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Organization: Idaho Recreation Council

Title:

Comments: comments for your consideration

Friday, October 24, 2014

Nez Perce-Clearwater National Forest

Supervisor's Office

ATTN: Forest Plan Revision

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RE:Forest Plan Revision

Salmon Nez Perce-Clearwater National Forest

Comments of Idaho Recreation Council

Dear Sir or Madam:

Please accept this letter as the official comments on behalf of the Idaho Recreation Council (herein "IRC") relative to the Proposed Action for Forest Plan Revision, Nez Perce-Clearwater National Forest, dated July 7, 2014 (herein "FPR"). Idaho Recreation Council may be contacted at 501 Baybrook Court, Boise, Idaho 83706. Its Executive Director, Sandra Mitchell, may be contacted by telephone at (208) 424-3870. IRC has several general concerns regarding the FPR, as well as many site-specific concerns, all discussed further and at length below.

The Idaho Recreation Council

The Idaho Recreation Council (herein "IRC") is an Idaho nonprofit association representing Idaho mechanized and non-mechanized recreation interests, which acts through committee(s) comprised of representatives from numerous Idaho recreation organizations, including the Idaho Off-Road 4x4 Club, the Idaho State ATV Association, the Idaho Aviation Association, the Backcountry Horsemen of Idaho, the Idaho Trail Machine Association, the Gem State Mountain Bike Alliance, the Western Whitewater Association, the Northwest Jet Boat Association, and the Idaho State Snowmobile Association (ISSA will also be submitting separate comments). IRC members use motorized and non-motorized means, including off-highway vehicles (motorcycles, all-terrain vehicles, Jeeps/4 wheel drives), snowmobiles, horses, llamas and mules, mountain bikes, boats, skiing and hiking, to access state and federally-managed lands throughout the United States and especially in Idaho, including the Forest Service-managed lands in the Nez Perce Clearwater National Forest (herein "the Forest"). IRC members have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of recreational, aesthetic, and commercial activities within the Forest, which require continued use of the roads and trails of the Forest. These activities (including sightseeing, hunting, fishing, camping, wildlife and plant viewing, photography and travel) require motorized access. IRC and its members regularly attend public meetings, submit input, and otherwise participate in planning activities within the Forest.

IRC promotes a collaborative framework for recreation enthusiasts and environmental interests to work together in cooperation with land managers, legislators, and the public to ensure a positive future for responsible recreation access for everyone, now and into the future. IRC members have enjoyed the motorized use of the Forest areas, roads and trails. For some, OHVs and OSVs are primarily used to provide access to points of interest, while for others (particularly snowmobile, UTV, ATV, and motorcycle users) riding the designated areas, roads and trails on the Forest is the primary reason they visit the Forest. The Forest is widely known to have some of the very best areas, roads and trails in the United States, and they are enjoyed not only by local residents, but by visitors from around Idaho and from all across the country and Canada. The Forest, its areas, roads and trails, is a tremendous recreation asset, as well as an increasingly significant economic asset for its local counties and communities. Accordingly, preserving responsible access to the areas, roads and trails on the Forest is an extremely high priority for the IRC.

Official Comments of the IRC

As recognized in the FPR, the FPR is very important because consistency with the FPR is required in future projects and activities within the Nez Perce Forest. Therefore, the IRC feels certain broad and wide ranging principles must be reflected in the FPR to ensure future management decisions are made with a proper starting point in mind.

Economic Importance of Outdoor Recreation. The Forest lies within north-central Idaho in a region comprising Clearwater, Idaho, Latah, Lewis and Nez Perce counties. The Forest partially lies within Benewah and Shoshone counties. These counties receive tremendous economic benefits from recreation activity within the Forest, in particular motorized recreation. For that reason, it is important that the FPR contain desired conditions and standards that facilitate and increase this economic impact. Within the aforementioned counties, the impact of summer OHV recreation is remarkable with annual trip expenditures of approximately \$181,000 and annual capital expenditures of approximately \$36 million. See Economic Importance of off-highway vehicle recreation: an analysis of Idaho counties, University of Idaho, 2014 (copy attached).

FW-DC-WTR-07; Water Quality. The IRC is troubled by the reference to access routes and vehicle parking compacting or exposing tree roots. The desired condition indicating avoidance of the same is not supported by any scientific study indicating the problem posed by the same. Exposed tree roots are common throughout the Forest landscape, not just along access routes and in parking areas. The Forest is alive and vibrant, even in areas where tree roots are exposed. Without scientific evidence to support this desired condition, it should not be included.

