



State of Idaho

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November 7, 2024

Attention: Ronald Tipton - Moose Creek District Ranger
USDA Forest Service
Nez Perce-Clearwater National Forests
c/o Karen Hardwick, Project Team Leader
1008 Highway 64 Kamiah, ID 83536
Via <https://cara.fs2c.usda.gov/Public//ReadingRoom?Project=67078>

RE: FSR 1114 Closure Modification Proposed Action, <https://www.fs.usda.gov/project/?project=67078>

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 current scoping process for the FSR 1114 Closure Modification Proposed Action:

Technical Matters

Trail 183 inventoried during the former DRAMVU¹ process, located between Road 1114 and Trail 723, should be assessed for presence on the ground. Legacy GIS data which informs IDPR's presentation for trails on Moose Cr. RD (8/2011) indicates the possibility of this connection, however satellite imagery is inconclusive as to the actual on-the-ground prism alignment. Trail 183 should also be analyzed in the scope of potentially affected access miles. See <https://arcg.is/0a5XeD>.

Note on page 2 of the Environmental Assessment Review Form (04_001_FSR1114ClosureModificaitonProposedAction.pdf; sic: "Modificaiton"), Table 1, cites "OSY1" which may have been intended to read "OYS1" (codes matching the standard in the former DRAMVU).

Please inform IDPR, and the project record and documents, under which NEPA project and/or Forest Order the current OYA designation was established for the first segment of NFSR 1114 starting from NFSR 286; and then for the OYS1 designation (vehicle width restriction to <50" open yearlong) of the next segment of 1114 starting at ~MM1.7, and subsequently also for the current OYS1 designations to the spurs off 1114 numbered 1114-C, 9712 and 9712-A.

Since the designations for these routes stated above matches those cited in the cancelled DRAMVU project record, we would ask the Forest for advice to IDPR and the public as to whether the 2017 FEIS Appendix B Road and Trail designation tables in cancelled DRAMVU still remains a valid reference not just for this project but for all roads and trails across the three former-DRAMVU Ranger Districts. This information will be of utility for current IDPR representational mapping purposes (in absence of FS TM mapping²). TM changes made by various NEPA projects and Forest Orders since the 2017 FEIS would understandably supersede the Appendix B tables of designations, but the 2017 FEIS Appendix B list would be a valuable starting point to determining the current-day condition.

Recreational Access Semantics

The EA Review Form in three cases on pages 16, 17, and 29, asserts non-motorized users “would gain access” by the removal (“loss”) of motorized uses from existing routes or decommissioning of motorized routes. Redesignation of existing routes to exclusive access by non-motorized users logically does not accomplish any new “gain” of access. Characterizing redesignation as a “gain” misrepresent the outcome as a binary opposite and pits the user communities against each other. This wording should be reconsidered.

Since non-motorized access is authorized everywhere on the Forest and therefore co-exists on routes designated as motorized accessible, removing motorized uses cannot inherently become a “gain.” Conversely, non-motorized users never “lose” access when a route becomes designed motorized or opens seasonally to motorized use since there is no such designation as “motorized-only” route anywhere in any National Forest.

Decision Recommendation

IDPR recommends cancelling the project or else rendering a Decision of Alternative 1, No-action. That is, NFSR 1114 and its spurs should remain open to use by all members of the public by all travel modes and times of year as per previous standing policy, prior Decisions, and respective Forest Orders.

First, an Alternative 2 Decision under any reasoning is not timely with the impending final revision of the Revised Forest Plan yet to be released. Irrespective of which version of the Forest Plan this project is formed under, it does not appear to serve a clear purpose toward reaching Forest Plan goals and may have the potential to limit non-detrimental public access contrary to the social and economic goals of the Forest Plan(s).

Second, this Project is another in a long line of examples of travel management planning by one-route-at-a-time NEPA process that goes back to the time before the 2005 Travel Management Rule mandated that all Forests complete *comprehensive* Travel Management (TM). With the June 2024 cancelation of DRAMVU, which would have implemented comprehensive TM for the three remaining Ranger Districts in the State of Idaho without MVUMs, and in light of the impending finalization of Forest Plan Revision, another case of single-route TM planning is not in order. Instead, appropriately, TM analysis of NFSR 1114 and its associated spurs and trails should be included in a renewed, comprehensive TM process pursuant to the 2005 TM Rule, which can look at the impacts and merits of retaining or removing public motorized access to routes from a whole-system perspective relative to Forest Plan objectives, balancing for the various social and resource values the Forest Plan requires the Deciding Officer to consider.

