

## Rapid River Travel Management Comments

- Page 2. “**Echols Ridge Trail 187** from the junction with trail 328 to the junction with trail 177 (two miles);

I will start out by correcting an incorrect name. The name “Echols” should be spelled “Eckels”. For whatever reason it is misspelled on all the maps. It was originally named for a miner by the name of Billy Eckels. The correct spelling is labeled on historic maps.

The signs on location actually list this trail as the “Lake Fork Ridge Trail”, not the “Echols Ridge Trail” and the trail number is actually #328, not #187. Trail #187 is the “Echols Butte Trail” (correct spelling, Eckels). Trail #187 runs from its intersection with trail #362 (R1W, T21N, Section 19) around Echols Mountain (correct spelling, Eckels) to its intersection with the Black Lake Road #112 (R2W, T21N, Section 15).

I have barely gotten started and you can see how confusing such a document could be to a new visitor to the area or to someone that does not know the history. It appears like the forest service does not know the area or the history either, otherwise these errors would not exist. Anytime these errors have been pointed out to the forest service in the past the information has fallen on deaf ears. Whether they are following the path of “cancel culture” or do not have the motivation it takes to correct these issues, I do not know. However, I do not think it is right that the forest service makes decisions on a place they know nothing about.

- Page 2. “**Cub Creek Trail 362** from the junction with trails 328 and 517 to the junction with trail 177 (1.1 mile).”

As stated above, trail #328 is mislabeled on the map. This should read, “from the junction with trails 187 and 517 to the junction with trail 177 (1.1 mile).”

### 1. Page 2. **Project location**

The project is approximately fifteen miles northwest of New Meadows, Idaho in Adams County. The legal description is: Township 21 North, Range 1 West, Sections 3-10; Township 21 North, Range 2 West, Sections 1, 2, 12, 13, 24, 25, and 36; Township 22 North, Range 1 West, Sections 2, 10, 11, 14-16, 21, 22, 27, 28, and 31-34; Township 22 North, Range 2 West, Sections 35-36. The project area is approximately 13,838 acres in size and is within the following designated areas (figure 3 and figure 4):

The project location has added R1W, T22N, Section 2, which is located within the Nez Perce National Forest and is not included in the project boundary. This description is also missing a large part of the project location. R1W, T21N, Sections 16-21 and 28-32 need to be added to the description of location. This is the location that contains a portion of trail #183 and the entire length of 184 and 362 that is being considered for change.

Map reading should be something that all forest service employees understand.

2. Page 5. The project boundary on the map on page 5 does not match the legal description given on page 2 under "Project Location".
3. Page 6. The project boundary on the map on page 6 does not match the legal description given on page 2 under "Project Location".
1. Page 7. **Proposed action alternative** —This alternative would designate 23.4 miles of trail as *open to foot and horse traffic only* and 2.3 miles of trail as *open to motorcycles*. The alternative also includes the construction of two motorcycle turnarounds.

If this was not totally bias and was an actual "environmental assessment" that was constructed by people that truly cared about the area, they would have taken into consideration the sediment and potential e. coli that is being delivered into Rapid River from stock usage. There are sections in all the trails in Rapid River that have suffered from rutting caused by stock traffic. There are rutted sections of trail #177 that lie within the corridor that has loosened material that is delivered directly into Rapid River. Hardened fords have been made mandatory on certain trails if motorcycles are allowed to continue to use the area. I don't see anything mentioned about constructing hardened fords for the 5 crossings along the length of trail #177. These crossing don't just cross small side streams, they cross the main Rapid River. There are numerous other side stream crossings that have not been taken into consideration where stock is concerned. It's almost like we are talking about unicorns here.... Because even where the forest service has located

fords that will need hardened if motorcycles continue to use the area, they have not taken into consideration the amount of turbidity pulse generated by stock on those exact same crossings.

If you go back to page one you will see that the forest service takes any kind of discrimination very seriously, well, except in the case of motorized use. Then they bow down to the selfish, whining, once in a lifetime user and their temporary friends the envirowienies and anyone else that signs a form letter. While we are on the subject of discrimination, my Honda has started identifying as an Arabian Stallion that goes by the name Huckleberry. Let's not get confused and throw a tantrum when you see him on a trail, that would hurt his feelings!

1. **Page 7. Motorized use alternative** —This alternative would designate 19.1 miles of trail as *open to foot and horse traffic only* and 6.6 miles of trail as *open to motorcycles*. The alternative also includes the construction of five motorcycle turnarounds and eight hardened fords.

The construction of 5 motorcycle turn arounds would not be necessary at the locations chosen by the forest service. These are flat areas that would need no soil disturbance. This terminology was obviously relevant only in the case of bias and only when trying to make a case against motorized use. The 8 hardened fords only apply to motorcycles, because unicorns, I mean horses, walk on water and do not add sediments to the water when they cross streams and wet areas.

1. **Page 7. Non-motorized use alternative** — This alternative would designate 25.7 miles of trail as *open to foot and horse traffic only*. It would essentially be an administrative change, as it would be the same trail use designations as the existing condition (table 5). No activities other than trail use designation are included under this alternative.

