

Submitted electronically via: NEPANWW@usace.army.mil- Subject Line: LP Trail EA



U.S. Army Corps of Engineers, Walla Walla District

ATTN: CENWW-PPL-C- LP Trail EA,

201 North 3rd Avenue,

Walla Walla, WA 99362-1876

June 19, 2020

RE: Draft Finding of No Significant Impact and Environmental Assessment for the Lake View Recreation Trail at Lucky Peak Dam and Lake, Boise, Idaho

Dear Army Corps of Engineers,

These comments are submitted by Idaho Wildlife Federation on the draft Finding of No Significant Impact (FONSI) and Environmental Assessment (EA) for the Lake View Recreation Trail at Lucky Peak Dam and Lake, Boise, Idaho.

Idaho Wildlife Federation (IWF) is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 29 affiliate

organizations and over 45,000 affiliate members and 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 fish, wildlife, and land management.

IWF asks the U.S. Army Corps of Engineers (Corps) to reject the EA's proposed action and FONSI determination for the Lake View Recreation Trail. Due to the negative impacts to big game winter range on the Boise River Wildlife Management Area, we believe the Corps should not proceed with any action that would result in the construction of the 15-mile Lake View Recreation Trail as proposed. Our concerns of the proposal are listed below.

Background

The Corps is proposing to construct a 15-mile multiple use trail for bike and pedestrian traffic along Lucky Peak Lake's southern shoreline from Lucky Peak Dam to the Chimney Rock park area. Southwestern Idaho Mountain Biking Association (SWIMBA) would provide volunteer labor and equipment for construction of the proposed trail, and the trail would be managed by the Corps.

As noted in the EA, non-motorized recreation trails in the Boise area are in high demand, and the overall landscape has seen a large increase in recreation in recent years. In response, Ridge to Rivers estimates a total of 190 miles of trails over 85,000 acres have been constructed in the Boise foothills just west of the proposed project area¹. This extensive trail network is enjoyed by

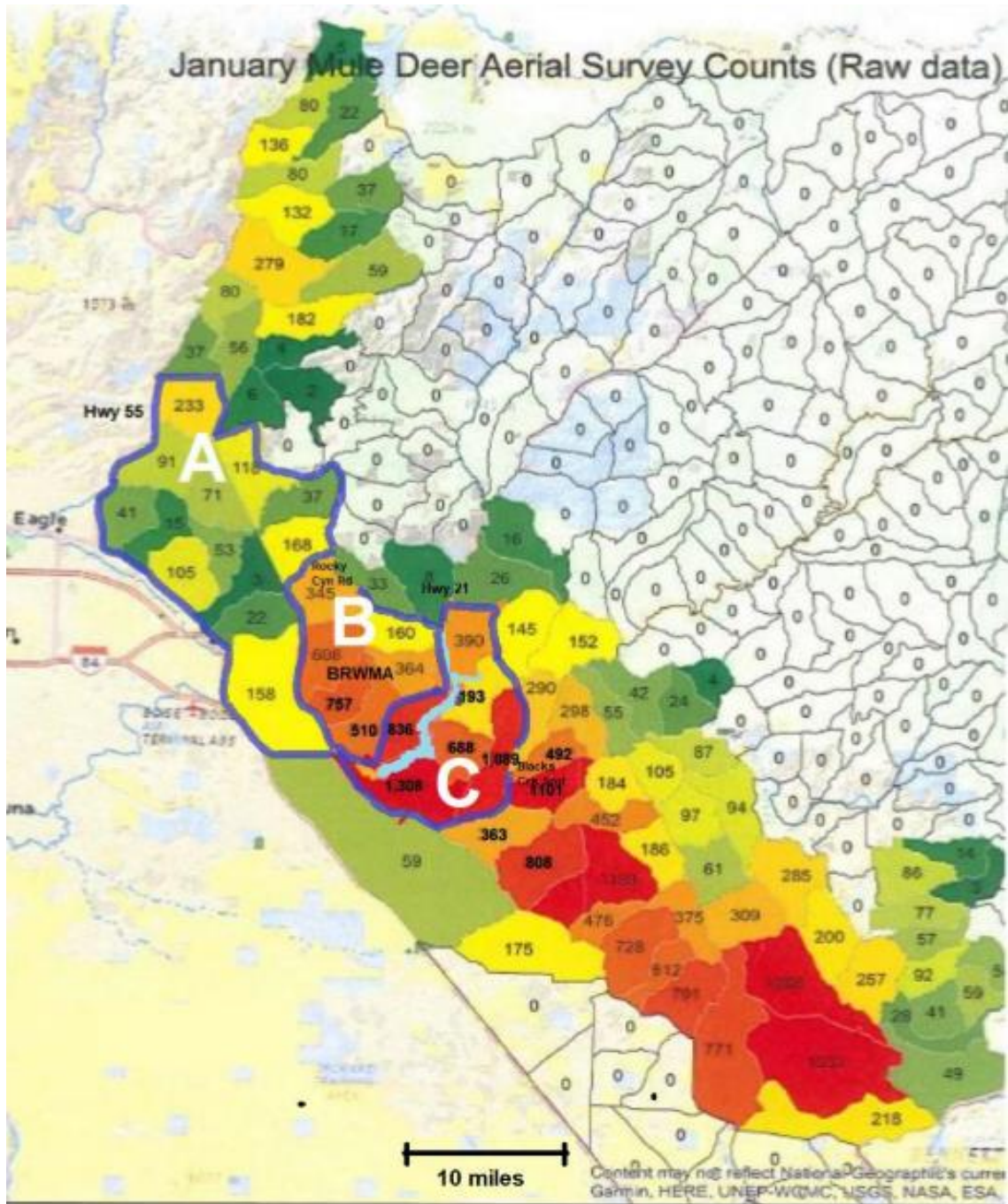
¹ Ridge to Rivers. 2016. A 10-Year Management Plan for the Ridge to Rivers Trail System. P. 4. https://www.ridgetorivers.org/media/1027/ridge_to_rivers_10_year_plan.pdf

