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District Ranger, New Meadows Ranger District
Payette National Forest
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RE: Idaho Wildlife Federation, Idaho Outfitters & Guides Association, and Trout Unlimited Comments on Rapid River Travel Management Project Environmental Assessment

Dear District Ranger Phelps,

Idaho Wildlife Federation, Idaho Outfitters & Guides Association, and Trout Unlimited (collectively, groups) thank you for the opportunity to provide comments on the Rapid River Travel Management Project Environmental Assessment (EA) 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.

Trout Unlimited is the nation's oldest and largest non-profit coldwater conservation organization with over 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU staff and volunteers

have worked toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges. Nine chapters with 2,500 members statewide actively engage with state and federal agencies, local communities, and private landowners in order to maintain the larger landscape that is so vital to the social and economic well-being of communities in Idaho.

We greatly appreciate your efforts to seek robust public engagement despite logistical challenges related to covid-19. The PNF has been extremely helpful with responses to questions we have raised, for supplying relevant documentation and historical background. We would also like to thank the Forest for developing additional alternatives that are reflective of the comments received during the scoping period and for the dedication to an inclusive NEPA process.

Our groups support the non-motorized use alternative for the Project, which would designate 25.7 miles of trail as *open to foot and horse traffic only*.

We detail our reasons for support of the non-motorized use alternative below.

Purpose and Need

As stated in the EA, the purpose of this project is to review and update the designated use of approximately 26 miles of trails 177, 183, 187, 188, and 362 within and immediately adjacent to the Rapid River Wild River designated corridor on the New Meadows Ranger District of the Forest. The two needs for this project are to resolve conflicting management direction for motorized and mechanized use on trails within the Wild River corridor that are included under order 0412-401; and to review the sections of trail adjacent to the Wild River corridor that are included under order 0412-401.

I. The non-motorized use alternative achieves hunter preference and desired experience that is unique to the Rapid River.

Big game hunting is a culturally and economically significant recreational activity in Idaho. Hunting and fishing combined generates \$6.3 billion per year and almost 80,000 jobs. Many small communities are reliant on this industry and the inextricable link between it and the wild landscapes that provide for these opportunities. The Rapid River Area is no exception.

As referenced in our scoping period comments, this project falls within the Idaho Department of Fish & Game (IDFG) McCall Zone and GMU 23. This zone is one of IDFG's few remaining over-the-counter, uncapped elk zone opportunities that is highly used and often yields higher than average harvest success. Overall, the majority of over-the-counter, uncapped elk and deer hunting opportunities across the West have been restricted to draw opportunities or similar due to hunter and/or recreational pressure. Repeated disturbance can displace elk from preferred

habitats, thereby causing long-term habitat fragmentation and loss¹, compromising energy conservation², and ultimately reducing survival and reproduction³.

In 2019, elk hunters totaled over 15,000 hunter days in GMU 23 alone. Surveys have shown that hunter desire in the McCall Zone is based on the ability to acquire a tag in that zone every year. 89% of McCall Zone hunters choose to hunt in the same zone every year⁴. Almost 95% of McCall Zone Hunters favor the opportunity to harvest a raghorn bull *every year* over one mature bull every ten years.

Many hunters choose their hunting location based on the chance that they will not encounter other hunters with OHVs (73% found this extremely important, quite important, moderately important, or somewhat important). 68% of combined survey respondents felt that restricting use of OHVs is an acceptable form of management to improve hunter experience. It is easy to see that, as you zoom out, the Rapid River drainage offers the only significant non-motorized recreation opportunity within GMU 23 and across the entire McCall Zone. The remaining McCall Zone and GMU 23 offer plentiful motorized and mechanized recreational opportunities.

Our groups draw the conclusion that McCall Zone elk hunters prefer to retain current hunting opportunity first while either maintaining or reducing motorized activity across the zone. The non-motorized use alternative is the only alternative that would retain the experiences that the majority of hunters and recreationists prefer within the Project area. While we recognize the Forest has no authority in the management over hunting, it is important to understand that what the Forest authorizes has implications beyond the agency and to the majority of users on the Forest. We again support this alternative to clean up administrative designations in order to lift the 2010 Rapid River Special Use Order 0412-401.

II. The non-motorized alternative ensures that Identified Resources Provided by the Wild Rapid River are not compromised.

The Rapid River Inventoried Roadless Area (IRA) represents 78,522 acres of public land with high biological integrity and natural complexity. The Rapid River IRA is in the Idaho Roadless Rule's Wildland Recreation category but not designated as recommended wilderness, as most IRA's in this category are, highlighting its intact backcountry attributes. Additionally, Congress recognized this functioning ecosystem with the designation Mainstem and West Fork of the

¹ Wisdom, M. J., R. S. Holthausen, B. C. Wales, C. D. Hargis, V. A. Saab, D. C. Lee, W. J. Hann, T. D. Rich, M. M. Rowland, W. J. Murphy, and M. R. Eames. 2000. Source habitats for terrestrial vertebrates of focus in the Interior Columbia Basin: broad-scale trends and management implications. USDA Forest Service, Pacific Northwest Field Station, General Technical Report, PNW-GTR-485.