Now we are talking about a true paradise!!! One where only unicorns and fairy tales exist. Let's not forget that horses weigh anywhere from 800-2200 pounds. Trail tread suffers greatly from such use and the result is sediment delivery into Rapid River. Remember this is Rapid River, with its "outstanding remarkable water quality" and its "outstanding remarkable fisheries value"! Anyone that is not truly bias and cares at all would take into consideration that stock traffic creates as much or more erosion than motorcycles. Deep rutted stock trails can also harm the character of the area.

“Consistent across the alternatives, trails within the Wild River corridor would be *open to foot and horse traffic only* in order to comply with 36 CFR 292.44(b)(2). There would not be any motorized use within the Wild River corridor under any alternative.”

If I remember correctly there is something in the “wild river act” that says something about there not being anything within the high water mark that impedes the wild flow of the river.... I guess bridge abutments and gabion baskets within the high water mark of Rapid River don’t count as impoundments. Or maybe the forest service is overlooking that ugly little detail.

“**Wild River Areas** – Those rivers or sections of rivers that are **free of impoundments** and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.”

The quote below came directly from a forest service website.

“The Forest Service works with the public to ensure that the free flowing condition, water quality, and outstandingly remarkable values of these rivers are protected from overuse, **instream developments**, and other impacts that do not enhance these values.”

I guess when you are as bias as the forest service, there are exceptions to the rules.

## Turnarounds

Turnarounds would be constructed where trail use designation would change from *open to motorcycles to open to foot and horse traffic only* under the proposed action and motorized use alternatives. Turnarounds would be located outside of the Wild River corridor. The non- motorized use alternative does not include turnarounds because changes in designated use would occur at existing trail junctions.

The turnarounds would assist with accommodating motorcycles and designated trail use compliance. We would also consider installing gated openings and signage at the turnarounds to assist with designated trail use compliance. Turnarounds would be completed before lifting order 0412-401. (Project design feature 4)

Trail turn around locations for motorcycles, whether they are randomly located along a trail’s length or at a trail junction, should be created equal. When trail junctions were originally created, they were at random places and there were not 10’ x 10’ areas excavated to accommodate turning a motorcycle around. The point I am trying to make is that turn around locations at the ends of the motorized alternative trails were looked at closely to minimize any “construction”. Construction should actually be non-existent at the points chosen by the forest

service, but it seems like they have added the word “construction” to the terminology to help scare people into thinking there will be soil disturbance, erosion and sediment delivery into Rapid River. I doubt that the forest service even looked at the trail junctions to see if they were safe turn around points or if they needed any turn arounds constructed. There is no such documentation in the environmental analysis that I could find. So, tell me, is the 191/188 junction a safer turn around than the proposed turn around at the end of the motorized alternative for trail 188? How about the 187/328 junction, is it safer than the turn around proposed on trail 328? Or the 362/187 junction, is that a safer turn around than the one in the motorized alternative for trail 362? Let’s not forget about the 184/178 junction, is that safer than the motorized alternative turn around for trail 184? And last but not least, is the 178/183 junction safer than the motorized alternative turn around for trail 183? The forest service has chosen to make turn around points at the junctions without considering whether they need constructed for safety or not.

Let’s use Fry Pan Trail #279 as an example for motorcycle turn arounds. Before the last travel plan change the motorized turn around was located at the corridor boundary and there was a sign there that said, “no motorized use beyond this point”. There was not a 10’ x 10’ turn around at this location. After the latest travel plan change more of trail #279 was closed to motorcycles. The turn around for motorcycles was moved back up on top a ridge and there was still no consideration made for “constructing” a turn around. So, tell me, are these the shortcomings of our transient forest service employees that are only here for a few years and leave for greener pastures and higher paying jobs, that don’t know the area or the history? Or is there terminology being used here that’s sole purpose is to help further their agenda? The way this EA reads, I would say both would be correct assumptions.

Page 8. There is a small possibility that live and/or standing tree removal may occur on a limited basis during turnaround construction under the proposed action and motorized use alternatives (project design feature 5). However, as demonstrated by figure 5, this would not likely occur as there are locations available that would not need tree removal. Incidental tree removal is an activity allowed by the Idaho Roadless Rule at 36 CFR 294.24(a)(2) because the tree removal would be incidental to the implementation of a management activity not otherwise prohibited by the rule (36 CFR 294, Subpart C).

If turn around locations were looked at with any real concern regarding tree removal than they could be placed in an area where this should not be a concern. Did the forest service not look at these locations with that in mind? Or are they

being bias and throwing out terminology that paints motorcycles and the motorized alternative in a bad light?

In 2017 I signed a volunteer agreement with the forest service to locate possible turn around locations on all the trails in question, outside the corridor. At the turn around locations that I took a gps coordinate for, there was to be no tree removal. There should have been several locations along the lengths of these trails with turn arounds that don't require tree removal. Why then, would tree removal at turn around points be in question, but turn around locations at trail junctions not be? Probably because it doesn't fit the narrative, and the construction of turn around points at trail junctions would cause someone a little extra work.