Accordingly, IDPR would strongly discourage FS from adding yet another one-off TM prescription to the stack, in that doing so will contribute further to the weighty problem of insufficiency of public notice and actionable information regarding the status of legal public motorized access to the Forest. (Cancelled DRAMVU listed --without specifically naming the projects for reference, the effects of over 100 NEPA

projects impacting travel management implementation across the three affected Ranger Districts. Any projects since would have compounded the count.)

The current form of public information for travel regulations, notably without official maps available for Moose Creek and the two other affected RDs, remains exceedingly deficient, before and since the cancellation of DRAMVU. Determining which system roads and trails the public may use, during which seasons, and by what vehicle type, is an impenetrable exercise from the public standpoint. Irrespective of existing signage to inform the public, and width restrictors and gating to physically manage access on the ground, in seeking information in lieu of travel maps the public cannot reasonably be expected to wade through the hundred-plus individual NEPA prescriptions and Forest Orders implementing TM-related actions therein, particularly since many NEPA Projects and Forest Orders impacting TM do not appear to be findable online. The NPCNF Alerts web pages³ appear to not have been updated for Forest Orders since 2022 except for one in 2023 (Court-ordered Fish Lake Trail Closure). Many Orders appear to potentially be out-of-date, and possibly many Orders impacting TM on a route-by-route basis may be missing from the collection. The public simply cannot know what is *not* online and cannot make travel decisions based on what it *cannot* see.

Lastly, the 2023 Clear Creek Integrated Restoration (CCIR) Decision⁴ affecting the area and which precipitated this current project scoping, not only made no determination as to changes to TM on the subject routes, the Record of Decision specifically cited the Deciding Officer's rational for *not* changing the existing TM prescription on the subject routes and several others involved in the broader area bounded by the CCIR project: Seasonal closures were "outside the scope of the project" (page 19 and elsewhere).

To underscore the thinking of a no-change approach on the subject routes --though technically irrelevant with its cancellation in June 2024, DRAMVU's Preferred Alternative (5M) specified no designation changes from the then current condition (1A) in the 2017 FEIS. The starting point (1A), all change Alternatives (1-5), and the final Preferred Alternative (5M) cited the same designations: OYA (1114 MM0 to MM1.7) and OYS1 (1114 MM1.7 to MM5.3; and entirety of 1111-C, 9712, and 9712-A) for the same routes now in question in this current project scoping.

Thank you for your consideration of IDPR's input in this matter.

Regards,

Land Access Coordinator
IDPR – Recreation Bureau

See *Notes and References* on following page.

Notes and References

1. DRAMVU: Designated Routes and Areas for Motor Vehicle Use.
Project web site: <https://www.fs.usda.gov/project/?project=17752>
The Final FEIS Published March 22, 2017 is obscured in the Project repository under the *Analysis* folder rather than under the *Decision* folder.
Subsequent to the 2016 release of the Draft ROD and its attending Objection period, the Final FEIS was published March 22, 2017 with the stated expectation of a Final ROD being issued within 30 days of that release. Without known reason, the Final ROD was never issued. The project became effectively shelved until it was finally cancelled outright effective June 6, 2024, as announced by email notice from the Forest on June 26, 2024. The Project page has never been updated to reflect the cancellation status issued by email. (Email copy attached.)
As of the April 2024 SOPA report, the DRAMVU project was still listed as being in the Objection period. Finally, the July 2024 SOPA report marked the project as Cancelled:
<https://www.fs.usda.gov/sopa/components/reports/sopa-110117-2024-07.html>

“2008 Road and Trail Guides” referred to in the DRAMVU cancellation announcement, as guidance as to routes where the public may use motor vehicles, are inherently defective since they are tabular lists which do not reference maps and which omit many routes subsequently inventoried in later part of the DRAMVU scoping process.
See <https://www.fs.usda.gov/activity/nezperceclearwater/recreation/ohv>

