



State of Idaho

Department of Parks and Recreation

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February 17, 2024

Leanne Marten, Objection Reviewing Officer
USDA Forest Service, Northern Region
ATTN: NPC National Forests Plan Revision Interested Person Request
26 Fort Missoula Road
Missoula, MT 59804

VIA Comment Portal at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=44089>

RE: Interested Person Request for the Nez Perce-Clearwater Land Management Plan Revision
Objection Process

Requester

Alex Ernst, Land Access Coordinator, (208) 514-2415, alex.ernst@idpr.idaho.gov
Idaho Department of Parks and Recreation (IDPR), Recreation Bureau
5657 Warm Springs Avenue, PO Box 83720
Boise, Idaho 83720-0065

Apart from State of Idaho's Objection filed through the Governor's Office of Species Conservation (OSC), IDPR requests direct participation in the Objection Resolution process as an Interested Person, specifically regarding public motorized access issues.

IDPR's intent is to participate collaboratively in forming resolutions to Objections stated by IDPR's constituent stakeholders who are concerned that the Revised Forest Plan's Management Objectives will result in a loss of access by, and reduced recreational opportunities for, motorized access primarily by off-highway vehicle (OHV) and over-snow vehicle (OSV) uses. Permitted vehicles under IDPR's Motorized Trail Programs include 43,817 OSVs (2022-23 season), and 172,439 wheeled-OHVs (2023 season).

IDPR wishes to help Forest Service find ways to be successful in meeting its multiple use mandate, by providing for recreational access while pursuing resource management goals.

Objection Issues of Interest

Summary:

- Recommended wilderness management Objectives
- Recreation Opportunity Spectrum in relation to motorized access Objectives
- Road conversion Objectives
- Lack of Objective for specifically addressing the greater-than-50" OHV trail class

Continued on page 2.

Management of areas defined as recommended wilderness as though Congressionally-designated Wilderness will reduce motorized access opportunities. Other National Forests with RWAs continue to manage for motorized use in such defined areas, without controversy.

Reduction of motorized access due to changes in Recreational Opportunity Spectrum (ROS) to non-motorized classification without specifying an Objective for designating offsetting mileage in remaining motorized ROS areas will result in reduced motorized access and recreational opportunities in subsequent travel management planning (TMP). This will add to the already significant reduction in motorized access lost, first from the 2009 Clearwater TMP (198 miles). An estimated 400 miles of access was lost year-by-year through individual route closures contained in over one-hundred separate NEPA actions. Estimate does not include access lost due to ongoing “natural closure” by withholding management of routes as though closed, without having completed a TMP to officially close such routes on the Nez Perce side of the Forest.

There is no stated Forest Plan Objective to convert National Forest System (NFS) Roads and other non-inventoried roads, otherwise slated to be decommissioned, instead to be managed as NFS Trails. Failure to state management direction for this purpose will squander the potential of repurposing and enhancing existing prism to create additional public motorized trail access, or to replace motorized access opportunities lost when such are rolled back by revised ROS and Recommended wilderness designations under the FP Revision.

In addition to defining the management of trail opportunities for single-track (motorcycle) and 50”-and-under OHV access, an Objective is needed to clearly define management direction for designation of full-width NFS Trails (greater-than-50” width class, EG UTV and jeep) to accommodate the quickly growing usage demographic and users seeking a trail-character experience as opposed to a road-driving experience.

Previous Participation

IDPR directly commented on July 6, 2021 during the Administrative Review process for the draft FEIS (four pages, copy attached).

An IDPR letter dated November 13, 2014 was incorporated in combined State of Idaho comments from the Office of the Governor detailing IDPR’s feedback of the draft scoping process. Letter includes statement that a Cooperating Agency (CA) role was accepted by IDPR (five pages, copy attached; CA documents not located).

Prior staff members participated in-person at multiple meetings beginning Fall of 2012 and in various stages of the ongoing process since then, often coordinating through the Governor’s Office of Species Conservation (file notes).

Thank you for this opportunity for IDPR to further contribute to the success of the Forest Planning Revision process. IDPR looks forward to partnering with Forest Service and stakeholders in achieving shared recreational access goals.