## Page 8. **Hardening fords**

Here we go again with the forest service's hate for murdercycles and their love affair with unicorns. If there is to be any motorcycle use on the motorized alternative, they are saying that hardened fords will need to be constructed. In the other alternatives, they are not proposing any hardened fords be constructed. In fairy tale land, unicorns don't loosen the soil or add sediments into streams. In the real world, horses do as much or more damage to trails than motorcycles. Why is the forest service not worried about sediments being delivered into Rapid River from stock use like it is for motorcycle use? Aren't these the exact same sediments?

## Page 9. **Rapid River Trail 177**

The forest service needs to take into consideration the proximity of trail #177 to Rapid River. The entire length of trail #177 is within the corridor and has several crossings that do not have hardened fords. The trail is located so close to the river that it delivers sediments to the river that hurt the outstanding remarkable water quality and fisheries of Rapid River. With the collapse of the large bridge over Rapid River at the bottom of trail #183, stock traffic has pioneered a trail below the bridge. Both approaches to the ford they have created are extremely steep and have significant erosion that is washed directly into Rapid River.

When this bridge was originally damaged by a fallen tree, it could have been repaired. Since the forest service did nothing about it, it collapsed under the snow load. The forest service's failure to remove fallen trees located directly upstream

from the bridge caused the river to wash around the west abutment. This abutment which was backfilled with several yards of native material were subsequently washed into the river. During the Wesley Fire in 2012, this bridge was wrapped in foil to help prevent it from burning. The cost to the tax payers for this fire was \$18.3 million, evidently the forest service decided to save us a few bucks by leaving the foil wrapping to naturally biodegrade, it is still littering the area today and is falling off into the river.

Just downstream from this immense failure of the forest service, is the Lake Fork Creek bridge which has been laying in the creek after it collapsed under the snow load in 2008. This bridge is located within the corridor and only a stone's throw from Rapid River itself. Stock traffic has also pioneered a new trail below this bridge which directly channels sediments into Lake Fork Creek and into Rapid River. There is also pressure treated lumber laying in the creek that has slowly seeped into the water. This greatly reduces the remarkable outstanding water quality and remarkable outstanding fisheries value.

After the last travel plan change the forest service approached myself and one of the Adams County Commissioners about writing a letter of support for a grant that would provide the funding for a kiosk, bridge and gate at the head of trail #191. The new bridge was to be constructed over Lake Fork Creek approximately 4 miles above Rapid River. We both agreed to write a letter of support for the project under the agreement that the forest service would repair the lower Lake Fork bridge that I just mentioned. The forest service received the grant money for the kiosk, upper bridge and gate, and installed them. It has been over 10 years since this project was completed and there has not been a finger lifted to repair or replace the lower Lake Fork Creek bridge.

In the EA it states that both the Lake Fork Creek bridge and the Rapid River bridge both failed because of high water. That is an absolutely false statement made by people that have no idea what happened to either bridge. Which further reinforces my belief that the forest service does not know the area, the history of the area or cares about the area. These people don't have the qualifications it takes to pull weeds out of a garden, yet they have been placed in charge of millions of acres of public lands throughout the country.

In 2017 under a volunteer agreement with the forest service I located a trail turn around on top of a ridge that was .34 miles from Rapid River. This turn around point was flat and would facilitate a good safe turn around point for motorcycles and would not have required any “construction or tree removal”. Under the bias proposal made by the forest service the turnaround location was located approximately 1.7 trail miles from Rapid River. There is no other reason for their moving the turn around point up the trail, other than to shorten its length to motorcycles.

During my reconnaissance of the trail, I located yellow toadflax and made it a point to gps its location so that information could be relayed to the forest service. As far as I know, nothing has been done to try to contain the spread of that noxious weed. I would be willing to bet that there is no one in the forest service that even knows the location of that noxious weed?

#### 1. Page. 10 **Indian Spring Trail 184**

There is no reason to not allow motorcycle traffic on trail #184 outside the corridor. There is a bridge that crosses Sinking Creek so there would be no issue with motorcycles adding sediments to the stream. As it is, the stock traffic is not using the bridge and is crossing below the bridge. This is adding sediments to the stream, but evidently, they are forest service approved sediments, so it's okay.

The bridge on trail #184 was actually built by TEAM “Trails for Equal Access Management” (a motorcycle group), in cooperation with the forest service. The forest service had the bridge material flown in, it was dropped in the wrong location, but was retrieved and assembled in the proper location by the volunteers.

After the Bear Tornado in June of 2006, I was instructed by the forest service that there was to be **no** trail work done on trail #184 where the tornado crossed it and laid down several hundred trees. In 2007, without the cooperation of the forest service some volunteers and I reopened trail #184 for all to use. This led me to believe that the forest service at the time, did not want motorcycles on the trails in Rapid River and they were going to use the tornado as a management tool. One year before the last travel plan change some volunteers and I attempted to adopt several trails in the Bear Creek and Rapid River area. Because a couple of the trails we were wanting to adopt were in review for change in the travel plan, we were denied the volunteer agreement. It didn't matter that we were willing to assist in trail maintenance that would benefit everyone. The forest service did not



want motorcycles in the area, so they denied the use of good free labor. I still have the original letter that denied our willingness to help. Those 2 blatantly bias excuses, coupled with this EA reassures to me that the forest service does not have a good reason for closing the Rapid River trails to motorcycles.

