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From: Friends of the Rapid River (FRR)

Re: Rapid River Travel Management Project scoping comments

Erin. These are comments from our group of citizens in the FRR addressing our concerns regarding the review of the designated use of sections of trails: 177,183,184,187, 188 and 362 in the New Meadows District, Payette National Forest.

These sections of trails have been open to non-motorized use and closed to motorized use since a settlement agreement was reached in 2010. Since that agreement has been in effect the FRR has supported it. Except for the necessary changes for the Payette National Forest to make these changes permanent in the Travel Management Plan we see no need for this agreement to be "revisited" or "resetled" to change anything on-the-ground. What has been in effect for the past decade has proved effective and provided the public with more than adequate access to the public lands in the upper Rapid River canyon. We do, however, see future problems in regards to further fragmentation of the trails as proposed in this project.

1.Enforcement. Opening the short sections of trails 183, 184, 187, and 362 to motorized use "up to" the W&S River corridor while maintaining non-motorized protection to the W&S River corridor will be very difficult, if not impossible. This is a very remote and rugged area and enforcement resources are already spread thin across all National Forests. Past experience has shown that voluntary adherence to "motorized closure" policies such as this in remote areas simply don't work without adequate enforcement. A case in point is the 191 trail into Paradise Basin, which is actually adjacent to this proposed project. That (seasonally opened) trail's motorized "stopping point" dead ends at the creek crossing at Paradise Creek. For the past 10 years that line (and the creek) have been constantly crossed with motorized vehicles. Not just by "joy riders" who jet in and out knowing that no enforcement is present or practical, but by hunters who ride OHV's loaded with camping supplies into the Basin during the summer months while the trail is open to the Creek crossing. These supplies are then hidden or "cached" to be used during the fall hunting season while the trail to Paradise Creek is officially closed to motorized use. The trails in this proposal are just as remote as Trail 191 and we have no confidence that any trail closure, particularly on the steep hillsides where these trails intersect the W&S River boundary, would be adhered to nor could it be enforced with any rational degree of certainty.

2.Construction of turn arounds or parking lots for motorized OHVs. It's not at all clear how, or even where, these types of facilities could be built in this terrain without scarring and disturbance of the hillsides and unnecessary risk to the water quality in the Rapid River.

3.Assurance of cold-water quality protection. The Rapid River W&S River corridor was established largely to protect the pristine cold-water quality existing in the Canyon. That water quality is formally identified as an Outstanding and Remarkable Value listed as a reason for its protection under the W&S Rivers Act. It's the opinion of FRR that further extension of motorized use, and trail work to accommodate that use, on these fragile hillsides would encroach on the Canyon's ability to provide that protection in a future further compromised by a warming climate. Deep, snow fed canyons such as the RR are essential cold-water refugia for fish that will become increasingly scarce in a warming and changing climate future. And this is not just some "futuristic imagining." The present contribution of this cold-water within the RR Canyon to the Salmon/Snake/Columbia River system is essential now. The RR canyon has been identified by biologists as providing irreplaceable cold-water spawning habitat for critical Bull Trout populations that migrate up the river from the larger downstream rivers. It also provides habitat for native Redside and Westslope cutthroat trout populations as well as spawning habitat for some of Idaho's last wild steelhead and chinook salmon populations. One of the most critical roles that the upper RR Canyon fills in regards to migratory fish is the ice-cold water that feeds the Rapid River Federal Fish hatchery located just above its confluence with The Little Salmon River. According to the hatchery manager

this single Hatchery supplies up to 40 percent of the sport-harvested chinook salmon in the entire Columbia River system. That contribution alone eclipses any benefits - economically or otherwise - that could be imagined by adding a few more miles of motorized trails in the streams headwaters which simply are not needed. One egregious example of this cumulative encroachment on the RR water quality can be seen along Lake Fork trail (188). Past attempts to re-route the existing trail out of the sensitive creek bottom only resulted in several examples of illegal motorized users attempting to reuse the creek bottom route. The only phrase that can be used to describe that legacy is: It was (and is presently) a mess.

4. Big Game security. Very few areas are left in the Nation where hunters have the freedom to simply walk into a sporting goods store and purchase a regular elk or deer tag and hunt nearly a month to fill that tag. Unit 23 - specifically The Rapid River canyon country - is one of the few places left in the world where that experience is still possible. The detrimental effects of motorized access into areas on the security of big game animals is well-documented with past research and scientific studies.

Thank you for the opportunity to voice our concerns and opinions on this subject. The Rapid River Canyon, with its abundant and healthy fish and wildlife resource, its beautiful scenery and unparalleled muscled-powered, quiet and primitive recreation opportunities is not only loved and cared-for by our members, but most of us live, and have invested our lives here. We thank you for your work to protect these beautiful lands and waters.