

June 11, 2007

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Sent Via US Post and Email to comments-northern-clearwater@fs.fed.us

Dear Ms. Jones,

Enclosed is the second set of comments from Friends of the Clearwater on the second phase of the Clearwater National Forest's Recreation Site Facility Master Planning (RSFMP) process. We have several problems with this process and strongly urge you to drop it. It is being used as a vehicle to make illegal allocation decisions without NEPA, privatize the recreation infrastructure, and further develop roadless areas by declaring them already developed.

If recreation planning of this type is needed, the forest plan revision process is the most suitable place for that to occur. At the very least, this process should be limited to legitimate campgrounds and recreation infrastructure, not backcountry sites, administrative sites (current and former) or other places, which are dispersed rather than developed. We address this in more detail below.

Sites—General

A few general comments are in order. Trailheads, informal pull-offs and the like shouldn't be recognized as developed sites in the same sense that formal campgrounds are recognized. For example, a wilderness trailhead would not likely be supported with wilderness money. As such, only the developed campgrounds should be part of this process.

It is instructive to note most of the sites do not appear on the forest visitor map. Only the sites marked as campgrounds on the visitor map should be included in this process.

Clearwater National Forest Niche

The niche map and statement is very problematic in that it tries to do what should be done through recreational or forest planning, with full public involvement **THROUGH NEPA**. This is an illegal attempt to make allocation decisions without admitting they are being made. Furthermore, the niche statement conflicts with the forest plan the forest plan settlement agreement.

If this is not an allocation, then the remote backcountry setting should include ALL roadless areas and the Selway-Bitterroot Wilderness. Confining this setting 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 and the 4,000 miles plus of roads on the Clearwater National Forest.

The room to roam and ride and the convenient section settings must be eliminated. They suggest industrial, motorized recreation take precedence over all other values on the majority of the Clearwater National Forest. Again, this is an allocation issue presented as a plan for recreational sites. The niche map shows the whole forest, not just recreational sites, as begin zoned. That fact alone proves that this is a broad-based allocation issue and not merely a recreation site issue.

The niche as currently written will remove any ability for the Forest Service to make recommendations of other roadless areas like Weitas Creek or Pot Mountain for wilderness in the upcoming forest plan revision. RSFMP is making that de facto decision now, prior to NEPA, and that is clearly illegal. Again, this is recreation allocation and planning masquerading as prioritizing sites for maintenance/upkeep.

All of the Clearwater roadless areas would be protected as wilderness under HR 1975. The niche statement conflicts with a bill currently in Congress.

The Elk Creek Falls recreation area, a backcountry area, is in the convenient connection section. This clearly conflicts with the direction for Elk Creek Falls (A-2) found in the forest plan on pages III-3 to III-6. The forest plan requires “a natural appearing setting” and requires nonmotorized dispersed recreation setting. In addition, one roadless area is included in the convenient connection section—Eldorado Creek.

The niche map misallocates several areas that are dedicated to backcountry recreation (primitive and semi-primitive recreation) in the forest plan. These areas include A-3, C8S, C-1, C-3, C-6, and B-2 (as amended by the settlement agreement). In fact, the only areas that should be included in the niche statement are the campgrounds (not the administrative sites) in management area A-5. The irony here is some of these areas (some B-2, some A-3, some C-6, some C8S) are included in the backcountry category while other areas are not.

Specific Sites

Fish Lake Campground (NFRD) This so-called campground is located in an area recommended for wilderness by the forest plan (B-2). The history of this campground is one of Forest Service deceit. There has been no NEPA done on the development of the campground. It is illegal and must be removed.

The forest plan requires that recreation meet the visual quality objective of preservation. A developed campground does not, by definition, meet this standard. (See forest plan pages III-36 to III-39). The forest plan requires that “each recommended wilderness” must be managed “to protect in wilderness character.” Again, a developed campground is inconsistent with preservation of wilderness character. It is also interesting to note the Fish Lake Camp appears nowhere on the forest visitor map.

Scurvy Mountain Lookout. (NFRD) This area, like Fish Lake, is in an area, according to the forest plan settlement agreement, that is supposed to be managed as recommended wilderness (B-2). As such, a fee cabin site is inconsistent with the forest plan. The settlement agreement section II. a. states:

"The Forest Service agrees, effective immediately, not to approve any timber sale or road construction project decisions within the area covered by the proposed 'Idaho Wilderness, Sustainable Forest and Communities Act of 1993,' H.R. 1570 and **that such lands will be managed according to Forest Plan standards and guidelines for recommended wilderness (Management Area B2)**. The Forest Service further agrees to apply these management prescriptions to any area(s) added by amendment to H.R. 1570, and to any area(s) included in any other Idaho wilderness proposal introduced in Congress by any member of the Idaho delegation." (emphasis added).

In B-2 areas, any facilities, if allowed at all, are only supposed to be for user safety and resource protection (page III-36). A cabin site like this is more than for resource protection or visitor safety. It was not needed in the past. It is an amenity in an area where such recreation amenities are not allowed, according to the forest plan.

Furthermore, the niche statement map excludes this as a backcountry area. That conflicts with the direction in the forest plan which has it as a primitive setting.

Liz Butte and Weitas Butte Cabins. (NFRD) These are accessed by roads in an area dedicated to nonmotorized recreation according to the forest plan (C8S).

Liz Creek Cabin. (NFRD) This area is not even on the newest visitor map as a site. Again, this is yet another attempt to “develop” the backcountry by turning former administrative sites into developed recreation areas.

Cold Springs Lookout Cabin. (NFRD) This area is in management area A-3, which is intended to retain its wild character. The only facilities that are allowed are those “necessary for public health and safety and resource protection.” This cabin, as a rental site for the public, is not needed for those purposes. Rather, it is an amenity that conflicts with the forest plan.

Furthermore, the niche statement map excludes this as a backcountry area. That conflicts with the direction in the forest plan which has it as a semi-primitive setting. Other A-3 areas are included as backcountry.

Castle Butte Lookout Cabin. (LRD) This area is in management area A-3, which is intended to retain its wild character. Indeed, this area is to be dedicated to

“semiprimitive, nonmotorized” recreation. The only facilities that are allowed are those “necessary for public health and safety and resource protection.” This cabin as a rental site for the public is not needed for those purposes. Rather, it is an amenity that conflicts with the forest plan.

Furthermore, the niche statement map excludes this as a backcountry area. That conflicts with the direction in the forest plan which has it as a semi-primitive nonmotorized setting.

Wendover Staging Area. (Po.RD)As per a decision and appeal agreement, this site can't be upgraded.

Summary

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 tollbooths, internet cafe campgrounds, developed sites in the remote backcountry 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.

Sincerely,

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