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Title:

Comments: Comment on Clearwater Nez Perce Forest Plan

Dear Forest Planner

Please read and consider our attached comments and include them in the record

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What should the Forest Service make a high priority?

- Priority #1 should be preserving public access and recreation opportunities by preserving public access, roads, trails and campgrounds under the Multiple Use Act.

This should not be dependent on the public's availability to attend planning meetings or willingness to submit comments. Additionally

Opportunities for the public to access and recreate on public lands must be viewed as a highly valued resource, a resource which needs to be safeguarded and preserved just as environmental resources are currently safeguarded.

- o If recreation opportunities are further restricted, the loss must be mitigated in kind and the cost of the mitigation must fall to the agency mandating the change. Example; If Fish and Wildlife mandate that public access be restricted and routes closed the lost recreation opportunities (route miles, type, terrain, connectivity, etc.) must be replaced in-kind and the cost born by Fish and Wildlife as mitigation.

2) How should the Forest Service restore forests so that ecosystems are more resilient to climate change and uncharacteristic wildfire?

- Getting more fuel reduction projects implemented on the ground would improve forest health and fire resilience and reduce the need for huge standby fire crews and equipment. It would also provide income and a renewable product.

- Roads and trails need to be kept open as fire breaks and access routes for fire fighting and forest health projects.

USER CONFLICT OR INTOLERANCE

While visiting the Clearwater Forest we found ourselves on the incredibly overgrown Brown Hill trail #490.

Vegetation had completely obscured the trail

with downed logs hidden underneath. However this trail was part of our loop back to camp so we persevered carefully following the non-existent trail

on our motorized trail bikes. The trail was not marked as closed. Imagine our surprise when we saw a sign at the other end showing the trail as closed to

motorized use due to conflict with mountain bikers (picture at right). There was no way mountain bikers or anyone else was using this trail. We did notice an

extensive horse camp on another nearby trail with tent platforms, irrigated lawn and solar lighting. It seems likely that the Brown Trail was closed to

motorized trail bikes in order to provide more exclusive use of the area by the horseman.

Forest Service regulations allow managers to consider Conflict of Use when managing trails. A Conflict of Use would be the physical incompatibility of two types of activities. For example, a popular destination trail and campground are in an area that has been identified for clear-cut logging. If the logging were allowed the trail and campground would be closed for two years. The

one activity would be a Conflict of Use and prohibit the other. This is far different from a User Conflict, in which some users do not want to share trails with other forms of recreation. User Conflict should not be a valid criterion for trail designation. In the past anti access groups have claimed user conflict, often imaginary or contrived and been rewarded with exclusive use of areas to non-motorized recreation. While they may not get everything they want, they often get something. Motorized users always lose something, which has a cumulative effect of more users on smaller and smaller motorized trail systems. It may be time to level the playing field. In future when a user group makes a case that they cannot share the resource, they should be excluded from using those areas. This would go a long way towards encouraging future collaboration and tolerance among recreationists.

The Recreation Opportunity Spectrum (ROS) is out of balance-

The 2014 Assessment found that 69% of the Forest is set aside for non motorized recreation under Primitive and Semi Primitive Non Motorized ROS lands while only 14% of the Forest allows Semi Primitive Motorized Recreation.

According to the 2006 NVUM for the Nez Perce Clearwater Forest there were 690,000 visitors for the year and of that 29,000 or a mere 4.3% visited Wilderness. Yet 69% of the Forest is already set aside for their Wilderness experience. This forces 95.7% of the public to recreate on the remaining 31% of the Forest. There clearly are not enough lands for Multiple Use.

The creation of Wilderness Areas discriminates against youth enjoying these lands. Only 8% of Wilderness visits are by people under the age of twenty, compared with 20% visitation on Non Wilderness lands, indicating an aversion to lands with Wilderness restrictions. Here are two compelling reasons for the lack of Need for Wilderness- 1. Many of the current non motorized trails are overgrown and suffering from lack of use. 2. Maintenance of trails in non motorized areas is far more costly and time consuming than on motorized trails. Yet motorized recreation has been found to be the fastest growing form of recreation and this appears likely to continue, while non motorized recreation is on the decline.

There is a current need for more motorized single track trails and ATV trails in order to disperse use, reduce impacts and provide greater loop opportunities for future generations.

The ROS needs to be changed by increasing Semi Primitive Motorized (SPM) areas.