FW-OBJ-WTR-03. The IRC is supportive of this objective indicating that recreational facilities where water quality is impaired by introduced pollutants will be repaired or relocated within two years. Far too often such conditions result in the total decommissioning of the recreation facility. It is pleasing to see that the FPR will not require consideration of decommissioning, and instead will focus on repair or replacement.

FW-OBJ-WTR-06 and FW-OBJ-WTR-07. This objective indicates a goal to conduct watershed improvements on a regular basis through decommissioning, relocation or improvement. This objective relates to roads and trails. The IRC encourages the Forest to consider preferences and ranking for consideration of such alternatives, with road/trail decommissioning being the least preferred alternative. The loss of recreation opportunity ought to be reserved for the most extreme conditions. Repair, improvement and reconstruction ought to be the preferred alternative, followed by relocation, followed by conversion to another road/trail type, followed by total decommissioning.

FW-DC-WL-03. The IRC is supporting of the desired condition indicating that animal activity near and around existing human uses evidences that the animals are accepting of the existing human use. This reflects wise

recognition of actual conditions.

FW-STD-WL-01; Canada Lynx. The IRC supports the concept of managing for Canada Lynx in accordance with the Northern Rockies Lynx Management Direction and ROD. Importantly, the FPR should further recognize that it is not proper to manage for Canada Lynx by increasing roadless or wilderness areas, but instead by creating habitat preferred by Snowshoe Hare, the preferred prey of the Canada Lynx.

FW-STD-WL-04; Bighorn Sheep. It is understanding, for biological reasons, to exclude domestic sheep and goat grazing and trailing in bighorn sheep habitat because the domestic animals are away from humans and may interact with the wild animals. However, the restriction on the use of goat packing in bighorn sheep range is not appropriate. Pack goats are attended to by humans and there is very little danger of pack goats interacting with the wild sheep population. It is our opinion this decision is an over-reaction and not justified.

Human Uses – Cultural Resources. Many people that visit the Forest wish to view enjoy and learn about cultural resources such as ancient camps, villages, trail ways, homesteads, mines, mining camps, forest service sites and other historic features. The IRC encourages the inclusion of an objective relative to cultural resources that would provide that where motorized access to such sites currently exists, such access shall be maintained. It is important that all people, regardless of limitations, are able to access these sites if motorized means exist under present on-the-ground conditions.

Recreation Opportunity Spectrum. The FPR categorizes recreational opportunity based on classifications of primitive, semi-primitive non-motorized, semi-primitive motorized, roaded natural, and roaded modified. The IRC objects to these limited classifications, as discussed in detail below, but the IRC objects to the inclusion of significant parts of the roaded front range within the Forest as being classified as semi-primitive non-motorized. These areas within the roaded front range should more properly be classified as semi-primitive motorized. This will allow for future recreation opportunity in the roaded front range. As indicated at page 46 of the FPR, only 31% of the Forest is accessible in the summer season by motorized means. However, that includes roaded, natural and modified. Those conditions are not desirable to OHV users. Only 14% of the Forest is designated as semi primitive, motorized, which is the true experience desired by most OHV users.

Additionally, a desired condition and objective should be developed to provide that opportunities be increased for OHV travel by OHVs greater than 50 inches in width – so called UTVs, SOHVs and Jeeps/4WD Vehicles. Too many trails are being limited to motorcycles or ATVs less than 50 inches in width, forcing other OHV users to operate on full-size auto roads. These OHV users need trail opportunities, and that should be an objective of the FPR.

In addition to the above, the IRC proposes that the recreation opportunity spectrum be modified in order to promote responsible shared use of the Forest lands and its resources. The Forest Service Handbook (FSH 1909.12) and Manual (FSM 1920) directives, provide that –

FSH 91.1: "Recreation setting. The social, managerial, and physical attributes of a place that, when combined, provide a distinct set of recreation opportunities. The Forest Service uses the recreation opportunity spectrum to define recreation settings and categorize them into six distinct classes: primitive, semi-primitive non-motorized, semi-primitive motorized, roaded natural, rural, and urban."

