

Data Submitted (UTC 11): 3/25/2021 5:50:20 PM

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March 25, 2021

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Please accept these comments from the Idaho Office of The Wilderness Society (TWS) on the Rapid River Trail Management Project.

TWS was one of the parties in the 2009 lawsuit against the U.S. Forest Service that brought travel management in the Rapid River drainage into compliance with the Wild and Scenic Rivers Act. The closure that was implemented in 2010 as part of the litigation settlement agreement has, for over a decade, protected the many natural resource values in the Rapid River drainage as well as providing a unique non-motorized recreational experience. TWS remains committed to protection of the resources in the Rapid River drainage and the preservation of the existing non-motorized recreation opportunity created by special order 0412-401 (USDA FS 2010).

TWS supports the non-motorized alternative for the Rapid River Travel Management Project. This alternative designates 25.7 miles of trail as open to foot and horse traffic only. As stated in the project document, adoption of this alternative is essentially an administrative change as it preserves the existing trail conditions under the special order referenced above.

The need to provide motorized recreationists riding opportunities in the Rapid River drainage has not been established by the project document. A review of non-motorized/motorized trails in the project and surrounding area at <https://trails.idaho.gov/> shows that the Rapid River drainage is the only significant non-motorized recreation opportunity, outside the Hells Canyon Wilderness, in the surrounding Weiser, Council, New Meadows and McCall Ranger Districts. NO other landscape of the size and diversity of the Rapid River watershed is available for non-motorized recreationists. Motorized recreation trails lace the surrounding landscapes and watersheds. There are no shortages of motorized recreation opportunities in this region. There is a shortage of significant non-motorized opportunities. From the standpoint of just offering a meaningful diversity of recreation opportunities in this region, the Rapid River drainage should remain a non-motorized recreation area.

Implementation of the non-motorized alternative for Rapid River is consistent with and fulfills the commitment the Payette National Forest made to the public in July 2003 with adoption of the Payette National Forest Land and Resource Management Plan. That comprehensive document was developed over several years with opportunities for public comment.

The LRMP states that "(n)on-motorized trail opportunities are the recreation emphasis for the Rapid River Watershed (Payette LRMP pg. 111-143)." The LRMP represents a commitment between the Forest Service and public regarding management the Payette National Forest. The Payette National Forest needs to honor that commitment made in good faith with the public that non-motorized recreation would be emphasized in the Rapid River drainage.

Opening trails closed by special order 0412-401 to motorized recreation runs counter to the commitment made by the LRMP. Opening the trails currently closed to motorized recreation by special order 0412-401 will re-ignite user conflicts in Rapid River, an issue identified by the LRMP back in 2003: "(u)ser conflicts are escalating between motorized and non-motorized recreationists within the Rapid River Watershed (pg. 111-143)."

Special order 0412-401 gave the Forest Service the tool to achieve the commitment made to the public by the LRMP as well as the tool to address user conflicts. Now, under the proposed action, the Payette National Forest wants to formally break the commitment made by the LRMP to emphasize non-motorized trail opportunities in the Rapid River watershed and create conflicts between motorized and non-motorized recreationists.

There is little reason to expect the proposed action, with the construction of motorized trail turnarounds, will achieve the promised results. It has been TWS's experience throughout the national forests of Idaho that trail closures to motorized recreationists don't work if a trail extends beyond the closure site. "Dead end" motorized trails closures, if a trail still physically extends beyond the closure, will not work. Motorized recreationists see a trail extending beyond a closure and proceed to travel on it. It's as simple as that. The utter failure of trail closures on the Idaho side of the Hells Canyon National Recreation Area are examples. The Forest Service erected barriers and tried to close to motorized recreationists segments of trails at Sawpit Saddle and Low Saddle. The barriers were ripped aside, torn out, and motorized recreationists proceeded to travel the "closed" segments that extended beyond the barriers. The only chance where trail closures to motorized recreationists have any chance of working are if closures occur at trail junctions, where motorized recreationists can proceed, legally, on a trail open to motorized use at the junction with a trail closed to motorized uses. The non-motorized trails in Rapid River must be closed at the top of the drainage where "pass by" motorized use on through-trails is the option.

