



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.

RE: Lucky Peak Lake View Trail Proposal

July 28, 2020

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

Thank you for the opportunity to comment on the Lucky Peak Lake View Trail Proposal. The Congressional Sportsmen's Foundation (CSF) respectfully urges that the U.S. Army Corps of Engineers (USACE) support "Alternative 1 (No Action Alternative)" of the Lucky Peak Lake View Trail Proposal Environmental Assessment. It is the position of the Idaho Department of Fish and Game (IDFG) that the existing conditions on the Boise River Wildlife Management Area (BRWMA) have struck a balance between the best interests of wildlife and the needs of various user groups. Therefore, CSF believes Alternative 1 (No Action Alternative) is the best option, and the proposed changes to the existing conditions on the BRWMA are overly risky to the current homeostasis.

The BRWMA sustains high quality winter habitat for mule deer and elk, supports populations of wild turkey, upland game birds including chukar, gray partridge, California quail, dusky grouse, ruffed grouse, and mourning doves, and attracts use by a diversity of other wildlife species. As the primary winter range for big game, it is estimated that 5,000 to 7,000 mule deer and 1,200 elk winter on the BRWMA each year. In order to ensure that the habitat on the BRWMA satisfies the needs of wildlife, human access is purposefully managed throughout the property.

Over 36,000 acres of publicly-owned lands are managed for wildlife habitat, as well as hunting, fishing and trapping access as part of IDFG ownership and agreements with the USACE, USFS, BLM, and the Idaho Fish and Wildlife Foundation. Access management is used to maintain or improve hunting, fishing, trapping and other wildlife based recreational opportunities, while still providing high quality habitat for big game and productive habitat for other wildlife. Per that agreement, the IDFG has primary management responsibilities of lands located within the BRWMA boundary.

Guided by the BRWMA 2014-2023 Management Plan, IDFG has determined that in order to minimize the effects that hiking, biking, running, mountaineering, dog walking, and other non-wildlife-based activities have on wildlife, no new non-motorized routes or access points will be developed on the BRWMA. Concerns surrounding the proposed trail include habitat fragmentation, wildlife disturbance, invasive plant species introduction, erosion, increased fire

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danger, impact on hunting and fishing activities, and the ability to enforce the proposed seasonal closures for wintering big game. As is stands, any trail segment through the BRWMA boundary or through IDFG owned property would need to be thoroughly discussed and/or approved by the IDFG. Currently, IDFG does not have an agreement with the USACE to allow trail construction on IDFG property.

Once again, CSF supports the position of IDFG and strongly urges the USACE to support the “Alternative 1 (No Action Alternative)” of the Lucky Peak Lake View Trail Environmental Assessment. The current conditions on the BRWMA are satisfactory for wildlife and user groups. The proposed changes to the BRWMA are an unnecessary risk to the wildlife and their habitats.

Thank you for the opportunity to comment on the Lucky Peak Lake View Trail Proposal prepared by the South West Idaho Mountain Biking Association and presented to the USACE.

Sincerely,

Ellary TuckerWilliams  
Inter-Mountain Western States Coordinator  
Congressional Sportsmen’s Foundation