

Data Submitted (UTC 11): 1/27/2024 8:00:00 AM

First name: Karen

Last name: Crosby

Organization:

Title:

Comments: Hello,

My Objections and suggestions are contained in attached file.

Objections:

East Meadow Creek being listed as RWA.

No objective in Sustainable Recreation for:

- over 50" user group
- no objective/std for stating that if a motorized lost opportunity occurs that another opportunity will be created in the forest locally in the area.
- semi primitive non-motorized ROS on Front Country and Roadless Areas. Basically this kills any opportunity for ATV trail in a roadless area.
- There needs to be clarity in the forest plan on how this forest intends to consider the 2008 Idaho Roadless Rule and regards to ATV trails and should be considered.
- The proposed Forest Plan hasn't listened to the local communities, Idaho County Commissioners nor their constituents in regards to not adding additional acres to Wilderness or Wild and Scenic Designations. Solution is to make Meadow Creek semi primitive motorized ROS which is what it is. It is not potential Wilderness and is a roaded area with motorized trails.

I look forward to resolving.

Sincerely,

Karen Crosby

January 27, 2024

Objection Reviewing Officer
USDA Forest Service, Northern Region 1
26 Fort Missoula Road
Missoula, MT 59804

RE: Karen Crosby Objection Comments to the 2023 Land Management Plan for the Nez Perce-Clearwater National Forests

Sustainable Recreation Management Section:

I object that there is no recreational objective for over 50" OHV USER GROUP. The forest plan dictates the planning and zoning for the Travel Planning. There is no mention in the forest plan addressing the over 50" growing OHV user groups. The interpretation is that this greater than 50" OHVs will be addressed in Travel Planning. However, what is outlined in the Forest Plan will be the framework that we will work with within the Travel Plan Mgmt phase. How can we address in Travel Planning when it is not addressed in the Forest Plan?

Secondly, the recreational objectives on pg.76 makes the user group feel like trails are going to be reduced to a point that we are all recreating in on congested area. Annually maintained to a standard a minimum of 30 percent; reduce deferred maintenance of trails by 5% every 5 years.

Regarding the forest service saying there are resource issues. I have requested to help set priority for which trails are contracted. I have yet heard any response back from the forest. The forest is awarding trail contracts which consist of a series of trails to be done over a four year period. Who is setting the priority of which trails are maintained. The local groups are requesting across the Nez and Clearwater forests without any engagement from the Forest. Someone else is setting the priority and this is unfair to the user groups. The user groups want to be engaged in the process of setting the priority and which trails are selected. Historically the trails are non-motorized and this behavior needs to change within the forest service. Even though the forest has seen a reduction in their maintenance. The forest service feels that they are at "full capacity". Money should never be in the equation for motorized trails. Data shows that the forest service likes to eliminate and/or severely limit motorized use.

If there is ever a case where a motorized road/trail opportunity is lost; I support a standard or objective being added that states the Forest providing that when a motorized road/trail opportunity is lost, the lost opportunity will be mitigated by the addition of a new opportunity in other areas locally within the Forest.

Standards FW-STD-REC-01 - Roadless Rule is not identified in their examples. This standard basically says there is no roadless rule acknowledgement. Is the Roadless areas still recognized as roadless on a forest when they have a ROS?

pg.82 Ecosystem Services Guidelines FW-GDL-ES-01. should also include "non-motorized" verbiage. Secondly this guideline If a route is identified as adversely affecting aquatic ecological values, rerouting and route improvements should be considered prior to closure, to preserve motorized/non-motorized access opportunities. If a route or area needs to be closed, alternate motorized access to maintain social and economic sustainability of rural communities should be provided. this guideline should be added to the Recreational Values section on page 76.

Designated, Recommended, Geographic and other Special Areas Section

-I object to East Meadow creek being a RWA.

