

Data Submitted (UTC 11): 4/17/2020 7:00:00 AM

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Organization: Efficient Public Collaboration

Title:

Comments: Please find our cover letter and 2 recommendation attached, along with one map. Please let me know if any of these documents did come through.

ATTACHED COMMENT BELOW

Efficient Public Collaboration: Topic #4 Forest Plan Revision - Draft EIS Comments: Recreation/Access: Recreation Opportunity Spectrum (ROS) I. Introduction: Efficient Public Collaboration (EPC) is an organization working collaboratively to find resolutions to natural resource issues and to make recommendations to public agencies. EPC is organized using the U.S. Forest Service definition of collaboration: "Collaboration: A structured manner in which a collection of people with diverse interests share knowledge, ideas, and resources while working together in an inclusive and cooperative manner towards a common purpose." 36 CFR 219.19 EPC comprises a diverse group of people (the Collaborative Pool has approximately 45 organizations/groups/interests), sharing knowledge, ideas and resources in a structured, inclusive, and cooperative manner (non-profit organization with a Mission Statement and Charter, open to any group or organization agreeing to the Charter), working with the common purpose of supporting the broadest possible public interest for the use of public lands. II. EPC's Process for arriving at its Recommendation: EPC's common purpose/goal is to facilitate a dialogue that focuses on multiple public interests or the greatest good. In short, EPC defines the public interest, as framed by the courts, as the broadest a set of interests held by the public related to the topic and within the parameters under which the agency must operate. EPC's Collaborative Group for this topic represents approximately 38 organizations/groups that came together not to negotiate over how to divvy up the pie, but to collectively identify how all interests could be considered and a solution in the broadest possible interest identified. While EPC is open to any organizations/group that agrees with its purpose/goal, some organizations choose not to participate in the EPC's process. The interests of these groups are still taken into account by EPC's Collaborative Group. III. The Collaborative Topic: EPC's Advisory Group, after discussions with EPC members and National Forests, selects a topic on which to collaborate. The Collaborative Topic EPC addressed in this document is: What lands should be allocated to the different Recreation Opportunity Spectrum (ROS) strategy and what Plan Components should be assigned to these different ROS allocations as part of the Nez Perce -Clearwater National Forest's Forest Plan Revision. IV. EPC's Recommendation: The Collaborative Group came to a consensus on the following recommendations for each of the ROS strategies. The recommendations are presented largely in the form of a map. The rationales for the allocations are also described below: a. See the attached ROS maps for both winter and summer recreation opportunity recommendations. b. MA 3 should be mostly Roadless Natural (RN) c. Two areas are identified to meet the needs of a Semi-Primitive Motorized opportunity, with a low motorized trail/road density, are: 1. East and West Meadow Creek Roadless Area (RA) 2. Big Horn/Weitas RA. The Sneakfoot RA (Selway Additions) should be managed as a mixed-use winter recreation area (Semi-Primitive Motorized) to meet the interests of the public who are looking for a winter recreation area with easy access. e. Hoodoo RA (Great Burn RWA) should be Semi-Primitive Non-Motorized except for about 20% of the area, which would be Semi-Primitive Motorized (See additional attached map). f. Provides an overall balance between motorized and non-motorized areas, particularly for Semi-Primitive Motorized and Non-Motorized. V. EPC's Rationale for each of the Roadless Area Recommendation: The Collaborative Group's rationales for each of the recommendations are based on the following: a. MA3 as Roadless Natural: MA3 consists largely of the land suitable for timber production. It is reasonable for the public to assume there will be vegetation treatments and timber harvest on these lands. It does not seem reasonable for the public to encounter a Semi-Primitive Setting while recreating in this area. The expectation would be for a Roadless Natural Setting, especially as timber harvesting progresses. If a focus of MA3 is using timber harvest to achieve vegetation goals, then overlaying a possible restriction does not correspond with that desire. Also, hard-wiring small areas that currently meet a Semi-Primitive Setting amongst Roadless Natural Settings removes opportunities to modify transportation systems or to adapt to changing conditions. b. East and West Meadow Creek RA and