² Cole, E. K., M. D. Pope, and R. G. Anthony. 1997. Effects of road management on movements and survival of Roosevelt elk. *Journal of Wildlife Management* 61:1115-1126.

³ Davidson, G. A., B. K. Johnson, J. H. Noyes, B. L. Dick, and M. J. Wisdom. 2012. Effect of archer density on elk pregnancy rates and conception dates. *Journal of Wildlife Management* 76:1676-1685.

⁴ Middleton, A., Sanyal, N., Krumpe, 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>

Rapid River under the Wild and Scenic Rivers Act. The Rapid River's identified Outstanding Remarkable Values (ORVs) are water quality and coldwater fisheries habitat. This area has designated critical habitat for Chinook salmon that assists in the recovery of the listed species. Steelhead and bull trout are also well distributed throughout the drainage.

In addition to the natural services that the area provides, the Rapid River is also the water source for the Rapid River Fish Hatchery. Over 3 million Chinook are produced in this facility yearly to provide sporting opportunity for all Idahoans. Continued success of this facility is reliant on the pristine water quality the Rapid River provides.

At the time of designation, management direction from Congress clearly stated: "Provided, that the Secretary shall establish a corridor along the segments of the Rapid River and may not undertake or permit to be undertaken activities on adjacent public lands which would impair the water quality of the Rapid River segment."⁵

We are pleased to see the Forest consider these values and develop the non-motorized use alternative, as well as modification of the proposed action alternative to best avoid adverse impacts to ORVs. While we may consider these modifications on the proposed action to be adequate on paper, it still does not completely conserve these values if implemented on the ground. Our biggest concern is with user compliance on the two turnarounds (North Star Trail #183 and Echols Ridge Trail #187). Given the sheer size of law enforcement patrol areas (2.3 million acres for one PNF officer, IDFG Patrol Area #342 covers 462 square miles), and the size of the Rapid River area compared to the overall motorized trail density in the proposed action, we have little confidence that the turnarounds would be adequately respected and enforced. It is our understanding that the 2010 Rapid River Special Use Order 0412-401 was implemented for trails both within and outside of the Wild River corridor due to the threat of continued illegal motorized use into the corridor and the lack of enforceability. We believe the Forest should adopt the non-motorized use alternative to provide assurances that it will uphold the values for what the Rapid River was recognized for.

III. The proposed action will not achieve the results the Forest seeks.

We cannot conclude that selection of the proposed action will lead to the results the Forest hopes to achieve. While we appreciate the Forest's attempt to reach a middle ground of non-motorized and motorized desires, the proposed action will likely prove to have little acceptance by both motorized and non-motorized interests.

The proposed action offers a total trail mileage (2.3 miles over two trails) that is of minor significance to the motorized community while having the potential to have major impacts to current uses and special permit holders, of which are foot and horse users.

The Final Forest Plan Revision for the Payette National Forest states that non-motorized trail opportunities are the recreation emphasis for the Rapid River Watershed. We believe it is important for the Forest to adhere to the non-motorized recreation emphasis for the Rapid River,

⁵ Public Law 94-199 Sec 3(b).

as stated in the Forest Plan. Additionally, the Forest Plan noted that unauthorized cross-country ATV travel has caused resource damage in riparian areas and user conflicts are escalating between motorized and non-motorized recreationists within the Rapid River Watershed (III-143). Instead of consolidating uses, the proposed action integrates differing uses and will escalate conflicts that have already been noted. Consolidating these uses may pose a safety issue between motorized and non-motorized recreationists on certain trails that currently have significant horse travel. Given the limited recreational resources within the agency, we believe efforts to expand motorized opportunities can be more effectively utilized elsewhere.

Conclusion

Our organizations support the non-motorized use alternative to allow the Forest to clean up conflicting management decisions while preserving the status quo conditions on the ground. We believe the Rapid River area's current conditions provide one of the most unique experiences for the majority of recreationists who seek a day-use, backcountry, non-motorized area. The non-motorized use alternative ensures that the Outstanding Remarkable Values of the Wild Rapid River are not compromised and provides the Forest with the strongest, most defensible decision that will uphold Congressional directives.

Our organizations actively promote reasonable access and responsible shared use to our National Forest System lands. We are confident that all partners can sit at the table and identify 2.3+ trail miles on the Payette National Forest where motorized use is more appropriate than in the narrow Project Area. We stand at the ready to aid the Forest in identifying these other areas and look forward to continued conversations.



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A handwritten signature in black ink that reads "Michael T. Gibson". The signature is written in a cursive style with a large, looped initial "M".

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