



OFFICE OF
BOARD OF COUNTY COMMISSIONERS
ADAMS COUNTY
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Joe Iveson, Chairman
Mike Paradis, Commissioner
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Sherry Ward
Clerk of the Board
Phone: 208-253-4561

March 22, 2021

New Meadows District
Attn: Rapid River Travel Management Project
P O Box J
New Meadows, ID 83654

Dear Ranger Phelps:

The Commissioners would like to thank you for finally taking some action, through this project, to resolve a problem that we have been concerned about for more than ten years, as have a number of our constituents. Many have contacted your agency to discuss issues concerning the management of Rapid River, especially travel constraints. Your proposal deals with at least some of the concerns that we have expressed to the Rangers that have preceded you.

Adams County has always expressed support for managing Rapid River for a range of users, in particular assuring that motorized travel, and that recreationists continued to be allowed the use of trail motorbikes on the trails in and across Rapid River. That support was again expressed when the Forest Plan was being revised and again as the Travel Management Plans were developed. This occurred even without effort by your agency to gather that information. The County had sponsored a group of motorized vehicle users to develop a series of loop trails that tried to focus out of the Council much as was done on the southern Utah National Forests when they developed their motorized loop trails that return to small rural towns with facilities. This is why we prefer the implementation of the motorized alternative, slightly altered.

Rapid River area users, in large measure, come through the County's historical road to Black Lake. The use and dispersal of recreationists would be best served by the motorized trail alternative that is proposed in the EA for the Rapid River Travel Management project. As all ready explained, this has been the focal of the County's emphasis to the Forest Service in its management proposals. It ties with what the County has proposed around the Council area. It also supports the ever-expanding motorized recreation use on the County's land area, except on areas managed by the Forest Service that managed that portion of the Payette National Forest boundary. The County hopes that through actions allowed under law that they can expand the amount of motorized recreation uses on the historic routes that existed prior to the establishment of the Weiser N.F. in Rapid River.

A major consideration about the Black Lake Road, a major Rapid River access point, is the relatively short season of use that actually occurs. Large drifts of snow on the 112 road as it crosses "High Dive" is the reason. This natural closure mechanism controls much of the use to seasons when used by vehicles and others have reduced impact. Drift usually allows travel by July but may close the road before November.

There are areas of the project EA that have caused us some concerns or questions. Those follow.

1. Project Area Description- The legal land area description has some sections missing that are included in the map identified project area but, it also included areas not a part of the Payette National Forest.
2. Trail 187 – The trail depicted on both the EA project map, Closure Order/Map, and as described, does not compare to the Forest Map your agency sells to the public. It would also not fit with your MVUM which controls travel. Our constituents report that agency posted trail signs indicates that what you are calling Echols Ridge Trail 187 is in fact Trail 328 Lake Fork Ridge Trail. This creates a substantial law enforcement issue.
3. In the alternatives dealing with motorized trail use the language seems to indicate that the existing closure order to motorized use on specific trails would NOT be lifted until the trails that had a water crossing appropriately hardened with rock, etc. was in place. We object to the implications of this statement. Your agency is notorious for having insufficient funds, people, and/or time to complete the trail maintenance needs annually. Your provision statement could stall re-establishing use on these trails for years after our preferred alternative is selected. It should be removed.
4. Some of the wording on page 7 causes us to seek clarification. Mechanized equipment is restricted only in the Wild River corridor, correct? Yet you indicate a broader restriction in the Rapid River Roadless Area which is not a Congressionally created Wilderness area. We also understand that when you use the term motorized trails that term means 2 wheel motorized vehicles that qualify under Idaho Code as motorcycles that typically are used off highways, but that would also mean that electric bikes also fit the category? These standards would need to be displayed and described to be enforceable.
5. The rationale for stopping motorized use at a specific turnaround far short of the Wild River Corridor on some of the trails is not clear. The qualifying 2 wheel vehicles can turn in most places along the trail, often leaving the trail when approaching equestrians or other trail users. They can be parked in a variety of places near the trail. For that reason, the terminus of their travel should equate to somewhere very near the corridor, not nearly a mile away. Your agency had been advised by a trail bike riding expert for logical terminus points but, it appears that was ignored. We object to some of the terminus points.
6. On page 9 the terminus/connection for Rapid River trail 177 is with trail 229 at Lick Creek saddle.
7. The discussion about riparian conservation areas (RCA) management has been repeatedly interpreted by your agency in a variety of projects that, as members of the Payette Forest Coalition have agreed on those interpretations. On ground verification based on the vegetation and other indicators are necessary simply based on the definition. For that reason, field verification of the mapped indications is necessary to determine management requirements. That doesn't appear apparent in the statements.
8. The County is concerned that if the non-motorized alternative is selected by the Forest Service as the management direction that the continued trend by the agency for reduced commitment to trail maintenance and repair of the bridges across Rapid River would continue. The requirements of "wild" for the river corridor have already claimed 2 costly bridges and will probably never restore any of the other 6 bridges that were present along the river, allowing passage without dangerous fording. The differential interpretation of rules about motorized and who and for what reason it is allowed is almost mind-numbing and confusing. We believe potential users will suffer. Without some heavy maintenance requiring motorized equipment, the river will continue to redirect some of its flow onto Trail 177 simply because it is poorly located in the floodplain of Rapid River. Such diversion and retrenchment create sediment which influences the important water quality assigned by the Act to this river. Trail 177 should be analyzed for relocation to a higher elevation to reduce sediment placement into the river. Relocation should be a top priority.

The Commissioner's wish to continue to be involved in the management of the Payette National Forest as it occupies over 60% of Adams County. That causes significant effects on our county's citizens. Thank you for considering and responding to our comments.

Respectfully,

Board of Adams County Commissioners

By: Joe Iveson
Joe Iveson, Commissioner

By: Viki Purdy
Viki Purdy, Commissioner

By: Mike E. Paradis
Mike E. Paradis, Commissioner

