March, 2021

To: New Meadows District Ranger, Erin Phelps ATTN Rapid River Trail Management Project P.O. Box J New Meadows, ID 83654

From: Friends of the Rapid River, PO Box 249, Pollock, Idaho 83547. Ray Petersen, President, ray.petersen7devilsmts@gmail.com, Holly Endersby, Secretary hollye@hughes.net

These comments are from our group of citizens (Friends of the Rapid River) addressing the recent release of the proposed EA on the Rapid River Trail Management project.

These sections of trails have been open to non-motorized use and closed to motorized use since a settlement agreement was reached in 2010. The special order that was implemented at that time as part of the litigation settlement agreement has, for over a decade, protected the natural resource values in the Rapid River drainage as well as providing a valuable, non-motorized recreational experience.

All of our members (FRR) live in the local area. We hunt, fish, hike, camp and recreate in the Rapid River Wild and Scenic canyon and the entire surrounding area. We support the present policy. What has been in effect on-the-ground for the past decade has proved effective and provided the public with appropriate access to the public lands in the upper Rapid River canyon.

FRR supports the non-motorized alternative for the Rapid River Travel Management Project. This alternative designates 25.7 miles of trail as open to foot and horse traffic only. As stated in the project document, adoption of this alternative is essentially an administrative change as it preserves the existing trail conditions under the special order referenced above.

The need to provide additional motorized opportunities in the Rapid River drainage has not been established by the project document. A review of non-motorized/motorized trails in the project and surrounding area at <https://trails.idaho.gov/> shows that the Rapid River drainage is the *only* significant non-motorized recreation opportunity, outside the Hells Canyon Wilderness, in the surrounding Weiser, Council, New Meadows and McCall Ranger Districts. NO other landscape of the size and diversity of the Rapid River watershed is available for non-motorized recreationists. Motorized recreation trails lace the surrounding landscapes and watersheds. There are no shortages of motorized recreation opportunities in this region. There *is* a shortage of significant non-motorized opportunities. From the standpoint of just offering a meaningful diversity of recreation opportunities in this region, the Rapid River drainage should remain a non-motorized recreation area.

Implementation of the non-motorized alternative for Rapid River is consistent with and fulfills the commitment the Payette National Forest made to the public in July 2003 with adoption of the Payette National Forest Land and Resource Management Plan. That comprehensive document was developed over several years with multiple opportunities for public comment.

The LRMP states that “non-motorized trail opportunities are the recreation emphasis for the Rapid River Watershed (Payette LRMP pg. 111-143).” The LRMP represents a commitment between the Forest Service and public regarding management in the Payette National Forest. We ask that the Forest Service honor that commitment made in good faith with the public that non-motorized recreation would be emphasized in the Rapid River drainage.

Special order 0412-401s gave the Forest Service the tools to achieve the commitment made to the public as well as the tool to address user conflicts. The proposed action in the EA seems to be counter to the commitment made to emphasize non-motorized trail opportunities in the Rapid River watershed and not create conflicts between motorized and non-motorized recreationists.

