

April 1, 2021

Frank Schwartz

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Payette National Forest, New Meadows District  
Attn: Erin Phelps, District Ranger  
P.O. Box J  
New Meadows, ID 82654

Dear Ranger Phelps,

Thank you for the opportunity to provide comments on the Rapid River Travel Management Project Environmental Assessment. This trail system is important to the surrounding communities, residents and the various recreational and other users that come to the area.

Of the three alternatives evaluated, I would only support the second alternative (Motorized use alternative). The other alternatives do not support wise management of this area, as my further comments will highlight. Though I am not a mechanized (motorized or non-motorized) user, I fully support having many of the trails outside of the wild river corridor open to a variety of mechanized use. The motorized use alternative provides less access than I had hoped, but it is better than the other two alternatives.

I am disappointed that the Forest Service did not consider the broader travel management for the Rapid River headwaters area, which I had suggested in my scoping comments. Without considering that broader trail system, the proper context of all travel and use of that area is not achieved, correct conclusions on things like economics, recreation, local social and culture, and the value of those to local residents and communities are not reached and the resulting decision will be based on incomplete information.

The access to and use of this Rapid River headwaters area is important to local communities, local cultures and local economies. The Forest Service has continued to reduce and restrict access to National Forest lands while the demand for access and recreational use continues to grow. Access by local residents, some of which are descendants of the early settlers of this Rapid River and adjacent area, as well as other interested local residents and visitors to the area and the ability to physically see some of this history is being eliminated by decisions to limit and close access. Resources can be protected while still allowing a variety of uses and access, however, the decisions being made don't appear to consider this fact. Alternatives 1 and 3 presented in this EA do have negative impacts to the local communities, cultures and economies even though the EA does not conclude those impacts are real.

The following are specific comments related to the analyses presented in the EA.

1. The choice of presentation of the alternatives as "motorized" or "nonmotorized" is misleading and automatically introduces a bias to readers and the decision process. If a single terminology were to be used, it would be more appropriate to use "mechanized or nonmechanized," since mechanized would include both motorized and nonmotorized man-made machinery. While on that subject, why does the Forest Service allow use of game carts and similar mechanical

equipment within the wild river corridor and within wilderness areas? This clearly is no less mechanical or man-made than a bicycle or a motorcycle. This would appear to be another conflict in management direction that should be addressed in your travel plan.

2. The characterization of the mechanized trails as “newly opened” throughout the document is misleading and introduces an inherent bias. These trails were historically motorized/mechanized trails that were temporarily closed to resolve conflicting forest management direction, and a resumption of the historical motorized/mechanized use is now being addressed. Please completely present the facts with no spin.
3. The EA sections titled “Trail Designations” (page 7) and/or “Project Design Features” (page 11) do not include an activity to “ground truth” trail signs/markings. There are currently instances of incorrect trail signs on the ground, mismatches between maps and trail signs and disagreement between some current and older Forest maps on trail numbers. Particularly given that the very few visitors that might ever come to this area solely to enjoy the “remarkable value of the wild river corridor” are not familiar with the area and likely have little or no navigation skills, incorrect signage will assure they get lost. And, as previously noted, properly marked trails on the ground and correct maps will result in better compliance by all users to the travel management plan.
4. Table 3 indicates that the topic economics isn’t carried forward for analysis based on speculative visitation assumptions and a conclusion that effects of the action would be indiscernible. This could be partially correct due to the fact that the project area was so narrowly scoped and did not consider the broader network of trails and recreational demand. However, any revenue for users of this area is important to small communities in rural counties such as Adams. Since there is such a high percentage of federal and state land in this county, the access to these lands directly effects the numbers of users and visitors from outside of the county. And local residents that are denied local access to forests will spend money elsewhere that would otherwise stay local. While these aren’t the megabucks associated with the elite people visiting areas such as McCall, it is enough to mean the difference between a local business staying open or closing. Please don’t arbitrarily dismiss the economic value associated with the multiple uses (or closure) of these areas. An accurate qualitative analysis should be relatively easy to prepare and present and would cause different conclusions than are presently drawn.
5. Table 3 also addresses the historic use of the area, but incorrectly attempts to narrowly tie this topic of historic use to the area within the wild river corridor. The comment made was broadly addressing the historic use of the entire area, and particularly requesting allowing access and use of the areas outside of the wild river corridor. While I believe the designation of the wild river corridor was inappropriate because it did not meet the “natural state” criteria for such a designation, that improper designation is not being challenged here. The request is to allow access by a variety of users to the areas outside of the wild river corridor.
6. The suggested issue of motorized or mechanized access impacting a “quiet river experience” in the wild river corridor is not accurate. Anyone who has been within that wild river corridor knows that you hear the river and the wind, not sounds from the adjacent areas, even if there are chainsaws or motorcycles running. Please do not attempt to perpetuate the myth of sounds spoiling the experience in order to support a desired outcome. Mechanized use of lands adjacent to the wild river corridor will not diminish the wild river experience.
7. The west side of the project area only has about three miles between the wilderness boundary and the wild river corridor. This narrow strip of land has had motorized and mechanized use for more than 100 years. Anyone wishing their natural experience can go into the wilderness or the wild river corridor. Leave this small finger of access between these “lands of no use” open to a variety of users, including motorized and nonmotorized mechanical travel. Most of the users

seeking the wilderness or wild river experience in fact travel by motorized vehicle to get as close as they can to the wilderness or river corridor before taking their brief journey on foot, where they will only visit the fringe of a very small fraction of those areas. Very little of the wilderness or wild river corridor is ever seen or used by these very visitors that want to keep it “natural” and limit access.

8. The EA frequently repeats an assertion that increased motorized use will require more trail maintenance and repair, which the Forest Service will not be able to keep up with. This incorrectly implies that the Forest Service is currently maintaining these trails. Anyone that spends any time in this area knows that the Forest Service does little to no maintenance on most of these trails, and most trail maintenance done in the past 40 years was done by local residents and user groups and any permittees (livestock and outfitters). This EA should honestly present facts, and omit speculation and emotional fiction.
9. There is an inconsistency between the listed mechanical mileage for alternative 2 in the document. See Table 1 (6.6 miles), Table 6 (6.9 miles), Table 12 (6.6 miles). While 6.9 is a better number, it would appear that 6.6 is what the Forest wants.
10. Table 9 illustrates just how ridiculous and meaningless the watershed condition framework rating system. The rating of “Functioning at risk” for sediment/turbidity essentially says there will never be a stream that isn’t functioning in a degraded state. The wildlife and nature are the primary cause of the current condition in these headwaters of Rapid River. That stream is functioning appropriately and should not be rated otherwise. As the EA states, Rapid River is an “outstanding remarkable value” - how can it be functioning at risk?

Please feel free to contact me at the address above if you have any questions or require any clarification.

Thank you.

Sincerely

Frank Schwartz