In 2017 under a volunteer agreement with the forest service I located a good turn around for motorcycles on trail #184. It was located outside of the corridor and not within a riparian conservation area (RCA). The turn around would not have required any "construction or tree removal" and was located on a flat ridgetop. In the motorized alternative that the forest service came up with, they located a different turn around and placed it within an RCA. Ignorance or a non-motorized agenda would be the only reason for locating this turn around in an RCA when there were other options, or perhaps because they waited until November of 2020 to actually do any assessment work, it was too late to revisit the area and locate the turn around in a different spot.

1. Page 10. **Echols Ridge Trail 187**

This trail is listed as trail #328 on the ground and on several maps. It is also called the "Lake Fork Ridge Trail" on the signs, not Echols Ridge Trail. Anyone that did not know this area could easily become confused and lost and all because the forest service has failed to fix this issue, even though it has been pointed out to them numerous times in the past.

The proposal by the forest service would allow this trail to stay open for a little over a half mile. I feel like I should be getting on my knees and kissing their feet! Oh, thank you, thank you! What's the point, why even open it at all? Or is that the point, open it a half a mile and no one will use it anyhow, it never got over 6 motorcycles on it in a year anyhow. This entire trail, outside the corridor, is located on a dry ridge. There is no reason to not place the turn around near the corridor at another convenient location. Under a volunteer agreement I had with the forest service in 2017, I located a good turn around on this trail outside the corridor that allowed motorcycles to access more of the area. It would not have required any tree removal and little to no soil disturbance. A little soil disturbance on a dry ridge outside the corridor would not have hurt anything.

1. Page 10. **Black Lake Creek Trail 188**

With this trail being an historic road that extends down Lake Fork Creek and onto a portion of what is now trail #177, there is no reason it should not be open to the corridor for motorcycles. Taking into account the volunteer efforts that were put into this trail by TEAM “Trails for Equal Access Management”, in cooperation with the forest service, is another reason why this trail should be left open. The governor and secretary of the interior both acknowledged the hard work done by the volunteers on this trail by presenting them with a “Take Pride in Idaho”, “Take Pride in America” and a “Certificate of Cooperation” awards. These awards should still be available to view at the New Meadows District Office. If not, they were probably thrown in the trash as part of “cancel culture” and their agenda to remove motorcycles from Rapid River.

During the Wesley fire in 2012 the forest service let one or more of the footbridges along this trail burn. They have not mentioned the fact that these bridges burned. The transients currently in charge may not have known that these bridges even existed. In any case, I would say they are pushing their agenda on this trail as well.

If this is to remain a trail in the future, the fords that have been required under the motorized alternative should be required for horse travel as well. Horses have caused more erosion and sediment delivery in Rapid River than motorcycles ever have and ever will. If the turn around for this trail is located in the correct location, it would not require any “construction or tree removal”.

Under a 2017 volunteer agreement with the forest service, I located the turn around for this trail just outside the corridor. At that location it would not have required any “construction or tree removal”.

## Page 11. **Cub Creek Trail 362**

Long live the Queen, for she hath given us a 6 tenths of a mile alternative!!! This trail should also be left open to its intersection with the corridor. Under a 2017 volunteer agreement with the forest service, I located a turn around on this trail that was outside the corridor and required no “construction or tree removal”.

1. Page 11. If the motorized use alternative is selected, additional heritage surveys will be conducted at the turnaround on trail 362 prior to implementation and the Idaho State Preservation Office will be notified of the findings.

Why, if you are ¼ mile **outside** the corridor would it be necessary to waste the money to do a heritage survey? Is this plan “B”, for never allowing motorcycles on trail #362 again?

While taking this into consideration, the forest service should not allow any motorized tools for trail work until a complete heritage survey can be done on the entire corridor. Allowing indiscriminate use of motorized tools could lead to them being used inside the corridor where they are not allowed. Even when used outside the corridor and within a certain distance of the area, noise pollution would harm the remarkable outstanding value that is emphasized within the Rapid River drainage.

1. Page 11. An implementation plan would be developed to prioritize implementation of activities directly tied to the opening of trails to motorcycle use before rescinding order 0412-401 (e.g. turnaround construction, hardening of crossings, installation of signage, and performance of routine maintenance within the trails opened to motorcycle use).

Considering the forest service has not performed any “routine” maintenance on these trails in over 10 years, it is likely that with any implementation at all, these trails will never be ridden by motorcycle or used by the recreating public again.

1. Page 11. Turnarounds would be located on stable, well-drained areas with gentle side slopes. Turnarounds would not be located immediately adjacent to streams. Excavation and turnaround size would be minimized. Tree removal for turnaround construction would be avoided to the extent possible and would only occur on a limited basis, if necessary (36 CFR 294.24(a)(2)). Tree removal for turnaround construction would also be avoided in riparian conservation areas, but if necessary, would be designed to comply with forest plan standard SWST10. Avoid whitebark pine during turnaround construction.

“immediately adjacent to streams”, is that a technical term that is accompanied by a specific measurement or is that a term loosely used that means, anywhere we see fit? The only proposed turn around that was located in an RCA, on trail 184, by the forest service, did not have to be located there, they had other options.

