

11/22/2013

To:

Objection Reviewing Officer

This objection is for both the Idaho Panhandle & Kootenai National Forests.

The areas in question are on both forests and in both states.

Responsible Official: Faye Krueger, Regional Forester, Northern Region

The main issue concerns the Scotchman Peaks Proposed Wilderness Area (see included map). There are also some slight boundary changes that need addressing in other parts of the KNF plan.

All areas of concern were addressed in the comment period leading up to the Draft Record of Decision on both forests. It is apparent that very little collaboration went on between the two forests. The IPNF was open to winter motorized use, and the Kootenai was closed. The new direction closes **all of the IPNF portion**, & opened a small portion on the KNF. The included map identifies those areas that need addressing, with suggestions on how the plan can be improved. The revision is inconsistent because there were boundary changes that occurred, but boundary changes we asked for were not. Revising a Forest Plan allows for change, the changes we are asking for are no more than what we were using. On page 18 of the KNF ROD 3rd paragraph indicates that there are 2 exceptions, Savage Peak is the one we are concerned with and require a boundary adjustment, identified as 5-C or MA 3 Scenic. On page 347 of Appendices for KNF suggest that the Troy Snowmobile Club was a willing partner regarding this closure. Since that area was already closed we respected that closure with the understanding that we wanted that area opened under the Revised Plan. Saying that the boundary is enforceable is not correct. Easy access to the IPNF side is available and these boundaries border one another. On page 462 of the KNF Final EIS, right after the 3 bullets it says that "if congress were to drop an area from further consideration as recommended wilderness, management would be reconsidered." This statement says that congress has identified recommended wilderness? Not so, the forest service looks at the suitability and evaluates the Need, Capability, & Availability. Before recommending a PW designation. Since congress has not acted on the Scotchman Peak PW for the past 25 years, it's time to remove this designation and identify it as only an IRA with different designations possible. Our comments show why the PW ratings are incorrect.

The IPNF portion of the Scotchman's has been open to winter motorized use since the 87 Plan, (25 years) only a portion was actually used and is identified as a **1 E** (a **Primitive** designation) on the map. Making this boundary change will continue to allow our recreational use.

The slight additional boundary changes on the KNF will allow link access through some 5a areas to allow travel from one 5C to another.

Included are the comments to both the IPNF & KNF Preferred Alternative B Forest Plans. The comments hold the basis for the required boundary designations & changes. There are additional supporting information and documents submitted by us that can be accessed through both Supervisors offices, but are not included with this objection.

Both plan comments are similar in nature because the area of concern encompasses both forests and states.

I would like to meet with the reviewing officer, to discuss issues raised in the objection and seek potential resolution.

Sincerely;

A handwritten signature in black ink, appearing to read "Jerry Wandler", with a long horizontal flourish extending to the right.

Jerry Wandler

Lead Objector

For Troy & Libby Snowmobile Clubs

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The Troy & Libby Snowmobile Clubs Comments To the Kootenai National Forest Draft Land Management plan Preferred Alternative B

The Preferred Alternative B has areas that are identified as 5C and MA3. We wish to thank you for including them in this alternative, we also want you to include all of those currently identified 5C's as part of the final document, without change. The Northwest Peaks MA 3 is also very important to the snowmobile community. We want that designation to remain unchanged also. The 5C's, Backcountry Winter Motorized and MA 3 Recreation/Scenic Area designations are premier winter recreation play areas, that have, current, established, historic, and traditional use. These areas provide majestic views and scenic beauty found only in these winter playgrounds.

We wish to address concerns regarding other areas, considered centerpieces to the snowmobile community. The main concern is the Scotchman Peaks Area. This area is on both forests, and straddles both states. This makes for confusion when explaining how to change the designations. Our approach is to change the KNF side as identified on the **included Scotchman map** with areas marked in **red**. There are two areas, the Savage Peak area, and the Dry Creek area. The Savage Peak area needs to have either a 5C, Backcountry Winter Motorized or a MA3, Scenic Recreation area designation like Northwest Peaks that allows winter motorized use. The other area on the IPNF is adjacent to the savage peak area, and north of East Fork Creek it needs to be a **1E (Primitive)** designation, returning winter motorized use to this area. We know that there seems to be concern that our winter use is in mountain Goat winter Range. The MTFWP polygon sheet submitted by them, (identified as Winter Wildlife) a **copy is included**, shows the polygons going through the Savage Peak area as well as to the north towards Drift Peak. **The label "Winter Wildlife" is false.** The State Metadata information is for both General & Winter Distributions. The MTFWP GIS Manager, Lydia Bailey stated that all of the polygons for Mountain Goats throughout the state are for General & Winter distributions. **There is no Winter only Distribution Polygon.** The Entity and Attribute Information page gives an Attribute definition, it states **USE TYPES: Note: Species occur in areas of suitable habitats within their overall distribution, however not all areas will have animals or sign at all times every year. The specific areas occupied may expand or contract through time as seasons, population levels and habitat conditions change.**

