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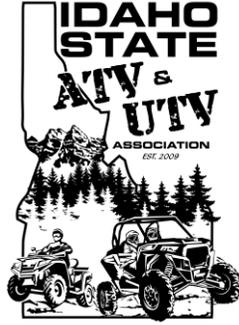
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Date: September 27, 2024

To: Idaho Panhandle National Forest, St. Joe Ranger District Office

Attn: Amy Thompson,
222 South 7th Street Ste. 1
St. Maries, Idaho 83861

via online: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=60853>

Regarding: Lacy Lemoosh EA Project #60853

Dear Amy:

Please accept this letter as the official comments upon matters regarding the Lacy Lemoosh Project #60853. Idaho State ATV & UTV Association has several comments related to the Lacy Lemoosh Project #60853.

I. Idaho State ATV & UTV Association.

The Idaho State ATV & UTV Association (ISATV/UTVA) represents motorized non-profit recognized Clubs in the State of Idaho. Our member chapter Clubs are located throughout the State of Idaho (in Twin Falls, Rupert, Mountain Home, Boise, Nampa, Emmett, Cougar Mountain, Whitebird, Elk City, Orofino, Lewiston, Coeur d'Alene) and collectively we have over 2,000 members, but represent the tens of thousands of motorized vehicle users in the State of Idaho. ISATV/UTVA members are motorized comprised of off-highway vehicles (OHV) (motorcycles, all-terrain vehicles, utility type vehicles). ISATV/UTVA members have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of recreational, aesthetic and commercial activities with the Idaho Panhandle National Forest (IPNF), which require continued use and access to the IPNF, in particular by means of motorized travel. These activities (including sightseeing, hunting, fishing, camping, wildlife and plant viewing, mushroom picking, recreational rock hounding, photography and travel) require motorized access. ISATV/UTVA regularly attend public meetings, submit input and otherwise participate in planning activities in all the national forests within Idaho.

ISATV/UTVA supports a truly collaborative framework for recreational enthusiasts and environmental interests to work together in cooperation with land managers, legislators, local government and the public to ensure a positive future for responsible recreational access for everyone, now and into the



future. ISATV/UTVA members have enjoyed the motorized uses of the IPNF. For some, OHVs and over-snow vehicles (OSV) are primarily used to provide access to points of interest, while for others (particularly snowmobile, UTV, ATV, and motorcycle users) riding the designated areas, roads and trails is the primary reason they visit the IPNF. Motorized travel within the IPNF is a tremendous recreational asset, as well as an increasingly significant economic asset for the local communities and counties. Accordingly, preserving responsible motorized access to the IPNF is an extremely high priority for the ISATV/UTVA.

II. Comments related to the Lacy Lemoosh Project #66486.

The Lacy Lemoosh Project proposal could use clarity with definitions. For example, the IPNF 2015 Land Management Plan (LMP) does not have any definitions for All-Terrain Vehicle (there is the Acronym...but no term or definition in the glossary). LMP does have a Term Off-Highway Vehicle (OHV) = a motor vehicle designed for, or capable of, cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland or other natural terrain. It's a very generic definition of 36 CFR 212.1 used in all Land Management Plans. Exception being that the Sawtooth NF went a step further by including examples like I have stated below. There are no terms or definitions referring to 50" or less in width, which is ATV. The OHV interpretation is that you believe that OHV means maximum 50" designation of trail class. Which is incorrect and needs to be corrected. OHV stands for Off-Highway Vehicles (definition: motorcycles, ATVs, UTVs) (examples: motorcycles=single track; ATVs = 50"; UTVs over 50"). We recommend adding clarification instead of leaving folks with ambiguity and unintentional understandings. This action is lacking a specific intent or plan and can be remedied by considering adding and editing terms and definition examples below.

Please consider adding and editing terms and definitions:

Add: All-Terrain Term - A type of off-highway vehicle that travels on three or more low-pressure tires, has handlebar steering, is less than or equal to 50 inches in width, and has a seat designed to be straddled by the operator.

Edit: Off Highway Vehicle (OHV) Term - Any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water snow, ice, marsh, swampland or other natural terrain. These include common vehicles such as motorcycles, ATVs, snowmobiles, UTVs.

Add: Utility Type Vehicle (UTV) Term - A small four-wheel-drive utility terrain or recreational off-highway vehicle that can seat two to six people, over 50" in width to 74" in width.

Add: Trail Open to All Vehicles (TOV) Term - The routes are included on the MVUM as off-highway vehicle trail open to all vehicles (TOV) (36 CFR 212, Subpart B). The trails are open to all vehicles, maintained as either Trail Class 2, 3, or 4 (to be determined by ground conditions), and have a tread width of 72 to 120 inches based upon suitable trail class, as defined in FSH 2309.18 – Trails Management Handbook, Chapter 20, Section 23.23 (USDA, 2008). Trail management objectives are developed for each new trail segment.



