

This document represents Idaho County Commissioners' response to the Nez Perce-Clearwater NF's Recreation and Access sections as part of Forest Plan revision.

We will address our concerns in three categories: 1) Recreation, 2) Travel and Access, 3) Plan Components. Our concerns and comments are not new as they have been outlined in our County Resource Plan, which the Forest has and have been verbally expressed during CBC sub-committee meetings and personal communication by our representative. The following outlines our concerns:

1. Recreation

We find the recreation section in the proposed revised forest plan to be lacking for specific recreation direction, a vision. Many of the plan components are very general; they could be anywhere. We would like to see more strategic direction on the allocation of recreational use across the forest. We would like to see more specific direction such as the discussion on the GEM trail. The Idaho County Resource Plan provides more information along these lines. We see little direction concerning issues such as:

- a. Creating more recreational opportunities that are closer to communities for skiing, horseback riding, hiking, etc.
- b. Managing areas for more specific uses in unique settings across the forest. Not all ROS's are the same.
- c. Increased motorized semi-primitive area for both winter and summer use.
- d. Inconsistency with the winter ROS calculations when compared to other allocations. This flaw seems to unrealistically inflate the acres of winter motorized semi-primitive (SPM) setting. There are large areas assigned as winter SPM that are not capable of this activity.

2. Travel and Access

Motorized Road Density: A forest plan provides the strategic direction for the forest from which site specific projects are implemented. These site specific projects are intended to implement the forest plan. The forest has completed or is completing forest travel plans (site specific decisions). Our concern is that the current forest plan provided little direction for the development of that travel plan. The lack of strategic information for travel planning led the process to be more contentious and difficult than it needed to be.

In the proposed revised forest plan we still see little strategic information to guide future travel planning for the forest. We believe the forest plan needs to provide direction that not only protects resources but also provides information that helps the public to understand what type and how much access will be provided across the forest. It needs to provide a framework that helps protect social and economic sustainability, as well as protecting customs and cultures.

The proposed revised forest plan identifies a range of ROS that help define where motorized and non-motorized activities take place, but does not speak to the amount. Speaking to the amount of motorized use is critical not only for resources, but for providing a range of experiences. This speaks directly to Issue 2 identified by the forest in your letter dated December 18, 2017.

Because of this, we recommend that the forest develop alternatives that utilize motorized travel density to address this issue. This concept has been successfully used on other forests and is outlined in Idaho County's Resource Plan. We believe this is a reasonable alternative that addresses the issue and should be fully developed in the EIS. We will also add that we have been trying to work with your office for the last 6 months to get baseline information to assist in this discussion, but have not received any of the information we have requested.

When we have discussed this concept with the public, we find overwhelming support. Having this concept as an alternative in the EIS would allow for the public to comment. We find no logical rationale for keeping this concept from a public discussion. The intent of an EIS is to evaluate alternative ways to resolve issues. To not consider this alternative or to hide it from the public during a process that is intended to provide for public comments would only show an agency bias.

Travel Planning: Most of the current trails and roads on the forest have been created for a variety of uses: mining, grazing, fire and/or timber harvest. We do not believe there has ever been a transportation plan that looked at the best way to move people through and across the forest, to specific sites, and/or for specific uses. We recommend the forest have a process for looking at the relocation of trails and roads over time to better facilitate recreation, as well as to protect resources.

As an example, a trail may have been developed up a creek bottom by a sheep herder years ago to facilitate the movement of their sheep. This trail may not be in the best location to facilitate recreational use, to move people through the area. If we looked at it from a recreational standpoint, we may want to relocate the trail in a different location. This may actually increase public use because it works for them. With planning, the trail may be in a better location for maintenance as well. If there was a transportation plan in place that identified future needs, then, as money or opportunities become available, the trail/road system could be created that better facilitates recreational need in the future. We need a long term vision that is proactive, not just a continuation of past developments.

For these reasons we recommend an Objective that requests the development and overall long range transportation document that assists future travel decisions (see also Idaho County

Resource Plan). This would also compliment the use of ROS and motorized road density desired conditions.

We also recommend an Objective that identifies the location of a trail from Elk City to Florence and then to the Payette NF as part of a larger system. This trail would most likely cross Johns Creek.

3. Plan Components

- a. Plan component FW-DC-ROS-03 seems to indicate an either/or situation which creates sides and, in some cases, divisions. We agree that a non-motorized vs motorized setting is important. However, there are many instances where users of both share the resource. There are situations where rafters and jet boats, skiers and snowmobilers, horses and 4-wheelers share the same resources. Since this is a desired condition, it would prohibit or could severely limit opportunities to look at mixed uses. Since much of ROS is based on noise, there needs to be some thought as to how to deal with future technologies where motorized travel is considerable reduced noise.
- b. Plan component FW-DC-ROS-05 does not currently identify a desired condition; however, it does give existing conditions. Almost 70% of the forest is in non-motorized ROS. Only 14% is in a semi-primitive motorized ROS. This difference is even larger in Idaho County. The Desired Condition should increase the semi-primitive motorized setting across the forest and within Idaho County. See Idaho County Resource Plan for additional information.
- c. Plan component FW-DC-ROS-06 does not currently identify a desired condition, however it does give existing conditions. When comparing the summer ROS with winter ROS, there are differences that do not seem to make sense. We would like to see a map of each ROS and further explanation of these numbers. Our concern is the increase in semi-primitive motorized ROS for winter when compared to summer.
- d. The following tables are our recommended estimates. We would want to have more discussion with the Forest on further refining these numbers since we do not have access to your mapping.

Summer

ROS Class	Percent Existing	Percent Desired future
Primitive	29	27

Semi-primitive Non-motorized	40	30
Semi-primitive motorized	14	23
Roaded Natural	17	20
Rural	0	0
Total	100	100

Winter

ROS Class	Percent Existing	Percent Desired future
Primitive	23	20
Semi-primitive Non-motorized	21	20 (30 **)
Semi-primitive motorized	43 **	47 (33 **)
Roaded Natural	17	17
Rural	0	0
Total	104	104 (100 **)

** As mentioned in our comments above, SPM percentage seems to be incorrect, misleading, or flawed and needs further discussion. We have included numbers we feel more accurately reflect actual ROS.