There is also an Attribute Value which states: Winter Distribution - **Depicts areas where populations of this species tend to concentrate during the winter season, commonly December through April. These areas are also considered part of the General Distribution. NOTE: Not all populations concentrate on specific ranges during the winter season. In areas where no winter distribution is delineated animals depend upon and occur across their General Distribution area during the winter season, or they may occur in localized concentrations that can not be depicted at the scale of these maps. Keep in mind that weather extremes can have a large influence on winter distribution in any given year.**

Comments from the Troy & Libby Snowmobile Clubs

A study done in June of 2003 by the Mackenzie Forest District Omineca Region, called Brewster Mountain Goat Ungulate Winter Range (UWR), (U-7-004) Report. **A copy is included**, states on page 4. Ecology They are considered non-migratory although **there is often a vertical movement from high elevation summer ranges to lower elevations during winter.** The report also states: Mountain Goats are not territorial. Home ranges vary, depending on the degree of seasonal movement (tagged goats in Olympic National Park, USA are known to have made seasonal movements of up to 16KM). Page 5 of the report identifies winter habitat. **Mountain goats generally avoid snow depths greater than 50 cm or 20 inches.** In deep snow areas, they may have to winter in areas with 100 cm or more. **In the interior mountains, many goats move from the high alpine and sub-alpine meadows down to the upper areas of timber on steep south and west-facing slopes, gaining protection from the severest winter conditions. Others seek high elevation wind-blown ridges where forage is exposed or covered by little snow.** Also on page 5 Thermal Cover: **Both coastal and interior ecotypes will use lower elevations to escape heavy snows and cold temperatures but interior populations may also move upslope to wind swept ridges to find exposed herbs and grasses if the snow is dry enough.**

A USGS Report dated 2011, Titled, Seasonal distribution and Aerial Surveys of Mountain Goats in Mount Rainier, North Cascades, and Olympic National Parks. Washington. **A copy is included.**

In this report, on page 12 **Timing of seasonal transitions between summer and winter ranges varied among individuals (fig. 7).** Due to sample size constraints, we were unable to discriminate differences among parks in the seasonal timing of altitudinal movements of mountain goats. Data pooled among parks indicated that the median date of seasonal transition to summer range was June 11 for females and June 19 for males, although these transition dates ranged from April 24 to July 3 for both males and females. The median date of transition from summer to winter range was October 26 for females and November 9 for males, but these dates ranged from September 11 to December 16 for females and from September 28 to December 23 for males. Although females typically moved to summer and winter ranges over a week earlier than males, both sexes were on winter ranges approximately equal durations, generally more than 200 days

On page 13 **Altitudinal distributions also varied among individuals within seasons (fig. 8).** Median altitudes used by individual GPS-collared goats ranged from 817 to 1,541 m during winter in Olympic and North Cascades National Parks, and from 1,215 to 1,787 m during winter in Mount Rainier. By contrast, median altitudes used by GPS-collared goats during summer ranged from 1,312 to 1,819 m in Olympic and North Cascades National Parks and 1,780 to 2,061 m in Mount Rainier National Park (fig. 8).

The Appendix 3, **Maps, pages 29—46, showing seasonal distributions of 17 selected GPS-collared mountain goats in Mount Rainier, North Cascades, and Olympic National Parks, Washington. Each map shows summer and winter range, and every map shows a definite, significant, change from summer to winter range. Both in elevation, and distance. All GPS-collared goats made the transition from Summer Range to Winter Range.**

Comments from the Troy & Libby Snowmobile Clubs

The Troy and Libby Snowmobile Clubs comments for the
Mountain Goat Study
By
Gayle Joslin
1980

The 1980 Mountain Goat Study, although outdated, contains information repeated by more recent studies that are also submitted as references for the Preferred Alternative B of the Forest Plan Revision by the Troy and Libby Snowmobile Clubs. The page # and paragraph references and notes will help justify our winter use areas in the three areas identified on the Scotchman Peaks IRA/ Proposed Wilderness map.

