

March 20, 2007

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Sent Via US Post and Email to [comments-northern-clearwater@fs.fed.us](mailto:comments-northern-clearwater@fs.fed.us)

Dear Ms. Jones,

Enclosed are comments from Friends of the Clearwater on the Clearwater National Forest's Recreation Site Facility Master Planning (RSFMP) process. We have several problems with this process, including its origins.

#### Public Involvement/NEPA

RSFMP should go through NEPA via the preparation of an EIS. It would have been smart to include this in the forest planning process (pre-2005 regulations) but the new regulations--which have been challenged in court by many, including Friends of the Clearwater--no longer do an EIS on forest plan revision. As such, this process needs a separate EIS. The program outlined on the website is insufficient because it is making allocation decisions.

Furthermore, it calls citizens stakeholders and visitors. We are not stakeholders, customers, shareholders, or even visitors; we are citizens of the country, we own the public lands. The relationship between the Forest Service and citizens is not one of the market place. It is not one where the Forest Service "owns" the land and we are merely guests. This terminology, which leads to a certain mindset, must be changed.

#### Origins and Purpose of RSFMP

The idea behind RSFMP did not originate with the Forest Service. It seems to have come from policies developed by the anti-public interest American Recreation Coalition. This is a special interest organization that represents mainly the industrial outdoor industry. Their goal has been to change public land recreation so that they can profit from the marketization and/or privatization of public lands. As such, the whole program is illegitimate.

In response to the assumptions on the website, we have several questions/concerns about the real purpose of this process. They include:

- 1- The web information suggests visitor preferences and expectations may have changed. What data specific to the Clearwater National Forest support these assertions? If such data exist, they should have been referenced and/or included in the web information. Please let us know if such data exist so we can file a Freedom of Information Act request to obtain the data.

Specifically, what empirical, statistically valid data show that in the last 30 to 40 years, vehicles have gotten bigger (remember, 40 years ago was the era of the large vehicles of the 60s) and the citizens now have different interests in the national forests? While it is probably true vehicles have gotten bigger in the past 10 - 20 years, valid data is needed to support such a contention

2- Since the letter suggests citizen preferences and expectations may have changed, what do you believe those expectations and preferences are?

3- Where are the financial data for the Clearwater National Forest? We only found the list of recreation sites on the web page. This is important as it seems the vast amount of money appropriated for recreation by Congress does not reach the ground. The Western Slope No Fee Coalition has done a report on RSFMP and it focuses on budgets.

4- What are the assumptions behind prioritizing sites?

5- What determines whether a site is developed? Why are Fish Lake, Smith Creek, Beaver Dam Saddle, Fish Creek, Lewis and Clark Grove, Nimiipuu, Sherman Creek, Split Creek, Lolo Creek, eagle Mountain, Mocus Point, Elk Creek falls, and potlatch Canyon Trailheads listed as developed sites and not other trailheads, some of which are equally undeveloped? Does the agency intend to charge citizens for hiking on the national forest? We explore this crucial question in more detail later.

#### Clearwater National Forest Values

The Clearwater National Forest is part of the largest wildland complex in the lower 48 states. Indeed, the Clearwater River Basin is the most important area in the entire Rockies--from and including Yellowstone National Park to and including Jasper National Par--for large carnivores (see Carroll et al., 2001). These wildlands are unmatched in the lower 48 and much of Canada.

As such, the Clearwater National Forest provides citizens with the opportunity to re-create in a publicly owned, wildland setting. That is part of our birthright as citizens of this country.

The two issues above: the relative wildness of the Clearwater National Forest (even in developed sites) and the fact these wildlands are held in public trust are the key foundations of what makes this place immensely important and unique. These points are explored in a bit more detail below.

The Clearwater National Forest, in contrast with private lands, is held in trust for public benefits. It is not part of nor should it ever be part of the private market system. The relationship between agency personnel and the public is not one of a buyer and seller. Metaphors that equate the public sector with the private sector are a transparent attempt to rob citizens of their collective heritage.

The Clearwater National Forest, in contrast with private lands, is relatively wild. It offers a respite from the industrialized private landscape. It provides clean water, wild habitat for wild

life, and a place where people can unwind away from the heat and noise all too common in our private surroundings.

To put it another way, the current facilities don't lack development--indeed some are over developed like the Lochsa River. They are more than adequate to provide for citizen needs and, with the apparent decline in recreation use, should be more than adequate for the future. The Clearwater National Forest must not compete with private accommodations which offer electricity, internet hookups, cell phone coverage, hot, running water, and oversized and overhardened pullouts for monster dwellings on wheels.