Page 12. Figure 6.

The trail numbers on this map do not match the trail numbers on the ground or the trail numbers on my maps. The legal description of the project area does not match the boundaries on this map.

Page 13. Figure 7.

The trail numbers on this map do not match the trail numbers on the ground or the trail numbers on my maps. The legal description of the project area does not match the boundaries on this map.

Page 14. Figure 8.

The trail numbers on this map do not match the trail numbers on the ground or the trail numbers on my maps. The legal description of the project area does not match the boundaries on this map.

Page 15. **Table 2. Issues which informed alternative development and were carried forward for detailed analysis**

It appears like modifications were made based on these comments.

Maintenance of water quality outstanding remarkable value <sup>3</sup>	Motorized use may threaten the ability of the Rapid River Wild River corridor to maintain its water quality outstanding remarkable value.	Modification of proposed action; development of non-motorized use alternative	Water quality
Maintenance of fisheries outstanding remarkable value	Motorized travel adjacent to the corridor may impact the ability of the Rapid River to maintain its fisheries outstanding remarkable value, and may impact spawning habitat for Endangered Species Act listed chinook salmon, steelhead and bull trout, and degrade habitat for (Region 4 sensitive) Westslope cutthroat trout.	Modification of proposed action; development of non-motorized use alternative	Fisheries

But yet the forest service has this to say on page 29

“Incremental increases in sediment and turbidity may occur at and immediately downstream of the proposed fords. However, transmittal of sediment downstream to fish habitat or to the Wild River corridor is not anticipated due to the distance from fish habitat, small stream size, and short duration of any sediment pulse from a motorized ford. Any potential increase in sediment or turbidity in fish habitat is expected to be negligible.”

They have made changes based on people’s assumptions. Even when the forest service says that “any potential increase in sediment or turbidity in fish habitat is expected to be negligible”. If your opinion matches that of the forest service, they will value your comment and make changes to further their agenda.

Let's not forget that horse traffic will cause as much or more sediment or turbidity as motorcycles! Yet, that is not taken into consideration because it does not fit the agenda.

Page 15.

Impacts to the non- motorized experience	Allowing motorized and mechanized recreation in the Rapid River area will impact the experience of the area sought by non-motorized and non-mechanized users and change the character of the area.	Modification of proposed action; development of non-motorized use alternative	Recreation
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Let's not forget that all these trails were open to motorcycles in the past. If people want a wilderness experience, let them go to the wilderness. Non-wilderness areas should be equally divided and open to multiple forms of recreation, including motorcycles.

Page 16.

Loss of motorized recreation opportunities in the Rapid River area	Designating the trails as closed to motorcycle use will result in the loss of motorized recreation opportunities and limit the ability of those users to experience the Rapid River.	Development of the motorized use alternative	Recreation
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This is a joke! The forest service developed a motorized use alternative only because they had to in order to make it appear like they were trying to be impartial. In doing so they still closed valuable trail miles to motorcycle riders which will limit their recreation opportunity and limit their ability to access different areas. Even if the forest service does adopt the motorized alternative, the trails will probably still remain closed because their opening hinges on work that needs preformed before they will allow them to open. Judging by the work that the forest service has done in Rapid River over the last 10 years we can expect the trails to continue to degrade, more trash to pile up and more bridges to collapse and never be repaired. Opening these trails will be the very last thing on their list.

Out of the 6 topics that were chosen for analysis, only one of those was chosen that supported motorized use. This is completely bias and put together to further the forest service's agenda to end all motorized use in Rapid River.

Page 16.

Trail maintenance	Increased motorized use will require more trail maintenance and repair, which the Forest Service will not be able to keep up with. Therefore, there would be an increase in poor trail conditions if the trails are opened to motorized use.	Modification of proposed action; development of non-motorized use alternative	Recreation
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This is a good one too! In the last 25 years I have not seen the Rapid River trails in so much need of maintenance and repair as they have needed over the last 10 years, since closing them to motorcycles. When they were open to motorized use there were volunteers performing maintenance as well as the Parks and Recreation. Since being closed to motorized use the forest service has been left with the sole responsibility of maintaining the trails and they have failed miserably! Motorized use allows for quicker and easier maintenance of trails and motorcycles do not cause any more erosion than horses do. I challenge anyone to point out any section of trail that has been open historically to motorized use that has been eroded worse than the non-motorized use trails, and prove that it has been caused by motorcycles. If there had been more of a thorough look at the historic maintenance on these trails, the forest service would have found in the parks and recreation records and volunteer records, that when open to motorized use these trails were in far better shape than they are now. Motorized use would improve these trails, not degrade their condition.

Page 16. Table 3 summarizes those issues which have been eliminated from detailed analysis. Issues were eliminated because they were adequately addressed through project design; were already addressed by law, regulation, or policy; or were irrelevant to the project (e.g. lacked a cause-effect statement; beyond the scope of analysis, or were a matter of opinion) (40 CFR 1500.4(c) and (g)). Additional information is in the draft forest plan consistency review (project record exhibit 01- 01).

