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This letter is in response to the Nez Perce-Clearwater National Forest's request for comments on the 2023 version of the Forest Plan.

The Idaho Chapter, Lewis and Clark Trail Heritage Foundation is a group of individuals interested in the Lewis and Clark Trail, its history and stewardship. Draft comments were reviewed by the Chapter Board of Directors.

Our comments follow on the next four pages. Sincerely,

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Enclosure 4 pages

COMMENTS ON 2023 NEZ PERCE-CLEARWATER FOREST PLAN AND RECORD OF DECISION

We have reviewed the 2023 Forest Plan and Record of Decision and have the following comments which relate to our comments in 2014. We primarily focused on the Record of Decision, on Appendix I: Lolo Trail National Historic Landmark Administrative Context and Management Recommendations.

The Idaho Chapter's focus on the Lolo Trail Landmark goes back at least 40 years, and with our member's background we question some of the Landmark facts and the Landmark Integrity discussion.

1. THE LANDMARK LEGAL CORRIDOR IS INADEQUATE: Our comment #1 in 2014 was to redo the Lolo Trail National Historic Landmark. This is still not complete.

We see four significant stages in the development of the Lolo Trail into a system of now Historic Travel ways.

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* The first stage was the initial development of a trail by people wearing moccasins traveling between resource areas long before the arrival of the horse. Most of those trail traces have become too faint to follow unless they became a horse trail in stage 2.

* The second stage occurred after the arrival of the horse which provided the technology to increase trade between the peoples of the Columbia Basin and the Great Plains. The Lolo Trail was the trade route that facilitated the trade between those geographic areas. Heavy horse traffic built a tread by using the trail, and that is the trail that Lewis and Clark followed.

* The third stage was the first deliberately built trail using iron tools. It was done under government contract by two men named W. Bird and Major Truax. It is often referred to as the B-T trail. This is the trail that the Army followed when crossing the Bitterroot Mountains in pursuit of the Non-Treaty Nez Perce in the 1877 war and is the route designated by Congress in adding NezPerce National Historic trail to the National Historic Trail system.

* The fourth stage is the first motorized road across the mountains. It used the same ridgeline route of the Lolo Trail. It was completed in the 1930s and was given the popular name Lolo Motorway. It was the only road across the mountains south of Coeur D'Alene until the completion of the Lochsa River Road more than 20 years later.

We believe the Historic Landmark Corridor should include all four of these stages. According to the maps the corridor fails to include significant portions of the first motorway. Our understanding is that the first road out of Musselshell Meadows was the Pioneer Mine Road built in the late 1800s and which was extended in 1928 by today's current Road #535 to Beaver Saddle, then today's Road #104 east over Snowy Summit, past Beaverdam Saddle, to Pete Forks Junction where it met today's Rd # 500. Most of road #535 and

parts of road #104 are not included in the current description of the landmark. Some of our members visited Dr.

Merle Wells about this in 1989 and again in 1990 when he accompanied the Lolo Trail Chapter's tour of the Lolo Trail following the 1990 National Lewis and Clark Trail Heritage Foundation's National meeting. When his first nomination did not include many of these sections of road, he apologized to some of our members and promised to include it in a revision. We have discussed this with several Forest Archaeologists since and were told it would be corrected but it never seems to happen.

Further, the description about the Lolo Trail [CORRIDOR] as presented is limited thinking and needs to be viewed from a much larger perspective than just National Forest Land. The name [Lolo] comes from Chinook Jargon, a language used by early fur trappers, traders, and explorers in the Pacific Northwest to communicate between the many tribes and groups. It contained words from many languages. If you Google [Chinook Jargon] it will lead you to an early dictionary dated 1863. It informs us that [Lolo] means [carry] or [to carry]. This suggests that the trail was a [carry] over the mountains. We know it was an important link between the Columbia Basin peoples and the people of the Great Plains and is mentioned in many early journals of that era.

The western terminus of the trail should be considered at the mouth of Alpowa Creek at the Snake River, about 10 miles west of Clarkston, Washington where two Native American trails met coming from southwest near Walla Walla and from the north near Spokane and Coeur d'Alene areas. From the mouth of Alpowa Creek the Lolo Trail went east through Clarkston, WA, Lewiston, Idaho and east over the Camas Prairie near the town Nez Perce, Idaho where it split. One route dropped to Greer, crossed the Clearwater River and then to Weippe. The other fork went to Kamiah, and then crossed the Clearwater River and then Lolo Creek and then to Weippe. From Weippe the trail went east to Musselshell Meadows and then followed the traditional ridge trail over Snowy Summit, Beaverdam Saddle to Rocky Ridge and east to Lolo Pass, to Lolo Hot Springs. The eastern terminus was Lolo, Montana where trails from the Kootenai north, from the Great Plains, from eastern Idaho met in the north end of the Bitterroot Valley.