Our Association opposes decommissioning roads. We believe that roads proposed for decommissioning should be reviewed for both motorized and non-motorized trail opportunities. That rural communities and user groups want to be involved in determining opportunity locations. Decommissioning roads and trails prevents the forest, fire teams and emergency response teams from quickly gaining access into a fire area or for search and rescue efforts or for general emergency response. The IDFG likes to see decommissioning like recommending “front end obliteration instead of gates or barriers. IDFG needs to prove wildlife habitat and habitat security issues in this particular area, by showing number of species that inhabitants the area. As I am out in the forest and haven’t seen wildlife or habitat security issues. On my 114-mile trip within your District, no one saw any wildlife or tracks on roadways. The only bear I saw was just outside St. Regis by I90. Our Club members are responsible individuals who obey laws and regulations when we see gated or barrier roads. IDFG needs to prove wildlife in said area so we know what exactly is living in the area. We have seen the increase in population since 2020 and outdoor recreation users wanting to access public lands. We see a trend with forests putting a minimum value on roads and trails due to maintenance and resource shortage. The forest must recognize the economic value. For example, Non-motorized trail opportunities close to the Coeur d’Alene area are examined. Trail systems are clearly identified for appropriate uses and seasons of use. A variety of winter trails provide motorized and non-motorized opportunities. (Panhandle LMP) (intent is to possibly utilize gated roads for equine users and some for TOV and UTVs and or any other road being considered for decommissioning. That rural communities and user groups want to be involved in determining locations.) It feels like there is a decommissioning target that the St. Joe Ranger District is trying to accomplish by decommissioning OHV mileage. For example 5 miles (299B, 299E, 320, 364A) in attempt to keep density under some target.

We support OHV riders mileage increase and the new routes provided in the Tyson area would become travel loops using RD 200, 3749 and 3748. Adding onto existing trails system routes of 3 miles; adding to trails system from ne construction of 5.8 miles (20, 10A1, 10A2, 25A, 25B, 320); convert 1 mile (299E and 364A). We definitely need clarification on terms and definitions and trails for all vehicles including UTVs.

We have seen the increase in population since 2020 and outdoor recreation users wanting to access public lands. We see a trend with forests putting a minimum value on roads and trails due to maintenance and resource shortage. The forest must recognize the economic value. In the attached OHV Economic Impact Study performed in 2012-2013 shows OHV and Snowmobiling trips and expenditures. Users travel from Montana, North-Central Idaho and southern Idaho to visit Benewah County in the IPNF. They will either spend money in their home town or wait to spend money in the rural community and county that they are visiting. This data was done prior to 2020 and reflects in Idaho’s Billion Dollar Motorized Recreation Industry. The biggest issue was Access Denied! Motorized recreation has exploded during Covid and continues to be aggressive where folks want to be outdoors



and do not want to be confined in a “park-like” setting. Preservation of our recreational opportunities protects the economy, businesses and communities.

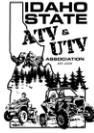
ATV registrations average 72,000. Motorbike 39,000. UTV over 50” 32,000. Specialty OHV 1,274. UTV under 50” 19,000. Total of 164,000. UTVs are a growing population and like “trail” opportunities like we are seeing in other forests occur around the state.

Access to the IPNF lands is the fabric to everyone here in Idaho where folks enjoy the views and bring their friends and visitors to enjoy the beauty. This forest provides year-around recreation for users. The club members are responsible recreationalist who do not go out and abuse the land or ride during the muddy season. We recognize our natural resource and take great pride in protecting it. We don't take anything for granted and appreciate the IPNF employees who work diligently with us on projects.

OHV users care about the resources and can assist you in establishing a travel management plan that is sustainable and can be supported by recreational users of this area. Our group has hundreds of members, and many are located and travel into the IPNF from either Coeur d'Alene, Mountain Home, Treasure Valley, Lewiston, Montana and Washington areas, so if you need assistance recruiting work group members, just let us know.

III. Conclusion.

ISATV/UTVA appreciates the St. Joe Ranger District Office employees; this Lacy Lemoosh Project; the two new OHV looping opportunities and accommodating 50” ATV user group. Thank you for incorporating citizens requests for improved OHV access in this project. It would be advantageous to take the time to provide width classification detail in the EA. The Idaho Panhandle National Forest is a tremendous recreation asset enjoyed by thousands of people each year. IPNF is one of the leading forests in Region 1 that promotes motorized opportunities on Facebook. Nice Job and Thank you! The ability to escape society and travel through secluded parts of the forest for hours on end in motorized vehicles is a thrill and escape for many people that deal with everyday life in urban settings. It is important that this project recognizes, appreciates and supports continued recreation, for motorized within the St. Joe Ranger District. Personally, I spent six days traveling, this past week, around in the St. Joe Ranger District and Lolo National Forest enjoying the views on my ATV. The Mountain Home ATV/UTV Club coordinated the rides every day in the forest and brought 32 folks with them along with 18 OHVs (two ATV, 16 UTVs). You can see that the UTVs outnumbered the ATVs on this trip 😊. Compliments on a healthy forest and everyone enjoyed the OHV routes in your forest. I will return to enjoy your forest. ISATV/UTVA believes the comments and suggestions set forth herein will be for the better of the IPNF and the humans that appreciate all that the St. Joe Ranger District offers. Thank you for the opportunity to comment. We trust that the above will be well-received and fully considered.



Very truly yours,

Karen Crosby
ISATV/UTVA President