Recently the Bureau of Land Management alerted TWS that motorized recreationists were traveling beyond the closures at the end of the two-track non-wilderness "cherrystems" in the Owyhee Canyonlands Wilderness Areas. These dead-end "cherrystems" were created in a good faith effort by conservationists, sportsmen and outfitters to provide reasonable access to the Canyonlands. That good faith effort is now being rewarded by incursions into designated wilderness by motorized recreationists, demonstrating that "dead end" motorized access closures fail.

The proposed construction of the turnarounds themselves are problematic. Although the project document attempts to minimize the ground disturbance caused by the turnaround construction, nevertheless it is certain that bare ground, constantly churned up by motorcycles, is going to facilitate the establishment and subsequent spread of invasive noxious weeds.

The threat of noxious weeds on the Payette National Forest on disturbed sites like the proposed turnarounds is documented in the LRMP Final Environmental Impact Statement (FEIS):

Frequently, initial infestations for noxious weeds and exotic plants occur in conjunction with trailheads, trails, campground, and other developed recreation sites (LRMP FEIS, Vol. 3 pg. 3-621).

Experience indicates that this area of the Payette National Forest is not often visited by Forest Service staff - it is remote, difficult to access, and staffing resources of the Forest Service are often lacking and cash-strapped. These factors combine to heighten the risk that if noxious weeds are established at the ground-disturbing turnarounds, it will be some time before the infestations are found and suppression actions taken. The LRMP FEIS plainly lays this risk out:

The ability to detect and monitor weed populations will influence the size and density of new weed populations. Detection is strongly connected to the frequency and amount of time various management activities take place in an area during the year, consistency among personnel to detect or document sites, and the amount of visitation by the public. For example, in areas where other resource management activities are low and administrative visits are infrequent, the likelihood of detecting new populations is also low. If a new infestation becomes

established, a couple of years could potentially pass without detection, thus creating a large weed seed source that would take several years to eliminate. For example, the Supplemental Draft Environmental Impact Statement for the Frank Church - River of No Return Wilderness gives an actual scenario where a new infestation expanded from 2 to 15 acres in a three-year timeframe (LRMP FEIS pg. 3-627).

In the project document the Forest Service responds to concerns identified through scoping about weeds by citing existing weed control programs:

Project will be consistent with forest plan components NPOB06, NPGO01, and NPGU01, which provide direction for invasive plant species and noxious weed management (project record exhibit 01-02).

NPOB06, NPGO01, and NPGU01 are all rather general, citing the need for education, cooperation, and an "integrated weed management approach." These components don't really address the concern stated above that it is difficult for Forest Service staff to access this remote area on a regular basis. Of particular concern is the fact that the Forest Service, with limited staff and dollars, will always focus its weed efforts on the "front country" as opposed to remote areas like Rapid River. Even then, the explosion of noxious weeds throughout Idaho's national forests calls into question the adequacy of the forest plan components cited by the Forest Service in the first place.

The Hells Canyon National Recreation Area Comprehensive Management Plan Final Environmental Impact Statement Volume 1 (USDA-FS June 2003) documents the following:

The southern end of the (Hells Canyon National Recreation Area) represents an ecological corridor that ties forested habitat in the Wallowa and Blue Mountains to forested habitat of the Rocky Mountains. This forested link is unique; similar forested corridors do not exist between the two mountain ranges. This corridor could be important for genetic exchange for plant and animal species as well as for recolonization of forest habitat species (FEIS pg. 3-131).

While the Hells Canyon National Recreation Area(NRA) Comprehensive Management Plan FEIS naturally only addresses lands within the Hells Canyon NRA, the ecological corridor referenced is adjacent to the larger Rapid River drainage (Hells Canyon NRA FEIS pg. 3-133). It is logical to assume that the Rapid River drainage is part of the forested ecological corridor that ties the Wallowa and Blue Mountains to the Rocky Mountains.

