

**From:** [Phelps, Erin -FS](#)  
**To:** [Bennett, Rita -FS](#)  
**Subject:** Fwd: [External Email]Rapid River Travel Management  
**Date:** Tuesday, April 6, 2021 5:58:38 PM  
**Attachments:** [GHCC Rapid River TM EA Cmts 4.6.2021.pdf](#)

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**From:** Veronica Warnock <veronica@hellscanyon.org>  
**Sent:** Tuesday, April 6, 2021 5:53:14 PM  
**To:** Phelps, Erin -FS <erin.phelps@usda.gov>  
**Subject:** [External Email]Rapid River Travel Management

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Hi Erin,

I just went to submit our comments through the electronic portal and saw that it was closed. I swear the message on cara said comments would be accepted through the 6th but after calculating the date based on the legal notice see that the comment period closed yesterday.

While these are being submitted after the close of the official public record I hope that you will give them full consideration especially since they are being submitted so close to the deadline.

Thanks!

Veronica Warnock  
Conservation Director  
Greater Hells Canyon Council

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April 6, 2021

Ms. Erin Phelps  
New Meadows District Ranger  
Payette National Forest  
P.O. Box J  
3674 Highway 95  
New Meadows, ID 83654  
(208) 347-0300

Electronically Submitted Via Email: [erin.phelps@usda.gov](mailto:erin.phelps@usda.gov)

Dear Ms. Phelps:

I am writing on behalf of the Greater Hells Canyon Council (GHCC) to provide comments on the Rapid River Travel Management Project. GHCC is a non-profit conservation organization based in La Grande. Our mission is to protect and restore the inspiring wildlands, pure waters, unique habitats and biodiversity of the Hells Canyon-Wallowa and Blue Mountain Ecosystems through advocacy, education and collaboration, advancing science-based policy and protective land management. GHCC has a long history of involvement with Rapid River Travel Management planning including being a party to the 2009 litigation and subsequent settlement. That settlement agreement brought travel management in the Rapid River drainage into compliance with the Wild and Scenic Rivers (WSR) Act and the Hells Canyon National Recreation Area (HCNRA) Act and for over a decade has protected the many outstanding resource values (ORV) in the Rapid River drainage.

When Congress established the HCNRA, it also recognized that the Rapid River was deserving of special protections. Section 3(a)(11) of the HCNRA Act specifically designated the Rapid River as Wild. ORVs for the Wild Rapid River worth protecting or enhancing were identified through a resource assessment. These ORVs are water quality and fisheries, scenery, and traditional and cultural resources. Motorized recreation is not an ORV of the Wild Rapid River.

We ask that the Forest Service continue to protect the Wild Rapid River's ORVs and adopt the Non-Motorized Use Alternative for the Rapid River Travel Management Project. This is the only alternative that will continue to protect the ORVs identified for the Rapid River. Although the proposed action does not allow motorized traffic within the Wild and Scenic River (WSR) corridor, the proposed action would allow motorized use on trails that lead to the edge the WSR corridor, thereby encouraging trespass and inviting potential conflicts to the values for which the river was preserved.

The Forest Service has a very limited ability to prevent motorcycles from entering and accessing historic trail connections or user-created trails. This is a very remote and rugged area and enforcement resources are already spread thin across all National Forests. Past experience has



shown that voluntary adherence to "motorized closure" policies such as this in remote areas simply don't work without adequate enforcement. In fact, many of the submitted scoping comments note ongoing issues with motorcycle riders not obeying the current trail closures and non-motorized access rules within the project area.

The HCNRA's 2003 Comprehensive Management Plan (CMP) and Payette National Forest's 2003 Land and Resource Management Plan (LRMP) recognized the need to protect the Wild Rapid River, the Wild Rapid River's protected river corridor, and the Wild Rapid River's surrounding watershed because of the importance of the Rapid River fishery and the clean water it depends on.

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". HCNRA CMP FEIS Appendix K pg. k-8

The Rapid River is considered an aquatic stronghold for [chinook salmon, steelhead, and bull trout]....The Upper Rapid River and Copper-Castle subwatersheds have strong populations, excellent watershed conditions, and associated aquatic habitat that serve as conservation pools to assist in recovery of listed fish species. Payette LRMP at 111-141.

The importance of the Wild Rapid River watershed was also recognized by the Final Environmental Impact Statement (FEIS) for Idaho Roadless Rule.

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... 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. Appendix C The Roadless Area Conservation FEIS Appendix C at. C4-207.

Opening up motorized trails right up to the edge of the WSR corridor will further encourage violations of motorized traffic entering the WSR corridor, thereby degrading the ORVs of fishery and water quality. There are plenty of other motorized recreation opportunities in the area and the new motorized trails proposed by the Proposed Alternative and Motorized Use Alternative are not the loop trails preferred by the motorized recreation community.

Adopting the Non-Motorized Use Alternative and continuing to emphasis non-motorized travel within the Wild Rapid River corridor and throughout the adjacent watershed is the only alternative that will protect water quality and fisheries, traditional and cultural resources, and honor Congress' intent when it designed the Rapid River as Wild when it established the HCNRA. Further, it would provide non-motorized recreation and backcountry hunting

opportunities and protect important core wildlife habitat and the critical connectivity corridor the drainage provides between the Blue Mountains and the Rocky Mountains.<sup>1</sup>

Thank you for the opportunity to participate in this planning process and for your review of these comments. GHCC looks forward to working with the district as this project progresses. Please do not hesitate to contact me with any questions.

Sincerely,

/s/

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<sup>1</sup> The southern end of the (Hells Canyon National Recreation Area) represents an ecological corridor that ties forested habitat in the Wallowa and Blue Mountains to forested habitat of the Rocky Mountains. This forested link is unique; similar forested corridors do not exist between the two mountain ranges. This corridor could be important for genetic exchange for plant and animal species as well as for recolonization of forest habitat species. HCNRA CMP FEIS at FEIS. 3-131.