Kind regards,

Land Access Coordinator
IDPR, Recreation Bureau

July 6, 2021



Brad Little
Governor

Susan E. Buxton
Director

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5657 Warm Springs Avenue
P.O. Box 83720
Boise, Idaho 83720-0065

Phone (208) 334-4199

www.parksandrecreation.idaho.gov

Cheryl Probert, Forest Supervisor
Nez Perce-Clearwater National Forests
903 3rd St.
Kamiah, ID 83536

RE: Nez Perce-Clearwater National Forest Plan Administrative
Review

Dear Supervisor Probert:

The Idaho Department of Parks and Recreation staff reviewed the 2021 Nez Perce National Forest Final Environment Impact Statement (FEIS). This FEIS discloses the impacts that the Forest Plan will have on recreation opportunities. We focused our review on 3.42 Sustainable Recreation in the FEIS and 4.3 Sustainable Recreation in the Revised Forest Plan.

We previously commented on the revised forest plan during the draft environmental impact statement (DEIS) comment period. We have also commented during the scoping period for the revision and attended public meetings for the plan development.

Section 3.4 has a footer that reads "DEIS for the Revised Forest Plan". The footer needs to be changed to "FEIS for the Revised Forest Plan"

On Page 3.4.2-7, the document displays Table 1 (Total Estimated Visits). The most current year is 2016. This table should be updated to have the more current figures 2020 rather than 2016. Our state parks had much higher use in 2020 than in 2019.

On Page 3.4.2-11, the document displays Table 4 (Existing summer and winter recreation opportunity spectrum class distribution by acres and percent of the Nez Perce-Clearwater. The table has different numbers for the total acres for both summer and winter recreation. These different numbers indicate the GIS staff forgot to clip the summer ROS layer with the Nez Perce Clearwater Forest Plan boundary. This is most like the difference between the total figures in the Summer ROS and the Winter ROS.

Table 5 shows Miles of Trail by designed use on Page 3.4.2-14. The table needs to show what is designated for motorized and non-motorized uses. This is what the public is looking for. It is very misleading to show miles by designed use instead of what is designated. With the revised forest plan being decided on, the plan should show how designated use miles could change by alternative.

Also on this page, when referring to groomed snowmobile trails, there are actually 5 groomed snowmobile trail systems on the Nez Perce Clearwater Forest. The county programs that groom on the Nez Perce Clearwater are Elk City/Dixie, Grangeville, Clearwater County, and Latah County. The Montana Snowmobile Program also grooms snowmobile trails in Idaho at Lolo Pass. This clearly shows that there are 5 snowmobile grooming programs on the Nez Perce Clearwater National Forest.

We completed our review of the effects analysis in Section 3.4 (Sustainable Recreation), the effects analysis is complete and we do not have any specific comments on this analysis.

We also reviewed 3.6.2.1 Recommended Wilderness Area. Table 1 shows recommended wilderness by alternative. The IDPR staff does not support the Recommended Wilderness Area (RWA) designation, because of the Forest Service's insistence on managing RWAs as de facto wilderness without the designation process. A recommended wilderness Area would not be suitable for motorized or mechanized uses in the revised forest plan (Page 115, Revised Forest Plan). The preferred alternative would designate three areas for recommended wilderness. Those areas are the Mallard Larkins, the Hoodoo, and Meadow Creek. If the recommended wilderness area designation would go into effect in those areas, motorized opportunities will be lost.

The Meadow Creek drainage contains most of the single-track motorized trail mileage on the Nez Perce Forest. Under the proposed decision, 52.7 miles of single-track motorized trails will be closed to motorized use (changed to non-motorized). There are trails outside of West Meadow Creek that could provide additional motorized trail access. We request working with the Nez Perce Clearwater National Forest to provide some of those lost motorized trail opportunities.

The Hoodoo recommended Wilderness contains portions of the Idaho Centennial Trail. This trail should be marked for priority in maintenance for this area. The area did have some valuable single-track motorized trails, but these trails were lost because of the Clearwater National Forest Travel Plan decision.

The Mallard Larkins recommended Wilderness contains many non-motorized trails as well as important access roads to the recommended wilderness. These roads should be maintained to provide access to non-motorized trails for visitors.

The Nez Perce Clearwater National Forest is home to The Selway-Bitterroot, Gospel Hump, and Frank Church River of No Return Wilderness, and are essentially separated by a primitive jeep road (Magruder Corridor) or the Salmon River Wild River (Wild and Scenic Rivers). According to www.wilderness.org, "Idaho's Frank Church-River of No Return Wilderness is the largest designated wilderness in the lower 48 states." Further, "Idaho holds the third largest amount of designated wilderness in the lower 48 states, with 4.7 million acres of designated wilderness." The Selway-Bitterroot Wilderness is considered the third largest wilderness area in the lower 48. Both the Frank Church-River of No Return Wilderness and the Selway-Bitterroot Wilderness are amongst the "Top 3" largest wildernesses in the lower 48.