P3. P22.

All areas identified as possible winter range are known to have supported goats during other seasons, and during mild years, these areas may continue to be used into winter. The Spires of Mount Vernon is documented as an important kidding ground. P22. Kidding ground are not winter range.

P6. 2nd paragraph

Management situations 1,2,3, identify areas used by mountain goats. 2 and 3 are areas where goats may have had populations, but do not currently support them.

P9. 3rd paragraph

Precipitation levels of 30 to 110 inches of snow and snow packs of 14 feet. Mountain Goats prefer snow depths of 20 to 40 inches.

P24. P40. End of 1st paragraph

Winter range is selected for its snow shedding qualities which exist because of favorable combinations of slope, aspect, and elevation. Our winter use areas hold the snow and are not generally south or west aspects.

P35. 2nd paragraph

Few goats if any spotted in these areas.

P41, last paragraph

Fall brings the first snows and signals a return to winter range.

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P57. Table 7

Winter Range slope 80% a roof pitch of 9:12, or for every 12 inches horizontal a vertical rise of 9 inches yields a 75% slope. A 10:12 pitch yields a 83 % slope. The elevation we ride in is in the range of 45 to 65 hundred feet on aspects of 0 to 180 degrees. Most of the winter range is on aspects of 180 to 300+ degrees, these are mostly south and primarily west facing slopes.

P59, 60. Table 8

Defines probable and possible winter range. The table identifies the areas and their management situation.

Probable sites are identified by a W2, dashed lines on the map. These sites are suitable terrain when snow depths are 20 inches or less.

Possible sites on W2 are dotted lines on the map are not likely used consistently, since environmental parameters indicate unsuitable habitat. These areas may be used during other seasons and during mild winters with 20 inches or less of snow.

P84,5,6. Chapter 6, Recommendations.

Management Situations 1,2,3 Situation 1 is the most important habitat if the snow depth, aspect, and slope, are conducive for goat winter range. Situations 2 and 3 are not as important because of their past history. Winter Range is defined from November to April, 3000 feet and above with exceptions where suitable terrain extends lower. Slopes are generally 80% and exposures vary, with critical areas occurring on southerly, east or west aspects.

Observations:

This study was undertaken at the same time logging was a priority. Many of the statements are directly related to road building and logging activities. This study along with the other two studies included in our comments, all reflect the same conclusion.

Mountain Goats prefer snow depth from 20 to 40 inches, prefer windswept slopes, and prefer southerly or west facing slopes.

Our winter use is in areas where the snow depth is in excess of 6 feet to depths of 12 or more feet. Our area is generally wind loaded slopes, and our primary riding occurs on east and north facing slopes.

As you can see we are the opposite of the Mountain Goat winter range as identified. This should make changing designations an easy process based on these facts.

A concern might be the goat population and the hunting permits for this area. There has also been the elimination of doe tags, and the number of elk cow permits have been reduced in the same hunting district. There is no correlation between snowmobile use and these hunting permits. Maybe predators are to blame for the demise of these ungulates.

In all 3 studies, Mountain Goats move from high elevation summer range to lower elevation winter range. These ungulates prefer lower elevations during winter and also seek, steep, South & West facing slopes. They may also seek high elevation wind-blown ridges where forage is exposed or covered by little snow.

The areas we identified for our winter use are not wind swept ridges, they are usually not south or west facing slopes. The preferred areas are most often east or north facing, where snow depths usually reach 8 to 12 feet or more. These areas provide no thermal cover, no escape terrain, and no food source. Pictures taken during a flyover in April 10, 2008 by both Jerry Brown of MTFWP and myself, Jerry Wandler, and by Cesar Hernandez on April 13, 2008 show no signs of mountain goats or tracks in either sets of pictures. Snow depths at this time were in the range of 10-12 feet. A hint of snowmobile tracks can be seen on the IPNF side of the Scotchman Peak area. An additional series of pictures taken February 6, 2012 from the 2000 fire (see Google map #1) area looking towards the east, showing the steep, west facing, windswept areas from Savage Peak to Drift Peak in a sequence of pictures. There are no mountain goat tracks visible in any of these pictures the snow depths at this time were in the range of 12 feet. A DVD is included with all of the pictures labeled. The best way to view these pictures is with Picasa, a free download from Google. This will allow you to zoom in to have a better look at the terrain.

