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September 18, 2020

**RE: Idaho Wildlife Federation and Idaho Outfitters & Guides Association Scoping Comments for Rapid River Travel Management Project**

Dear District Ranger Phelps,

Idaho Wildlife Federation (IWF) and Idaho Outfitters & Guides Association (IOGA) (together, the Commenters) thank you for the opportunity to provide scoping comments on the Rapid River Travel Management Project (Project) on the Payette National Forest (PNF, or Forest).

The Idaho Wildlife Federation is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations with 45,000 affiliate members and individual supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

The Idaho Outfitters and Guides Association is a non-profit business trade association representing licensed outfitters and guides across the state. Members primarily are small, independently owned businesses offering guided hunting, river running, trail riding, hiking, biking, climbing, skiing, snowmobiling, guest ranch trips, and guided fishing trips. Our organizations as well as the individuals and businesses we represent have deep interest in and knowledge of the Rapid River drainage.

We greatly appreciate your efforts to accommodate for public engagement despite logistical challenges related to covid-19. We also thank you and the PNF for your responses to questions

we have raised, for supplying relevant documentation, and for your dedication to an inclusive NEPA process.

### *Background*

The PNF has initiated scoping on proposed use designations for Trails 177, 183, 187, 188, and 362 in the Rapid River drainage. This is in an attempt to resolve conflicting travel management and Forest planning directives in the designated Wild Rapid River corridor and adjacent watershed. The management direction for the wild river corridor at 36 CFR 292.44(b)(2) prohibits motorized and mechanized travel within the corridor, yet the Payette National Forest Snow Free Travel Plan Record of Decision for the Council and New Meadows Ranger Districts did not prohibit motorized and mechanized travel within the wild river corridor. Because the Hells Canyon National Recreation Area (HCNRA) overrides the adopted Travel Management Plan, litigation and subsequent settlement between various groups resulted in the 2010 Rapid River Special Use Order 0412-401, prohibiting motorized use on certain trails in order to protect the Wild Rapid River and its' Outstandingly Remarkable Values (ORVs). Despite this order, there is still a need to resolve and revise the Travel Management Plan to accurately reflect the management on-the-ground. This scoping proposes to change Trails 177 and 362 from motorized/mechanized use to conform to the HCNRA language, while designating sections of Trails 183, 184, 187, and 188 as open to two-wheel motorized use.

The Commenters urge the Payette National Forest to consider the following points as the District Ranger begins to move out of the scoping process and into an Environmental Assessment.

**A. Hunters choose to hunt in the McCall Elk Zone, in GMU 23, and in the Rapid River because it offers an over-the-counter, un-capped elk tag opportunity in a remote setting. The proposed expansion of motorized activity may put this preference and experience at risk.**

In Idaho, elk zones are generally capped at specified numbers to reduce hunter congestion and improve success rates and hunter experience. A draw process may also be necessary to implement to manage for mature age class ungulates or to reduce hunting pressure if it has shown to have a negative impact on the herd. As hunting and recreational pressure increases, over-the-counter, un-capped elk zones will become even more of a rarity across the Western United States. However, this project falls within the Idaho Department of Fish & Game's (IDFG) McCall Zone and GMU 23. This zone is one of IDFG's few remaining over-the-counter, un-capped elk zone opportunities highly used with higher than average harvest success. In 2019, Elk hunters totaled over 15,000 hunter days in GMU 23 alone. Surveys have shown that McCall Zone Elk hunters are loyal to their area, with 89% of McCall Zone hunters who choose to hunt the same zone every year.<sup>1</sup> The majority (61%) of survey respondents marked that their desire to hunt in the McCall Zone is based on the ability to acquire a tag in that zone every year. In

<sup>1</sup> Middleton, A., Sanyal, N., Krumpel, E. Elk Hunting in Idaho: Understanding the Needs and Experiences of Hunters [McCall Zone].2013. For Idaho Department of Fish and Game. <https://idfg.idaho.gov/old-web/docs/wildlife/elkPlan/surveyMccall.pdf>

addition to McCall area elk hunters having a strong preference to hunting every year, many choose their hunting location based on the chance they will not encounter other hunters with OHVs (73% found this extremely important, quite important, moderately important, or somewhat important).

When asked about preferences on various restrictions to improve upon the quality of elk in the McCall Zone, survey results stayed consistent among respondents. Almost 95% of Hunters responded that they would favor a raghorn bull *every year* over a mature bull *every ten years*. Even when posed with the chance to harvest a mature bull every three years, survey respondents overwhelmingly (74.8%) favored harvesting a raghorn bull every year. 77.4% of respondents found it unacceptable to offer the potential for more controlled hunts with more and/or larger bull/success, but only having the opportunity to hunt with a drawn tag. Consider that half (49.1%) favored further restricting use of OHVs compared to the current activity, and 68% of combined respondents felt that it is an acceptable form of management to improve hunter experience. These statistics show that, in the very least, that this project will fall short of capturing overwhelming acceptance from the sporting community.