We believe the State Historians of all three states should work together with the Nez Perce Tribe to rewrite and re-map this nomination.

2. NATIONAL HISTORIC RECREATION TRAIL.

Our 2nd comment in 2014 was the abandonment of the National Historic Trail across the forest as called by in the Congressional designation.

The route designated as NeeMePoo National Historic Trail fits the requirements in 16 USC

1241 which calls for trails [along historic travel routes of the Nation] of 100 miles or more and the purpose is [recreation.] (see further definition in our 2014 comments) The NeeMePoo National Historic trail meets those criteria and is unique in that it is the few such trails in the nation. Where else can trail

users such as youth groups or Horse riders follow a trail with high historic values, not be faced with extended marches on a road competing with motorcycle and ATV traffic while enjoying adjacent road support in the event of accident or other needs? This goal was incorporated into the 1987 plan, and we believe it should be a significant element in this plan.

1. LOLO TRAIL FACTS: We note that Appendix I, Fact #3 lists the trail length as 62 miles. This is the currently open length, but if open the length of the National Historic Trail from Musselshell Meadows to Lolo Pass would be about 100 miles. Then it is 7 miles to Lee Creek Trail Head on the Lolo NF where today's trail starts. Since our mileages are educated guesses from Google Earth, these numbers will change once the 40 miles of existing trail is reopened so that it can be used by the public as Congress directed.

We request that you revise the Record of Decision and the relevant Appendix with the correct facts or at least a better description of the facts listed in the Appendix.

LOLO TRAIL MANAGEMENT CONCERNS.

1. LANDMARK MANAGEMENT AND TRAIL MANAGEMENT.

Plan hierarchy. We quibble about the discussion of trails not being important to Landmark Management. If the primary purpose of designating a trail to be a National Historic Trail under 16 USC 1241 is to have a trail for recreation use by the American public, how can there not be a goal of an open public trail for public use? The plan sets other goals such as the allowable cut, so by the absence of such a goal sets a lower value on public use versus the sale of physical items. We request that this goal of a public trail called for in 16 USC 1241 be included.

Trail to Nowhere. Secondly, both Congressional laws and this plan call for volunteers to help maintain the trails and facilities. The existing trail starts at the western edge of the forest at low elevation in heavily timbered lands and climbs to the ridgeline and ends near the center of the forest in a very un-dramatic way. For ten years the Idaho Chapter, Lewis and Clark Trail

Heritage Foundation organized and managed a week-long 25-person volunteer project maintaining about 30 miles of trail, together with signs and occasionally the road. The volunteer program died during Covid, but a major reason dropping the annual work program was that the experienced volunteers saw little public use of the trail. Why spend time, energy and money maintaining a trail that no one uses because it is a trail to nowhere. We wonder how you can carry out Congress's goal of utilizing volunteers on one hand while on the other hand you kill the incentive to volunteer.

5. WHAT WILL NOT HAPPEN IS THE FOCUS OF THE PLAN, AND LITTLE IS SAID ABOUT WHAT WILL HAPPEN. Management concern #1. The landmark and its status were viewed as something to get around. We see change for the worse, not for the better. In the 1987 plan there were specific goals. Several Forest Supervisors between Mr. Jim Caswell and Ms. Cheryl Probert were either ambivalent or hostile to the landmark, its management and its goals. Now the plan removes the "do-something" goals and in effect says: Trust Us. One of the purposes of a Forest Plan is to provide for consistent management as individual managers come and go. We believe this plan goes in the wrong direction.

6. INCREASED NATURAL FIRE CLOSES THE HISTORIC TRAVEWAYS TO PUBLIC USE. Two of the past three years have resulted in a Prescribed Natural Fire burning near the motorway. To ensure public Safety the Forest closed the National Forest land to public entry from mid-summer to late in the fall. Much of the time there was little fire activity and little or no Forest Service presence near the fires, but public entry was still

prohibited. We are concerned that [ldquo]prescribed natural fire[rdquo] is a tool being used to reduce public use because public use increases the management costs to the agency.