The current forest plan developed in the 1980's, had recommended wilderness. In the 35 years since, Congress has designated Wilderness in Idaho, but not on the Nez Perce Clearwater National Forest. In the current political climate in Idaho, it is unlikely that any Wilderness will be designated on the Nez Perce Clearwater National Forest over the life of this new plan. Using it as a justification for closing trails is completely unwarranted.

The revised forest plan discusses Sustainable Recreation on Page 80. The 5th paragraph discusses Wilderness and recommended wilderness. The plan should also incorporate the information above at the top of the page. The Nez Perce Clearwater National Forest is home to 2 of the Top 3 largest Wildernesses in the lower 48.

On Page 81, the revised forest plan covers suitability for motorized and non-motorized use. The plan mentions the Idaho Roadless Rule direction as one of the parameters for suitability. The Idaho Roadless Rule did not cover designated for motorized and non-motorized recreation. It was decided that the individual forests would make those decisions. The roadless rule does not have an impact on either motorized or non-motorized recreation.

The revised Forest Plan on Page 84 covers the guidelines for Sustainable Recreation. These guidelines missed any sort for trail protection from other projects on the forest. We would like the following guidelines in the revised forest plan to protect the trail system.

1. As a part of the planning process, consider designing trail corridors to protect the integrity of the trails.
2. Relocate the trails around the logging activity on either a temporary or permanent basis.
3. Provide recreationists on the trails with an alternate route around the sale during the logging activity.

4. Require in the sale contract that trails be re-established upon completion of the logging.
5. Consider prohibiting logging during weekends and holidays.

We appreciate the opportunity to review the administrative draft for the Revised Forest Plan Final Environmental Impact Statement. There are still some updates for the sustainable recreation to be completed. The update should be completed before the public FEIS is released. If you have any questions about our comments, please contact me at (208) 514-2483.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Cook". The signature is stylized with a large, looped "J" and a cursive "Cook".

Jeff Cook, Outdoor Recreation Analyst
Recreation Bureau



November 13, 2014

Cheryl Probert, Forest Supervisor
Nez Perce-Clearwater National Forests
903 3rd St.
Kamiah, ID 83536

RE: Nez Perce-Clearwater National Forest Plan Proposed Action

Dear Ms. Probert:

The Idaho Department of Parks and Recreation (IDPR) staff reviewed the Nez Perce-Clearwater National Forest Plan Proposed Action. The revised forest plan is being development under the 2012 Planning Rule. This plan will also serve as a guide for the next 10 to 20 years for projects on the Nez Perce-Clearwater National Forest.

The IDPR is a duly-established executive department of the State of Idaho. Idaho Code §§ 67 2402(1) and 67 4222(a). The IDPR, acting under the supervision of the Idaho Park and Recreation Board, carries out recreational policies and programs of the State of Idaho. Idaho Code §§ 67 4221 and 67 4222. The IDPR is authorized by state statute to prepare and keep current a "Statewide Comprehensive Outdoor Recreation and Tourism Plan" referred to as "SCORTP," for the protection and maintenance of areas of scenic beauty, recreational utility, historic, archeological, or scientific interest for the enjoyment of the people. Idaho Code §§ 67 4219 and 67 4223(h). Consistent with these authorities, the Department participates in USFS land management planning and project planning to further the public interest in recreational, scenic, and historical/archeological values.

Our staff has participated in the collaborative working group meetings over the past 20 months. We have also worked with the interdisciplinary team in helping outline issues with recreation management and developing initial goals, objectives, and guidelines for the revised forest plan.

In July 2014, the IDPR received an invitation from the Nez Perce-Clearwater National Forests to work as cooperating agency in the development of this plan. The IDPR has worked several times as a cooperating agency with other federal agencies such as the Bureau of Land Management and the National Park Service. We accept this invitation and look forward to working with the Nez Perce-Clearwater National Forest in the plan development as a cooperating agency.

C. L. "Butch" Otter
Governor

David Langhorst
Director

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5657 Warm Springs Avenue
P.O. Box 83720
Boise, Idaho 83720-0065

Phone (208) 334-4199

www.parksandrecreation.idaho.gov

Specific Proposed Action Comments

The current forest plans (Nez Perce Forest Plan and Clearwater Forest Plan) were developed in the 1980's and are nearly 30 years old. The plans placed significant emphasis on timber production and paid little attention to the growing recreation needs of the public.

