



NEZ PERCE TRIBE

Department of Fisheries Resources Management

Administration • Enforcement • Harvest • Production • Research • Resident Fish • Watershed



ADMINISTRATION DIVISION

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September 17, 2020

Erin Phelps, District Ranger
New Meadows Ranger District
P.O. Box J
New Meadows, ID 83654

Submitted via weblink

<https://cara.ecosystem-management.org/Public//ReadingRoom?Project=36507>

Re: Rapid River Travel Management scoping comments

Dear Ranger Phelps:

Thank you for the opportunity to provide scoping comments on the Rapid River Travel Management proposed action to review the designated use of 23 miles of National Forest System trails 177, 183, 184, 187, 188, and 362 within and immediately adjacent to the Rapid River Wild and Scenic River corridor, south of Riggins, Idaho. These comments reflect technical concerns of the Nez Perce Tribe's Department of Fisheries Resources Management (DFRM). Our concerns are related to: potential effects on the Rapid River as a Wild and Scenic River, potential effects to the water supply of Rapid River Hatchery, potential effects to the water quality of the Little Salmon River, potential effects on specific fish locations and concerns with management and use of the motorized trails.

You are welcome to contact Emmit Taylor, DFRM Watershed Director at (208) 621-3544 (emmitt@nezperce.org) with any questions and/or to schedule a meeting. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "D.B. Johnson".

David B. Johnson, Department Manager

Cc: NPTEC

The Nez Perce Tribe's DFRM Comments on the Rapid River Travel Management

Potential Effects relative to Rapid River as a Wild and Scenic River

Rapid River was added to the national Wild and Scenic Rivers (WSR) system in 1975. The purpose of the WSR Act was to recognize and protect selected rivers through appropriate land use management.

“It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations.”¹

It was clear to Congress that Rapid River exhibited the characteristics needed for protection. The Payette National Forest (Forest) performed a resource assessment to identify Outstanding Remarkable Values (ORV) worth protecting or enhancing. The remarkable ORV's identified for Rapid River are²:

- Traditional Use
- Prehistorical Cultural Resources
- Historic Cultural Resources
- Scenery
- Fisheries
- Water Quality

Rapid River (Yáwwinma) was always known to the Nez Perce Tribe (Tribe) as an important location worthy of protection. Traditional ecological knowledge of the Little Salmon River watershed is well documented, including the informative description of the river by a Nez Perce fisher below:

Yawinme (pronounced Yah-win-me, meaning a very cold tributary or canyon), coming from the word “yaw'n” meaning coldspell. The creek is known as Rapid River and has been used for fishing purposes from time immemorial³

Although the DFRM recognizes that this proposal does not allow motorized traffic within the WSR corridor, this proposal would allow motorized use on trails that lead to the edge of and perhaps trespass into the WSR corridor, thereby inviting potential conflicts to the values for which the river was preserved. Rapid River is critically important for fishery resources, and should not be encroached upon or further developed.

¹ Wild and Scenic River Act (Public Law 90-542; 16 U.S.C 1271 et seq.)

² Appendix K: Wild Rapid River Resource Assessment. Hells Canyon National Recreation Area Comprehensive Management Plan FEIS.

³ Ancient Nez Perce Fishing Practices on the Snake and Salmon Rivers: Nez Perce perspectives on the fishing practices and locations, Allen Slickpoo, Sr. at 22.

Concern with Potential Effects to Rapid River Hatchery and Salmon Fisheries

Rapid River provides the water source for holding, incubating and rearing spring Chinook salmon at Rapid River Hatchery. The hatchery is operated by Idaho Department of Fish and Game and funded by Idaho Power Company as mitigation for hydrosystem dams constructed and operated in Hells Canyon. Any potential degradation of the hatchery's water supply would be a serious issue for the Tribe.