It says in the above statement that certain issues have been eliminated from detailed analysis because of several things including, “a matter of opinion”. Yet the forest service did a detailed analysis on this opinion-

“Increased motorized use will require more trail maintenance and repair, which the Forest Service will not be able to keep up with. Therefore, there would be an increase in poor trail conditions if the trails are opened to motorized use.”

If the forest service wasn't trying to push a bias agenda, it would have been easy to prove this was an opinion and contained no facts! Yet they chose to include it for detailed analysis. In fact, most of what I see listed for reasons that would eliminate motorized use is opinion only and there are no facts to back them up. The forest service has contradicted their reasons for closing these trails when they go on to say that sediment delivery and turbidity would be negligible in fish bearing streams. Erosion and sediment delivery are the only issues that could factually support the elimination of motorized use in Rapid River and the forest service has failed to prove that that is an issue.

Change from historic use	The area has a long history of motorized use, which should not be ignored or restricted.	Addressed by law, regulation, or policy. Motorized use inside the Wild River corridor would be in violation of 36 CFR 292.44(b)(2). Previous travel management decisions disclosed the impacts of changes from historic use outside the Wild River corridor.
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The fact that Rapid River has had extensive historical motorized use has been completely brushed under the rug by the forest service. Eliminating motorcycles from the corridor was not enough for them, so they restricted them even farther in a motorized alternative and even farther in their proposal. This comment did contain some facts but was not taken into consideration and the forest service came up with a couple of excuses as to why it would not need detailed analysis.

Page 17 & 18. The potential for increased erosion was eliminated from detailed analysis because potential effects were addressed through project design (e.g. hardening of fords). Any existing erosion issues are part of the existing condition and would be addressed with trail maintenance outside of this project. Motorized use adjacent to trails would be addressed through enforcement of the motor vehicle use map, which is outside the scope of this project.

The potential for sediment delivery that may result from motorized use is addressed through the fisheries and water quality analyses.

This statement supports the idea that the forest service has made their proposal based solely on personal opinions that do not contain any facts. This issue was not taken into consideration because they could not produce the data that it would take to eliminate motorcycles based on sediment delivery or erosion.

The entire EA sounds like it was put together by 15 different people, 2 of which supported the document with facts and 13 that gave their opinions and were allowed to make decisions based on those opinions.

Trail maintenance	Routine trail maintenance and management activities in this project, such as installing signage and erosion control, could occur outside of this project, as appropriate under a categorical exclusion. Trail maintenance and management activities would meet Forest Service Trails Management Handbook direction (USDA Forest Service 1991) and each trail's trail management objectives (project record exhibit 07-02).
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This is rather vague? I would assume that this would include trail maintenance for only the trails that are being looked at within the EA boundaries. Installing signs

and erosion control will need to take place no matter what alternative is chosen. The forest service appears to have made up an excuse as to why they would not address this issue, when it is a legitimate concern.

Page 20. Table 5.

Trail #328 has been mislabeled as trail #187 in this table. Even if it was not, not all of trail #187 is currently closed to motorized use. This is a reoccurring problem that needs to be fixed.

Page 21. Table 6.

Assumption	Possible increase in visitation to the project area because of additional 2.3 miles of trail newly <i>open to motorcycles</i> .  Possible decrease in foot and horse traffic because some hikers/runners and equestrians may choose to avoid trails open to motorcycle use.	Same as proposed action, but to a greater extent (impossible to quantify).
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Since we are making assumptions, let's assume that with increased motorized traffic maintenance would be easier and faster. Which would lead to improved trail conditions and increase the amount of foot and horse traffic. If you haven't noticed, some of the most well-maintained trails on the forest are the ones that get used the most.

Page 21. Table 7.

“Trail bridges High water caused two trail bridges within the project area (the bridge over Rapid River near the junction of trails 177 and 183 and the bridge over Lake Fork Creek on trail 177) to collapse. It is unknown if these bridges may be replaced.”

This is a false statement and if the forest service had any connection with Rapid River at all they would know that high water was not the reason for the failure of these bridges. Snow load crushed the Lake Fork bridge. The Rapid River bridge was hit with a snag that slightly buckled it, that combined with snow load over the next couple years caused it to fail. The large expensive Rapid River bridge could



have been repaired when it received the initial damage from the fallen tree, but was never made a priority and subsequently collapsed under the snow load. Both of these bridges still have solid abutments which proves the fact that high water did not cause them to fail. Rapid River washed around the west abutment of the Rapid River bridge and made it unable to be used. This was caused by fallen trees that were laying in the river directly above the bridge. This too could have been fixed if the issue had been addressed by the forest service. Their lack of maintenance in the area has caused the trails and bridges to become unusable and has increased the sediments delivered into the river. Not to mention the garbage foil that is hanging off the Rapid River bridge is an eyesore. If any member of the public had left this litter laying around, they would have been written a citation (unless it was left by someone riding a horse). Our wonderful forest service is obviously above the law.

Page 26.