This should answer the questions related to the issue of mountain goat winter range, and our proximity to it. Since the goats are not in our identified winter riding area, there is no reason to restrict snowmobile access to the Scotchman identified areas. Changing the designation in these areas still protects the road-less & wilderness qualities, while allowing additional recreational access.

The Dry Creek Area has a long history of snowmobile use. The 1987 Plan had boundaries that were acceptable to the snowmobile community. For some unknown reason, new lines were drawn, removing a major portion of this established, traditional use area. We would like these boundaries returned to the 1987 Plan boundaries with only slight modifications to include the ridge lines as the boundary, as identified on the included Scotchman map.

There was a removal of some Scotchman PW near the southern boundary, by the Clark Fork River. We have no problem with re-including this area to the Scotchman PW. It is currently identified as a 5A. This is not ride-able terrain.

The Alternative B of the Draft Plan also shows some previously heavily managed areas in the Scotchman Peaks PW these areas are identified on map #4, second page. The new boundary identifies these areas as part of the PW. These areas should not be included in the PW boundary. A PW designation should not contain visible past management activity. These areas can also be seen from maps #2 & 3. Make the right decision, remove these areas from the PW.

Comments from the Troy & Libby Snowmobile Clubs

Additional issues are identified in the **Appendices of the Draft Environmental Impact Statement**, for the KNF. There is mis-representation in a few areas that are of concern to the snowmobile community. Table 24, on page 93, has some definitions/criteria that are confusing. It seems strange that under Skiing and Snowshoeing Opportunities, using snowmobiles to reach an area is ok, but if you are a snowmobiler you cannot enter that same area once you reach that boundary. Seems like a dual standard, the quiet, solitude recreation deemed important for the ski & snowshoe recreationist is broken by the sound of a snowmobile, brought on by their own choice, and use. The snowmobiler makes a choice, and doesn't see a problem accessing the area to enjoy the scenic beauty, the same scenic beauty enjoyed by the ski/snowshoe individual. A true ski & snowshoe recreationist would start at the trailhead and enjoy the quiet solitude as they progressed up the trail.

Table 33, page 110, #25 & 26, Hiking Opportunities for the Scotchman Peaks. The terrain is listed as medium, yet the same terrain for snowmobiles is high. There are obviously areas where a hiker will encounter terrain that is impassable, yet the evaluation criteria as a whole considers the terrain gentle. The trails class3? Regularly maintained, Ross Creek and Little Spar are the only two I know of and both only go a short distance into the area. On Page 33, We have some definite concerns over how the Primitive and Unconfined Recreation, Elements and Criteria are identified and weighted for all of these. Many of the ratings should be moved to Medium, because of the disparity in the identification methods. One type should not be given priority over another in any of the Elements and Criteria ratings.

The Availability Resource Assessment for the Scotchman Peaks area should have a Moderate rating. Understanding that a low rating, across the 8 Resources equates to a high Availability Rating. If you look at Roderick they are all low with 1 low/mod, which equates to a high. The Scotchman Peaks has 4 low, 3 low/mod, and 1 high, yet the rating is High?? Ten Lakes has 5 low, 3 moderates and the rating is Moderate. Rock Creek has 6 low, 1 low/high and 1 high but rates a Low??

The Suitability Determination on page 136, Scotchman Peaks should show a **no** because all ratings should be Moderate..

On page 111, Scotchman Peaks, #37, not all of the Terrain is steep or is the vegetation too dense to make travel difficult. Realize, that in winter most underlying vegetation is covered, and only those trees of stature would impede travel. More importantly the premier areas we have identified can be reached in winter without difficulty. This rating needs to be a Medium. #38, this is currently the correct statement. Our comments identify those changes, we need, to allow access to specific portions of the Scotchman Peaks area.