Current uses of East Meadow creek should still be allowed (motorized, bicycles and chainsaws)

There should not be a semi-primitive non-motorized ROS overlay on roadless areas or roaded areas. We had an atv road that was decommissioned in a roadless area that was there before the roadless enacted. That could have been used to help fight the fire that went through Orogrande. We want clarity on how this forest intends to consider the 2008 Idaho Roadless Rule areas with regard to TRAILS. In other Forests, roadless designation Roadless does not mean no motorized trails or OSV access, but it is considered. IOW, "Roadless" does not mean "Motorized-Trailless" and that will be a battle to fight during TMP NEPAing. The forest service has made the Roadless Rule worthless by their Region 1 attitude and just ignoring it. We need objective in the Forest Plan addressing the 2008 Idaho Roadless Rule areas with regards to Trails, semi-primitive non-motorized ROS and Trails.

I object that there is nothing addressing how a fire will be fought in the event that more Wilderness is created near towns like Elk City and Newsome. People's lives and homes will be on the line. We seen what happened in the Orogrande Fire of 2022 and how the wildland fire fighters retreated.

This proposed Forest Plan has not listened to any communities, recreation users, Idaho County Commissioners nor their constituents in their comments regarding wilderness. For example, the Idaho County residents passed a resolution vote put on a ballot stating that they do not support more acres of wilderness to Idaho County. And do not support adding wild and scenic river segments. In the Red River District, we performed a signature drive with over 1,000 signatures where recreation users do not want anymore Wilderness or Wild and Scenic Designations. The outfitters that operate in the Meadow Creek drainage sent the forest service a letter letting them know that they do not support any RWA or Wilderness designation. Outfitter's cannot access their permit areas due to fire damage, fallen trees due to tree root deterioration, erosion and the habitat has exited the area as well. The forest service has included a roaded Meadow Creek area as potential wilderness that has motorized trails and vehicles access into East Meadow Creek, Lynx, Running Creek areas. The forest service is claiming a chunk of land outside of Meadow Creek as RWA. Running Creek, Bargamin and Lynx creek drainages do not drain into Meadow Creek. The 285 Elk Mountain Road is the divide ridge line. The outfitter in the area cuts roughly 75 miles of trail in the East Meadow Creek and Running Creek via trail contract. 2 guys can clear five miles a day with a chainsaw. Whereas the forest service brought in seven guys with hand saws and worked seven days to open a trail that could have been easily opened up in two days with two guys using chainsaws. Users see the forest adding Wilderness so they do not have to manage the land. Then the forest and their partners want

"Administrative Use" to use motorize in a RWA/Wilderness. The forest lives by a different standard than the common day worker who wants to access the forest and cannot. The more Wilderness, the less users get to use the land. The forest has blocked the Idaho Department of Parks and Recreation Trail Rangers from clearing trails in the area. Motorized Motorbike and ATV users should be able to continue riding routes in this area. Allow the IDPR Trail Rangers to maintain the motorized trails in Meadow Creek.

The forest does not have the ability either financially or resource wise to manage the forest as they want to manage. The forest service people could not stop people from accessing the forest, they had a difficult time managing areas where they allowed users to recreate. It isn't smart to do something that the forest cannot manage effectively to begin with. If they close an area it has to be manageable and definable or it is ineffective. In the end, the decision does damage to the land, the fuel loads as seen in Orogrande where the wildland fire fighters couldn't get a handle on the fire and retreated and burned historical building and destruction to campgrounds. Let alone try to issue citations on travel planning when the forest only has three LELOs. Not manageable by any means possible.

I look forward to resolving these issues.