Heaven's Gate Wilderness Adventures special use permit activities	Heaven's Gate Wilderness Adventures, LLC most recent permit was issued in 2018 and authorizes outfitting and guiding for ten years. They are authorized for 750 priority use service days, six assigned sites (two within the project area), and 36 livestock head months on the Payette, Nez Perce-Clearwater, and Wallowa- Whitman national forests
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Here is another area of concern that the forest service does not like to address or manage. The outfitter camp at Lake Fork Creek lays within the Rapid River Corridor and within this project area. There is garbage left lying around the camp by the outfitter, they have cached supplies, they fall trees for firewood using chainsaws (inside the corridor), the area in which they corral their stock is a quagmire of mud and manure and instead of packing out old bales of hay they are left to rot on site. Their Upper Copper Creek camp (outside the corridor and project boundary) has a pile of gear that never gets packed out and has been left a disaster with garbage strewn about in the past. Their Lower Copper Creek camp is left setup year around and is an eyesore that harms the outstanding remarkable value that has been placed on Rapid River.

These are not the only camps that are left a disaster by those that choose to travel by horse. Other camps in the area have been reported to the forest service in the past for having left garbage and caches. These are all camps that have items packed into them on horseback. In certain camps there are insulators nailed to trees, electric fencing scattered about, woodstoves that have been left and other heavy objects. Nothing to my knowledge has ever been done eliminate this problem. Another failure on the part of the forest service!

**Direct and indirect effects of the proposed action**

## Local population size, growth, and survival watershed condition indicator

Trail fords create the potential for direct impacts to individual fish from motorized and non- motorized use of fords. Impacts to individuals may include: disturbance of mobile fish at all life stages; crushing of fry or juvenile if they attempt to hide in gravel with motorized or non- motorized crossings; disturbance of spawning fish if they are spawning; trampling of redds; or disruption of migration behavior if fish are in these areas. Indirect effects could include increases in sediment and turbidity in and downstream of crossings or exposure to fuel or other contaminants.

I think someone might have made a mistake here and added that non-motorized use of fords could cause impact to individual fish. This could not happen with the unicorns we have been discussing up to this point. Let's not forget that these effects, whether by motorized or non-motorized were said to be "negligible". The definition of negligible is, "so small or unimportant as to be not worth considering". Therefore, the construction of hardened fords should not be an excuse worthy of eliminating or reducing motorized travel within the project area.

Page 28.

There is confusion with trail numbers and their locations on the maps.

Page 29.

"Small pulses of sediment and turbidity may occur when motorcycles cross these streams on trail 187 immediately downstream from the ford. "

The forest service has stated that there were no fords on trail #187. Now it says there are fords? This is confusing, is it because of the issues with trail numbers being inconsistent on maps and with what is signed on the ground? Or are there fords on trail 187? This issue needs addressed so that there are no contradictions in the EA.

Page 31 and 32.

## **Direct and indirect effects of the motorized alternative**

With what has been stated on these 2 pages there is no evidence that motorcycles will cause harm to the fisheries of the area. Therefore, there is no reason to not allow motorcycles to continue to use the area under the motorized use alternative.

Sediment/turbidity watershed condition indicator

It is expected that the current sediment conditions and functional ratings would be maintained at the subwatershed scale in all three timeframes under the motorized alternative, although effects would be incrementally greater than the proposed action, as described below.

I am unclear what the above statement is saying. Is the forest service saying that in addition to motorcycles using the trails, the effects would be incrementally greater or are they saying that motorcycles are the sole cause of the incrementally greater effects? I don't see where any analysis has been done to compare the effects of motorcycles vs stock vs foot traffic. If the forest service is stating that motorcycles are solely responsible for the additional effects, then there should be an analysis done that explains to what extent motorcycles add to these effects and as part of that analysis they should also include stock traffic and foot traffic.

Page 35.

Why is the forest service including water quality effects from outside the project area boundary? Isn't this, "outside the purpose and need and outside the scope of the project"? This seems to be a legitimate excuse when it doesn't fit the agenda.

Page 38.

The six trails analyzed in this analysis are currently *open to foot and horse traffic only*. A field review was conducted in 2020 to assess trail conditions. Several locations with runoff or wet areas causing erosion and **maintenance issues were found**, particularly on trail 188.

In the above statement on page 38, it states that maintenance issues were found. Considering the fact that the forest service has not performed any maintenance on these trails in at least the last 10 years, that does not surprise me. The forest service having not done their job has contributed to the degradation of the trails and the amount of erosion that has occurred. There should have been an analysis done on the effects the forest service has on trails when they fail to maintain them.

Perhaps the state of Idaho should consider taking over management of these lands.

Page 39.

Hardening is proposed at the eight fords proposed on trail 188. Two fords on trail 362 would not be hardened due to low potential for erosion and intermittent stream flow.

There was only 1 ford mentioned for trail 362 in the EA. What about the fords mentioned on trail #183?

Page 39.

Lake Fork (tributary to Rapid River) would be the most impacted by proposed motorcycle use on trail 188 because of the additional motorized fords and the proximity and extent of motorized trail along the stream (figure 13).

If all uses were looked at in respect to the extent and proximity of trail along streams, then the impact by stock use should be considered as well. Especially at the Rapid River fords and all along trail #177 and its proximity to Rapid River.

Page 40.