Rapid River Hatchery is one of the largest and most successful hatcheries in the Pacific Northwest, producing over 3 million spring Chinook smolts annually (20% of the spring/summer Chinook juveniles in the Snake River Basin). Adult salmon returning from juveniles reared at Rapid River Hatchery provide important harvest for treaty and non-treaty fisheries from the mouth of the Columbia River to Rapid River itself. Rapid River Chinook salmon account for the majority of fish harvested during the Tribe's spring fisheries management period. On average, 70% of all Nez Perce tributary harvest occurs within the Rapid River/Little Salmon subbasin. Thus, a management action that may potentially degrade natural resource conditions in this watershed and negatively influence fisheries would be detrimental to the Tribe.

Importance of Rapid River to the Water Quality of the Little Salmon Watershed

The Little Salmon River has been impaired by anthropogenic alterations that impact water quality, such as elevated stream temperatures, bacteria, and nutrients.⁴ The Little Salmon River's poor water quality and elevated stream temperatures are only alleviated as several major tributaries: Hazard Creek, Boulder Creek, and Rapid River enter the Little Salmon River. Therefore, Rapid River is critical for improving water quality in the lower reaches of the Little Salmon River.

One of the ORVs identified for Rapid River is water quality; there are only a few WSR that have this identified ORV. The importance of protecting the land adjacent to the WSR for water quality and fisheries is identified in the Hells Canyon National Recreation Area Report.

*"The various river segments included in this section are to be administered in accordance with the Wild and Scenic Rivers Act, and the Secretary is directed to establish detailed boundaries for the segments in accordance with that Act. A specific provision is included which prohibits the Secretary from undertaking or allowing any activities on Federal Lands which would impair the water quality of the Rapid River. Although the National Forest land outside of the wild river corridor along the mainstem and portions of the west fork of the Rapid River were not included in the recreation area, the Committee intends through this section that the Secretary exercise particular care in the management of the lands of this drainage. The salmon hatchery located along the river is vital to the management of this fisheries resource, and the water quality of the river must be assured."*⁵

Fish Locations in Relation to the Proposed Motorized Trails

⁴ IDEQ. (2017). *Idaho's 2014 Integrated Report*. Boise, ID: Idaho Department of Environmental Quality.

⁵ Hells Canyon National Recreation Area, House Report No. 94-607.

Please see the map showing Endangered Species Act (ESA) threatened steelhead and bull trout presence within the Rapid River Travel Management project area (Figure 1). The trails proposed for management changes are numbered 177 (along the mainstem of Rapid River), 183 (entering from the east to 177), 184 (coming in from the east), 187 (from the west), 188 (entering from the west parallel to the Lake Fork of Rapid River), and 362 (from the west and upstream along Rapid River) within and immediately adjacent to the Rapid River WSR corridor. The map illustrates that bull trout and steelhead are located upstream, downstream, and adjacent to the trails proposed for two-wheeled motorized use. We hope this fisheries map will help with the site-specific review of existing trail use conflicts.

Concern with Potential Management and Use of Motorized Trails

Through this proposal, the Forest would consider clearing turnarounds for motorized users where trail use designations change from motorized to non-motorized on trails 183, 184, 187, and 188. Fortunately, these turnarounds would be located outside of the WSR corridor.⁶ However, it is unclear precisely where the turnarounds would be located, and how they would effectively keep unauthorized motorized traffic from entering the WSR corridor.

Motorized and non-motorized trails can deliver sediment to Rapid River and its tributaries in this steep country. Motorcycle trails often develop trail ruts that focus water and cause scour on the trail prism, potentially delivering sediment to streams. Intermittent trail maintenance and riding during wet conditions can exacerbate sediment delivery to streams. The Forest should conduct a thorough analysis in the environmental assessment on fisheries and watershed resource concerns, such as sediment delivery, high traffic use, unauthorized user-created trails, landslide potential, and the spread of noxious weeds and describe how these values will be protected.

Summary of Concerns regarding this Travel Management Proposal

Rapid River, in addition to being a WSR, is an extremely important watershed for fisheries and water quality reasons. All of the proposed motorized trails lead to the WSR corridor and there is limited ability to prevent motorcycles from entering and accessing historic trail connections or user-created trails. In fact, it is likely that this proposal may encourage violations of motorized traffic entering the WSR corridor, thereby degrading fishery and water quality resources. As such, we ask that a new alternative be considered in this analysis that does not allow mechanized and motorized use on any sections of trails 183, 184, 187, and 188. In addition, the DFRM recommends that the Forest engage the Tribe in further discussion on this proposal.