Weitas RA: EPC agrees with the wilderness assessment's description concerning the ecological value of the East Meadow Creek and West Meadow Creek RA's. However, it is this backcountry/primitive environment that also makes it desirable for the public who are looking for a Semi-Primitive Motorized Setting. The limited amount of this type of setting in the Forest compared to the amount of Semi-Primitive Non-Motorized Setting, makes this area important to this user group. It is also important for the following reasons:

1. Provides significant economic value to Elk City and Dixie by the visitors (many from out-of-state) who use motorized routes in the West/East Meadow RA.
2. The value and "ease of use" of the historically available and future access from the West via paved highway system. See the EPC recommendation concerning recommended wilderness for additional support for this recommendation.

c. Sneakfoot and North Fork Face RAs: There has always been a public interest in areas that have easy access (close to towns or highways) with quality summer and winter recreation opportunities. This area has provided that opportunity for the public, particularly those on the east side of the Forest. This is a small but popular area with potential for growth and capable of accommodating increased use. This area provides for a mix of family-oriented recreational opportunities including snowmobiling, snowshoeing, cross-country skiing, snowboarding, hiking, and mountain biking. It provides opportunities for a range of activity levels, from easy to difficult. This area has great opportunity for the recreating public that ROS mapping does not otherwise account for. Sneakfoot and North Fork Face RAs provide easy access to the Selway Wilderness and a transition from the highway to a semi-primitive motorized to semi-primitive non-motorized and then primitive. Bringing the wilderness boundary closer to the motorized activities would only diminish the wilderness character and increase conflict. This would not be a positive addition to the Selway's wilderness character and would eliminate an important recreational area valued by a wide range of mixed users and interests, including city, county and state governments.

d. Hoodoo RA (Great Burn RWA): See EPC for our recommendation specific to this area. This is a summary of that recommendation. Hoodoo RA is the only remaining area in the Forest that provides for a high elevation recreation experience that can be accessed by means other than hiking or horse back. This area consists of numerous lakes and high basins that are highly desired by the recreating public, including those who use or need alternative modes of access. This area would be summer non-motorized except for the trail to Fish Lake. It would be winter non-motorized except for approximately 20 percent that would be motorized. Within this 20 percent area, site-specific decisions would be made as to where snowmobiles would be allowed. This would allow for an adaptive management approach to address wildlife concerns. It is not suggested that the specific areas available for snowmobiles be identified as part of the revision effort. We believe it is not appropriate to make a site-specific decision on the exact areas for snowmobile use as some are proposing. We are suggesting a general area that allows for modifying decisions as new information or changed condition may arise.

e. Balanced User Opportunity: This recommendation results in approximately 30% of the Forest in a Roaded Natural/Rural Setting, approximately 30% in Primitive Setting, and 40% in a Semi-Primitive Setting. There would be approximately 12 percent in motorized and 25 percent in non-motorized, providing a balance of opportunities.

VI. Collaborative Group Participants and Other Organization Contacted: The following is a list of those who make up EPC's Recommended Wilderness Project Collaborative Group and others who have been involved in our discussions and deliberations. There was unanimous agreement on the EPC recommendation among the EPC Collaborative Group/Committee.

The Collaborative Participants and Other Organization Contacted:

Organization in Collaborative Group Agreeing to Recommendation

Group Representative

American Legion (AL) Jinny Cash Backcountry, Hikers, Bicyclists & Equestrian, Inc. Cory Biggers Citizen at Large Tracy Duncan Clearwater County Commissioner Mike Ryan Clearwater Trekkers Leslie Anderson Community of Dixie Steve Repp Efficient Public Collaboration Marty Gardner Elk City Karen Crosby Empire Lumber Greg Danly Idaho Aviation Association (IAA) Bill Ables Idaho Co. Veterans Association (VFW) Jinny Cash Idaho County Commissioner Skip Brant Idaho Park & Rec Randy Doman Idaho Pathfinders Todd Stenzel Idaho Recreation Council Mark Jennings Idaho Soil and Water Conservation Commission Eileen Rowan Idaho State Snowmobile Association Sandra Mitchell Idaho Wild Sheep Foundation Mike Schiegel Health Care Administration Michelle Gardner Lewis and Clark ATV Club Jim McIver Mining Interest Ron Hartig Montana Mountain Bike Alliance Greg Beardslee National Wild Turkey Foundation Alex Arnold Public Lands Access Year-round (PLAY) Dave Galantuomini River Access For Tomorrow (RAFT) Jim McIver Small Businesses Don Ebert Small Businesses Kelli Rosollini Team Lochsa Scott Bledsoe The Oregon Pilots Association (OPA) Bill Ables The Recreational Aviation Foundation (RAF) Bill Ables Twin Rivers

