

This document represents Idaho County Commissioners' response to the Nez Perce-Clearwater NF's (Forest) wilderness and recommended wildernesses sections as part of the Forest Plan revision.

We will address our concerns in three categories: 1) Exiting Wilderness, 2) Recommended Wilderness, and 3) Plan Components for Recommended Wilderness. 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. Existing Wilderness:

According to the Wilderness Act, Section 3(e), Proposed Modification, modifications can be made to existing wilderness boundaries. The Forest Plan is the appropriate place to make recommendations for wilderness boundary modifications. This process is similar to making recommendations for wilderness. There are areas we believe need to be corrected. The Forest is making modifications to the boundary for the Selway-Bitterroot Wilderness (see Selway Additions in category 2 below). We do not know what the rationale would be to make recommendations to modify wilderness boundaries that increase wilderness acreage, but not look at boundary modifications to correct management issues, which result in a decrease in the wilderness acreage. Some of these include, but are not limited to:

1. Adjusting the Gospel-Hump Wilderness Boundary to allow for access to Slate Lake. This access was originally intended to be allowed.
2. The Boise Trail runs in and out of the Hells Canyon Wilderness complicating maintenance. The wilderness boundary needs to be adjusted so the trail is outside of the wilderness.
3. The Forest should evaluate and identify other boundary considerations that would resolve issues, improve management, and reduce conflicts.

2. Recommend Wilderness:

Great Burn: Although the Hoodoo Roadless Area (Great Burn) is not in Idaho County, it is immediately adjacent to the county. Many of our residents utilize this area. Also, there are people who travel through Idaho County to access the Great Burn providing economic benefits to the county.

There should be alternatives where the Great Burn is not recommended for wilderness. Snowmobiling, mountain biking, and other activities have been taking place in this roadless area for over 30 years.

This area is the last unique high elevation area that can be accessed and utilized by mountain bikes, snowmobiles, and other future mechanized or motorized travel on the Forest and within Idaho and Clearwater Counties. The Great Burn provides a unique, motorized semi-primitive experience, above timberline. In fact, it is the only area on the Nez Perce-Clearwater National Forest or Idaho and Clearwater Counties where this opportunity remains.

This opportunity also includes an area where those who like to ski or snowshoe can utilize snowmobiles (a mixed recreational opportunity) to access this same unique environment. The combination of these uses is also increasing, largely due to the Forest Service reducing the number of these areas (cumulatively) in their desire to create more wildernesses.

Across Region 1, snowmobiles and mountain bikes are being removed from these high elevation areas. They are being removed without an appropriate cumulative effects analysis as to the adverse effect on these recreational activities despite a continual outcry by these user groups.

Over the years, the use of these unique high elevation winter areas has increased, largely with snowmobiles. The number of people using snowmobiles to access these unique areas to ski, snowboard, or snowshoe is also increasing. This recreational use is burgeoning with the increase in snowmobile technologies, which will continue to expand in the future. The opportunity for a winter semi-primitive motorized or non-motorized (including mechanized) setting is increasing, particularly for the high elevation areas, frequently referred to as “rock and ice” above timberline.

This unique recreational opportunity also exists for mountain biking in the summer season. Technologies for mountain bikes will surge, as well as, technologies for yet unknown devices. The Forest Plan needs to have a vision to accommodate future uses.

There are currently 1.1 million acres of wilderness on the Nez Perce-Clearwater NF (28% of the forest) and within Idaho County, there are 2.2 million acres of wilderness (49% of the county). When considering all adjacent nation forests (Lolo, Payette, Hells Canyon, Salmon, and Bitterroot N.F), there are 3.9 million acres of wilderness.

The Hoodoo Roadless Area is approximately 252,000 acres of which 153,900 acres (3.8% of the forest) are on the Nez Perce-Clearwater National Forest. This 3.8% represents the last unique high elevation setting available to snowmobiles, mountain bikes, and other recreational users. What is the logical rationale for increasing the percentage of wilderness from 28% to 31% while reducing this recreational opportunity from 3.8% to 0.0 percent? How does this fit within a multiple use strategy for the Forest?

The Wilderness Act states, "In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection...". It is ironic that the Nez Perce-Clearwater NF has so much wilderness that there is only one remaining high elevation area available for mechanized use and that the Forest is using the Wilderness Act to remove this last remaining area available for mechanized use.

To remove the only area where this winter recreational experience can be achieved would be contrary to the Forest Service "multiple use" concept. It even makes less sense when it is compared to the fact that the Forest is almost 30% wilderness. To remove the remaining 3.8%, the only area providing this opportunity, defies logic when considering the facts.

