Data Submitted (UTC 11): 10/14/2014 3:57:36 AM

First name: Alex Last name: Ernst Organization:

Title:

Comments: Nez Perce-Clearwater Forest Plan Revision public input

Dear Forest Planners,

I am writing as an individual trail motorcyclist who frequently uses Forest Service trails throughout the State of Idaho, and as a life-member of both the Blue Ribbon Coalition and the American Motorcyclist Association. BRC was kind enough to inform me of the plan revision process so that I would be alerted to the public participation opportunity. They have also recommend constructive, technical input to the plan, which I have copied below my own comments, and which you hopefully already have seen. I encourage the planners to take BRC's valuable, professional input into consideration, as well as my layman's perspective.

Though I could not glean it from a full read of the Proposed Action document, it has been brought to my attention that there is a significant threat of closure to many miles of historic single track motorcycle trail routes in the Nez Perce and Clearwater NFs simply by act of omission in the planning process, and subsequently by not including the trails in the official MVUMs for the regions.

I stand with the thousands of trail motorcyclists throughout Idaho and beyond in stating that I am completely against any Forest Plan action --or inaction-- that would arbitrarily reduce trail mileage that the public wants to be kept in place. Under circumstances where a trail resource is found --factually-- substandard and not reasonably remediable, it must be replaced with similar trail mileage that meets management priorities of "suitability" and "desired condition" objectives, not simply closed with no thought of affect on the continuity and quality of the overall trail system.

Dispersed use --that is, adequate trail mileage-- is a key factor in the pursuit of meeting non-recreational desired condition objectives while also adhering to the core recreational purpose of the public's national forest lands. Reducing trail mileage acts to concentrate per-forest-unit use and to increase per-mile usage and thus concentrated-usage impacts. This increases costs of sustainability --both social and monetary-- creates a self-fulfilling prophesy of willfully-induced system failure if left to go too far. Closures resulting from management-failure-induced impacts are entirely intolerable to the public, and they are surely avoidable when land managers and collaborators choose to do the right things toward the multiple objectives of a forest plan.

Furthermore, do not let the matter of tight recreational trail management resources within the FS be a main determinant of single-track trail closure actions. It would be an act of willful malpractice to dismiss as a tool the Idaho ATV/Motorbike Program's funding and manpower, such as Trail Rangers and Trail-Cat Programs, as well as the good will of individual citizens and clubs who can donate their labor, resources that are at your disposal to meet management objectives while maintaining citizens' access to their beloved trails.

Please also consider the backlash from the non-motorized users who count on the benefits of well-maintained trails (blowdown removal, tread and water removal structure upkeep), when trail maintenance stops being done because the trails no longer meet the State's multi-use criteria for funding and executing trail work under the Program. OHV-permit payers are grateful to be in a symbiotic relationship with equestrians, hikers, hunters, and mountain bikers, all who benefit significantly from the work of Trail Rangers which the fund underwrites.

Information on the hundreds of miles of trail maintained and repaired, and the thousands of blowdowns removed each year by the Trail Rangers on FS lands, can be seen at facebook.com/IdahoATVMotorbikeProgram and click on Photos.

Thank you kindly for your consideration of my concerns in this matter. Please also see the technical suggestions below.

Best regards, Alex Ernst Boise, Idaho

----- Forwarded message -----

IDAHO - Nez Perce-Clearwater Forest Plan Revision Collaborative Meeting Scheduled

...

[BRC proposes...] several concepts that should be included in the forest plan revision process:

ML 3 Roads to Trails - Reclassify ML3 roads to ML2 roads. Reclassify ML2 road to motorized trails or manage appropriate ML2 roads as "roads managed as trails." Manage appropriate ML1 roads as "motorized trails."

ML 2 Roads to Trails - Convert "roads-to-single track trails" or "roads-to-motorized trails less than 50 inches in width" and "roads managed as motorized trails greater than 50 inches in width" as a tool to help the agency achieve its budget objectives while still providing a substantive and high quality recreational route network.

Single Track Trails - 2005 Forest Service Travel Management Rule (TMR) Subpart B planning efforts in California and other Western States resulted in the loss of many, if not most, of our historic single-track motorcycle trails. Historic and legal motorized single-track opportunities such as enduro trails, old pack-mule/mining or pioneer trails were simply eliminated from consideration due to time constraints.

During Subpart B of Travel Management, the Forest Service promised OHV leadership that once these initial "foundational" route networks were established and codified that they would work with the users to either bring some of these historic single-track opportunities "back onto the system" or construct new engineered single-track system trails.

BRC believes that a strategy should be developed to replace the lost single-track experience. Retention or enhancement of high quality single-track dirt-bike trails is no different than keeping or enhancing "quiet" single-track hiking, equestrian, and mountain-bike trails.

Wet Weather Closures - Any TMR-based wet weather closure strategy should allow for native surfaced trails and roads to be open when soil conditions/lack-of-rainfall permits. If a wet weather closure is needed, the implementing Forest Order should be for the shortest period of time rather than a longer time period. In NEPA, it is always easier to extend a short closure versus repealing a longer closure.

Mitigate Trail Impacts from Non-Recreation Projects - The impacts from non-recreation projects such as vegetative treatments and wildlife protection efforts often include obliteration of the trail or removal of water control structures such as rolling dips and catch basins. Those trail mitigations can often cost \$15,000 to \$20,000/mile to install (or replace). BRC recommends that "trail mitigation" guidelines be added to relevant non-recreation projects.

Ric Foster
Public Lands Department Manager
BlueRibbon Coalition
208-237-1008 ext 107