Back Country Horseman (TRBCHI) Carl Paulson Professor (Ret.) of Natural Resource Management Steve Daley-Laursen (Dr.) Professor of Environmental Philosophy Bert Baumgartner (Dr.) Director of Outdoor Recreation Program, U of I Trevor Fulton Veterans of Foreign Wars (VFW) Jinny Cash Western Whitewater Association Shay White Organization in the Collaborative Group Pending Internal Processes for Final Response Group Representative Mineral County Roman Zylawy Ravalli County Chris Hoffman Nez Perce County Don Beck Lewis County Greg Johnson Lewis and Clark Chamber of Commerce Kristin Kemak Organization in the Collaborative Group Having a different Recommendation Group Representative None State of Idaho Government Consulted Idaho State Representative, District 7 Representative Priscilla Giddings Agreed with this recommendation Organization/ Individual Advising the Collaborative Forest Service, ID Team Leader Zach Peterson Professor of Law Barb Cosens (Dr.) Idaho Department of Fish and Game, Clearwater Region Zach Swearingen Idaho Department of Parks and Recreation Jeff Cook ATTACHED RWA COMMENT LETTER

BELOW

Efficient Public Collaboration: Topic #3 Forest Plan Revision [ndash] Draft EIS Comments: Recommended Wilderness Area (RWA) I. Introduction: Efficient Public Collaboration (EPC) is a non-profit organization working collaboratively to find resolutions to natural resource issues and to make recommendations to public agencies. EPC is organized using the U.S. Forest Service definition of collaboration: [ldquo]Collaboration: A structured manner in which a collection of people with diverse interests share knowledge, ideas, and resources while working together in an inclusive and cooperative manner towards a common purpose.[rdquo] 36 CFR 219.19 EPC is a collection of people with diverse interests (the Collaborative Pool has approximately 45 organizations/ groups/ interests), working in a structured manner (non-profit organization with a Mission Statement and Charter), sharing knowledge, ideas and resources, while working together in an inclusive and cooperative manner (EPC is open to any group or organization agreeing to the Charter), and works towards a common purpose (EPC works toward a single goal of what is in the broadest possible public interest when looking at public lands). EPC is not a collection of people, each working towards their own individual interest, but rather focused on a common purpose, a purpose exceeding each individual interest. II. EPC[rsquo]s Process for arriving at its Recommendation: EPC[rsquo]s common purpose/goal is to facilitate a dialogue that focuses on multiple public interests or the greatest good. In short, EPC defines the public interest, as framed by the courts, as identifying the broadest set of interests held by the public related to the topic and within the parameters the agency must operate under. EPC[rsquo]s Collaborative Group for this topic represents approximately 38 organizations/groups that came together not to negotiate over how to divvy up the pie, but to collectively identify how all interests could be considered and a solution in the broadest possible interest identified. While EPC is open to any organizations/group that agrees with its purpose/goal, some organizations choose not to participate in the EPC[rsquo]s process. The interests of these groups are still taken into account by EPC[rsquo]s Collaborative Group. III. The Collaborative Topic: EPC[rsquo]s Advisory Group, after discussions with EPC members and National Forests, selects a topic to collaborate on. The Collaborative Topic EPC addresses in this document is: What lands should be allocated as Recommended Wilderness Areas (RWA) and what Plan Components should be assigned to these RWAs as part of the Nez Perce [ndash] Clearwater NF[rsquo]s Forest Plan Revision. IV. EPC[rsquo]s Recommendation: The Collaborative Group came to a consensus on the following recommendations for each of the Roadless Areas (RA). The rational for each recommendation will follow: a. Mallard Larkin RA: Recommend as an RWA b. Hoodoo RA (Great Burn): Not recommend as an RWA, c. North Fork Face RA (Selway Addition): Not recommend as an RWA d. Sneakfoot RA (Selway Addition): Not recommend as an RWA e. East Meadow Creek RA and West Meadow Creek RA: Not recommend as a RWA f. All Other RA: Not recommend as an RWA V. EPC[rsquo]s Rational for each of the Roadless Areas Recommendation: The Collaborative Group[rsquo]s rational for each of the recommendations are based on the following: a. General - Context: There is approximately 1.14 million acres (29%) of congressionally designated wilderness on the Nez-Perce Clearwater National Forest (Forest). This is the second largest land allocation on the Forest and an allocation the revision process can not alter. Although the Forest can recommend areas for wilderness, they cannot designate wilderness. The largest land allocation is from the Idaho Roadless Rule which created approximately 1.48 million acres (38%) of Forest as Idaho Roadless Area. The Idaho Roadless Rule is a higher-level decision than the Forest Plan and therefore the revision process can not alter this allocation either. Land suitable for timber production is another allocation of approximately 932,000 acres (24%) of the Forest. Although this allocation can be altered by the revision process, this number represents the highest acreage