There appears to be a bias/double standard within the Forest Service toward wilderness. This example demonstrates this belief:

Let's imagine for a second there was only one roadless area remaining on the Forest; all other areas were roaded or accessed by motorized trails. This last remaining roadless area also provides a unique high elevation setting. Now let's imagine the Forest is also in the process of revising their Forest Plan, a plan that would evaluate the future use of this last remaining roadless area. Since this area had been proposed for development in the previous forest plan, the Forest's Proposed Action for their revised Forest Plan was to road this area as well.

Now let's imagine that the Forest, under a separate document, made a decision to build a road in this last remaining roadless area prior to completing the revised Forest Plan, a decision which would affect the analysis for the new Forest Plan.

Can you imagine this scenario? Neither can we. We could not imagine that scenario because everyone would see that the decision to road the last roadless area prior to completing the revised Forest Plan would show a bias. It would undermine the Forest's credibility and process. We also could not imagine the Forest making a decision to remove the last roadless area.

But that is just what has happened with the Great Burn. The Forest is currently in the process of developing a revised Forest Plan, one in which the Great Burn (the only area providing a motorized/mechanized recreation opportunity in a unique setting) will be evaluated for its future use. In the middle of this process, the Forest made a decision, in a separate document, to remove all snowmobile and mountain bike use; use which has been in place for the last 30 years. Why did that decision have to be made at this time? It was not because of the existing forest plan. This decision aligns itself with the Proposed Action (to continue to recommend for wilderness) and removes the last remaining high elevation snowmobile and mountain bike area. This decision will affect the revised Forest Plan process and analysis in favor of recommended wilderness, and has shown the Forest's/Region's bias.

Lastly, the Great Burn was recommended for wilderness in the original forest plan developed 30 years ago. This increase in snowmobile and mountain bike use in this high elevation setting is new information or as Forest Service Manual states a "changed condition". This changed condition requires an 18.1 review, an examination of whether or not this new information or changed condition alters the original analysis or evaluation; in this case the 1980's FEIS and wilderness recommendation. The Forest has ignored this new information, has not followed policy, and did not reevaluate the Great Burn recommendation, which would require a supplemental EIS or forest plan revision. Instead, the forest moved ahead and removed the new information or changed condition so it did not exist anymore, and would not interfere with the Forest's desire to make the Great Burn wilderness. The Forest is not to be an advocate for one resource over another, but rather a neutral party giving equal weight to all resources based on facts. The facts are that the Forest (or Region) has never re-evaluated the Great Burn with this new information (18.1) and recommending the Great Burn removes the only area on the Forest that provides this unique recreational experience.

Selway Additions: We feel that the Selway additions may be something we could support, but they need to be accompanied by other boundary modifications (see Existing Wilderness comments Category 1), which may result in reduction. The additions appear to be modifications to wilderness boundaries. There are other adjustments that should be made to the Selway and other wildernesses that would be beneficial too, but would reduce wilderness acreage. In accordance with the Wilderness Act, Section 3(e), Proposed Modification, the Forest Plan is the place to make recommendations for modifications to wilderness boundaries.

Mallard Larkins: There should be alternatives where Mallard Larkins is not recommended for wilderness. There should be other management options for this area rather than

wilderness. This area has long been managed as a “Special Management Area” and consideration should be given to continue this strategy. Idaho County supports Clearwater County’s comments for this area.

Meadow Creek: There should be alternatives where East and West Meadow Creek Roadless Areas are not recommended for wilderness. The Forest is short on motorized semi-primitive opportunity. Idaho’s County Resource Plan recognizes this shortage and has identified Meadow Creek as an area which has the potential to fill this shortage. With a Forest which is almost 70% non-motorized, it does not seem logical to reduce the small amount (14%) of semi-primitive motorized area on the Forest, only to increase the non-motorized setting to above 70%. This would not meet the overall Desired Condition of Forest for providing for a diversity of recreational opportunities.

Other Alternative: Given the amount of wilderness within the County and Forest, there should be an alternative that has no recommendations for additional wilderness.

3. Wilderness and Recommended Wilderness Plan Components:

The Forest Plan should lay out the criteria for using chainsaws in wilderness. The Wilderness Act allows for the use of chainsaws to clear trails. The Forest has a huge backlog of trail needing clearing to provide access and enjoyment by the public of these areas.

We do not understand MA2-DC-RWILD-04. If its intent cannot be understood, it does not meet the criteria for a Desired Condition. It appears too broad and appears to include areas outside of recommended wilderness which could have some unintended consequences. We recommend this DC be deleted.