Currently the SPM ROS in many areas is a cherry stem allowing only the existing motorized trail surrounded by large Semi Primitive Non Motorized (SPNM) areas. This precludes the ability to add motorized routes or provide routes to connect trails. (See Map Below)

There already are huge blocks of Wilderness lands in the Forest providing exclusive non motorized recreation, although the trails in these areas often lack use. There is a need to categorize all SPNM lands outside of Wilderness as SPM in order to reduce maintenance costs for these trails, provide for this growing use and provide the greatest net benefit by allowing all

forms of recreation to enjoy the non Wilderness trail system. This would likely also improve forest health by allowing the Forest Service to perform much needed active management in these areas to more easily removing bark beetle infestations etc.

According to the Outdoor Industry Association study the Overlooked Economic Giant, Off Road Vehicle recreation is the largest economic form of recreation providing over \$100 billion each year to the economy. This lends credence to the importance of Off Road recreation as well as the incredible economic impact of recreation which was not acknowledged in the Assessment or the Proposed Action. (see table)

Special Management Areas restricting motorized use should not be created

There is a need for more motorized trails to reduce impacts and provide opportunities for the growing population, therefore the proposed action should not make SMA designations (below)

which prohibit the expansion of the existing motorized trail system if needed. Creating these designated SMA

may needlessly cause the future closure of these motorized routes since they are in a Special Area.

- SMAWPMC: Recreational motor vehicle use is prohibited in the SMA with the exception of the boundary trail, 505 Anderson Butte ATV trail.

- SMACayuse: Recreational motor vehicle use is prohibited in the SMA other than the designations for motor vehicle use per the 2011 Clearwater Travel Management Plan FEIS ROD.

Key Characteristic of Roadless is Activities are Allowed that are Prohibited in Wilderness-

Some may mistakenly desire the creation of the above SMA's thinking that is required for motorized trails to be allowed in Roadless Areas, however existing Roadless Areas can and do allow motorized trails per the below sections of the 2008 Idaho Roadless Rule.

Roadless characteristics: Resources or features that are often present in and characterize Idaho Roadless Areas, including:

(1) High quality or undisturbed soil, water, and air;

(2) Sources of public drinking water;

(3) Diversity of plant and animal communities;

(4) Habitat for threatened, endangered, proposed, candidate, and sensitive species, and for those species dependent on large, undisturbed areas of land;

(5) Primitive, semi-primitive non- motorized, and semi-primitive motorized classes of dispersed recreation

§ 294.26 Other activities in Idaho Roadless Areas.

(a) Motorized travel . Nothing in this subpart shall be construed as affecting existing roads or trails in Idaho Roadless Areas. Decisions concerning the future management of existing roads or trails in Idaho Roadless Areas shall be made during the applicable travel management process.

(36 CFR Part 294 Special Areas; Roadless Area Conservation; Applicability

to the National Forests in Idaho; Final Rule) Lands not suitable for Wilderness Recommendation- Through

Wilderness and other designations a considerable amount of the National Forest has been closed to most forms of recreation other than horseback or hiking. Sixty Nine Percent of the Clearwater Nez Perce has already been closed to most forms of recreation. This is more than enough land for hikers and horseman to have the exclusive use of.

- The Forest Service has not shown any Need for more Wilderness lands.

- Visitation in Wilderness areas is only 4.3% of visitation and likely to shrink further.

- Many trails in Wilderness are overgrown.

- The difficulty and cost to maintain Wilderness trails is higher than multiple use trails.

- Expansion of Wilderness will needlessly increase impacts on non Wilderness lands.

None of the remaining multiple use lands should be recommended for Wilderness. This is where the majority of the public recreate and where off road vehicle and mechanized recreation are allowed.

Many people are confused regarding the re-inventorying of lands for Wilderness. It is not widely understood that the Forest Service has been mandated with reanalyzing Forest Lands for recommendation for Wilderness, however it would be expected that any lands that were previously not recommended for Wilderness would remain "Not Recommended for Wilderness" given the same criteria.

Closures Not Supported by Wildlife Studies - Another trail in the area was closed year long to motorized use due to Elk Habitat. (pictured)

Over the years there has been much speculation as to the impacts of noise on wildlife. Studies of effects of human intrusion on animals often find profound

impacts. As a result, it is commonly assumed the impacts of OHV noise are equally as damaging. Research has shown that, while noise is initially

startling, animals generally adapt very well under most circumstances. Long term effects to animals, particularly big game animals, are negligible. Much of

the same research has shown that animals are more frightened by humans on foot than they are by OHVs.