The collaborative meetings showed that recreation access was the biggest issue of interest with participants. Growing recreation needs should be properly addressed in the forest plan and receive active management in the future. Actively managing recreation use is the best way to allow beneficial recreational use to occur on forest lands, minimize impacts to the forest resources, and develop strong public support for forest service programs.

The proposed action establishes special management areas as a management area direction. These special management areas preserve some qualities of wilderness character while allowing low levels of motorized use in the summer or winter. Special management areas provide outstanding backcountry recreation opportunities. We suggest instead of designating these areas special management areas, these areas should be called undeveloped recreation area, in order to preserve roadless characteristics.

The Boise, Payette, and Sawtooth National Forests used this designation in their forest plan revision. The management category given in the revised forest plan allowed them to have greater protections (primitive instead of backcountry restoration) under the Idaho Roadless Rule.

The special management area boundary left out Goat Lake and Blacklead Mountain and put them into the Great Burn recommended wilderness area (RWA). We request the special management area boundary needs to be revised to include Goat Lake and surrounding bowls, Blacklead Mountain including the south facing bowls, Doe Cr. drainage and surrounding bowls, Deer Cr. drainage and surrounding bowls need to be added to the Williams Lake cherry stem access.

Snowmobile use and summer motorized single-track trails do not detract from wilderness characteristics in RWAs to any significant degree. There are numerous examples of current and reauthorized RWAs with existing motorized use. The Red Mountain RWA has had single-track motorized trail use and snowmobile use in the winter. This RWA has been carried forward through 2 forests plans on the Boise National Forest. The Nez Perce-Clearwater Forest Plan Proposed Action proposes a new RWA (Meadow Creek) despite having over 40 years of summer and winter motorized use. These facts show that low levels of motorized use do not detract from wilderness characteristics in RWAs. As a result, should the Meadow Creek RWA be established, we encourage the existing motorized uses be continued.

If the planning team and the plan decision makers are already set on excluding motorized and mechanized use from RWAs, then any proposed RWA should exclude areas that have existing or historic motorized and mechanized use. There are areas on the Nez Perce-Clearwater

Forest such as the north side of Coolwater Ridge that do not have existing motorized or mechanized recreation opportunities. We feel that these are the types of areas that should be recommended for wilderness not areas with existing and historic motorized use such as the Great Burn and Meadow Creek.

Forest plans have always been controversial when they adopt popular motorized and mechanized areas for recommended wilderness. If the Nez Perce-Clearwater Planning Team is serious about lessening controversy with the general public and building support for forest service programs, then areas without existing mechanized and motorized use should be the highest priority when recommending proposed wilderness.

The need for additional wilderness in the Nez Perce-Clearwater National Forests is overstated. The planning area already has four different Wilderness areas (Selway-Bitterroot, Hells Canyon, Gospel Hump and Frank Church River of No Return Wilderness Areas). The National Wilderness System now covers 756 areas in 44 states, encompassing an area slightly larger than the State of California. Idaho has the largest combined Wilderness Areas in the lower United States with the Selway-Bitterroot and Frank Church River of No Return Wilderness only separated by the primitive Magruder Corridor Road #468.

Our staff reviewed the initial recreation opportunity spectrum gis information. We overlaid that information with existing motorized trail opportunities from the Idaho Trails Application (<http://www.trails.idaho.gov>). Our analysis shows that Alternative 5 in the proposed Nez Perce Travel Plan will convert 205 miles of motorized trails into non-motorized trails. This is on top of the 198 miles of trail that were converted from motorized to non-motorized with the Clearwater Travel Plan decision. The proposed action allocates 69% of the Nez Perce-Clearwater National Forest land base to non-motorized recreation (primitive or semi-primitive non-motorized recreation opportunity classes).

This past July, the IDPR Board approved the 2015-2019 Strategic Plan for the Idaho Department of Parks and Recreation. One performance measure that we are held to is "Work close with land management partners to ensure that there is no net loss of motorized and/or non-motorized access to recreation trails." Alternative 5 of the DRAMVU Project would not meet the performance measure of this plan, and would contribute to a Region 1 trend of continued reduction of motorized use, in spite of increased motorized recreation participation.

The revised forest plan needs to include more lands into semi-primitive motorized recreation ROS classes. To make up for the loss of Meadow Creek, the planning team could open up more single-track trail opportunities in the Weitas Creek drainage, Vanderbilt Hill area, and Great Burn.

Replacement opportunities such as the North-South ATV Route are not a replacement for lost single-track motorized and mechanized trails. Our staff has inventoried the initial North-South ATV Route proposal. The route is made up of existing roads (open to all motorized vehicles) and represents a considerably poor “trade” in terms of OHV opportunities. A collection of existing roads to make a route does not take the place of a looping single-track trail system.

