



State of Idaho

Department of Parks and Recreation

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April 15, 2025

Boise National Forest
Attn: Brian Lawatch
1249 S. Vinnell Way, Suite 200
Boise, ID 83709

Via CARA Portal linked at <https://www.fs.usda.gov/project/?project=67425>

RE: Lava Restoration Project Environmental Assessment and FONSI

Idaho Department of Parks and Recreation (IDPR) is the duly established executive department under State of Idaho Code, with the stated mission of improving the quality of life in Idaho through outdoor recreation and resource stewardship. Acting under the supervision of the Idaho Park and Recreation Board, IDPR carries out recreational policies and programs of the State. Consistent with its statutory authorities, the Department participates in federal land management planning and project planning to further the public interest in recreational, scenic, and historical/archeological values.

Responsible IDPR staff manage wheeled and over-snow off-highway vehicle (OHV) recreation throughout Idaho through the Motorized Trail Program. IDPR's Trail Ranger and Trail Cat Programs provide maintenance and construction, and its OHV Education Program provides OHV training and environmental education. Through IDPR's Off Road Motor Vehicle and Motorbike Recreation Funds, grants are awarded to fund trail building and maintenance, and law enforcement activities. IDPR Trail Program partnerships with US Forest Service, Bureau of Land Management, and Idaho Department of Lands result in the maintenance and improvement of hundreds of miles of Idaho's extensive and remarkable trails each year.

IDPR's Non-Motorized Trails Program advocates for non-motorized trail users across Idaho.

Regarding the subject Project, IDPR wishes to memorialize its support in finalizing the EA, FONSI, and a Decision to hopefully include authorization of an Emergency Situation Determination (ESD), to expeditiously pursue forest restoration goals. IDPR shares BNF's disappointment that the litigation-delayed Sage Hen Project (Decision in May 2024), rendered moot by the 2024 Lava Fire, would have been the much better approach to reaching forest restoration goals than a fire recovery Project.

IDPR offers input informing this EA/FONSI review stage of the NEPA process, as detailed on the following page. IDPR is concerned that substantive comments during the Scoping period were not addressed for cases of certain trails believed to be impacted directly or peripherally by the Lava Fire. IDPR can understand discrete technical reasoning for exclusion of certain trails listed in IDPR's previous comments from the 2024 Lava Fire response, since some are located inside the 2022 Four Corners Fire perimeter entirely. However, the interconnectedness of the trail system, the state of overlap of these two fires with potential impacts to trails by both fires, and the unknown state of trail conditions and recovery efforts after the 2022 Four Corners Fire, gives merit to include these trails in assessment and recovery response as though the two fires were one event.

Thank you for the opportunity to once again comment during this public process. We value our partnership greatly.

Regards,

Land Access Coordinator
Idaho Department of Parks and Recreation – Recreation Bureau

IDPR is encouraged by the commitment to include trail stabilization and prism re-establishment in the scope of the Project and looks forward to the Forest addressing what the Trail Program believes to be an extensive need. Recent pre-Decision collaboration between BNF Recreation staff, IDPR Trail Program staff, and IDPR's partner stakeholder volunteer groups, to stand up cross-organizational teams to systematically clear, assess, and inventory trail infrastructure and condition, is a sign that the work is already underway to conserve and restore recreational access and resources.

As stated in IDPR's previous comments, replacing damaged signage as soon as possible, re-establishing access to existing TMP-designated roads and trails in this Project area, and making maps easily available to the recreating public especially in electronic format will be paramount toward minimizing unauthorized vehicular use and enhancing user safety and satisfaction. IDPR will contribute to these efforts however practical such as through its trails.idaho.gov web-based mapping application, to include posting of closure notices applicable to Summer and Winter editions of *Idaho Trails* interactive maps, as soon as FS notifies IDPR of Forest Orders defining Area and Route Closures (noted in *Design Features*).

As noted in IDPR's December 10, 2024 letter *RE: 2024 Wildfire Impacts Response*, and again on March 17, 2025 for Scoping comment period for the Lava Project, IDPR is generally and broadly concerned about assessment and recovery of trails on Emmett and Cascade RDs inside all recent fire perimeters, more broadly than the list of trails cited in pre-scoping through to the current EA and FONSI Table 2 for Lava Fire alone. Consideration of the combined impacts, from the 2022 Four Corners Fire plus the 2024 Lava Fire perimeter surrounding what was not burned by Four Corners, forms IDPR's broader concerns.

Trails listed to follow are located inside either the 2022 Four Corners perimeter exclusively, or were affected by *both* 2022 Four Corners and 2024 Lava Fires. One trail, 119, appears to be an outright miss. IDPR anticipates at least the motorized trail 118 could be assessed during the clear/assess/inventory partnership activities noted above. The concern remains that by not including these routes specifically in the Lava EA, the ability to apply resources toward recovery of these interconnected trails once assessed for impact, will be limited by their exclusion from the scope of implementation of the Lava Project if strictly applied.

At a minimum, IDPR requests that the final ROD authorizing the Project should recognize there are additional trails not cited in EA Table 2 connected to those trails inside the Lava Project boundary. These trails would benefit from the same actions and resources dedicated to trail segments limited strictly to being precisely or entirely inside the Lava Fire perimeter.

Some trails are reasonably anticipated to have been impacted by the 2022 Four Corners Fire, and in some cases by both Lava and Four Corners Fires, subject to inspection and assessment:

- Trail 118 Van Wyck, multiple-use 50" (Four Corners only)
- 119004 Blue Lake, non-motorized, ~half of trail from its trailhead is in the Lava Fire *perimeter* but **omitted from project scope** by exclusion of definition of Project Boundary
- 121004 Campbell Creek, non-motorized (Four Corners only)
- 125004 Willow Creek, non-motorized; mostly in Cascade & partially in Emmett RD (segments in both Fires, or separately in each; closed currently under Forest Order 0402-06-74 expiring 12/31/25 unless rescinded)
- 131006 West Mountain, non-motorized (segments in both Fires; segment in Four Corners only)
- 132004 Skein Lake, non-motorized (Four Corners only)
- 133006 Wilson Creek, non-motorized (segments in both Fires, segment in Four Corners only)

IDPR's interactive *Idaho Trails* web map with the WFIGS Interagency Perimeters layer (2021+ fires) visibility activated, centered roughly on Lava Fire area: <https://arcg.is/1nKCuP0>