 39267, and 39281. You will find significant information in these surveys that is relevant to the decisions the Forest intends to make.
  8. All trails in this rapid river corridor area should allow mechanized and motorized travel up to the wild river corridor. This includes trail 362, as well as trails 191, 190, 189, 186, and 323. Proper signage and adequate parking/turnarounds must be provided at these motorized/mechanized terminations. If trail structures are used at these junctions, please assure they are proper and allow sensible passage of people, horses, pack strings, etc. Signage is most important;

complicated passage systems, width restrictors, etc. often create safety hazards for people and animals needing to pass through these areas, particularly if travel is not during daylight hours. Current standard Forest engineered systems for trails/bridges/passage restrictors for horse/livestock use often do not reflect the common-sense knowledge of the users.

9. The lack of signage, incorrect signage and maps that are incomplete or contain errors likely contribute as much or more to noncompliance with travel management plans than the intentional noncompliance. Please assure the proper marking of trailheads, trails, and intersections and assure all forest maps are complete and correct. This will greatly reduce the incidents of unauthorized use of the roads and trails.
10. Trail 191/190/323 provide access to private property and must allow for motorized use. These roads and trails have had over 100 years of mechanized and motorized access.
11. A road existed down Paradise Creek in the vicinity of trail 186 since prior to 1906. Please see BLM GLO record DM ID 39277. Continued mechanized and motorized use of this road/trail should be allowed and included in this travel management decision process. This road/trail provides access to the historic Paradise Cabin site.
12. Please fairly assess the economic implications of any proposed action and alternatives. Recreation, particularly motorized and mechanized recreation, is important to this area. Without the use of motorized and mechanized recreation, there will be many less visitors to this area each year, which further impacts the local economy. There should be ongoing grazing in this area, which would provide revenue to Adams County as well as money back to the Forest and Treasury. This grazing also provides local jobs, contributes to the sustainability of local ranches, reduces fire risk and benefits watershed and forest health in an area that is not otherwise managed. While I understand grazing would not be within the scope of this travel management proposed action, the road and trail access is important to the grazing allotments and decisions on these roads and trails must be made with that in mind. Grazing allotments have associated private property rights which must be recognized.

Please feel free to contact me at the address above if you have any questions or require any clarification.

Thank you.

Sincerely



Frank Schwartz