On page 109 of the Area Capability Assessment, Northwest Peaks #37 & #38 are identified as Low but the rating came out as Med?? How is this explained? Other areas with Low and Low have a Low as a rating, this makes sense. How many other summary ratings might also be questioned?

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On page 123, under Northwest Peaks #663 the word **some** should be removed, because it under represents the actual area used by snowmobiles in this MA 3. Wording that more accurately reflects the current use is necessary. This MA 3 area is heavily used by snowmobilers, the bowls associated with Hawkins Lake, to the South end of Rock Candy, are premier riding areas enjoyed by winter snowmobile enthusiasts.

On page 126, Table 48, Resource Criteria, Number 5. States that the number of wilderness acres within 100 miles of Kalispell or Coeur d'Alene. This reference as it relates to the Scotchman Peaks Area should fall to low as identified, but the same criteria used by the IPNF portion says High. This IRA is considered 1 IRA, Scotchman Peaks #662. Since 60,000 of the 85,000 acres are in Montana, it only makes sense that the overall rating be a Low for both forests. The Cabinet Mountain Wilderness is across Hwy 56 as well as other Wilderness areas near Kalispell.

On Table 60, page 136, Suitability Determination, map #16, Roderick, & map #25, Scotchman Peaks, have public comment & public support as a determination. I believe that these terms should be dropped from the determination and then re-evaluate them. We as a snowmobile community did not support the Scotchman Peaks as a proposed wilderness. We are in-fact identifying those areas we would like to see open. I believe the statement that **this is not a vote** should be reason enough to remove those terms. Specific information and facts should guide you towards the correct Suitability Determination. One additional point of information, if there is wildlife winter range along Clark Fork face, why was this area removed from the Scotchman Peaks IRA/PW?

The IPNF **Appendices of the Draft Environmental Impact Statement** also has some false information on Table 33. Page 104, Scotchman Peaks, #37, not all of the Terrain is steep or is the vegetation to dense to make travel difficult. Realize, that in winter most underlying vegetation is covered, and only those trees of stature would impede travel. More importantly the premier areas we have identified can be reached in winter without difficulty. This rating should be a Medium. **#38. This is false information snowmobile use has been allowed since at least the 1987 Plan on the IPNF portion of the Scotchman Peaks area. This should be changed to a Low rating.**

The Kootenai & Idaho Panhandle National Forest, should consider the following, in the Preferred Alternative B of the Forest Plan Revision:

- The FS should take critical steps to ensure a quality motorized recreational experience that is socially sustainable – specifically snowmobile use and access.
- The FS should include increased motorized recreation and access resulting from increased population and recreational needs in all alternatives - specifically snowmobile use and access.
- The FS should address that there is a preoccupation with documenting what impacts snowmobile use can have or may have to various resources, at various points in time, while ignoring the relevant environmental analysis. Environmental impact analysis documents often include statement after statement regarding various negative impacts while including little or no information about what the existing condition is, or how the existing snowmobile use is actually impacting resources, or whether that impact is significant, let alone a meaningful contrast between the current condition and the various alternatives. Impacts should be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of snowmobile use should be compared and contrasted to baseline data in order to establish a threshold on which the significance of the impacts of the Preliminary Proposals can be determined. Impacts should be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions and, ultimately, the decision reached by the Deciding Officer.
- Numerous scientific studies have shown that man on foot causes more stress in wildlife than a man on a snowmobile (Canfield 1999, Freddy 1986, Eckstein 1979, Richens 1978, Lavigne 1979, Bolling 1974). Numerous studies in Yellowstone and Glacier National Parks regarding the impact of snowmobiles on wildlife have come to the same conclusions. Even the lead biologist for the U.S. Fish and Wildlife Service says “the agency doesn’t consider snowmobiling to be a problem in lynx habitat”. (S. Sartorius 2009) Yellowstone Wolverines were not displaced from their dens by snowmobile activity (Inman 2007) and the Yellowstone studies have concluded “responses by wildlife to over-snow vehicles were relatively infrequent and of minor intensity” (White 2005). Strong consideration should be given to these scientific studies in the planning process.
- An assumption that was often proffered by other stakeholders is that closing roads and trails to motorized uses would dramatically improve the effectiveness of wildlife habitat. In our opinion, much of the rationale expressed for restricting motorized vehicle use is tied to incomplete research and grossly excessive extrapolation of research data, and is often directly contradicted by the current condition on the ground today. The agencies must not automatically assume that closing roads and trails to motorized use will instantly increase habitat effectiveness. The analysis must not improperly assume or overestimate the beneficial affects to wildlife resulting from motorized route closures. Research done at the Starkey Experimental Forest and Range is the most recent and