In 23.22b:—"Sustainable Recreation Resources and Opportunities to Connect People with Nature--Recreational settings and sustainable recreation opportunities may form the basis for applying certain plan components to management areas or geographic areas. Recreational settings are usually described by the recreational opportunity spectrum (ROS) (FSM 2310)."

The recreation opportunity spectrum drives management allocations and prescriptions for recreation on the

Forest. The IRC agrees that ROS has application as a tool in planning recreation related issues. However, it is not the Ten Commandments, etched in stone by God to guide man's activities forever. It is a tool that has uses but must be constantly reviewed and modified to meet the evolving needs and desires of the public. There must be flexibility in the use of ROS to meet these needs as our technology and society changes. The primitive, semi-primitive non-motorized, and semi-primitive motorized opportunities all pivot on whether or not motorized recreation is allowed. The assumption is that those who participate in motorized recreation are not compatible with, appreciative of or needful of a primitive setting as non-motorized uses. While current ROS establishes the boxes into which all recreationists must fit and if they don't fit they will just have to change, the IRC proposes that the boxes change instead.

The "Primitive" ROS setting is defined as large, remote, wild, and predominately unmodified landscapes. There is no motorized activity and little probability of seeing other people. Primitive ROS settings are managed for quiet solitude away from roads, people, and development. There are few, if any, facilities or developments. Its attributes are:

- Physical: Remote (3 miles from motorized use), predominately unmodified, naturally evolving, 5,000 + acres;
- Infrastructure: Non-motorized trails are present, rivers and lakes offer fishing, camp/picnic sites not developed or defined, no sanitation facilities, leave no trace, water supply is undeveloped-natural, signing is minimal-constructed of rustic and natural materials, interpretation comes through self discovery and at trailheads, some bridges made of natural materials (wood) may exist but are rare;
- Vegetation: Natural, no treatments except for fire use;
- Managerial: Few signs, few encounters with rangers, travel on foot and horse, no motorized travel allowed;
- Social: Very high probability of solitude, closeness to nature, self-reliance, high challenge and risk, little evidence of people.

The "Semi-Primitive Motorized" ROS settings, the first in the spectrum that allows motorized recreation, is defined as areas of the Forests managed for backcountry motorized use on designated routes. Routes are designed for Off Highway Vehicles (OHVs) and other high clearance vehicles. This setting offers visitors motorized opportunities for exploration, challenge, and self-reliance. Mountain bikes and other mechanized equipment are also sometimes present. Rustic facilities are present for the primary purpose of protecting the natural resources of the area or providing portals to adjacent areas of Primitive, or Semi-Primitive, Non-Motorized areas. Its attributes are:

- Physical: Predominately natural, or natural appearing, 2,500 + acres (no minimum size within designated Wilderness);
- Infrastructure: Motorized trails exist, fishing sites— rivers, lakes, and reservoirs with some trails & primitive roads (motorized trails), camp/picnic sites not developed, some identified dispersed areas, limited sanitation facilities, rustic, may have rustic outhouses available, undeveloped natural and rustic water supply developments, signing is rustic and made of natural materials, interpretation comes through self discovery, some located on site or at trailheads, water crossings may involve rustic structures or bridges made of natural material - some designed for motorized use;
- Vegetation: treatment areas are very small in number, widely disbursed, and consistent with natural vegetation patterns;
- Managerial: Minimum or subtle on-site controls with some restrictions, motorized off-highway vehicles allowed;
- Social: moderate probability of solitude, closeness to nature, high degree of challenge and risk using motorized equipment; motorized use visible and audible.

One user group that doesn't fit the above boxes is snowmobilers. They don't want or need roads or trails and go into remote areas where no one else, including skiers or snowshoers, can or will go. They value all of the attributes of a primitive setting, including challenge, risk, and solitude. The only exception is that they use motorized sleds, the only way anyone can get there short of a helicopter. In every sense the experience they want is "Primitive Motorized". Certainly the sleds they use are modern engineering marvels, but no more so than modern skis, backpacks, tentage, sleeping bags, clothing, rafts, coolers, oars and other high-tech equipment

routinely used in every ROS setting, including "Primitive".

The "Semi-Primitive, Non-Motorized" ROS is a major step down from the setting that many in the snowmobile community value and want to experience. They do not want trails, sanitation facilities or developments of any kind. They highly value solitude, challenge, risk and self reliance. They want a primitive, unmodified setting where they will be likely to encounter few if any other recreationists. The setting they desire is primitive in every aspect except the presence of motors.

