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First name: Harry

Last name: Jageman

Organization:

Title:

Comments: Attached are my comments on the Clearwater Travel Plan Supplemental DEIS.

Harry Jageman

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1228 Ponderosa Drive

Moscow Idaho, 83843

North Fork Ranger District

Attention: District Ranger Andrew Skowlund

12740 Highway 12

Orofino, ID 83544

Dear Andrew:

Subject: Clearwater National Forest Travel Plan Supplemental Draft EIS Comments

In response to a recent court ruling the Nez Perce - Clearwater National Forest has prepared an updated Supplemental EIS for the current Clearwater NF Travel Plan which was approved in 2017. Specifically, the analysis has updated elk habitat effectiveness for the entire Clearwater NF using the [ldquo]Interagency Guidelines for Evaluating and Managing Elk Habitats and Populations in Central Idaho[rdquo] (Servheen et al. 1997). The proposed action would lower elk habitat effectiveness from 100% to 90% in management areas A3, B2, C1, and C6; and designate the Fish Lake Trail as open for seasonal motorized use. By lowering the elk habitat effectiveness standard to 90%, the Forest Service claims that no other modifications to the 2017 Travel Plan are required and that several motorized trails like the Fish Lake trail can remain open within these management areas.

Elk Habitat Effectiveness (Consequences of Lowering the Forest Plan Standard from 100% to 90% in Management Area A3, B2, C1 and C6)

The Clearwater Forest Plan has several management areas that were expected to be managed at high levels of elk habitat effectiveness (near optimum) largely due to their unroaded character. Minimal open road and trail density is the largest factor in predicting elk habitat effectiveness according to Interagency Guidelines for Managing Elk Habitats and Populations (Servheen et al. 1997) and it was expected that motorized use would be kept to a minimum in these areas. These management areas are described as Management Areas A3, B1, B2, C1 and C6 in the Forest Plan. Timber management is generally not supported in these areas. Additionally, the 1993 Stipulation of Dismissal settling *The Wilderness Society, et al. v. F. Dale Robertson, et al.*, Civ. No. 93-0043-S-HLR (D. Id. 1993) (henceforth [ldquo]1993 Settlement Agreement[rdquo]), mandates that the Clearwater NF must manage as B2, all recommended wilderness in management areas designated therein. This means that management areas C8S covered by that agreement must meet all B2 standards. Thus, Management Areas A3, B1, B2, C1, C6 and specific C8S that are covered by the 1993 Settlement Agreement are to be managed in their existing roadless condition primarily for semi-primitive recreational values and high-quality fish and wildlife habitat. These lands were assumed to be managed at or near 100% elk habitat effectiveness (Forest Plan Record of Decision [ndash] Page 30). Consider the following statements from the forest plan:

MA-A3 [ndash] Page III-8 [ndash] Goal [ndash] [ldquo]Manage optimum wildlife (primarily elk) habitat within limits necessary to meet visual management standards and to maintain a semi-primitive setting.[rdquo]

MA-B1 [ndash] Page III-32 [ndash] Goal - [ldquo]Manage the Selway-Bitterroot Wilderness in accordance with the Wilderness Act of 1964.[rdquo]

MA-B2 [ndash] Page III-36 [ndash] Goal - [ldquo]Manage all uses to maintain wilderness qualities and retain semi-primitive settings.[rdquo]

MA-C1 and C6 [ndash] Page III-42 and III-51 [ndash] Standard - [ldquo]Permit trail bike use on trails to the extent that use does not damage trails, result in unsafe conditions for other users, or prevent achievement of fish and wildlife goals.[rdquo]

The Forest Service has argued that the 100% elk effectiveness goal is unobtainable because forage and cover conditions generally are never at ideal conditions and existing roads on the perimeter of these management areas preclude the achievement of 100% effectiveness. They then suggest that the elk effectiveness numbers should be lowered to 90%, but fail to mention that this reduction would allow motorized use on several trails that are currently located within these management areas. The current 2017 Travel Plan allowed these trails and the Fish Lake trail to remain open to motorized use.