It should also be noted the Clearwater National Forest is crucial in meeting treaty obligations with the Nez Perce. This will likely become even more important in future years.

In the future, the public values of the Clearwater National Forest will be:

- 1- a wildland biological corridor and habitat/genetic reservoir for species to adapt to global warming,
- 2- a relatively wild area where the forces of nature largely define the character of the area,
- 3- a crucial watershed that provide clean water for fish and other wildlife,
- 4- a public place where public interests--this is an expansive view of the public interest, including flora and fauna--take precedence over private special interests.

In 25 years, fossil fuel consumption in the US should be less than now (if not, we will be in real trouble). As such, the recreation infrastructure that maintains its sense of perspective and doesn't try to be captured by the recent and likely temporary growth in the size and number of machines and toys (assuming that growth has indeed occurred, see above) will succeed. A recreation infrastructure, as envisioned by RSFMP, that tries to market the Clearwater National Forest will fail the citizens of this country.

Clearwater National Forest Niche

No map is yet available. That makes commenting on this document somewhat problematic.

The niche settings should reflect the values of the Clearwater noted above. As currently written, they don't do justice to the citizens or the Clearwater National Forest. Massive changes must be made. They include:

- 1- The remote backcountry setting should include ALL roadless areas and the Selway-Bitterroot Wilderness. Confining this setting to rocks and ice, as the statement does, denigrates the biological values of the Clearwater National Forest and sets the stage for the destruction of these values. Quiet recreation, free of motors, must not be limited to alpine rocks and ice. It is the vastness of the backcountry that makes the Clearwater unique from a biological, ecological and

recreational setting. There are already many opportunities for more mechanized recreation on nearby private and state lands.

2- The room to roam and ride setting must be eliminated. It suggests industrial, motorized recreation takes precedence over all other values on the majority of the Clearwater National Forest. The cabin rental program is also misguided. It is an effort to “market” the Clearwater and a step toward privatization/commodification. The value of the Clearwater is as a wild area and a public area. Indeed, it is an allocation decision to declare, as this document does, portions of roadless areas as developed recreation sites.

3- The convenient connections section should also be eliminated. It also emphasizes an industrialized, urban setting that is much more appropriate on private land. Making the rustic campgrounds in the Lochsa Wild and Scenic River suitable for RVs--electricity, hot running water, internet hook-ups and the like--will destroy the Forest and conflicts with the intent of the Wild and Scenic Rivers Act. The Lochsa is already over developed.

4- In place of the last two categories, a roaded wildland setting should be adopted for all the roaded areas on the Clearwater National Forest. This setting would retain the current mix of more developed sites in the roaded setting, if supported by an evaluation through an EIS. Given the trends in recreation numbers,

5- Outfitters and guides should be allowed only where there is a need and such use is necessary and proper. The inclusion of outfitting in a document ostensibly meant only for developed recreation sites suggests that there is an intent to privatize the recreation infrastructure on the national forests.

The niche document needs to be drastically altered or preferably eliminated with a fresh start. Already, the backcountry has become part of the developed recreation program by virtue of its inclusion in this document. Primitive campgrounds are now part of a developed recreation program. Remote spots inside roadless areas (such as Scurvy Mountain) are now considered developed sites. The backcountry is being destroyed by administrative action, on paper, to make its physical destruction a fait accompli. It is not that different than the recent past where pressures to destroy the backcountry came mainly through commodity extraction like logging.

#### Problems with the Current Course

Given the history of the RSFMP process, no good can come of it. It is designed to declare the majority of the Clearwater National Forest “developed” by fiat without going through an EIS. That violates a plethora of case law, especially cases relating to “development” of roadless areas. It also makes the recreational sites a marketable recreation experience versus an important component in meeting the public interest.

Generations unborn need to be considered in the equation. Greeting them with toll booths, internet cafe campgrounds, developed sites in the remote backcountry with catered meals (serving only the rich) and the like would be an irrevocable tragedy. Recreation use trends on the national forests as a whole seem to be declining (though the data that exist are inadequate,

incomplete, and contradictory). The existence value of the Clearwater National Forest may become even more important in the future, especially if decreases in fossil fuel use/abundance lead to a less mobile society.

### Summary

The RSFMP process is misguided from the start. It seems designed to market recreation rather than provide a public good. Declining recreation use, if indeed it is happening, shouldn't be met with a program of disneyfication for revenue generation.

In other words, RSFMP is based upon an awful assumption--one that violates the very essence of public lands. That assumption is that an increasing population is spending less time on the national forests for recreation purposes; therefore, the national forests must become more like private urban settings to attract more customers. We look forward to your response.

Sincerely,

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