## **NEZ PERCE TRIBE**



## **Department of Fisheries Resources Management**

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April 5, 2021

Erin Phelps, District Ranger New Meadows Ranger District Payette National Forest 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 Environmental Assessment ("EA") comments

Dear Ranger Phelps:

Thank you for the opportunity to comment on the Rapid River Travel Management Project EA and the action alternatives. Depending on the Action Alternative chosen, this decision has the potential to allow motorized use on National Forest System trails 183, 184, 187, 188, and 362 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").

The DFRM submitted scoping comments on the proposed action on September 17, 2020, which are incorporated by reference. We appreciate the Payette National Forest's consideration of our concerns about fisheries and effects from motorized travel.

Certain watersheds, like Rapid River, are so critical to water quality and fisheries that they should not be encroached upon by motorized activities, and for that reason we recommend the Non-Motorized Use Alternative identified in the EA. The importance of protecting the land adjacent to the Wild and Scenic Rivers ("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."<sup>1</sup>

Although we understand 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 the WSR corridor. As such, we suspect that some users will trespass, and establish trails, into and along the river, thereby having the potential for introducing sediment where it otherwise would not occur. Numerous trails such as the 183 to 187 and 184 to 362 currently connect in the WSR. As shown by the story map created for this project, most of the trails are in open grassland where it would be hard to discourage motorcycles from trespassing into the WSR corridor should individuals be inclined to do so.

Because Rapid River is currently functioning at risk for sediment/turbidity watershed condition indicator<sup>2</sup> and the uncertainty of the frequency of vehicular fording, it is important to remove the option for motorcycles from impacting this area. As mentioned in the EA, "Motorized fords can potentially cause a turbidity pulse every time the ford is used."<sup>3</sup>

We strongly recommend the non-motorized alternative to protect the fisheries and water quality of Rapid River.

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

Sincerely,

David B. Johnson, Department Manager

Cc: NPTEC

<sup>&</sup>lt;sup>1</sup> Hells Canyon National Recreation Area, House Report No. 94-607.

<sup>&</sup>lt;sup>2</sup> Rapid River Travel Management Project EA at 26.

<sup>&</sup>lt;sup>3</sup> Id. at 28.