



Public Land Access Year-round, Inc. (PLAY)
PO Box 2191
Orofino, ID 83544

January 28, 2024

Nez Perce-Clearwater National Forest
ATTN: Objection Reviewing Officer, Northern Region 1
26 Fort Missoula Road
Missoula, MT 59804

RE: Objection to the Final ROD, FEIS and Land Management Plan for the Nez Perce-Clearwater National Forests

Dear LeAnn:

Public Land Access Year-round (hereafter referred to as PLAY) is a local Off Highway Vehicle club. Play's goals are preserving current motorized use, promoting increased motorized riding opportunities and working with land management organizations and legislative organizations.

We recognize that the Forest Plan Revision process is very important. The document will guide the forest in all future projects for 20-30 years into the future. One new area that was put into this process was recreation. As we stated in our DEIS comments Recreation is becoming an important component of the economic viability of many communities in and around the forest. Motorized recreation is a fast-growing industry as the populace ages. Past practices have shown the forest would like to manage for protectionism rather than allowing for motorized uses. We had hoped this plan will take that into consideration when determining future conditions and standards. We feel that motorized recreation is a not major part of this plan. The plan only called out two Recreation Objectives and it makes us feel that the forest is reducing recreation opportunities. There is no objective for a growing recreation user group that is over 50 inches. There is no objective saying

that the Forest will create a opportunity when they lose a motorized opportunity somewhere else locally in the forest.

Recreational Opportunity Spectrum. This category will be the deciding factor for the entire non wilderness land base. Play believes all the existing land in the "roaded front" and roadless areas should be semi-primitive motorized. IE. Pete King Creek area, all area West and North of the Lochsa River. West and East Meadow Creek. Roadless Areas should also have a percentage of semi-primitive motorized areas. The reason being; motorized use is a legitimate use in both categories. West and East Meadow Creek has established motorized Motorcycle and ATV Trails that need to continue. The forest intends to close more motorized trails in the Travel Planning. This is the only area that gives riders a Primitive experience. The Roadless rule does not address motorized trail use. Another example is where the Forest decommissioned the Frisco Mine road in Orogrande after a fuels reduction project. That road was established well before the Roadless Rule and should not have been decommissioned. The non-motorized ROS kills any opportunity to add additional ATV Trail in a Roadless area. There needs to be clarity in the Forest Plan on how the Forest intends to consider the 2008 Idaho Roadless Rule areas with regard to ATV Trails. In other Forests, roadless designation Roadless does not mean no motorized trails or OSV access, but it is considered. The Forest Plan will be the regulating document in this category. Existing trails already have a footprint in these areas. To locate all motorized use in 700 thousand acres out of 4 million acres is not acceptable. An 8 foot by 1-mile OHV trail will occupy approximately one acre of land. The foot print on the land does not occupy much area.

PLAY and CBC requested to see the section of John's Creek below the Gilmore Ranch (Trail 401) and the North West corner area of the Mallard Larkins Roadless Area be designated as Semi-Primitive motorized. The reason being is these two areas would allow the Grand Exploration Motorized (GEM) Trail to flow from the Big Salmon River to the Little North Fork River. This would have less layers of permitting to document. We do not see on the map where this area is carved out for the future Trail.

Infrastructure: Roads that are to be decommissioned over a period of time should be transformed into OHV trails or non motorized routes. We realize that there are many problem area roads, that need to be corrected. Trails should be placed in appropriate areas when the work is to be accomplished. We do not see any wording in the Forest Plan for this objective. Wording needs to be inserted in the document to allow roads that are decommissioned to become high clearance trails to allow greater than 50-inch vehicles and allow equine users their own routes as well. Reason: More Utility Type Vehicles greater than 50 inches are dominating

the system. Trails designed specifically for this type of recreation needs to be recognized.

FW-DC-WI. The desired condition should show that animals can and will adapt to changing environmental conditions. Humans included.

MA2-DC-ELK-02. Motorized access should be delineated as to what type it is and seasonal closures. Single track and double track with seasonal closures should be allowed if the need arises. Major roads would not be authorized.

