

OFFICE OF SPECIES CONSERVATION

BRAD LITTLE
Governor



P.O. Box 83720
Boise, Idaho 83720-0195

MIKE EDMONDSON
Interim Administrator

304 N. Eighth Street, Suite 149
Boise, Idaho 83702-5833

April 2, 2021

Attn: Rapid River Travel Management Project
New Meadows Ranger District
PO Box J
New Meadows, ID 83654

Dear District Ranger Phelps,

The State of Idaho, through the Idaho Governor's Office of Species Conservation (OSC), appreciates the opportunity to provide comment on the Payette National Forest's (PNF) Rapid River Travel Management EA. OSC is dedicated to planning, coordinating, and implementing actions within the State of Idaho that will preserve, protect, and restore species listed as rare and declining, threatened, endangered, or candidate while taking into consideration the state's economic vitality and values. OSC has taken the state lead to coordinate input and comments from Idaho's state agencies for this proposed project, and this comment letter represents Idaho's unified voice for this proposal.

The EA acknowledges that all action alternatives have the potential to impact fish and wildlife populations, hunting and angling opportunities, and recreation options. All three alternatives, regardless which is chosen, would achieve a resolution to the long-standing administrative issue in the Rapid River drainage. Below is a breakdown of the state's thoughts on the proposed alternatives:

- **Non-motorized alternative** -The existing conditions would continue to provide opportunities for those users seeking a primitive backcountry experience.
- **Non-motorized or Proposed alternative** - Fewer miles of trails open to motorized travel may reduce impacts to water quality, fish populations, wildlife populations, and recreationists seeking a more primitive experience.
- **Motorized and Proposed Alternative** - Increasing the number of miles open to motorized travel provides more opportunities for motorcycle and bicycle riders and hunters and anglers to experience the project area, while also creating new opportunities for those who depend on mechanized transportation to access the project area.

However, these motorized opportunities seem limited (2.3 miles total under the proposed alternative, 6.6 miles under the motorized alternative) and would not necessarily satisfy the

greater needs of motorized users and non-motorized users. On top of the limited opportunity, the lack of data on current trail usage makes future impacts to the Wild and Scenic River Corridor hard to predict.

There are opportunities outside the drainage that would garner more ‘wins’ across the board and satisfy concerns about resource degradation while providing distinct user groups more desirable recreation options. The Idaho Department of Parks and Recreation (IDPR) provided comments during the scoping period to this effect. They suggested that the Planning Team expand the project area slightly in order to incorporate other trails that could have created motorized looping opportunities (which would also be open to non-motorized users) instead of less desirable dead-end opportunities. IDPR carefully designed their trail recommendations to consider the Pony Creek Research National Area (which stays non-motorized use) and getting the motorized use out of the designated Rapid River Wild Corridor as required by the National Wild and Scenic Rivers Act.

This EA looks to solve the administrative issue in the corridor, and the proposed action will achieve this, but will be limiting in benefits to users on the trail and to the resource over time. The State strongly encourages the Payette National Forest to work with IDPR, Idaho Department of Fish and Game, and interested user groups to develop a more comprehensive strategy in the New Meadows Ranger District to provide for motorized looping opportunities while preserving primitive recreation experiences.

Thank you for the opportunity to review these projects and provide recommendations. Please contact my Federal Lands Coordinator, Jace Hogg (208-332-1553; jace.hogg@osc.idaho.gov), with questions.

Sincerely,



/s/ Mike Edmondson

Mike Edmondson

Interim Administrator and Aquatic Species Program Manager and Policy Advisor

Below are the specific issues the State of Idaho feels are the most important regarding this project:

Reference pg. 7: “We would also consider installing gated openings and signage at the turnarounds to assist with designated trail use compliance.”

Comment: Installing gate openings and proper signage for the turn arounds is strongly encouraged if the proposed action moves forward. The areas immediately surrounding the gate should be impassable (natural barriers, large boulders, etc.) to motorized vehicles to prevent users from creating their own path further into the corridor containing critical species habitat. On top of these measures, the PNF should explain in detail how they plan to enforce proper usage of the turnaround sites in this remote location.

Reference pg. 7: “Consistent across all action alternatives addressed in the EA, trails and trail segments within the Wild River Corridor would be open to foot and horse traffic only.”

Comment: The State concurs that this area represents the most critical habitat in the project area from a fish and wildlife perspective and is a highly sought-after area for primitive hunting and angling opportunities.

Reference pg. 11: “If threatened, endangered, candidate, proposed, sensitive, or forest watch plant species are discovered during project implementation, opportunities to avoid or minimize impacts will also be considered”

Comment: Underlined section should read “plant or wildlife species”

Reference pg. 21: Table 6: “Total of 6.9 miles of trail newly *open to motorcycles*”

Comment: In table 1, and elsewhere in the document, the motorized alternative has 6.6 miles, not 6.9 miles, of trail newly open to motorcycles. This typo should be resolved for clarity of the alternatives being considered.

Reference pg. 21: “Quantified assumptions were not possible because sufficient trail use data was not available and because of the subjective nature of the trail use experience.”

Comment: Many of the analyses conducted in the EA are based on assumptions due to the limited ability to predict future trail use under the different action alternatives, and the difficulty in evaluating social questions with sparse qualitative data. Therefore, both the proposed alternative and the motorized alternative have unknowns that could impose new risks compared to the existing non-motorized conditions.