Protection of this ecological corridor should be a consideration of this analysis. Across the West the protection of large, core areas that encompass high levels of ecological diversity across topographically complex landscapes, while simultaneously improving connectivity between these large core areas, has been broadly characterized as "an essential strategy by which managers can improve species' resilience to climate change impacts" (e.g., Heller and Zavalete, 2009; Graumlich and Francis, 2010).

What is needed for this project is a comprehensive examination and analysis of the role the Rapid River drainage plays as an ecological corridor between the Wallowa and Blue Mountains and the Rocky Mountains. For more than a decade wildlife in the Rapid River drainage has benefited from the lack of noise, disturbance, and displacement routinely caused by motorized recreation. Allowing motorized recreation back into the Rapid River drainage puts at risk the security values of core wildlife habitat areas and the value of the Rapid River drainage as an ecological corridor. Decades of research have documented the negative effects of motorized vehicles on various wildlife populations throughout the West and conflicts with other users. These impacts are not addressed in the proposal and must be before any actions are taken that diminish the decade-long positive results that have occurred because of the exclusion of motorized recreation.

The project and supporting documents conclude that the proposed action will not contribute to a trend towards federal listing under the Endangered Species Act or loss of viability to sensitive species populations in the project area. These sensitive species are monarch butterfly, Columbia spotted frog, boreal owl, great gray owl, northern goshawk, three-toed woodpecker, fisher, piliated woodpecker, and bighorn sheep. This list of sensitive species

that may be impacted by this project is long. TWS believes that a more complete discussion of wildlife impacts under the preferred alternative is in order for the public to have a better understanding of what is at risk here. Since the Rapid River drainage has been closed to the negative impacts of motorized recreation to wildlife for a decade, the project document should have presented to the public the benefits to wildlife - all wildlife, including sensitive species, elk, predators, etc. - afforded by the special order closure and how those benefits will be lost under the proposed action. As stated above, the Rapid River drainage is the only drainage of any significant size in the region closed to the detrimental effects of motorized recreation. That makes the Rapid River drainage special in the regional context. The public should have been made aware that the proposed action would sacrifice the wildlife values that have accumulated over the last decade from the special order closure and how those values are more than likely largely absent in the surrounding region.

As explained above, TWS does not expect the turnarounds constructed under the proposed action to successfully block motorcycles from proceeding past the closures, subsequently fording Rapid River to continue on other "closed" trails. Therefore, TWS does not believe the proposed action will protect Rapid River's water quality from degradation by motorized recreations. We have seen too many gouged, ripped up stream crossings by motorcycles to believe such actions can occur without significant water quality impacts.

The importance of Rapid River, its water quality and associated fishery resource cannot be overstated, and the assurance of their protection should drive management of the river drainage. Rapid River and its water quality were recognized by Congress nearly 50 years ago as worthy of special attention for protection with the passage in 1975 of the Public Law 94-199, the Hells Canyon National Recreation Area Act. P.L. 94-199 designated Rapid River as a Wild River under the provisions of the Wild and Scenic River Act (82 Stat. 906) with the following management direction:

Provided, that the Secretary shall establish a corridor along the segments of the Rapid River and may not undertake or permit to be undertaken activities on adjacent public lands which would impair the quarter quality of the Rapid River segment (P.L. 94-199 Sec 3(b)).

The Payette Land and Resource Management Plan (LRMP) (July 2003) provides the following description of the importance of the fishery resources in Rapid River:

The area has designated critical habitat for chinook salmon. Threatened chinook salmon, steelhead, and bull trout occur in the Rapid River and Boulder Creek drainages. The Rapid River is considered an aquatic stronghold for these species. Strong local populations of bull trout exist in the Lower Boulder, Copper-Castle, Upper Rapid River, Fry Pan - Paradise, and Lake Fork Creek subwatersheds.... The Upper Rapid River and Copper-Castle subwatersheds have strong populations, excellent watershed conditions, and associated aquatic habitat that serve as conservation pools to assist in recovery of listed fish species (Payette LRMP pg. 111-141).