Sincerely,

Karen Crosby

Hello, My name is Karen Crosby. I am submitting my comments for the Nez Perce-Clearwater National Forests: Draft Revised Forest Plan and Draft DEIS. I live in Elk City, Idaho and have a lodging rental business. My late husband and I purchased property and moved to Elk City from the Treasure Valley back in 2010. Prior to 2010, I first started riding ATVs on the Elk City trails back in 1998 when we first purchased ATVs. I was invited to spend time hunting here with friends who I worked with in Boise and finally took them up on the offer to come up here in 1992. I am an Idaho native resident and raised in a family that recreated in many forests here in Idaho. In 2013, my husband built a rental business providing nice lodging accommodations for recreation users who are mobile or restricted to wheelchairs. From my past volunteering experience as Gem State ATV Association Officer, Idaho State ATV Association Officer; many clubs (Mountain Home, Kuna, Boise, Riggins, Lewiston) came to Elk City bringing their members (4 to 40+) who camped on my property and staged for rides (day rides and weeklong rides or 2 wk rides) - riding the Lolo Motorway or Magruder Corridor or riding southbound for Prairie roundtrip up to Stanley/Challis/Montana back to Elk City. These users are both ATV and buggy users. Middle age users have or will be migrating from ATV to side-by-sides to accommodate family structures to include their children or grandchildren and babies. My customers are referrals from clubs and Off-Highway Vehicle (OHV) users or repeat families who call the local ranger station seeking information for their summer travel vacations. Families travel here from out of state to make Elk City their destination vacation spot several times during a summer, for example and they come here for the side-by-side riding opportunities and fishing time at the ponds out in Red River or Orogrande 5-mile pond. I took this family from the Tri-Cities area on a loop ride that they thoroughly enjoyed and then learned that they couldn't go on that particular route anymore due to a new replacement bridge

and barricade restricting them in their side-by-side. They are very unhappy because they can't go again and take their family. They like the roads but really like old roads that get them off a main road so they can have a somewhat backcountry experience without being in a congested high traffic area. The family has been a repeat guest for the last 3 years. This is the first year that they won't come because they feel motorized routes are being restricted and they will go ride in other areas that accommodate their side-by-side riding.

Recreation Riding Areas include all the Anderson Butte trails, Red River trails, trails and roads between Red River and Dixie, and over to Orogrande and Buffalo Hump area; along with trails leading to Sourdough and Old Golden; Elk Summit, Newsome Creek drainages, Pilot Knob and over to Lookout Butte and down to Selway Falls. Lodging Guests riding extends further to the Lolo Motorway, Magruder Corridor and Elk City Wagon road south to Hungry Ridge and on to Burgdorf, or from Riggins to Elk City via same route through Florence, Adams Camp.

My rental guests OHV riding complaints consist of:

- * increasing desires for opening up decommissioned gated roads and creating loops for the Seniors riding in side-by-sides (SxS) over 50";

- * Why? Based on Idaho Department of Parks and Recreation OHV Registration Data, side-by-side usage has dramatically increased and drives the need for conversations to startup on how the forest service will provide riding opportunities for SxS over 50".

- * re-establishing the SxS route in Whiskey Creek area after the timber sale completes (9815, 9867);

- * Why? This is a popular route for the SxS seniors who participate on club rides and allows them to get off the main forest road, and would bring in money for local club.

- * Re-establishing Selway Falls NF-443 lower section up for full size vehicle travel for Jeeps and SxS;

- * Why? This is a number one call complaint from motorized riders who have enjoyed this 33 mile road to Selway Falls and dined at local caf[eacute] in 3-Rivers Resort, then drive back to Elk City. This route served as a Egress route for our small community. The Trail machine riders are extremely unhappy at not being able to travel and forced to take a much longer route

- * Re-establishing Meadow Creek motorized trails and any other motorized trails lost from the past, previous Administrations intentional actions to reduce/eliminate motorized trails in the Nez Perce National Forest.

- * Why? The past, previous Administrations have not followed proper protocol and sought local input. This became apparent while addressing the ATV barricade installed on the NF-9836 5-mile bridge replacement project. In 2005, the Administration made a decision to eliminate full size vehicle traffic on the lower section of NF-9836, and re-classify from full size vehicle to ATV 50". In a 10/4/2019 agency meeting between the Acting Floor Supervisor and Idaho Department of Parks and Recreation-Recreation Bureau Chief David Claycomb, the Acting Floor Supervisor acknowledged this particular decision was a one-off decision and there were a bunch of other motorized routes affected as well. It is the goal of the motorized community to re-open the motorized trails that were closed by Administrative Closures or however they were closed during Travel Planning in the early to mid-2000. Another example is the ATV trail 541 to Green Mountain via Meadow Creek that was closed by Administrative Closure.

