



State of Idaho

Department of Parks and Recreation

BRAD LITTLE
Governor

SUSAN E. BUXTON
Director

Idaho Park and Recreation Board

Brian Beckley, Chair - District 3 | Chuck Roady - District 1 | Hugh Cooke - District 2 | Jim Keating - District 4 | Amy Manning - District 5 | Cortney Liddiard - District 6

September 27, 2024

Attention: Benjamin Johnson, District Ranger
Idaho Panhandle National Forests, St. Joe Ranger District
Via Project Portal <https://cara.fs2c.usda.gov/Public//CommentInput?Project=60853>

RE: **Lacy Lemoosh Project**, Draft Environment Assessment Comment Period
<https://www.fs.usda.gov/project/?project=60853>

Idaho Department of Parks and Recreation (IDPR) is the duly-established executive department under State of Idaho Code, with the stated mission of improving the quality of life in Idaho through outdoor recreation and resource stewardship. Acting under the supervision of the Idaho Park and Recreation Board, IDPR carries out recreational policies and programs of the State. Consistent with its statutory authorities, the Department participates in federal land management planning and project planning to further the public interest in recreational, scenic, and historical/archeological values.

IDPR staff is responsible for managing off-highway vehicle (OHV) recreation throughout Idaho through the Motorized Trail Program. IDPR's Trail Ranger and Trail Cat Programs provide maintenance and construction, and its OHV Education Program provides OHV training and environmental education. Through IDPR's Off Road Motor Vehicle and Motorbike Recreation Funds, grants are awarded to fund trail building and maintenance, and law enforcement activities. The Trail Program's partnerships with the Forest Service results in the maintenance and improvement of hundreds of miles of National Forest Trail each year.

Regarding the subject Project, IDPR offers the following commentary limited to the recreation scope of the draft EA, to inform the subsequent stage of the NEPA process:

Project documents frequently cite the term "OHV" within the context of proposed actions to provide much-welcomed summer motorized looping-trail recreation opportunities. The intended OHV machine type and maximum vehicle width to be accommodated in the proposed action is not clearly defined for the reader until reference in the EA-supporting Transportation Analysis Process document (TAP) Appendix A. There, finally, the intended OHV type to be designed for use on the trails is partially defined for Proposed Prescription codes for the proposed public OHV routes (A2, B2, C2) as "designated as a trail open to OHVs < 50[inches]" in each case.

To allay confusion for the reader –and to assure implementation to the intended use design, as to OHV type (presumed wheeled) and maximum-width to be accommodated in route designations ("up to 50 inches" or "50 inches and under" per defining terms typical in MVUM data and maps; minimally conflicted with "less than 50 inches" in terms seen in road use standards), it may be as simple as including a single narrative clarification within the final Decision Notice and FONSI as to the intent and finer definition of what "OHV" refers to throughout the EA and associated supporting documents. In this way, the existing documents may not need any edits to achieve clarity. However, we would suggest this clarification is made at least one time, early on in the text of the EA. Also consider the Acronyms and Definitions sections of the TAP, PDF pages 31-32, which could be improved by defining "UTV" and to be more specific in wording relative to the Plan intent to manage the proposed trails for max-50" wheeled-OHV summer use.

Those criticisms stated, IDPR wishes to recognize and applaud the Forest's staff's creativity and good faith in finding opportunities to accommodate recreation within the limitations of the Travel Management Rule, minimization criteria, and the objectives of the Forest Plan. Vegetation management projects are often the only realistic vehicle to include recreation scope in Forest management activities, and a pattern has emerged over the years of lost opportunities when various plans sidestep improvements to recreation opportunities out of expedience of process. Therefore, IDPR thanks the Forest for putting in the extra effort to utilize Lacy Lemoosh as a vehicle to improve recreational access and opportunities while simultaneously moving the Forest toward conditions stated in Forest Plan objectives through the totality of the prescriptions in the Plan.

Finally, I commend the multiple Forest staff who thoroughly communicated with me to help IDPR staff understand the nature and scope of the proposed action relative to the defined trail proposal. IDPR supports the OHV trail scope of the Project as-proposed because Forest staff considered the interests of local stakeholders who know the landscape well, listened to their recommendations, and acted on that input by forwarding a desirable proposal for OHV access improvements. IDPR supports the decision to define the trail proposal as for maximum 50" wheeled-OHVs, considering the Forest's other available opportunities for motorized recreation on existing roads, and trails managed to various prism designs, including opportunities for recreating by motorbikes, ATVs, and UTVs.

IDPR looks forward to a final Record of Decision to include the proposed trail scope, and toward the potential to assist implementation however may be practical within the capacity of the Motorized Trail Program's resources.

Thank you for the opportunity to comment during this phase of the process.

Regards,

Land Access Coordinator
IDPR – Recreation Bureau

CC: IDPR Trail Program staff

IDPR Map reference: <https://arcg.is/0rf0rm>