possible and could only be reduced through revision. From a recreational opportunity aspect (ROS) or an access stand point the Forest is currently around 54% non-motorized. Of this approximately 30% is in a primitive classification, which is largely in designated wildernesses and cannot be changed in the revision process. Roadless Natural and Rural classification are also fairly consistent between alternative ranging from 24% to 26% combined. The main issue is with the Semi-Primitive allocation divided between motorized and non-motorized. In the DEIS SPNM and SPM range by alternative from: Semi-Primitive Non-Motorized (SPNM): 34% to 13% Semi-Primitive Motorized (SPM): 32% to 18%. It should be noted that these numbers can misrepresent the actual usage on the forest. Examples of this include:

Example 1: An area may be mapped as semi-primitive motorized for winter but given the terrain, snow condition, and/or vegetation there may be large areas that are not used or physically not capable of being used by motorized vehicles.

Example 2: Conversely, there may be areas mapped as semi-primitive non-motorized that because of terrain, vegetation, or other physical restriction are not utilized or desired by the public.

Example 3: There is also the situation where areas within a mapped semi-primitive motorized allocation are closed to motorized travel for a variety of reasons, including but not limited to, resource protection, winter range, calving season, and/or to reduce motorized density.

In general, the public appears to be more interested in specific areas and types of use rather than overall percentages of ROS allocation acres. There are some groups that do focus on ROS percentages. Although the Forest DEIS did not address this concern with ROS, EPC did take this into account as it identified the varying public interest in making its recommendation.

b. General - Protection of Resources: There is almost total agreement that many of these roadless areas provide for important resources like fisheries, wildlife, water quality, and other resources. The vast majority of interests agree these values and areas need protection. The differences appear to be more about how to protect them. Some groups view Wilderness designation as the vessel to provide maximum protection. They want the permanent protection provided by a congressionally protected area and not able to be altered by the next revised forest plan. There are others who want the full range of management activities, including timber harvest as the way to provide protection. There are some who want the area protected but believe the wilderness act is too restrictive and, in some cases, because of the act's restrictions actually threaten some of the resources by restricting activities needed to protect the resources. These groups see the Idaho Roadless Rule with the addition of the Forest Plan providing the protection needed. This concept appears to have the greatest support.

c. Mallard Larkin RA: Recommends as a RWA EPC agrees with the wilderness assessment's description of the Mallard Larkin RA. EPC also agreed with the wilderness assessment that there were minimal conflicts identified with summer/winter motorized use or mountain biking. Because of the high degree of wilderness character and minimal user conflicts, EPC recommends this area as a RWA. EPC also recommends this area as a RWA because the collaborative felt that it provided for a greater amount of public interest when considered part of a total package of areas recommended as wilderness. Although there are some who do not want to see any recommended wilderness, there are others who do want to see areas recommended for wilderness; adding this serves the greater interest, thus increasing interests addressed.