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most detailed and complex research done on deer and elk in relation to human travel modes consisting of ATV/trail bike, bicycle, hiking, and horseback. Previous studies dating back to the 1970s indicate that these animals flee from all of these travel modes. Starkey research quantifies the different rates, times, and distances. However, they admit that the resultant impact on individuals has not been determined and no scientific conclusions are reached in the studies on how this disturbance affects individual health or survivability. Likewise, no relationship has been made between the four disturbance modes and herd health. All that is known is that deer and elk run from humans using any form of travel. Nothing in the Starkey research proves the existence of motorized trails actually results in a decrease in habitat effectiveness or in an individual animal's poor health and survivability, nor is this evidence that current vehicle use is negatively impacting herd health factors. It should not be assumed that the elimination of motorized use would drastically reduce disturbance of wildlife or improve "wildlife vulnerability" when walking persons, persons on horses, mountain bike use, bird watching, hunting and numerous other uses that are documented to disturb, harass or kill wildlife are still allowed.

- The FS should consider that tourism and recreation play an important role in the economic viability of our area specifically snowmobile use and access. The word tourism suggests that people have both time and money to visit new places. With high unemployment, closed lumber mills, businesses struggling, improved trailheads like those found on the Kootenai, Idaho Panhandle and Colville National Forest should be developed and supported by both the FS and volunteers from local snowmobile clubs – perhaps through existing grants.

IRA Changes and Information

The Forest Service should not recommend and/or designate any additional lands as wilderness. When areas are given special designations such as recommended wilderness, wilderness study areas, wild and scenic rivers, research natural areas, backcountry non-motorized they become in fact "Wilderness" and are managed as such. Our state has almost 30 percent federal lands and Lincoln County has 90 percent federal lands. (See attached map) Our local economy is dependent on multiple use of the forest. Additional wilderness is a hindrance to local economies - no more wilderness.

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The Roberts, Mount Henry, and the bottom half of the Saddle IRA's, should be 5C, this designation will allow continued use of these areas to snowmobilers. All of the areas have current snowmobile use in a large portion of these IRA's. The Flagstaff IRA needs to have a boundary adjustment. The Libby snowmobilers access the 5C portion of the Flagstaff area from Quartz Creek, but according to the current boundary settings this area is 5A. To allow continued access a 200 foot corridor or buffer along the ridge is necessary. Two additional IRA's also need a change. The Trout Creek #664 needs to be a 5C to reflect current use from both the Idaho and Montana snowmobile communities. The Willard Estelle IRA #173 needs to have an additional portion included as a 5C. The head end of Callahan Creek where the pink area of Callahan Cr. and Glad Cr. form the top of a T. That portion that connects the Benning area and major portion of Willard Estelle needs to be a 5C. All of this is located in T59N, R3E. This area has current and historical use by both the Idaho and Montana snowmobilers.

Snowmobile use only occurs when there is sufficient snow. Generally speaking the "season" starts December 1st and goes until the middle of May depending on the winter. Since the usable snow season is about 6 months, any area designated a 5 should be open to snowmobile use. Some may say that they need areas of solitude, but they can't get there in the depths of winter unless they use a snowmobile. Not many people are going to ski or snowshoe 5-6 miles just to reach those IRA areas, to enjoy the solitude. I believe there are 4 or 5 areas set aside for cross country skiing or snowshoeing in the Libby/Troy area. This does not mean that they cannot use the rest of the forest including the 5 designations. Snowmobilers respect those individuals who truly venture out and use the forest in winter. There also seems to be a concern that snowmobilers will drive game animals out of "their" area. If these same people were to reach these areas they would find that the game animals have already moved to their winter range, because of the snow depths of 6 to 12 feet or more. The winter range is significantly lower than the areas we enjoy, and are not any of the destination riding areas.