The Forest Service then rationalizes the impacts from motorized travel on trails and suggests that it makes little difference to the overall habitat conditions for elk, fish and other wildlife species. They fail to recognize that cover and forage conditions can be modified positively with prescribed burning and other measures, but motorized travel always has a negative impact on elk habitat. All peripheral roads were already in place and open to motorized use when the Forest Plan was signed in 1987 and these main access routes were never the target of the 100% goal which was centered more on the existing unroaded character within these management areas.

When motorized trails come close to preferred foraging areas or other areas of critical importance to elk like winter range, salt licks or caving areas there is always a negative consequence. Previously, groups like the

Friends of the Clearwater and others like myself have suggested that several trails now open to motorized use be closed to motorized travel in areas where the Forest Plan requires 100% elk habitat effectiveness. Many of these trails come close to key areas (calving areas and salt licks) that have been identified by the Forest Service. Motorized travel, particularly on trails that penetrate core use areas like Management Area C1 and C6 in the Cayuse and Weitas Creek drainages, should never be considered positive and are clearly in conflict with the Forest Plan management goals for these areas. Areas with a 100% goal of elk habitat effectiveness were intended to be managed as close to 100% goal as possible and allowing motorized trail use is clearly not supportive of that goal.

No one is asking the Forest Service to do the impossible. We are only asking the Forest Service to comply with the existing Forest Plan and close motorized trails in the management areas which are considered to be managed for optimum fish and wildlife habitat, wilderness values or unmotorized recreation. Reducing the standard to accommodate motorized travel in these areas is a terrible idea and the Forest Service should not be permitted to modify the Forest Plan every time their proposals come into conflict with existing Forest Plan direction.

A minimum level of elk habitat effectiveness is specified for E-1 and C8S management areas and the standards have been set lower to accommodate road and timber management activities. For example, there is a requirement to maintain elk habitat effectiveness at a minimum level of 25% in Timber Management Areas E1 and E3 (Forest Plan Page II-25) and at 75% in Management Area C8S [ndash] Big Game Summer Range/Timber Management (Forest Plan Page II-26). (As noted above, some of the C8S areas must be managed to B2 standards based on the 1993 Settlement Agreement). The elk habitat effectiveness standard assures that some minimal level of habitat effectiveness on all National Forest Lands as roads and trails are constructed and timber harvest is planned.

Management Area C8S includes existing roadless areas where timber harvest is permitted under the Clearwater Forest Plan. Standards for this management area were set higher than other lands that were suitable for timber management because these areas were roadless at the time the Forest Plan was completed and there was considerable concern about the loss of elk habitat. Even today, most of these lands remain roadless and their development still remains very contentious. This controversy is reflected in the 1993 Settlement Agreement, where the Forest Service agreed to manage several C8S areas as B2 proposed wilderness. In terms of elk habitat effectiveness this change moves the elk habitat effectiveness standard from 75% to 100%.

Lower standards in other areas are the main reason why the Forest Plan has areas designated for non-motorized travel and the protection of fish and wildlife habitat. Areas with 100% elk habitat management potential were intended to offset areas with lower standards and reducing the standard negates compromises that were made in the Forest Plan to protect elk habitat and allow for timber management and motorized recreation. Motorized recreation travel does not need to occur on every acre of the Forest and the standard in management areas A3, B2, C1 and C6 should not be lowered.

There are 78,800-acres in MA-A3, 198,200-acres in MA-B2, 45,100-acres in MA-C1 and 102,440-acres in MA-C6. Total acreage involved is 424,540 acres or approximately 23.6% of the 1.8-million-acre Forest. In contrast, there are 515,567-acres in MA-E1 and E3 (Elk standard 25%) and 207,500 acres in MA-C8S (Elk standard 75%) which represent 40.2% of the Clearwater NF. Numerous motorized trails already exist in these areas offering more than adequate opportunity for motorized recreation. Existing wilderness (259,165-acres) and winter range (133,000-acres) make up the bulk of the remaining acreage on the Forest (these areas do not have elk summer range effectiveness standards).