d. Hoodoo RA (Great Burn): Not recommend as a RWA The rationale for the Hoodoo RA was discussed in a previous recommendation to the Forest during its comment period prior to the DEIS. EPC recommended the area be recognized as a "special management" area protecting the resources similar to wilderness but allowing for certain activities to continue. EPC believes the rationale for the recommendation is still valid. That recommendation is attached to this recommendation. A summary of that rationale follows:

- * The Great Burn is the only remaining area on the Nez Perce-Clearwater National Forest that provides this high elevation setting with numerous lakes that can be utilized by a variety of uses that are not available in the existing wildernesses on the Forest.
- * There are historical uses of this area by a variety of users which have social and economic benefits.
- * Human intervention has increased fuels and altered the climate that may not allow for natural processes under the wilderness act

The Idaho Roadless Rule eliminated development in the Great Burn. EPC agrees with the wilderness assessment concerning the ecological value of this area; however, we feel the assessment and the DEIS did not accurately identify the historical users and those interests nor did it describe the context and intensity of this area in relationship to the entire forest. EPC recognized there are some groups who want to see this area as an RWA, however, the collaborative was not able to determine that in doing so would address the greater interests.

e. North Fork Face and Sneakfoot RAs (Selway Addition): Not recommend as a RWA EPC agreed with the wilderness assessment's description concerning the ecological value of the North Fork Spruce-White Sand

and Sneakfoot RA. However, EPC did not feel that the wilderness assessment or the DEIS accurately described or recognized the current users and the many interests nor did it describe the context and intensity of this area in relationship to the entire forest. There has always been a public interest in areas that have easy access (close to towns or hwy) with quality summer and winter recreation opportunities. This area has and does provide that opportunity for the public, particularly those on the east side of the Forest. This is a relatively small area but a popular area with potential for growth and capable of accommodating increased use. This area provides for a mix of family oriented recreational opportunity that can consist of snowmobiling, snowshoeing, x-county skiing, snowboarding, hiking, mtn biking, and other activities. It provides a range of opportunities from easy to difficult. As mentioned earlier, this is an area that has great opportunity for the recreating public that ROS mapping does not account for. It also provides easy access to the Selway Wilderness. It provides for a transition from the highway to a semi-primitive motorized to semi-primitive non-motorized and then primitive. Bringing the wilderness boundary closer to the motorized activities only diminishes the wilderness character and increases conflict. It would not positively add to the Selway's wilderness character, but would eliminate an important recreational area valued by a wide range of mixed users and interests, including local (city and counties) and state governments. For these reasons, EPC agreed that the greater interest for this area is not recommended wilderness but to build on the opportunity for the diverse recreational opportunities it has provided over the years and continues to provide.

f. East Meadow Creek RA and West Meadow Creek RA: Not recommend as a RWA. EPC agreed with the wilderness assessment's description concerning the ecological value of the East Meadow Creek and West Meadow Creek RA's. However, EPC did not feel that the wilderness assessment or the DEIS accurately described or recognized the current users and the many interests nor did it describe the context and intensity of this area in relationship to the entire forest. It also did not recognize the economic value this area has on the communities of Elk City and Dixie:

1. The significant economic value to Elk City and Dixie afforded by the visitors (many from out-of-state) who use motorized routes in the West/East Meadow RA.
2. The value and ease of use of the historically available and future access from the West via a paved highway system.