All of the destination riding areas are located in the higher elevations, with few trees and are mostly rock surfaces. Due to the lack of timber management at the higher elevations, caused by many reasons, Lynx, Grizzly Bear, litigation, the higher elevation previously managed areas are quickly becoming overgrown and will soon not support a desirable riding area. The only remaining possibility is fire in those higher elevations that will open up the forest for destination areas in the future. Since this is also not predictable, the only viable option is to allow the "5" designations to be open to snowmobile use when adequate snow cover exists. If you were to look at the "5" designation on Google Earth you can see the areas we are talking about, and you will be able to identify the high elevation areas that support winter motorized use. Snow still exists in some of the destination areas when the satellite images were taken.

- **Snowmobile Facts:**

- The following facts are from the American Council of Snowmobile Association, International Snowmobile Manufacturers Association, and the EPA. These facts, some of which may not be relevant to our area, do play an important part in understanding these key issues, and removing the concerns identified by others.

- **Compaction and Vegetation**

Everything we do has some effect on the environment. When a hiker steps on a flower, he affects the environment. When land is paved over for a bicycle path, it affects the environment. Many of the foot paths man has used for centuries still exist and are clearly visible throughout the world.

However, it's a fact that a snowmobile and rider exert dramatically less pressure on the earth's surface than other recreational activities (i.e., just one-tenth the pressure of a hiker and one-sixteenth the pressure of a horseback rider). Average pounds of pressure per square inch exerted on earth's surface:

Object	Pounds Of Pressure
Four-Wheel Drive Vehicle	30
Horse	8
Man	5
All-Terrain Vehicle	1.5
Snowmobile	0.5

(All vehicle weights considered include 210 pounds estimated weight of one person and gear).

Moreover, the snowmobile's ½ pound of pressure is further reduced by an intervening blanket of snow.

In many jurisdictions, snowmobiles are not classified as off-road vehicles. By both definition and management policies, these jurisdictions have completely separated snowmobiles from off-road vehicles. As the U.S. Department of the Interior concluded in an environmental statement: "*A major distinction is warranted between snowmobiles and other types of off-road vehicles. Snowmobiles operated on an adequate snow cover have little effect on soils - and hence cause less severe indirect impacts on air and water quality, and on soil-dependent biotic communities, than other ORV's do*". Given adequate snowfall and responsible operation, all evidence of snowmobile operation disappears when the season changes and the snow melts.

In its environmental statement regarding off-road vehicle use of public lands, the U.S. Department of Interior stated: "*Where snowmobiles are used exclusively over snow on roads and trails, the impact on vegetation is indeed virtually nil*".

A University of Wisconsin study of J. W. Pendleton entitled **Effect of Snowmobile Traffic on Non-Forest Vegetation** discovered that snowmobile traffic had no effect on grain yield of winter wheat, alfalfa, red clover plots or grass legume. Species of turf grass showed slightly reduced yields at first harvest, but were not negatively affected in subsequent harvests.

Research undertaken by Dr. James C. Wittaker and Dennis S. Wentworth of the University of Maine concluded that "**compaction by snowmobiling does not alter the grain weight yields of alfalfa in Maine**".

A Utah Water Resource laboratory study found that snow compaction, caused by snowmobile tracks, does not damage wheat crops. Instead, the compaction increases the yield and eliminates snow mold. Erosion is also reduced.

There is no evidence that snow compaction caused by snowmobiling, ski-touring or snowshoeing has a significant impact on the population of small burrowing animals. Since these recreations take place over a minuscule portion of the total land area, the ecosystem of burrowing animals tends to be overwhelmingly affected by natural forces—such as wind-induced compaction, early and late snowfalls, temperature fluctuations resulting in thaws and freezes, etc.

SOUND & ENVIRONMENT

Sound

EPA Requirements

¹ EPA Family Emissions Limits (FEL) for Snowmobiles are 75 for Hydrocarbons and 275 for Carbon Monoxide (2010 and 2011 model years). (See *Federal Register* Vol. 73, No. 123, Wednesday, June 25, 2008, page 35946)

² Hydrocarbons: certified by EPA to a Family Emissions Limit (FEL) of 15 g/kW-hr or less.

³ Carbon Monoxide: certified by EPA to a Family Emissions Limit (FEL) of 120 g/kW-hr or less. Air emission figures for carbon monoxide and hydrocarbons presented are either the Official Test Results (OTR) or the certified FEL. The Official Test Results are actual measured emissions. FEL's are not-to-exceed levels as certified by EPA.