I prefer Alternative X as described in the DEIS. I have attached the Petitions signed by the greater Elk City Area which includes Newsome Creek Community, Orogrande Community, Dixie Community, Red River Hot Springs users, and Elk City Residents and recreation travelers who frequent Elk City Businesses. Petition Counts: Adverse Economic Impact Petition=1,071; Alternative X Petition=422. The "Adverse Economic Impact" petition signatures believe there will be Adverse Economic Impacts on the greater Elk City area's economy. A significant portion of the Elk City, Idaho business community is dependent upon recreation, tourism, hunting, fishing, mining and logging in the Nez Perce-Clearwater National Forests. The addition of more "Recommended Wilderness Areas" RWA designations and "Wild and Scenic Rivers" designations will have a negative and detrimental impact on the Elk City area economy; resulting in the loss of jobs and economic hardships. Orogrande folks initiated these petitions to collect signatures and I aided in helping to collect signatures as well. I respectfully submit these signatures on behalf of the residents and travel visitors who come here for their family vacations. The "Alternative X" petition signatures are in support of the Nez Perce-Clearwater National Forest's "Forest Plan Revision":

Alternative X! to Wit: No more Wilderness and wild-Scenic Rivers areas in the Nez Perce-Clearwater National Forests; more vehicle and off-road vehicle access on National Forests Roads (Open Closed Roads and Do Not Close other Roads); expanded opportunities for Logging, Mining and other activities. Alternative "X" allows for more access to USFS Roads (not closing them off to the public and motorized users). It stops the encroachment of federal government rules and regulations on public access and control of these areas; as well as, preventing more "Wild and Scenic Rivers" and "Wilderness" designated areas which adversely and directly impact small mountain communities such as Dixie, Elk City and Orogrande, Idaho. Each signature is to be counted as "one" individual and separate vote in favor of each petition. Each signature represents the wishes and desires of each individual signatory. The total number of signatures are to be counted in their totality; not as a single document from some "Special Interest" group. The total number of votes to be tabulated, are the total number of signatures on each petition. This forest is home to the largest wilderness area in the lower 48 states. The forest has enough wilderness already. I oppose any new wilderness in the Nez Perce Forest, and I oppose any recommended wilderness in the Nez Perce Forest.

I have attached my rental profit/loss comparison economic data showing profit/loss comparison 2016-2019. I have also attached Elk City area Lodging Guest percentages non-motorized_motorized data collected from a phone survey, done in early 2020, with Elk City lodging businesses and have data collected from Orogrande Campgrounds showing visitor usage and concerns. For the Phone Survey, questions asked to the business owner were what type of travelers stay at your place and what percentage of those travelers are non-motorized vs. motorized. I would like to note that there is a percentage of travelers considered 'day trippers' who will drive over 50 miles to the Elk City area and drive back out the same day. This Phone Survey only considered those visitors who purchased over-night stay accommodations. These travelers are spending more money in the town businesses like the Elk City General Store, Elk Creek Station and Caff[eacute] and fuel, restaurants and bars, gift shops at the Elk City Hotel and Framing Our Community, and visiting Red River Hotsprings for a soak and burger. Over 90% of visitors are motorized. Motorized users consist of ATV groups, Side-by-Side groups, Hunters and Trail Bike groups. Group size ranges between 6 - 40. At the Red River Hotsprings resort, they have 95% motorized and 5% non-motorized. Non-Motorized users are peddlers who travel forest roads and motorized routes. The Red River Hotsprings resort do not have guests who travel into Meadow Creek area. They also get day users who swim and eat along with overnight guests. In the Dixie area, they have motorized hunters on ATVs. When Dixie will have a fuels reduction project, afterwards they want to take some of the logging roads and make into ATV trails. In the Elk City area, the corporate mining company plays a huge factor in our economics. Endomines Corporate team leases my rental for their lodging needs along with other places here in Elk City. The last two winters, this company was here in Elk City full time standing up their operation. The money spent on fuel,

groceries, ca[ccute]'s is incredible as it carries our small businesses through the lean winter months. The suction dredgers who travel here in July/August, spend money as well at local businesses and are welcome here in Elk City. When the Forest Supervisor's project team came to Elk City to share information on the Draft Revised Forest Plan and DEIS, the supervisor and project lead took time to meet with Elk City businesses and discuss economic matters with each and every business. The community message to the project team is that they do not want additional Recommended Wilderness Areas and no Wild and Scenic River Designations. The Nez Perce-Clearwater National Forests Supervisor should follow lead of what the locals want, desire and need.

