



IDAHO DEPARTMENT OF FISH AND GAME

SOUTHWEST REGION
3101 South Powerline Road
Nampa, Idaho 83686

Brad Little / Governor
Ed Schriever / Director

May 17, 2019

Keith Lannom, Forest Supervisor
Payette National Forest
500 North Mission, Building 2
McCall, ID 83638

RE: Environmental Assessment for the South Fork Restoration and Access Management Plan #51257

Dear Mr. Lannom,

The Idaho Department of Fish and Game (Department) has reviewed the Environmental Assessment for the South Fork Restoration and Access Management Plan. The project includes numerous actions relating to watershed restoration, motorized and non-motorized access, and improvements of recreation facilities within the South Fork Salmon River (SFSR) watershed within a 329,000 acre project area. The Department previously submitted scoping comments in a letter dated July 19, 2017.

The purpose of these comments is to assist the Payette National Forest by providing technical information addressing potential effects on wildlife and wildlife habitat and how any adverse effects might be mitigated. It is not the purpose of Idaho Department of Fish and Game to support or oppose this proposal. Resident species of fish and wildlife are property of all Idaho citizens, and IDFG and the Idaho Fish and Game Commission are expressly charged with statutory responsibility to preserve, protect, perpetuate and manage all fish and wildlife in Idaho (Idaho Code § 36-103(a)). In fulfillment of our statutory charge and direction as provided by the Idaho Legislature, we offer the following comments and suggestions.

General Comments

Department staff have participated in the Big Creek-Yellow Pine-South Fork Collaborative (Collaborative), serving an advisory role by providing technical input with respect to IDFG management priorities, potential project effects on wildlife, and IDFG wildlife plan management objectives. The charge of the Collaborative has been to develop recommendations balancing watershed restoration with access and recreation opportunities in the South Fork Salmon River (SFSR), and Department staff participation has been directed toward contributing to that outcome.

IDFG's analysis of travel management planning is generally based on the following primary considerations:

Keeping Idaho's Wildlife Heritage

- Disturbance and displacement effects. Wildlife populations may be affected by recreation activities and vehicle travel. Some wildlife may be displaced from habitat adjacent to roads and trails (e.g., Schultz and Bailey 1978, Rost and Bailey 1979, Forman and Alexander 1998, Canfield et al. 1999, Gaines et al. 2003, Wisdom et al. 2004, Shively et al. 2005, Wisdom et al. 2005, Barton and Holmes 2006, Naylor et al. 2009). These effects are species-specific, and wildlife responses are also dependent on the circumstances of the disturbance, e.g., its timing, duration, frequency, etc.
- Big game vulnerability during hunting seasons. High road and trail densities and increased motorized use reduce functional security habitat for big game during the hunting season (Unsworth et al. 1993, Gratson and Whitman 2000, Rowland et al. 2005). The planning area is within portions of IDFG Game Management Units (GMUs) 19A, 20A, and 25. The planning area has a history of providing a diversity of motorized and non-motorized hunting opportunity for mule deer and elk under a general and controlled season framework.
- Wildlife-related recreational opportunities. Travel management should strive to provide a balance of motorized and non-motorized opportunities to support a variety of approaches to fish- and wildlife-based recreation.
- Effects on fish and wildlife habitat. Road and trail construction, maintenance, and use have the potential to adversely affect habitat quality, and the Department prioritizes avoidance of adverse effects on high-value and difficult-to-replace habitat types, such as sport-fish spawning and rearing habitat or seasonally limiting or uncommon wildlife habitat.

This proposal has the potential to affect fish and wildlife populations, and the Department has a particular interest in deer and elk populations in this area. The South Fork is the primary winter range for most of the deer and elk in GMU 25, and deer and elk from west 20A and east 19A also winter in this area. For example, the portion of the South Fork Salmon River canyon in the vicinity of the Davis Ranch Road provides important winter range for approximately 600 elk and 450 mule deer based on recent aerial winter surveys. Radio-collar data indicates 12 of 21 elk collared in GMU 25 during 2015-2017 inhabit this area at some time during the year. Most use occurs during winter (November through April), but data also indicate more limited use during the calving season (May and June). Additionally, this area provides big game security during both the archery and rifle hunting seasons (September and October). To avoid displacement of deer and elk from quality seasonal habitat, the Department recommends motorized travel restriction on Davis Ranch Road from September through June.

Review of Alternatives

The EA analyzes 4 alternatives:

- Alternative A, the no-action alternative, which would allow implementation of the existing Travel Management Plan;
- Alternative B, which would implement a range of actions for motorized and non-motorized access;
- Alternative C, which is intended to emphasize watershed improvement actions;

- Alternative D, which is intended to emphasize motorized vehicle access opportunities.

As described previously, the Department reviewed these alternatives with respect to disturbance and displacement effects on wildlife, big-game vulnerability, and access for fish- and wildlife-based recreation. The Department regards Alternative C to represent the set of actions that would have the least effect on fish and wildlife resources. However, Alternative C would offer reduced opportunity for access for fish- and wildlife-based recreation over Alternatives B and D. Alternative D would offer the greatest amount of motorized access for fish- and wildlife-based recreation. However, Alternative D would have the greatest potential to displace wildlife, increase big-game vulnerability, and reduce the variety of opportunities for recreation.

Alternative B most closely represents the Department's recommended balance between adverse effects on fish and wildlife and providing a variety of access opportunities. The set of proposed actions would balance protecting wildlife resources, such as elk calving habitat, and providing access to public lands controlled by USFS. Adopting Alternative B would support Department management and fish- and wildlife-based recreation goals. The Department has understood Alternative B to most closely represent the recommendations of the Collaborative, but also recognizes some of the proposed actions regarding road decommissioning have not been discussed by the Collaborative.

The Department appreciates the opportunity to provide information pertinent to the proposed projects. Please contact Nathan Borg in the Southwest Region-McCall office at (208) 634-8137 or Bill Bosworth in the Southwest Region-Nampa office at (208) 465-8465 if you have any additional questions concerning this letter.

Sincerely,



Bradley B. Compton
Southwest Regional Supervisor

BBC/WRB&NB

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