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Friday, March 26, 2021

New Meadows Ranger District
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via U.S. Mail
and via Facsimile: (208) 347-0309
and via Email: erin.phelps@usda.gov

RE: Rapid River Travel Management Project
Comments of Idaho Recreation Council on Environmental Assessment

Dear Ms. Phelps:

Please accept this letter as the official comments upon all matters related to the Environmental Assessment for the Rapid River Travel Management Project ("Project") now pending in the Payette National Forest ("PNF") and issued March 2021. These comments are submitted on behalf of the Idaho Recreation Council ("IRC") and its affiliated entities mentioned herein. The IRC may be contacted through undersigned counsel, or may be contacted directly at 501 Baybrook Court, Boise, Idaho 83706. Its Executive Director, Sandra Mitchell, may be contacted by telephone at (208) 424-3870.

Prior IRC Comments

We wish to incorporate and redirect the agency to the IRC comments provided by letter dated September 18, 2020 and previously delivered to the agency. Those comments express significant issues related to the invalidity of current management direction in this area, resulting in a faulty premise and "no action" alternative for this entire undertaking. Those comments further illustrate significant errors in the public information made available by the agency during scoping. Misinforming the public as to this history, and the conditions on the ground, and the trail numbers, results in incomplete public input and public input that is less meaningful. We are disappointed these errors were ignored and left uncorrected in the EA.

Comments on the Environmental Assessment

After years and years of work, discussion, collaboration, study, analysis and ground work involving IRC, USFS, Adams County and many other interested groups, it is extremely disappointing, and a source of great irritation, that this EA is what has been developed. It, quite frankly, utterly fails to restore historic, motorized use outside the WSR corridor to the fullest extent possible. A maximized motorized use alternative is not even provided, nor an alternative that expanded area and opportunity. Comments and suggestions of the State of Idaho, Adams County and user groups are simply ignored. If given only a choice between the proposed action, the motorized use alternative, and the non-motorized use alternative, IRC would clearly prefer the motorized use alternative. Unfortunately, it is the only alternative that does the most to restore historic conditions that preceded the WSR designation. There has been no demonstrated or proven basis to restrict historic motorized use outside the WSR corridor.

IRC fully supports construction of turnarounds **at the WSR corridor boundary** where trails intersect. IRC has pledged, and reiterates its pledge, to devote personnel and resources to assist the agency in implementing and constructing trail turnarounds, ford hardenings and other trail improvements in order to restore motorized use. IRC further pledges to assist IDPR and other agencies with trail maintenance activity going forward. There is no basis for the agency to refuse restoration of historic motorized access based on lack of available resources for implementation or maintenance where volunteer user groups are ready, willing and able to meet those needs.

The WSR designation, coupled with the agency's illegal application of an "emergency order" as a permanent use designation, has resulted in the loss of 25.7 miles of historic, motorized use. The proposed alternative restores only 2.3 miles. This is unreasonable. Restoration of the historic, motorized use should be maximized in this area. The motorized use alternative gets closer to restoration. The following would do better.

Indian Springs Trail 184 and Black Lake Trail 188. These trails lie within the WSR corridor and continue in areas outside the designated corridor. The IRC supports these trails being closed to motorized uses for those portions lying wholly within the WSR corridor. But, all areas outside the WSR corridor should be open to motorized use up to the corridor, topography for turnaround permitting. There are no pressing environmental or natural conditions threatened by such a condition.

Cub Creek Trail 362. IRC believes Cub Creek Trail 362 should be treated the same as the above trails lying partly within and partly outside the WSR corridor. No rational basis exists to treat this trail any differently than the others – that portion outside the WSR corridor should be open to motorized use. Simply because a route may be shorter than another is not a rational basis to close motorized use.

Additional Trails to Consider. We reiterate our request that the scope of this Project be expanded to also include Trail 229, Rankin Mill Trail 191, Frypan Trail 279, Rapid River Ridge Trail 178, and Lake Fork Ridge Trail 328. While none of these trails reach the WSR corridor, they are all interconnected with critical

motorized travel routes related to travel in the Rapid River area and **interconnect** in some instances with public road access. Collaborative groups assessing the area have always involved these trails in their discussions and there have been no presented environmental conditions that would hinder motorized use. We ask that the Project scope these additional trails for consideration as to being open to motorized use along their entire lengths.

Conclusion

A travel direction must be implemented immediately to restore historic, motorized uses in the Rapid River area that recognizes, appreciates and supports continued motorized recreation. This should be done now. IRC, IDPR, the agency and other interested organizations can then work together to implement improvements to accommodate the restored use. Restored use will lead to improved and better trails far quicker than waiting to reopen uses until improvements are made. Resources of the agency ought not be imposed as an obstacle to mixed use opportunities.

Thank you for the opportunity to comment. We trust that the above will be well-received and fully considered.

Very truly yours,



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cc: Sandra Mitchell, IRC, via email