Moreover there is no reason to expect the proposed action, with the construction of motorized trail turnarounds, will achieve the promised results. It has been our experience that “dead end” trail closures to motorized recreationists don’t work if a trail extends beyond the closure site. These sites are simply not enforceable. And the motorized recreationists know that. There are several of these “failure of trail closures” on the Idaho side of the Hells Canyon National Recreation Area as examples. The Forest Service erected barriers and tried to close to motorized recreationists segments of trails at Sawpit Saddle and Low Saddle. The barriers were torn out, and motorized recreationists proceeded to travel the “closed” segments that extended beyond the barriers. A perfect example is the motorized trail (191) closure is on the North side of Paradise Creek. The trail (south of Paradise Creek) is “seasonally closed” from Black Lake, where the road crosses Lake Fork Creek, to Paradise Creek. But it’s permanently closed from Paradise Creek North. That seasonal closure at the road crossing on Lake Fork works “ok” now because it’s visible. There are still hunters who take in large “cashes” of camp supplies during the summer to use during the Fall hunting season “after” the seasonal closure. But the permanent motorized closure out at Paradise Creek has been problematic from the start. When motorized recreationalists reach that remote spot, with nobody around, and the trail beckoning on down Paradise Creek and up to Holbrook Saddle, many simply cross the creek and ride their machines wherever they want. The only place where trail closures to motorized recreationists have any chance of working are if closures occur at trail or road junctions where there is a good chance they will be observed if they travel beyond the closure. The proposed construction of the turnarounds themselves are problematic. Although the project document attempts to minimize the ground disturbance caused by the turnaround construction, nevertheless it is certain that bare ground, constantly churned up by motorcycles, is going to facilitate the establishment and subsequent spread of invasive noxious weeds. Our experience indicates that this area of the Payette National Forest is not often visited by Forest Service staff – it is remote and difficult to access and the existing access roads are rough and travel is slow. In addition staffing resources of the Forest Service are often lacking or simply not funded.

One of the primary reasons the members of the FRR live adjacent to the Rapid River W&S Corridor is because of the healthy wildlife populations. For more than a decade wildlife in the Rapid River drainage has benefited from the lack of noise, disturbance, and displacement routinely caused by motorized recreation. Allowing motorized recreation back into the Rapid River drainage puts at risk the security values of core wildlife habitat areas and the value of the Rapid River drainage as an ecological corridor. Decades of research have documented the negative effects of motorized vehicles on various wildlife populations throughout the West and conflicts with other users, particularily on mule deer and elk during the calving and hunting seasons. We don’t believe these impacts are adequately addressed in the proposal. In our opinion this needs to occur before any action can take place that will possibly diminish the decade-long positive results that have occurred because of the exclusion of motorized use.

Since the Rapid River drainage has been closed to the negative impacts of motorized disturbance to wildlife for a decade, the project document should present to the public the benefits to wildlife – all wildlife, including sensitive species and elk, predators, etc. – and how those benefits could be altered under the proposed action. As we previously stated the Rapid River drainage is the only non-Wilderness drainage of any significant size in the region closed to the detrimental effects of motorized recreation. That makes the Rapid River drainage special in the regional context.

As we said we do not expect newly constructed turnarounds under the proposed action to successfully block motorcycles from proceeding past the closures. Therefore, we do not believe the proposed action will adequately protect Rapid River’s water quality from degradation by motorized recreations. We have seen too many gouged, ripped up dirt trail, stream crossings by motorcycles to believe such actions can occur without significant water quality impacts.

The importance of Rapid River, its water quality and associated fishery resource, cannot be overstated, We believe the assurance of that protection should drive management of the river drainage. Rapid River and its water quality were recognized by Congress nearly 50 years ago as worthy of special attention for protection with the passage in 1975 of the Public Law 94-199, the Hells Canyon National Recreation Area Act. The following management direction applies:

Provided, that the Secretary shall establish a corridor along the segments of the Rapid River and may not undertake or permit to be undertaken activities on adjacent public lands which would impair the quarter quality of the Rapid River segment (P.L. 94-199 Sec 3(b).

Both the Payette Land and Resource Management Plan (July 2003) and the Roadless Area Conservation, National Forest System Lands in Idaho’s Final Environmental Impact Statement Appendix C (USDA-FS August 2008) make strong statements for the importance of the Rapid River drainage, its wildlife and fishery resource. The following is taken from the Idaho Roadless Rule’s final environmental impact statement appendix C:

Fisheries: Three threatened fish species – steelhead trout, bull trout, and Chinook summer salmon – are distributed throughout the Rapid River drainage. This subwatershed provides optimum spawning and rearing habitat for these three species, along with high quality water for the downstream Rapid River Fish Hatchery. The fish stocks present in Rapid River above the hatchery are unique in that the Chinook and steelhead stocks are of wild origin and likely not influenced by hatchery fish. … Bull trout, also of wild origin, are fluvial and grow to a large size. The subwatershed has the largest, best remaining aquatic stronghold within the Little Salmon River landscape. Rapid River is one of the key areas for the survival and recovery of listed salmon and trout (pg. C4-207).