Over the course of the previous development of the Clearwater Travel plan, many responders including myself and the Friends of the Clearwater have suggested the closure of numerous trails to motorized use and within areas that the Clearwater Forest Plan identifies as semi-primitive or as high value fish and wildlife habitat

(Management Area A3, B2, C1, C6 and C8S (the latter to the extent they are covered by the above noted 1993 Settlement Agreement in *The Wilderness Society, et al. v. F. Dale Robertson, et al.*, Civ. No. 93-0043-S-HLR (D. Id. 1993)). Despite being directed by the court over seven years ago to make travel plan access consistent with the elk habitat effectiveness standards outlined in the Forest Plan and the Travel Management Rule's minimization criteria, the Nez Perce Clearwater National Forest has taken no action and allowed several existing trails to remain open to motorized use. These open trails are significantly reducing elk habitat effectiveness in areas that are supposed to be managed for semi-primitive recreation or high fish and wildlife values. Now, instead of just closing some of these trails in order to comply with the existing Forest Plan, the Forest Service suggests modifying the Forest Plan by lowering the elk standard from 100% elk habitat effectiveness to 90%. This modification would permit several trails to remain open to motorized use.

With the proposed reduction in elk habitat effectiveness, the Forest Service has caused unnecessary and detrimental impacts in Forest Plan Management areas (A3, B2, C1 and C6) that are supposed to be managed for high value wildlife and fisheries habitat, natural conditions or non-motorized recreation. This causes unnecessary increases in fishing and hunting pressure in areas that are supposed to be managed for high value wildlife and fisheries habitat. Leaving several trails open to motorized traffic in these areas yearlong or during the fall hunting season (8/1-11/15) displays a major lack of understanding of how these areas were to be managed in the 1987 Forest Plan. The hunting season is one of the most vulnerable times for elk as that is when they actually get shot. Please just close the trails instead of lowering the standard!!

Fish Lake Trail (Management B2 [ndash] Recommended Wilderness)

The court has made the correct decision to close the Fish Lake trail and it should not be reopened. The Clearwater National Forest has failed to maintain wilderness values along this trail (road) since the time that the Forest Plan was approved. The access road to Fish Lake should have been obliterated shortly after the wildfire to which it owes its existence, but since it was not it should have been one of the first roads scheduled for obliteration after the signing of the Clearwater Forest Plan in 1987. The trail is in the middle of a recommended wilderness area and provides access to a large lake that would be very attractive to users of the recommended wilderness area. The Forest should have never approved conversion of the existing road to an ATV trail, due to the fact that this heavy use is incompatible with wilderness values. Failure on part of past Clearwater National Forest administrations to protect wilderness values in this area should not be reason for this continued violation of the Clearwater Forest Plan.

Some Recommended Site-Specific Modifications to the Current 2017 Clearwater Travel Plan to bring it into compliance with Forest Plan (Closure to all motorized vehicles)

Trail 20 [ndash] Weitas Creek

Trail 167 [ndash] Windy Ridge

Trail 191 [ndash] Junction Mountain

Trail 203 [ndash] Sherman Creek

Trail 204 [ndash] Skookum Creek

Trail 225 [ndash] Ant Hill

Trail 229 [ndash] Fish Butte Saddle Creek

Trail 419 [ndash] Fish Lake Trail

Trail 445 - Elizabeth Mountain

Trail 524 [ndash] Survey Mountain

Trail 531 [ndash] Windy Bill

Trail 532 [ndash] Cayuse Creek

Trail 534 [ndash] Lunde Ridge

Trail 555 - Lean to Ridge (Beyond Weitas Bridge)

Trail 691 [ndash] Junction Lookout

Trail 2240 [ndash] Fish Creek

/s/ Harry R. Jageman

Literature Cited

Servheen, G., S. Blair, D. Davis, M. Gratson, K. Leidenfrost, B. Stotts, J. White, and J. Bell. 1997. Interagency Guidelines for Evaluating and Managing Elk Habitats and Populations in Central Idaho. Wildlife Bulletin No. 11, Idaho Dept. of Fish and Game. 75p.