A study commissioned by the Federal Highway Administration and performed by the U.S. Forest Service (Ward, Cupal, et al, 1976) near Laramie,

Wyoming, found that elk were likely to remain lying down and unconcerned when a trail bike rode by as close as 15 yards. Conversely, the elk took flight virtually every time a human walked within 20-100 yards.

Another study commissioned by the California Department of Parks & Recreation (Jones & Stokes Associates, Inc. 1991) found similar results. No significant variation was found in the activity and foraging patterns of mule deer due to differing levels of OHV use.

Research commissioned by the Maine Department of Parks & Recreation (Anderson & Mason, Unity College, 1991) found that ATV use in Mt. Blue State Park had no significant effect on wildlife. Control areas were set up to compare ATV and non-ATV disturbances for several animal groups, including deer and birds.

Historically, it appears that wildlife disturbances attributed to OHV use have been overstated.

Unusually high levels of OHV use, however, may have an effect on certain sensitive species, especially during reproductive stages. Where this occurs forest planning needs to look at expanding the trail system in order to disperse use and lower OHV concentration.

The Forest Plan needs to use the best science for travel management, including the above.

NEED FOR CHANGE- Sustainable Recreation and Forest Health

Importance to People There is one thing that everyone who enjoys National Forest lands needs and that is Access.

Driving on forest roads and trails is the main method of access for all forms of recreation.

Whether you are a hiker driving to the trailhead, a horseman towing stock to the trailhead, a mountain biker driving to the trailhead, a fisherman driving to the creek, a kayaker driving to the put in or take out, a camper driving to your camping spot, an off roader, a rancher hauling stock, or forest staff managing forest lands- everyone uses roads and trails.

They are especially important to those with disabilities, since in many cases motorized or wheeled vehicles may be the only way for them to enjoy their public lands. The Americans with Disabilities Act was updated in 2011 to address the need for access for the disabled on public lands.

There is a high demand for motorized and mechanized recreation shared trails which have been the fastest growing forms of recreation. Together these two forms of recreation provide the largest economic impact and when driving for pleasure is included they are the most popular primary forms of recreation per the NVUM. The increasing trend toward adventure sports will likely add to the continued popularity of motorized and mechanized recreation.

The Agency has reported that spending by recreation visitors in areas within 50 miles of national forests and grasslands amounts to nearly \$13 billion each year. Those dollars sustain more than 224,000 full and part-time jobs. Recreation accounts for more than half of all job and income effects attributable to Forest Service programs.

Threats to Losing Benefits in the Short-Term: Current Situation and Trends

While a demand analysis has not been done for either motorized or mechanized recreation, the demand for the multiple use trails they enjoy has not diminished and will likely increase in future.

Closures or restrictions that cause a reduction of existing multiple use trails will concentrate use and potentially increase environmental impacts, as well as increasing maintenance costs. Existing trails/areas were generally not planned, designed, nor constructed for OHV activities. Many areas that provided for trails/areas did not incorporate enough miles or enough challenge to adequately accommodate the OHV user. This has contributed to OHV management problems by

not dispersing the use and not providing the full spectrum of challenge levels (easy through most difficult). This practice often resulted in resource damage as a result of overuse and development of new trails that do not exist on inventory records. Environmental litigation has caused management by courts which have little or no expertise in managing public lands. This in turn has caused analysis paralysis where the Forest Service is forced to analyze and re-analyze in an almost endless loop that is cost prohibitive. The result is that few projects are implemented on the ground. Yet projects are needed to help promote forest health.

Important projects include fuel load reduction and recreation management while allowing use to continue.

Nationally, Fire Suppression now consumes 41% of the entire Forest Service budget of which \$1 billion goes to fire preparedness. Having the necessary equipment available and hiring retaining the crews is extremely costly.

This huge cost burden is taking much needed funding from recreation and forest health projects. Getting more fuel reduction projects implemented on the

ground would improve forest health and fire resilience and reduce the need for huge standby fire crews. It would

also provide income and a renewable product.