One might say that the "Primitive" ROS equates with designated wilderness, but there are many settings that qualify as "Primitive" outside of designated wilderness, such as the Great Burn, or HooDoo Roadless Area. Snowmobilers have been experiencing a "Motorized Primitive" setting there for decades in an area too remote for anyone without a motor to access in the winter months. Any sign of their presence is erased as the snow melts each spring.

The IRC proposes that the FPR adopt an additional ROS class, unique to snowmobiling in certain settings. We would define that class as follows:

"Primitive Motorized": This ROS setting is defined as large, remote, wild, and predominately unmodified landscapes. There is motorized activity in the winter months and little probability of seeing other people. Primitive Motorized ROS settings are managed for solitude away from roads, people, and development. There are few, if any facilities or developments. Its attributes are:

- Physical: Remote (3 miles from motorized use)(??), predominately unmodified, naturally evolving, 5,000 + acres;
- Infrastructure: No groomed or marked over-snow trails are present, camp/picnic sites not developed or defined, no sanitation facilities, leave no trace, water supply is undeveloped-natural, there is no above snow signing, interpretation comes through self discovery and at trailheads, some bridges made of natural materials (wood) may exist but are rare;
- Vegetation: Natural, no treatments except for fire use;
- Managerial: No signs, few encounters with rangers, motorized over-snow travel allowed;
- Social: Very high probability of solitude, closeness to nature, self-reliance, high challenge and risk, little evidence of people.

All of the ROS boxes should be periodically examined and changed to fit a changing world. The categorizing of opportunities strictly on the basis of motor use is one of those changes you need to examine. For winter recreation at least, there must be room near the top of the granite tablet to add one new category, "Primitive Motorized".

FW-DC-REC-18. The IRC proposes an addition to this recreation desired condition indicating that toilets receiving little or no use should be relocated.

FW-STD-REC-01; ROS. This standard indicates there will be no new motorized routes or areas in the primitive and semi-primitive non-motorized areas. As mentioned above, the latter category should be adjusted to reclassify the roaded front range as semi-primitive motorized so that new opportunity can be created in that area. Furthermore, standards should be included for the semi-primitive motorized; roaded natural and roaded modified areas to provide that motorized recreation opportunity should be increased through the addition of new roads and trails to meet public need, provide loop opportunities, or to provide enhanced recreation opportunity. Also, a standard should be included to indicate that when motorized road/trail opportunity is lost, the lost opportunity will be mitigated by the addition of new opportunity in other areas within the Forest.

FW-GDL-REC-05; Riparian Habitat. Improvement of riparian habitat is a laudable objective. This objective should be built upon by providing that partnership opportunities will be explored to improve water crossings on

motorized routes. Partnerships are available with local motorized riding clubs who are always willing to provide labor to improve water crossings and preserve access.

Infrastructure. The IRC objects to the objective of decommissioning and removing roads from the system. Rather than decommissioning, as stated above, preferred alternatives should be developed such as conversion of the road to a trail, with preference to creating OHV opportunity for UTVs, Jeep and 4WD vehicles, before converting to an ATV or motorcycle trail. The IRC further objects to the objective of decommissioning precisely 300 miles of unneeded road. The determination of need is highly subjective. Moreover, placing a precise number is unsupported by any scientific or technical data. Road decommissioning should be the least preferred alternative for road management and should be reserved for the extreme cases of absolute necessity. Instead of decommissioning, the objective ought to be for the reconstruction, relocation or conversion of unneeded roads to trails.

FW-GDL-INF-15; Water Quality. This guideline needs to be adjusted to reflect the allowance of new and temporary roads and trails in RCAs to allow for OHV stream crossings.

Management of Recommended Wilderness. The IRC objects not only to the addition of wilderness areas to the Forest, but also to the management direction of managing recommended wilderness as if it is already designated by Congress as wilderness. A variety of recreational opportunities exist in the RWAs, including motorized and mechanized uses. The current Forest Service Policy of allowing existing uses in RWAs has been working for decades. There is a total lack of any evidence of resource damage caused by motorized/mechanized uses that would in any way affect the qualifications of these areas for future designation.