Though a part of the cancelled DRAMVU document collection so not official, the closest to a usable map IDPR has found is the DRAMVU ROD Alternative 5M “Selected Alternative, and Other Decisions” map: <https://usfs-public.app.box.com/v/PinyonPublic/file/931852325324>
However, the map indicates route closures which are not implemented but which have been allowed to “naturally close” through the course of leaving the routes unmaintained.
2. Though not in an MVUM map or dataset since Travel Management was not completed under the 2005 Travel Management Rule, Moose Cr, Red River, and Salmon River RDs Roads centerlines are published in the Enterprise Data Warehouse (EDW), in the RoadCore geodatabase. RoadCore is available by static file download (Esri .GDB) or dynamically via “REST” service. Since published to the EDW, Roads centerlines are presumed to be current and meeting the national standards for centerline publishing and therefore availed for public consumption.
See <https://data.fs.usda.gov/geodata/edw/datasets.php?dsetParent=Transportation>
Centerlines for trails in these three RDs have not been similarly published to the EDW, else they would appear in EDW’s TrailNFS_Publish geodatabase and could be used in a preliminary pre-TMP map to aid the public until TMPing can be completed.
3. NPCNF Alerts pages: <https://www.fs.usda.gov/alerts/nezperceclearwater/alerts-notice>
4. 2023 CCIR Project: <https://www.fs.usda.gov/project/nezperceclearwater/?project=38021>

USDA Forest Service Nez Perce National Forest Travel Plan Update

USDA Forest Service <forests@public.govdelivery.com>

Wed 6/26/2024 5:42 PM

To: Alex Ernst <Alex.Ernst@idpr.idaho.gov>

CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Dear Planning Participant,

You are subscribed to Nez Perce National Forest Travel Plan for USDA Forest Service. This information has recently been updated, and is now available.

The Nez Perce Travel Management Plan Project, also known as the **Designated Routes and Areas for Motor Vehicle Use (DRAMVU Project)**, is on the Salmon River, Red River and Moose Creek Ranger Districts of the Nez Perce-Clearwater National Forests.

On June 6, 2024, Forest Supervisor Cheryl Probert decided to cancel the current DRAMVU planning effort. This site-specific planning effort has far exceeded the new guidance for timelines of National Environmental Policy Act efforts. The existing project analysis and documentation would need significant updating due to the long duration of the planning effort, several species status changes under the Endangered Species Act, the need to update consultation, new executive orders, and potential changes from the ongoing [Land Management Plan for the Nez Perce-Clearwater National Forests Revision](#) effort. The Forest will evaluate the need for travel planning efforts after the decision on the Revised Forest Plan is final. If information and analysis in the DRAMVU project is relevant and still the best available, it may be utilized for further planning efforts. Any subsequent travel planning efforts will consider tribal interests and contemporary public uses.

Beginning almost 20 years ago, the Forest completed an extensive NEPA effort, public involvement, consultation with the Nez Perce Tribe and federal agencies. The DRAMVU project Proposed Action was presented in 2007, a Draft **Environmental** Impact Statement (EIS) was presented in 2010, a Final Supplemental EIS was presented in 2012, a Final EIS and Draft Record of Decision were distributed in February 2016, the pre-decisional administrative review period was completed in June 2016 and a Final EIS was presented in March 2017. These documents and information are available on the project webpage: <https://www.fs.usda.gov/project/?project=17752>. It has been 7 years since the public saw the Final EIS and Draft Record of Decision.

Motorized access, wheeled and over-snow vehicles, on roads, trails and areas on the Nez Perce portion of the Nez Perce-Clearwater National Forests, will continue to be managed and enforced under signed Regional Forester Orders or Forest Supervisor Orders. See the 2008 Nez Perce National Forest - Road Access Guide and Trail Access Guide, at the Forest OHV Riding and Camping webpage on-line here: <https://www.fs.usda.gov/activity/nezperceclearwater/recreation/ohv>.

If you have questions about road, trail or area access please contact the District Rangers:

- Jeff Shinn, Salmon River Ranger District, 304 Slate Creek Road, White Bird, ID 83554; call 208-839-2211 or email: jeffrey.shinn@usda.gov.
- Jeremy Harris (acting), Red River Ranger District, 300 American River Road, Elk City, ID 83525; call 208-842-2245 or email: jeremy.harris@usda.gov.
- Ron Tipton, Moose Creek Ranger District, 831 Selway Road, Kooskia, ID 83539; call 208-926-4258 or email: Ronald.Tipton@usda.gov.

If you have questions about the DRAMVU project please contact Jennie Fischer, Team Leader, call 208-983-4048 or email: jennie.fischer@usda.gov.

Thank you for your interest in the management of Nez Perce-Clearwater National Forests.

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