

January 28, 2024

Objection Reviewing Officer  
USDA Forest Service, Northern Region 1  
26 Fort Missoula Road  
Missoula, MT 59804

**RE: Karen Crosby Objection Comments to the 2023 Land Management Plan for the Nez Perce-Clearwater National Forests**

**Sustainable Recreation Management Section:**

I object that there is no recreational objective for over 50" OHV USER GROUP. The forest plan dictates the planning and zoning for the Travel Planning. There is no mention in the forest plan addressing the over 50" growing OHV user groups. The interpretation is that this greater than 50" OHVs will be addressed in Travel Planning. However, what is outlined in the Forest Plan will be the framework that we will work with within the Travel Plan Mgmt phase. How can we address in Travel Planning when it is not addressed in the Forest Plan?

Secondly, the recreational objectives on pg.76 makes the user group feel like trails are going to be reduced to a point that we are all recreating in on congested area. Annually maintained to a standard a minimum of 30 percent; reduce deferred maintenance of trails by 5% every 5 years.

Regarding the forest service saying there are resource issues. I have requested to help set priority for which trails are contracted. I have yet heard any response back from the forest. The forest is awarding trail contracts which consist of a series of trails to be done over a four year period. Who is setting the priority of which trails are maintained. The local groups are requesting across the Nez and Clearwater forests without any engagement from the Forest. Someone else is setting the priority and this is unfair to the user groups. The user groups want to be engaged in the process of setting the priority and which trails are selected. Historically the trails are non-motorized and this behavior needs to change within the forest service. Even though the forest has seen a reduction in their maintenance. The forest service feels that they are at "full capacity". Money should never be in the equation for motorized trails. Data shows that the forest service likes to eliminate and/or severely limit motorized use.

If there is ever a case where a motorized road/trail opportunity is lost; I support a standard or objective being added that states the Forest providing that when a motorized road/trail opportunity is lost, the lost opportunity will be mitigated by the addition of a new opportunity in other areas locally within the Forest.

Standards FW-STD-REC-01 - Roadless Rule is not identified in their examples. This standard basically says there is no roadless rule acknowledgement. Is the Roadless areas still recognized as roadless on a forest when they have a ROS?

pg.82 Ecosystem Services Guidelines FW-GDL-ES-01. should also include "non-motorized" verbiage. Secondly this guideline If a route is identified as adversely affecting aquatic ecological values, rerouting and route improvements should be considered prior to closure, to preserve motorized/non-motorized access opportunities. If a route or area needs to be closed, alternate motorized access to maintain social and economic sustainability of rural communities should be provided. this guideline should be added to the Recreational Values section on page 76.

### **Designated, Recommended, Geographic and other Special Areas Section**

-I object to East Meadow creek being a RWA.

Current uses of East Meadow creek should still be allowed (motorized, bicycles and chainsaws)

There should not be a semi-primitive non-motorized ROS overlay on roadless areas or roaded areas. We had an atv road that was decommissioned in a roadless area that was there before the roadless enacted. That could have been used to help fight the fire that went through Orogrande. We want clarity on how this forest intends to consider the 2008 Idaho Roadless Rule areas with regard to TRAILS. In other Forests, roadless designation Roadless does not mean no motorized trails or OSV access, but it is considered. IOW, "Roadless" does not mean "Motorized-Trailless" and that will be a battle to fight during TMP NEPAing. The forest service has made the Roadless Rule worthless by their Region 1 attitude and just ignoring it. We need objective in the Forest Plan addressing the 2008 Idaho Roadless Rule areas with regards to Trails, semi-primitive non-motorized ROS and Trails.

I object that there is nothing addressing how a fire will be fought in the event that more Wilderness is created near towns like Elk City and Newsome. People's lives and homes will be on the line. We seen what happened in the Orogrande Fire of 2022 and how the wildland fire fighters retreated.

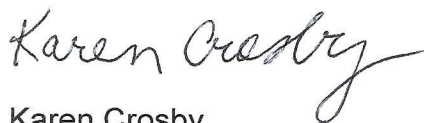
This proposed Forest Plan has not listened to any communities, recreation users, Idaho County Commissioners nor their constituents in their comments regarding wilderness. For example, the Idaho County residents passed a resolution vote put on a ballot stating that they do not support more acres of wilderness to Idaho County. And do not support adding wild and scenic river segments. In the Red River District, we performed a signature drive with over 1,000 signatures where recreation users do not want anymore Wilderness or Wild and Scenic Designations. The outfitters that operate in the Meadow Creek drainage sent the forest service a letter letting them know that they do not support any RWA or Wilderness designation. Outfitter's cannot access their permit areas due to fire damage, fallen trees due to tree root deterioration, erosion and the habitat has exited the area as well. The forest service has included a roaded Meadow Creek area as potential wilderness that has motorized trails and vehicles access into East Meadow Creek, Lynx, Running Creek areas. The forest service is claiming a chunk of land outside of Meadow Creek as RWA. Running Creek, Bargamin and Lynx creek drainages do not drain into Meadow Creek. The 285 Elk Mountain Road is the divide ridge line. The outfitter in the area cuts roughly 75 miles of trail in the

East Meadow Creek and Running Creek via trail contract. 2 guys can clear five miles a day with a chainsaw. Whereas the forest service brought in seven guys with hand saws and worked seven days to open a trail that could have been easily opened up in two days with two guys using chainsaws. Users see the forest as adding Wilderness so they do not have to manage the land. Then the forest and their partners want "Administrative Use" to use motorize in a RWA/Wilderness. The forest lives by a different standard than the common day worker who wants to access the forest and cannot. The more Wilderness, the less users get to use the land. The forest has blocked the Idaho Department of Parks and Recreation Trail Rangers from clearing trails in the area. Motorized Motorbike and ATV users should be able to continue riding routes in this area. Allow the IDPR Trail Rangers to maintain the motorized trails in Meadow Creek.

The forest does not have the ability either financially or resource wise to manage the forest as they want to manage. The forest service people could not stop people from accessing the forest, they had a difficult time managing areas where they allowed users to recreate. It isn't smart to do something that the forest cannot manage effectively to begin with. If they close an area it has to be manageable and definable or it is ineffective. In the end, the decision does damage to the land, the fuel loads as seen in Orogrande where the wildland fire fighters couldn't get a handle on the fire and retreated and burned historical building and destruction to campgrounds. Let alone try to issue citations on travel planning when the forest only has three LELOs. Not manageable by any means possible.

I look forward to resolving these issues.

Sincerely,



Karen Crosby  
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## Web Form Comments

Hello,

My Objections and suggestions are contained in attached file.

### Objections:

East Meadow Creek being listed as RWA.

No objective in Sustainable Recreation for:

- over 50" user group
- no objective/std for stating that if a motorized lost opportunity occurs that another opportunity will be created in the forest locally in the area.
- semi primitive non-motorized ROS on Front Country and Roadless Areas. Basically this kills any opportunity for ATV trail in a roadless area.
- There needs to be clarity in the forest plan on how this forest intends to consider the 2008 Idaho Roadless Rule and regards to ATV trails and should be considered.
- The proposed Forest Plan hasn't listened to the local communities, Idaho County Commissioners nor their constituents in regards to not adding additional acres to Wilderness or Wild and Scenic Designations. Solution is to make Meadow Creek semi primitive motorized ROS which is what it is. It is not potential Wilderness and is a roaded area with motorized trails.