thousands of recreationists in the Treasure Valley and provides open space unlike other booming Western cities.

The proposed trail falls within the Boise River Wildlife Management Area (BRWMA), a 36,000-acre landscape that supports more than 300 species of wildlife and harbors the largest wintering mule deer herd in Idaho. Historically, mule deer and elk have migrated from their summer range in the Sawtooth Mountains to their winter ranges in the Boise River Valley. Following the completion of Lucky Peak dam and reservoir in 1955, large portions of winter range were flooded and the need to conserve remaining low elevation habitat arose. Substantial investments have been made by sportsmen and women since that time to protect intact wintering habitat through property acquisitions and management prescriptions to provide the highest amount of protections for the 5,000-8,000 mule deer and 1,800 elk that winter each year on the WMA. In particular, the proposed trail is within Idaho Department of Fish & Game (IDFG) Charcoal segment- those BRWMA lands East of Highway 21 and West of Blacks Creek Road (also referenced as Area C in Figure 1). This 64 square mile segment has held as many as 5,812 mule deer, or $69 \pm$ deer/mile², as observed in January 2018². This data suggests that the Charcoal segment represents the highest density of wintering mule deer in the state.

² Data sourced from Idaho Department of Fish & Game. Unpublished. Density data calculated internally.

Figure 1. Boise Front Wintering Deer Area Comparison Map³



³ Data and figure sourced from Idaho Department of Fish & Game.

Inadequacies in Proposed Action

The majority of the trail identified in Alternative 2 (Multi-Purpose Trail, Proposed Action) lies within Corps lands classified as Wildlife Management. These lands were set aside to compensate for the loss of major deer migration routes following the completion of Lucky Peak Dam and reservoir⁴. As noted in the EA, most of these lands are administered under license to IDFG and any manmade instructions must include appropriate controls required to preclude or minimize adverse impacts relative to wildlife. Segments of the trail in Alternative 2 also cross into Bureau of Land Management (BLM) and IDFG property, but the overall landscape is utilized by big game species regardless of management boundaries.