There are those who are interested in the Forest providing a backcountry motorized experience. Some have described it as a primitive motorized experience. It consists of people who enjoy the high backcountry but do not have the means to get there. They are not interested in road, but rather motorized trails. There are two areas on the Forest that have the potential to be managed with an emphasis for this semi-primitive motorized recreation experience; East and West Meadow Creek RA and the Bighorn-Weitas RA is the other. The DEIS or Draft Plan does not identify any area with an emphasis on managing for this recreational opportunity. It identifies areas as semi-primitive motorized, but as mentioned earlier, just the mapping of areas does not look at or recognize an area's potential to be managed to accomplish an objective. This semi-primitive motorized opportunity is lacking on the Forest. There is approximately 1.5 million acres of semi-primitive non-motorized/primitive on the Forest. There is a desire to have a quality semi-primitive motorized area, with an emphasis on managing for and promoting that opportunity rather than occurring randomly. It would not positively add to the Selway's wilderness character, but would eliminate an important recreational area valued by a wide range of mixed users and interests, including local (city and counties) and state governments. For these reasons, EPC agreed that the greater interest for these areas is not recommended wilderness but to build on the opportunity for diverse and equitable recreational opportunities across the forest, opportunities that have existed for the last thirty years.

g. All Other RA: Not recommend as a RWA. The other roadless areas were not identified as having high wilderness characteristics. They are either smaller, have well established uses, and/or not supported as recommended wilderness area.

VI. Collaborative Group Participants and Other Organization Contacted: The following is a list of those who make up EPC's Recommended Wilderness Project Collaborative Group and others who have been involved in our discussions and deliberations. There was unanimous agreement on the EPC recommendation among EPC Collaborative Group/Committee.

The Collaborative Participants and Other Organization Contacted:

- Organization in Collaborative Group Agreeing to Recommendation
- Group Representative
- American Legion (AL)
- Jinny Cash
- Backcountry, Hikers, Bicyclists & Equestrian, Inc
- Cory Biggers
- Citizen at Large
- Tracy Duncan
- Clearwater County Commissioner
- Mike Ryan
- Clearwater Trekkers
- Leslie Anderson
- Community of Dixie
- Steve Repp
- Efficient Public Collaboration
- Marty Gardner
- Elk City
- Karen Crosby
- Empire Lumber
- Greg Danly
- Idaho Aviation Association (IAA)
- Bill Ables
- Idaho Co. Veterans Association (VFW)
- Jinny Cash
- Idaho County Commissioner
- Skip Brant
- Idaho

Park & RecRandy DomanIdaho PathfindersTodd StenzelIdaho Recreation CouncilMark JenningsIdaho Soil and Water Conservation CommissionEileen RowanIdaho State Snowmobile AssociationSandra MitchellIdaho Wild Sheep FoundationMike SchiegelHealth Care AdministrationMichelle GardnerLewis County CommissionerGreg JohnsonLewis and Clark ATV ClubJim McIverLewis and Clark Chamber of CommerceKristin KemakMining InterestRon HartigMontana Mountain Bike AllianceGreg BeardsleeNational Wild Turkey FoundationAlex ArnoldPublic Lands Access Year-round (PLAY)Dave GalantuominiRiver Access for Tomorrow (RAFT)Jim McIverSmall BusinessesDon EbertSmall BusinessesKelli RosolliniTeam LochsaScott BledsoeThe Oregon Pilots Association (OPA)Bill AblesThe Recreational Aviation Foundation (RAF)Bill AblesTwin Rivers Back Country Horseman (TRBCHI)Carl PaulsonProfessor (Ret.) of Natural Resource ManagementSteve Daley-Laursen (Dr.)Professor of Environmental PhilosophyBert Baumgartner (Dr.)Director of Outdoor Recreation Program, U of ITrevor FultonVeterans of Foreign Wars (VFW)Jinny CashWestern Whitewater AssociationShay WhiteOrganization in the Collaborative Group Pending Internal Processes for Final ResponseGroup RepresentativeMineral CountyRoman ZylawyRavalli County CommissionerChris HoffmanNez Perce CountyDon BeckState of Idaho Government Consulted NameCommentIdaho State Representative, District 7Representative Priscilla GiddingsAgreed with this recommendation except for Mallard-Larkins, which should not be RWAOrganization in the Collaborative Group Having a different RecommendationGroup RepresentativeNoneOrganization/ Individual Advising the CollaborativeForest Service, ID Team LeaderZach PetersonProfessor of LawBarb Cosens (Dr.)Idaho Department of Fish and Game, Clearwater RegionZach SwearingenIdaho Department of Parks and Recreation Jeff Cook