Recommended Wilderness and Geographic Areas: Play does not support Wilderness designation for the Meadow Creek RWA. Motorized use has been occurring historically and currently. The use should be preserved for future recreation. The Hoodoo Roadless Areas should not be designated as RWA. Historic summer use was eliminated in the Summer Travel Plan and Winter use was also eliminated. Historic motorized uses and non-motorized uses should be reinstated to the best interests of all recreationist in this area. Geographic Areas can be designated in this area for Summer use and Winter use. Do not make the complete area an RWA. Critical minerals have been located in this area. There are more than seven mines. Rare and critical minerals are essential for private and military technology. Access to these minerals is critical. Access to watersheds is also critical. The original Pioneer Area in the Mallard Larkins Roadless area is the only area PLAY can support designation as Wilderness. The additional acres that were added in the Roadless Rule cannot be supported as Wilderness. The above-mentioned areas are used by diverse recreationists. If the areas are designated as RWA'S bicycling, handicapped vehicles, and motorized maintenance equipment will no longer be allowed. We feel the best interests of the public will not be allowed. The Forest nor their Partners should be given "Administrative Use" card that allows them motorized access to do their jobs. Outfitters or the common everyday worker are forced to live by the Region 1 attitude. So should the Forest.

Wild and Scenic Rivers. Play believes that Fish Creek should be classified as a recreational stream because of the trail alongside of the creek for most of its length. The North Fork of the Clearwater should not be classified at all. If it is to be, it should be classified as a recreational river because of its use and the road. The South Fork of the Clearwater should not be classified.

Minerals: The Hoodoo Roadless Area of the upper North Fork of the Clearwater River contains critical minerals. The area is known as the Ankerite Belt. It contains Rare Earths that are required for every cell phone, computer or television produced today or 30 years from now. Executive Order 13817 signed by President Donald Trump on December 20, 2017 "states...the dependency of the United States on foreign sources creates a strategic vulnerability for both its economy and

military ...”. "...Despite the presence of significant deposits of some of these minerals across the United States, our miners and producers are currently limited by a lack of comprehensive, machine-readable data concerning topographical, geological, and geographic surveys; permitting delays, and the potential for protracted litigation regarding permits that are issued.” We object to the Forest Plan not recognizing Mining. There needs to be a section in the Forest Plan recognizing Mining.

America is now 90-95% dependent on China for critical minerals according to a US Geological Survey. One of the main reasons for this is the United States continued withdrawing lands from mineral entry. Some of these withdrawals were made without surveys of critical minerals. This is just one reason to **NOT** recommend eliminating exploration and removal of minerals in the mining districts of the upper North Fork of the Clearwater drainage. On August 13th, 2018, President Donald Trump signed the National Defense Authorization Act. The Act recognized critical and strategic minerals and metals as an essential part of our national defense. Especially batteries for the devices. The current administration and several states are mandating all vehicles and many other mechanical devices be electric. Dates that are being stated are 2035 to 2050. This Plan will be in place for at least 30 or more years. Where are the producers of this equipment going to purchase the raw materials to make the products? The administration also wants the majority of the raw materials to come from sources in the United States. PLAY cannot recommend Hoodoo Roadless Area or any river segments in the area to be designated RWA or Wild and Scenic.

Recreation: Recreation is becoming a major impact driver on the Forest. To try and curtail any increase in motorized recreation in the future is a disservice to the recreating public. Recreation supplies many dollars to the local communities in the region. One area the Forest has to do a better job is reviewing timber projects and identifying more recreational opportunities. How can the Forest justify removing timber and not supplying recreational opportunities after the project is completed? I am talking about both motorized and non-motorized opportunities. Roads to trails concepts. We have asked to participate in the selection of Forest Trails Contracts to be done in our area and keep getting passed by and not engaged in the priority and selection of trails that get contracted out for organizations to clear. There needs to be a mix of trails for both non-motorized and motorized. Not only non-motorized.

Play feels the FPR should be open to looking at motorized recreation as being part of the landscape and not the destructive force that it is being portrayed as. The FPR should have language that can make adaptable changes to situations when

needed. IE. Wildlife calving and nesting. Changes in the demographics of the forest. Allowing or not allowing when needed. Not permanent closure.

In Conclusion: PLAY cannot support the Land Management Plan, FEIS, ROD. The Clearwater County Commissioners, Idaho County Commissioners, Mining User Group and their constituents do not feel that the Nez Perce-Clearwater National Forest has been listening to them. PLAY supports: ROS setting for Semi-Primitive Motorized on the lower section of John's Creek Trail Number 401, the Northwest Corner of the Mallard Larkins Roadless Area, West and East Meadow Creek Areas. Township 41 North and Range 5 and 6 East. Sections 7, 8, 9, 16, 17, 18, 19, 20, 21, 28, 29, 30, 31, 32 and 33. The Forest is resource for many uses. The GEM Trail will eventually tie Southern Idaho with Northern Idaho. The less roadblocks put in its path to completion the better it is for the recreating public. Play hopes that the objection resolution meeting will balance the needs for continued economic stability and forest management against protectionism.

Sincerely



David Galantuomini
P.L.A.Y Trails Coordinator
208-791-5890

cc: Senator James Risch
Senator Mike Crapo
Representative Russ Fulcher