It is well documented that disturbance from recreation may have both immediate and long-term effects on big game species. The presence of humans may result in animals avoiding parts of their normal range⁵. The Corps concludes that the proposed action will have no significant impact to big game wintering habitat by implementing a seasonal closure from November 16 through April 30 with “vigorous closure enforcement.” The EA notes that Park Rangers and park hosts would monitor for trespass, which the Corps justifies as an adequate measure to prevent conflicts between humans and wintering wildlife. Additionally, the Corps notes that if IDFG raises concerns on wildlife impacts from the trail on its’ property, the trail may be re-routed to only on Corps land. Unfortunately, our groups do not see this as providing adequate measures that are needed. IDFG, despite a robust enforcement staff, continually struggles with ignored closures on the BRWMA and agency staff note that this problem will likely be elevated with the construction of the trail identified in Alternative 2. As an example, the Homestead trailhead

⁴ Idaho Department of Fish and Game. History of Boise River WMA. <https://idfg.idaho.gov/wma/boise-river/history>

⁵ Idaho Department of Fish and Game, Southwest Region. 2014. Boise River Wildlife Management Area, 2014-2023 Management Plan. p.39. <https://idfg.idaho.gov/sites/default/files/2014-2023-BoiseRiverWMA-Plan-Final.pdf>

adjacent to the Harris Ranch neighborhood remains closed to protect wildlife each year, yet it was estimated that the trailhead had 11,744 user visits from January 19-April 24⁶. Our organizations take pride in self-policing each of our recreation groups, yet the risk of continual violations compounds to a significant negative impact to big game during their most vulnerable state. We are forced to oppose this EA and FONSI, as submitted, due to the lack of substantive measures to address this threat. Although the enforcement measures laid out in the analysis have good intent, they simply fall short of actually preventing risk to this area. Thus, the proposed action should not proceed. This area is too valuable to risk due to increased human activity.

Fire Risk to the Boise River Wildlife Management Area

The BRWMA and the Lucky Peak area still hold large portions of native plant species and productive forage for big game herds. No single factor impacts wildlife more than habitat quality since reproductive performance and overall health are influenced by its condition (IDFG 2008). Providing high quality habitat for wildlife, especially for mule deer and elk, is the BRWMA's foremost priority.⁷

Though fires occur naturally throughout the West and can be beneficial to landscape health, increased human presence has the potential to increase negative impacts with uncharacteristic wildfire. According to the BLM, in the wildland urban interface of the Boise metropolitan area, on average, 23 fire starts occur annually. Approximately 83% of those fires are caused by humans (Humphrey 2011)⁸. This increase in wildfires in and around Boise has had a detrimental effect on wildlife habitat. As fires on the BRWMA have increased, a greater proportion of native

⁶ Idaho Statesman. April 24, 2017. "More than 11,000 trail users have ignored a closure at one Boise trailhead" <http://www.idahostatesman.com/outdoors/playing-outdoors/article146548724.html>

⁷ Refer to footnote 5. P. 25.

⁸ Refer to footnote 5. P. 20.

shrubs and perennial grasses that provide critical winter forage and cover for wildlife have been reduced or eliminated. Disturbance in plant communities such as this have led to an increase in noxious weeds. This change in plant communities on the WMA could ultimately cause a shift in habitat preference or avoidance of the area by wildlife species (Lowe et al. 1978).⁹

Substantially increasing the summer usage for human recreation with the addition of the proposed action will negatively impact winter habitat and has the potential to cause irreparable harm to some of the highest densities of mule deer in the state. Because of this, we believe it is short-sighted to adopt the proposed action for the incorporation of a few miles of multi-use trail amidst the already existing trail network within a short drive of the Boise area. Generations of conservation efforts in this area could be erased forever because of this increased human activity and associated fire risk.

Comment Period

We believe the 30-day comment period, amidst the COVID-19 pandemic, did not allow the public, interested individuals, institutions, and governments an adequate opportunity to review, and analyze in a way that is needed. Our organizations have been working diligently over the last weeks to confer parties to reach a consensus recommendation on the EA and FONSI, yet still feel that we have not been provided enough time or conversation while attempting to follow social distancing guidelines. We would appreciate a comment period extension or the ability to open the comment period again in the future.

We thank for the Corps for their analysis and look forward to discussing an alternative plan that is more widely supported among user groups.

⁹ Refer to footnote 8.