Ecological, Social and Economic Sustainability The Forest Service of the US Department of Agriculture is dedicated to the principle of multiple

use management of the Nations forest resources for sustained yields of wood, water, forage, wildlife and recreation. While funding has fallen short of that necessary to maintain existing trails in many National Forests many grassroots motorized volunteer groups have stepped up or would step up to eliminated deferred trail maintenance if the motorized trail system was kept open or expanded. The multiple use trails provide the greatest public benefit since they allow all forms of recreation. Money spent on multiple use trails and the efforts by motorized volunteers benefit everyone. Dispersed recreation is less costly since no facilities need to be built or maintained. Loop trail

opportunities should continue to be encouraged. "Recreation and tourism are vital to most rural economies. They depend on abundant access to National Forest Lands. Actions by public agencies to reduce or limit access to recreation on public lands have a direct and negative impact on the local economy. Limiting access by closing roads, campgrounds, RV parking, and trails negatively impact the surrounding communities." (USDA –Jobs, Economic Development and Sustainable Communities –Dr Glenda Hurniston 2010)

Successful management of the OHV program is highly dependent upon a strong commitment by line officers and program managers. Without exception, in those areas where the Forest Service Review Team saw this commitment they also saw a successful program with less resource damage, more user enjoyment, and less public controversy. Where sufficient range of experience and challenge are provided, there was less indiscriminate cross-country travel and fewer

enforcement problems. The concept of Trail Capacity may be used to express the physical ability of a trail to withstand use or the rate at which a trail incurs wear that eventually results in the need for maintenance or replacement. Current Management Direction: Opportunities for Change

The Forest Plan should encourage multiple use trail recreation and dispersed camping in order to continue to provide the public with this much desired opportunity and to provide for increased demand on National Forest Lands.

There has been too great a focus on environmental issues with little or no regard for the negative impacts to social and economic issues such as recreation trails. Abundant multiple use access to public lands provides a much needed opportunity for people to enjoy and connect with nature.

To help achieve positive change to the current management direction we recommend the following for the Forest Plan:

1. Update Recreation Opportunity Spectrum (ROS) so that multiple use land acreage is increased to allow for the expansion of these trails as needed in future
2. Change ROS to reflect existing motorized and mechanized uses in areas that are not designated Wilderness in order to continue to provide multiple use recreation and prevent fragmentation of multiple use trail systems, as well as to prevent concentration of use with associated increased impacts. Changes to ROS can also help ensure that roads needed for management to reduce fire hazard and perform forest health projects are not closed.
3. Perform a demand analysis for motorized and mechanized recreation and use this to determine where more trails will be needed in future to meet the demands of a growing population.
4. Utilize the concept of Trail Capacity to express the physical ability of a trail to withstand use or the rate at which a trail incurs wear that eventually results in the need for maintenance or replacement. "Trail Capacity" may also be used as an expression of the maximum number of recreationists that may use a given length of trail (usually one mile) in a given period of time (usually one day) and still meet user expectations for a particular type of wild land trail experience. Where Trail Capacity is being exceeded the Forest Service should expand the trail system prior to implementing closures.
5. Provide trails with a wide range of experience and challenge in order to keep people on the trails.
6. Provide for adequate trail/area identification or construction to make up for trails/areas which have been closed to traditional OHV use through changes to zoning and wilderness designation.
7. OHV planning efforts are needed to address the current need for long distance OHV touring opportunities, and the need to connect riding areas in a coordinated statewide trail system.
8. Develop more areas and opportunities for off-highway motorized recreation for future generations to disperse

use and reduce impacts such as identified in the 2008 California Outdoor Recreation Plan.

9. Use Adaptive Management as required in Wilderness Plans to recommend a reduction of Wilderness Areas due to diminished forest health from lack of management and due to lack of visitation per monitoring. Wilderness prohibits or severely restricts active management causing a reduction in forest health such as disease and larger more intense wildfires than would be the case if these lands were not designated Wilderness. Wilderness visitation at 4.3% shows a need to recommend a reduction of Wilderness areas from the 69% currently designated in the Forest. Experiences we Treasure-

Recreation experiences we treasure include remote primitive motorized and mechanized single track trails with scenic vistas and a variety of challenges and loops. It has been likened to dancing with the forest when one just floats through the landscape. We treasure remote primitive motorized ATV and 4x4 trails with scenic vistas and a variety of challenges and loops.

We treasure having a trail system large enough that all forms of recreation can share the trails without overcrowding or conflict.

Thank you for incorporating our comments into the proposed action or to create the Draft EIS.