⁶ Rapid River Travel Management Project Request for Scoping Comments at 4.

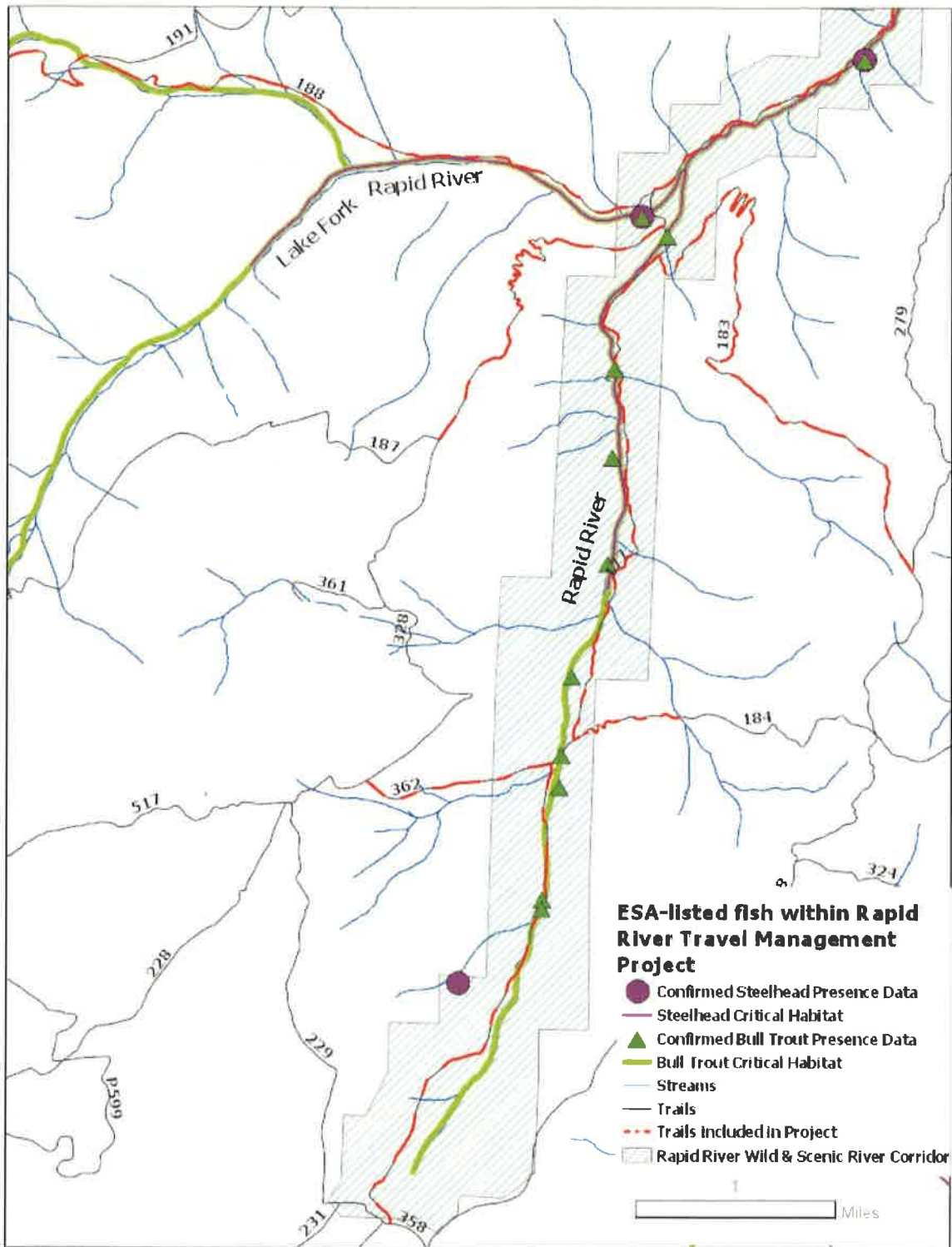


Figure 1. ESA-listed fish in the Rapid River Travel Management Project area.