Wildlife: … Due to the large, unroaded character of the area, human interaction with wildlife is low to moderate for most of the year, and the area serves as a security area for many species…. Potential habitat for lynx, a threatened species, occurs in about one third of the area. Generally, the upper slopes of the major drainages are potential lynx habitat. Habitat for several Region 4 sensitive species are also found in the roadless area. Unconfirmed sightings of wolverine have been reported, and the remoteness of the area suits the animal’s basic requirements (pg. C4-208).

The Hells Canyon National Recreation Area Comprehensive Management Plan Final Environmental Impact Statement Volume 2 (USDA-FS June 2003) also identified the importance of Rapid River’s fishery:

Rapid River contains three listed fish species (spring/summer chinook salmon, steelhead, and bull trout) and designated critical habitat for chinook and steelhead. Rapid River also contains the spotted frog, a sensitive species in Region 4. In terms of habitat, the Rapid River watershed is the largest and best remaining aquatic stronghold within the Little Salmon River system. It is a key area for the survival and recovery of listed salmon, steelhead, and bull trout. The populations of nationally significant fish species and the river’s near-natural habitat combine to a finding that fisheries is an outstandingly remarkable value for Rapid River (FEIS Appendix K pg. k-8).

Rapid River is one of the only rivers in Idaho where the U.S. Congress has specifically forbidden actions which would impair its water quality. The proposed action sets in motion a scenario which has the strong likelihood to lead to impairment of Rapid River’s water quality.

In summary we’d like to repeat the following from our recent scoping comments on this proposal:

The Rapid River W&S River corridor was established largely to protect the pristine cold-water quality existing in the Canyon. That water quality is formally identified as an Outstanding and Remarkable Value listed as a reason for its protection under the W&S Rivers Act. It’s the opinion of FRR that further extension of motorized use, and trail work to accommodate that use, on these fragile hillsides would encroach on the Canyon’s ability to provide that protection in a future further compromised by a warming climate. Deep, snow fed canyons such as the RR are essential cold-water refugia for fish that will become increasingly scarce in a warming and changing climate future. And this is not just some “futuristic imagining.” The present contribution of this cold-water within the RR Canyon to the Salmon/Snake/Columbia River system is essential now. The RR canyon has been identified by biologists as providing irreplaceable cold-water spawning habitat for critical Bull Trout populations that migrate up the river from the larger downstream rivers. It also provides habitat for native Redside and Westslope cutthroat trout populations as well as spawning habitat for some of Idaho’s last wild steelhead and chinook salmon populations. One of the most critical roles that the upper RR Canyon fills in regards to migratory fish is the ice-cold water that feeds the Rapid River Federal Fish hatchery located just above its confluence with The Little Salmon River. According to the hatchery manager this single Hatchery supplies up to 40 percent of the sport-harvested spring chinook salmon in the entire Columbia River system. That contribution alone eclipses any benefits – economically or otherwise - that could be imagined by adding a few more miles of motorized trails in the streams headwaters which simply are not needed. In addition to the aquatic impact FRR has serious concerns over the impact of the proposed alternative on elk and deer populations. Very few areas are left in America where hunters have the freedom to simply walk into a sporting goods store and purchase a regular elk or deer tag and hunt nearly a month to fill that tag. Unit 23 – specifically The Rapid River canyon country – is one of the few places left in the world where that experience is still possible. The detrimental effects of motorized access into areas on the security of big game animals is well-documented with past research and scientific studies.

Thank you for the opportunity to voice our concerns and opinions on this subject. The Rapid River Canyon, with its abundant and healthy fish and wildlife resource, its beautiful scenery and unparallel muscled-powered, quiet and primitive recreation opportunities is not only loved and cared-for by our members, we live, and have invested our lives here. We thank you for your work to protect these beautiful lands and waters.

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