An area of great concern to the IRC is the area known as the Great Burn, or the HooDoo Roadless Area. This area provides a significant winter recreation opportunity for snowmobile users and special summer opportunity for trail use by horsemen and mountain bikers. Snowmobiling and mountain biking in the Great Burn is important to any back country adventurer. The area provides stunning vistas and technical challenges to the rider. The area attracts snowmobile enthusiasts from throughout North America. The area is approximately 15 to 17 miles from the nearest plowed road, thereby offering riders with solitude and untouched opportunity. Winter over-snow use has been occurring over the past 30 years and does nothing to damage the physical environment, and the snow is so plentiful in the area that it provides no winter range for big game or critical habitat for endangered species. There is no environmental damage posed by OSV use in the Great Burn. There is further no evidence that trail use by non-motorized users (such as hikers, horsemen and mountain bikers) is causing any negative environmental effects. Allowing snowmobile use in the riding areas of the Great Burn and bicycle use on the trails in the Great Burn does not degrade the character of the area and it does not degrade the resources. The FPR should reflect the foregoing and adjust management directions accordingly. Not allowing snowmobiles to responsibly use the Great Burn because a few people do not want them there is simply not reason enough to eliminate the use. By eliminating the use now, you are denying future Congresses the opportunity to protect an historic use in a Wilderness Bill. When the lines were drawn for the Owyhee Wilderness Bill historic motorized uses were protected and there is no reason to believe that wouldn't happen in this area. The Forest Service needs to not predetermine the desires of Idaho's Congressmen or limit their options.

Based on the foregoing, the IRC supports creation of a special management area for the Great Burn, or HooDoo Roadless Area. However, in the FPR maps, several snowmobile areas have been omitted. The winter motorized recreation areas that must be preserved include all historic riding areas of the Great Burn. Notably omitted are Goat Lake and its surrounding geophysical bowls, Blacklead Mountain and its surrounding geophysical bowls, Doe Creek drainage and its surrounding geophysical bowls, Deer Creek drainage and its surrounding geophysical bowls which would be a contiguous extension of the Williams Lake cherry stem shown on the CNF PROPOSED ACTION map.

With respect to the West Meadow Creek Special Management Area, this area is not located within existing

wilderness and should not be closed to all motorized recreation. There are a handful of motorcycle trails within this area that should be preserved and maintained as such. No biological reason exists to do otherwise. The Anderson Butte ATV trail should further remain open to OHVs of 50 inches or less. OSV activity ought to be permitted throughout West Meadow Creek SMA.

River Systems. Table 24 of the FPR lists eligible wild and scenic rivers within the Forest. Fish Creek should not be designated as a wild river, but rather as a scenic river. There is a motorized trail that parallels Fish Creek for almost its entire length. This condition precludes consideration of the creek as a wild river. Additionally, North Fork Clearwater River ought not to be designated as a wild river. Again, it is more appropriately designated as a scenic river. The North Fork Clearwater River provides an excellent and challenging opportunity for jet boat recreation, and its system designation ought to be such to preserve that opportunity – it should not be managed as a wilderness river closed to motorized uses.

Appendix F; Partnership Opportunities. The FPR indicates a desire to build cooperative programs, including volunteer programs and partnership opportunities. Appendix F indicates partnerships can be developed with certain government agencies and large landowners to implement projects needed for forest development or environmental protection. The FPR should also indicate a desire to build those relationships with user groups – those who will use and enjoy the systems and facilities of the Forest. Local user groups are a tremendous asset and a willing volunteer labor pool to assist with implementation of Forest projects.

Comments by Stewards of the Sequoia. Stewards of the Sequoia submitted comments on the FPR on August 5, 2014. The IRC whole-heartedly agrees with and stands behind those comments. The IRC joins in the comments of the Stewards of the Sequoia.

Comments by Idaho Department of Parks and Recreation. If it has not already done so, it is expected that comments on the FPR will be submitted by Idaho Department of Parks and Recreation. The IRC further supports and joins in the comments of the Idaho Department of Parks and Recreation.

Concluding Remarks

The Forest is a tremendous recreation asset enjoyed by thousands upon thousands of people each year. It is important that a forest plan be developed that recognizes, appreciates and supports continued recreation, both motorized and non-motorized, within the Forest. The IRC believes the comments and suggestions set forth herein will be for the better of the Forest and the humans that appreciate all that the Forest offers. Thank you for the opportunity to comment. We trust that the above will be well-received and fully considered.

Sincerely,

IDAHO RECREATION COUNCIL
Sandra Mitchell
Executive Director