Our staff reviewed the proposed action summer ROS Maps. Many of the semi-primitive motorized areas are located along low use roads, which do not provide the trail experience that motorcyclists and ATV riders are seeking. These roads should be classified as roaded natural, unless the road is only travelable by high clearance vehicles. Given the low amount of semi-primitive motorized opportunities available through the forest (14%) and the high amount of semi-primitive non-motorized opportunities (40%), the IDPR suggests an alternative that would lower the amount of semi-primitive non-motorized and raise the amount of semi-primitive motorized opportunities. The Idaho Department of Parks and Recreation is eager and willing to work with the planning staff to develop an alternative which assist meet the growing demand for motorized opportunities and is at the same time, responsive to forest service management goals.

The University of Idaho conducted an economic research study in 2012¹. They found the planning area (Clearwater, Idaho, Latah, Lewis, and Nez Perce) had \$17.9 million dollars in trip expenditures and \$25 million dollars in capital expenditures for the year, resulting from recreational OHV usage. OHV Recreation is an important economic driver in the planning area and its economic impact should be a strong consideration when managing OHV opportunities.

Reducing motorized trail access by 403 miles² is essentially closing large areas of the forest to motorized use. We have prepared an online map of these cumulative changes at <http://bit.ly/1ggCiC1>. The Welfare Effects of Restricting Off-Highway Vehicle Access to Public Lands models indicate that changing access to public lands from fully “open” to “limited” results in relatively small welfare losses, but that prohibiting access results in much larger welfare losses³.

Instead of prioritizing one activity (non-motorized) over another (motorized), the revised forest plan should seek to provide both types of opportunities and help sustain struggling, rural communities. Rural communities that have a combination of both motorized and non-motorized recreation opportunities perform better than those that just cater to non-motorized recreation.

FW-DC-REC-15 on page 47 indicates that at least one high elevation, open riding environment would be available across the two national forests. The Great Burn area provided at least 5 high elevation riding areas before the 2009 Clearwater Travel Plan decision. This plan needs to provide more than one because open high-elevation riding is what the majority of Idaho snowmobilers are seeking. Groomed trails in Idaho provide access to these areas. The IDPR recommends that at least six high elevation, open riding areas are available across the two national forests. We are willing to work with the planning staff to identify these areas.

The Recreation Section of the Proposed Plan does not address emerging and growing recreation activities. For example, recreation utility vehicles are now selling one to one on par with ATV use. In addition, manufactures are developing single-person recreation utility vehicles and electric vehicles that will need management. Emerging use is expanding dramatically and should be addressed in this plan. The revised plan needs to provide guidance to address emerging and growing recreation activities.

The proposed action allows state, and tribal employees to use motorized vehicles in special management areas after consulting with the Forest Service (MA1-GDL-SMA-02). The Special Management Areas are not recommended Wilderness or designated Wilderness. This guideline should be removed from the revised Forest Plan. The MA1-GDL-RWILD-01 guideline should be revised to state "Administrative use (federal, state, tribal) of motorized and mechanized equipment is allowed in recommend wilderness."

FW-GDL-GRZ-01 needs to be modified to include system trails. When salt blocks are placed on system trails or next to system trails, the trail can be difficult to follow because cattle create trails all around the salt block area. Many visitors have difficulty distinguishing the system trail from the cattle trails. Prohibiting placing salt blocks next to or on system trails would keep visitors from losing the system trail and lead to less route proliferation.

Conclusion

The IDPR staff looks forward to working with the Nez Perce-Clearwater National Forest Planning Staff on this project. The proposed action is a start, but work is needed to develop alternatives, especially those that would preserve recreation access.

If you have questions about our specific comments, contact Jeff Cook, Outdoor Recreation Analyst (208) 514-2483.

Sincerely,



David Langhorst, Director
Idaho Department of Parks and Recreation

¹ Economic importance of off-highway vehicle recreation: An analysis of Idaho counties Christopher Anderson and Garth Taylor CIS 1195 University of Idaho Extension

² The combined results of the 2009 Clearwater National Forest Travel Plan Decision and the Proposed Nez Perce Travel Plan Decision available at <http://bit.ly/1qgCjC1>

³ The Welfare Effects of Restricting Off- Highway Vehicle Access to Public Lands Paul M. Jakus, John E. Keith, Lu Liu, and Dale Blahna; Agricultural and Resource Economics Review 39/1 (February 2010) 89–100 Copyright 2010 Northeastern Agricultural and Resource Economics Association