The Roadless Area Conservation, National Forest System Lands in Idaho Final Environmental Impact Statement Appendix C (USDA-FS August 2008) makes an even stronger case for the importance of the Rapid River drainage and its fishery resource:

Fisheries: Three threatened fish species - steelhead trout, bull trout, and Chinook summer salmon - are distributed throughout the Rapid River drainage. This subwatershed provides optimum spawning and rearing habitat for these three species, along with high quality water for the downstream Rapid River Fish Hatchery. The fish stocks present in Rapid River above the hatchery are unique in that the Chinook and steelhead stocks are of wild origin and likely not influenced by hatchery fish. The West Fork Rapid River has a barrier to upstream fish movement located about one-third mile above its confluence with the main stem, making most of the West Fork's habitat unavailable for anadromous species. Bull trout, also of wild origin, are fluvial and grow to a large size. The subwatershed has the largest, best remaining aquatic stronghold within the Little Salmon River landscape. Rapid River is one of the key areas for the survival and recovery of listed salmon and trout (pg. C4-207).

Wildlife: ... Due to the large, unroaded character of the area, human interaction with wildlife is low to moderate for most of the year, and the area serves as a security area for many species.... Potential habitat for lynx, a threatened species, occurs in about one third of the area. Generally, the upper slopes of the major drainages are

potential lynx habitat. Habitat for several Region 4 sensitive species are also found in the roadless area. Unconfirmed sightings of wolverine have been reported, and the remoteness of the area suits the animal's basic requirements (pg. C4-208).

The Hells Canyon National Recreation Area Comprehensive Management Plan Final Environmental Impact Statement Volume 2 (USDA-FS June 2003) also identified the importance of Rapid River's fishery: Rapid River contains three listed fish species (spring/summer chinook salmon, steelhead, and bull trout) and designated critical habitat for chinook and steelhead. Rapid River also contains the spotted frog, a sensitive species in Region 4. In terms of habitat, the Rapid River watershed is the largest and best remaining aquatic stronghold within the Little Salmon River system. It is a key area for the survival and recovery of listed salmon, steelhead, and bull trout. The populations of nationally significant fish species and the river's near-natural habitat combine to a finding that fisheries is an outstandingly remarkable value for Rapid River (FEIS Appendix K pg. k-8).

Rapid River is one of the only rivers in Idaho where the U.S. Congress has specifically forbidden actions which would impair its water quality. The proposed action sets in motion a scenario which has the strong likelihood to lead to impairment of Rapid River's water quality due to the inevitable illegal fordings of Rapid River by motorized recreationists once they are led into the canyon by the opened motorized trails. Experience throughout Idaho puts in serious doubt the closures/turnarounds will be respected and/or enforced.

In summary, the Rapid River drainage is the only non-motorized recreation opportunity of its like in the surrounding region. That opportunity should be maintained with the selection and implementation of the non-motorized alternative for this project. Re-opening currently closed trails to motorized recreation will only reignite conflicts between users that have been dormant for more than a decade. As explained above, it's not like motorized recreationists don't have access to hundreds of miles of trails in the region already. Rapid River is currently, and should remain, a destination for those who wish to enjoy the backcountry without the noise, weeds, and trail degradation that accompanies motorized recreation.

Please keep this office informed of further developments in this matter.

Heller, N.E. and Zavaleta, E.S. (2009) Biodiversity management in the face of climate change: A review of 22 years of recommendations. *Biological Conservation*, 142, 14-32. doi:10.1016/j.biocon.2008.10.006

Graumlich, L. and W.L. Francis (Eds.). 2010. Moving Toward Climate Change Adaptation: The Promise of the Yellowstone to Yukon Conservation Initiative for addressing the Region's Vulnerabilities. Yellowstone to Yukon Conservation Initiative. Canmore, AB.