The Forest needs to increase our summer motorized use opportunities for Trail Machines in Meadow Creek drainages; and side-by-side trails using low-level roads and creating loop opportunities for generations to come. The Meadow Creek area, both east and west, present special opportunities for single-track, motorcycle riders. Please preserve these special motorized opportunities by excluding the Meadow Creek area from RWA - it lacks suitability for this purpose. The Anderson Butte 505 trail in the West Meadow Creek area should remain open to OHVs 50 inches or less, and the 541 Green Mountain trail should be re-opened to ATVs that was closed with a special order. The DEIS ignores the tremendous growth among UTV users. IDPR 2018 OHV Registration Numbers Histogram Chart shows the tremendous OHV growth in Idaho. The Forest should recognize for, and plan for the increasing UTV use by making an objective to increase low-level maintained roads and trails that will accommodate UTVs wider than 50 inches and other high clearance off-road vehicles. Along with this objective, should be another to provide that opportunities be increased for OHV travel by OHVs greater than 50 inches in width. As we are seeing as I shared earlier, OHVs greater than 50 inches are being forced to operate on full-size auto roads. My guests are requesting they be provided trail opportunities. There are plenty of opportunities to provide this user group. There's an opportunity over in Silver Leggett to Newsome Creek, other opportunities with old logging roads are around us here in Elk City.

It is important to our small community to extend the GEM trail south. The Elk City to Florence trail would most likely cross Johns Creek, which needs an ROS setting that allows for the construction of this trail. In addition to this area, the Smith Ridge connector needs an ROS setting that allows for its construction. These objectives would be a great addition to the existing GEM system and develop an OHV route running the length of Idaho from north to south.

I support area designation of Primitive Motorized and Semi-Primitive Motorized. In the Elk City greater area, we need more motorized recreation opportunities so that users will keep coming back and bring their friends with them. I encourage the Forest Service to avoid road and trail decommissioning. Jean Poxleitner has been working on this front to get decommissioned roads opened up where it makes sense and there are no obvious reasons that appear to be an issue to keep roads from being opened. These conversations need to continue and make progress in getting decommissioned roads opened. If there were ever a case where a motorized road/trail opportunity is lost; I support a standard or objective being added into this Revised Forest Plan that states the Forest providing that when a motorized road/trail opportunity is lost, the lost opportunity will be mitigated by the addition of a new opportunity in other areas within the Forest.

I have heard the Forest say there are resource issues. Idaho Department of Parks and Recreation (IDPR) - Recreation Bureau Chief said, in the October 4th meeting referenced earlier in my comments, that is not the case. How can there be a resource issue when you haven't even asked for grant money to assist your efforts in

trail building/maintenance work. Historically, travel planning only goes one way and that is towards non-motorized. This is a symptom of a much larger issue. Data does not support that travel planning give access to motorized users. Data says that the forest service likes to eliminate and/or severely limit motorized use.

Even though the Forest has seen a reduction in their maintenance. The Forest Service feels that they are at 'full capacity'. On motorized trails alone, IDPR can't give away the grant money. Money should never enter the equation for motorized trails. The Nez Perce Forest is not taking advantage of existing IDPR money for motorized trails. If the Forest was to look internally, they would see that the grant money they are requesting is for non-motorized trails. That is a reflection of values.

Regarding Wild and Scenic River designations, there are enough federal and state regulations in place for water quality. The Southfork of the Clearwater river is not a high-quality river system like other rivers before it who were labeled with this designation. This river has a state highway running along side it, there is Avista power and Frontier phone lines running alongside river, mine tailings. The Southfork of Clearwater river should not be considered for this type of designation.

Thank you for the time and effort that you and your project team have done to work hard and achieve this goal of revising the forest plan. I have to say this has been a good experience for me and it has been a pleasure to create working relationships with you and your team. Local users like myself are more than willing to help with these activities to keep our routes open. I look forward to continuing our collaboration and helping the success of your project.

Warmest regards,

Karen Crosby