Trail bridges	<p>Two trail bridges within both the analysis and cumulative effects area washed out over ten years ago. The bridge over Lake Fork Creek on trail 177 has not caused much bank disturbance as it was originally a small wood structure. A user created ford has been developed by equestrians just downstream of the original bridge.</p> <p><b>The collapse of the larger steel bridge over Rapid River near the junction of trails 177 and 183 has resulted in extensive bank erosion and sediment washing downstream.</b></p>	<p>The bridge failures occurred approximately ten years ago (short term) and bank erosion from the larger steel bridge over Rapid River is currently occurring. It will continue until it is re-built or some level of restoration work is completed. Effects have potential to move into the long term.</p>
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This is an absolute false statement. Rapid River washed around the west abutment because the trees laying in the river directly upstream from the bridge channeled the water in a way that it eroded the bank and washed around it. As of 2017 the bridge was still upright, although slightly bent due to having been hit with a falling tree. I provided the forest service with pictures of the bridge at that time so they should know that high water did not cause its failure. At some point over the next 3 winters, the bridge succumbed to the snow load and collapsed.

The bridge over Lake Fork Creek also collapsed due to snow loading. Anyone can see that both ends of the bridge, even though it is now broken and laying in the creek, was not washed out by high water. I made the forest service aware of this broken bridge the same year it happened. Lack of management seems to be a common trend with the forest service.

Page 46. Figure 16.

The color scheme on this map seems to be incorrect. There are motorized trails in the semi-primitive non-motorized areas.

Page 47.

**Trails and access**

Within the project area, there are zero miles of trails *open to motorcycles* and approximately 26 miles of trails *open to foot and horse traffic only*.

There are 2 or 3 different trails within the project boundary that are open to motorcycles. Trail 191, and 187 or 328, depending on who you talk to. Maps and trail signs need to be changed to reflect the historic names and numbers of the trails.

“Portions of the trail 183, trail 184, trail 187, and trail 362 exceed Forest Service guidelines for maximum grade (USDA Forest Service 1991). These trails were exhibiting signs of soil erosion (figure 18 and figure 19).”

It would be important to know if the sections of trail that exceed maximum grade where actually located on the historic trail or due to the lack of maintenance, where located on user created sections of trail?

On trail 188, several bridges in wet areas were starting to collapse due to rotting wood stringers and decking. On trail 177, the bridge over Rapid River between trail 183 and trail 187 had collapsed. The bridge over Black Lake Creek had also collapsed and had washed downstream. At both crossings, users are fording the channels.”

It should be added to the above statement that, “users are fording the channels and these user created trails are exhibiting signs of erosion and adding sediments directly into the streams”.

Page 51. Impacts from noise

This should also take into consideration the noise from chainsaws that are allowed to be used to clear trails. Whether they are used inside the corridor for “administrative use” or outside the corridor.

In conclusion I would like to see the motorized alternation chosen. This is the only alternative that is fair to the motorized users that have been locked out of this area for over 10 years. Even when adding the motorized alternative, sediments, turbidity pulse and erosion were considered to be negligible. No other facts remain that would be good cause to eliminate motorcycles further.

This EA is completely focused on one tiny use. If it were a picture, the only thing in focus would be a motorcycle speeding down a trail, spewing exhaust, leaking oil and polluting the surrounding area with noise. There is nothing in this EA that points to anything positive. Even the few pictures that were included were chosen for the negative scene they could represent. Perhaps instead of zooming all the way in and focusing all our attention on one tiny little thing, we should be zooming out and focusing on the big picture and how to make it a better place. Stop finding reasons why we can't do things and start finding reasons why we can. Try making this place and all other places in the forest a good place to visit, there are lots of options. Try working with the state to fund more trail maintenance, use your volunteer program, start asking the wonderful environmental groups to put money back into the areas they help lock people out of and destroy, use your own trail maintenance program and look for more ways to fund these projects. Every other business in Idaho that is tied to recreation is making money hand over fist and the federal government is the only one that could screw that up so bad that they would actually go broke making up excuses as to why they can't make it happen.

I have also pointed out some of the erosion issues that horses create. That doesn't mean I would like to see horses removed from the area, it means there are issues that need addressed and by focusing on the tiny little scope of the project these issues will not be resolved and will only continue to get worse. All these things combined are like water running down the road. At first, it's just a little trickle, then it gets bigger and starts to create a little rut and if it's not dealt with it turns into a stream channel that will wash out the entire road. Having not properly dealt with all the issues in Rapid River has started the little rut and if they are allowed to continue they will only get worse and harder to fix.

Maybe by looking at the bigger picture we could solve the real issues. What if all the time, money and effort that everyone has put into making negative comments was put to good use. What if we were all working together to try to make this a better place for everyone. Well, first we would have to set our egos and selfishness aside, but then we could get down to doing something that we share a common interest in.

Throughout my comments I have been very terse and straight forward with my thoughts. I put value in individuals that work hard and are honest. However, it is my belief that the forest service as a whole, is just another broken government agency that needs completely restructured. If you have put 100% effort into this EA, being fair and unbiased and as factual as you possibly could, then don't take the abrupt comments personal.

Thank you for your time,

Shawn Ogden