These results draw a conclusion that McCall Zone elk hunters prefer to keep opportunity in the forefront while either maintaining or reducing motorized activity across the zone. As you zoom out from the Rapid River drainage and over the larger McCall Zone, it is easy to see that the Rapid River drainage is one of the few areas that currently offers a mostly non-motorized, vast backcountry experience with day-trip accessibility. Other areas on the New Meadows District and within the McCall Zone offer plentiful motorized experiences.<sup>2</sup> It is our belief that if the Rapid River drainage is subject to further motorized opportunities that it may risk the over-the-counter, un-capped McCall Elk Zone opportunity that so many hunters cherish in exchange for a capped zone.

Though elk are highly sought after, black bear and mule deer attract both resident and nonresident hunters to the Rapid River. This project has the potential to threaten the business of one of the largest land based, hunt outfitters in the state based in the Rapid River area, and their ability to sell various hunts as a backcountry experience. While identifying a single outfitter may give the impression of marginal impact, it is important to consider that said outfitter provides public access and opportunity to over 60 individuals per year, whom themselves are in turn contributing significantly- both in license fees and generated spending- to the state and hyper-local economy. Moreover, the significant trail maintenance and improvement work this outfitter has in their tenure and continues to provide is an invaluable contribution to the resource and to the PNF.

Aside from the necessary changes in the Travel Management Plan to conform with the HCNRA Act requirement in the Rapid River designated corridor, the commenters believe there is no demonstrated need from the public for this project. We believe this project actually runs counter

<sup>2</sup> The Payette National Forest Council and New Meadows Ranger Districts Snow-free Season Travel Management Plan Record of Decision selected alternative shows that 194 miles of two-wheel motorized trails is available between the two districts. This does not include all other ORV designated trails.

to many users' desires across the region. We urge the PNF to further analyze these social values in the formation of the Environmental Assessment and consider the desires of sportsmen, sportswomen, outfitters and guides in an alternative.

**B. The Payette National Forest lacks the ability to adequately enforce violations from the potential of increased motorized use in the Rapid River Drainage.**

The commenters requests that the PNF analyze enforcement challenges with the project. Though we appreciate efforts to prevent trail violations such as signage and user education, it seems that these efforts may be lost within the rugged country and sheer size of the upper Rapid River drainage. The Wild Rapid River corridor boundary is not uniform in its' buffer distance, and is unidentifiable when on the trail. Even if adequate signage was installed on the trails in question, this does not provide any signage for unauthorized user routes that may be created as a result of increased motorized use in the drainage. With only one Law Enforcement Officer for the entire 2.3 million acre PNF and IDFG Patrol Area #342 covering 462 square miles, it is difficult to comprehend what enforcement mechanisms will be effective to prevent illegal motorized use on existing trails as well as the potential for user-created trails. The commenters believe this inadequacy was assessed a decade ago and is why the trail closures stemming from the Special Use Order is in place today. We urge the PNF to assess the true conditions on-the-ground and be realistic in the Environmental Assessment when discussing enforcement adequacies.

**C. The Payette National Forest Should Analyze the Potential Impacts to the Outstanding Remarkable Values for the Wild Rapid River.**

After the HCNRA Act passage, the PNF conducted an ORV study to identify qualities worthy of protection. Water quality and fisheries were identified as an ORV and is of particular importance to our organizations. The commenters request that the PNF provide a robust analysis on the impacts to these ORVs if there is an increase in motorized use in the Rapid River drainage. This builds on the need to adequately assess enforcement mechanisms above, as illegal use immediately adjacent to and even through the Rapid River will threaten the ORVs that the Rapid River was protected for. The Rapid River's identified Water Quality ORV is one of just a few in Idaho and across the United States. It is easy to forget that while Idaho is home to more than 1,000 miles of protected rivers, Wild and Scenic protected rivers only represent less than one half of one percent of our nation's rivers. We have confidence that the PNF will take these considerations into account in the Environmental Assessment.

*Conclusion*

Our organizations promote reasonable access and responsible shared use to our National Forest System lands, including providing for areas that allow shared recreational opportunity. With the rapid increase in recreational use on the Payette National Forest, it is even more essential to strike a balance across the Forest and seek opportunities for each individual user and user group to enjoy their experience to the fullest extent possible. The Rapid River drainage is one of the few areas in the McCall Zone that currently offers a mostly non-motorized, vast backcountry experience with day-trip accessibility. We believe this should be preserved in order to maintain a

balance on the Forest. Our groups have shown that we are willing to sit at the table and explore alternative opportunities outside of the Rapid River drainage for motorized opportunity and will continue to do so in order to find a balance that each user group can accept. We look forward to continued conversations to resolve this management inconsistency.



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