⁴ Society of Automotive Engineers testing procedures allow for a 2 dB tolerance over the sound level limit to provide for variations in test site, temperature gradients, wind velocity gradients, test equipment, and inherent differences in nominally identical vehicles. (It has

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been observed that under some test site conditions, variability in test results greater than 2 dB can be experienced.) Sound emission figures represent an average of Official Test Results.

⁵ YellowstoneBAT certification for all 2007 year model snowmobiles will expire at the end of the 2011-2012 winter. Once approved, a snowmobile would generally be certified in Yellowstone as BAT for a period of six years.

Sound levels for snowmobiles have been reduced 94% since inception. Pre-1969 snowmobiles were noisy. At full throttle, these machines emitted sound levels as high as 102 dB(A) from a distance of 50 ft.

Snowmobiles produced since February 1, 1975 and certified by the Snowmobile Safety and Certification Committee's independent testing company emit no more than 78 dB(A) from a distance of 50 feet while traveling at full throttle when tested under the Society of Automotive Engineers (SAE) J192 procedures. Additionally, those produced after June 30, 1976 and certified by the Snowmobiles Safety and Certification Committee's independent testing company emit no more than 73 dB(A) at 50 feet while traveling at 15 mph when tested under SAE J1161 procedures.

For comparison purposes, normal conversation at three feet produces approximately 70 dB(A).

It would take 256 78 dB(A) snowmobiles operating together at wide open throttle to equal the noise level of just one of the pre-1969 snowmobiles.

Examples of decibel levels are as follows:

Sound	dB(A)
75-Piece Orchestra	130
Car Horn, Snowblower	110
Blow-dryer, Diesel Truck	100
Electric Saver, Lawn Mower	85
Garbage Disposal, Vacuum	80
Alarm Clock, City Traffic	70
Dishwasher	60
Leaves Rustling, Refrigerator	40

Effects on Wildlife

Dr. Andres Soom participated in the University of Wisconsin's comprehensive three-year study on the effects of snowmobile sound levels on deer and cottontail rabbits. His report entitled **Emission, Propagation and Environmental Impact of Noise from Snowmobile Operations**, concluded that *"only minor reactions were noted in the movements of cottontail rabbits and white tailed deer to moderate and intensive snowmobiling activity"*. He stated that it had not been possible to determine sound levels at which there is clear reaction on the part of the deer *"because snowmobiles must be so close to deer to generate the higher levels that other factors such as visible presence are likely to be more important"*.

The Wisconsin study also compared the reaction of deer to the presence of cross-country skiers. When cross-country skiers replaced snowmobiles on the test trail systems, the deer moved away from the trail more frequently.

A three-year study, **Response of white-tailed Deer to Snowmobiles and Snowmobile Trails in Maine**, conducted by wildlife scientists for the Maine Cooperative Wildlife Research Unit and the Maine Department of Inland Fisheries and Wildlife, revealed that: *"Deer consistently bedded near snowmobile trails and fed along them even when those trails were used for snowmobiling several times daily. In addition, fresh deer tracks were repeatedly observed on snowmobile trails shortly after machines had passed by, indicating that deer were not driven from the vicinity of these trails? The reaction of deer to a man walking differed markedly from their reaction to a man on a snowmobile? This decided tendency of deer to run with the approach of a human on foot, in contrast to their tendency to stay in sight when approached by a snowmobiler, suggests that the deer responded to the machine and not to the person riding it"*.

In a study entitled **Snow Machine Use and Deer in Rob Brook**, conducted by the Forest Wildlife Biologist of the White Mountain National Forest in New Hampshire, snowmobile operations and deer movement were monitored. A summary of the study indicated that deer travel patterns were not affected by periodically heavy snowmobile use. In addition, continued use of established trails was recommended.

The University of Minnesota issued a study by Michael J. Dorrance entitled **Effects of Snowmobiles on White Tailed Deer** which found no meaningful difference in the deer's home range during periods of snowmobile use and non-use.

Addressing the subject of snowmobile operations in Yellowstone National Park, Jack Anderson, a former Superintendent of Yellowstone commented: *"We found that elk, bison, moose, even the fawns, wouldn't move away unless a machine was stopped and a person started walking. As long as you stayed on the machine and the machine was running, they never paid any attention. If you stopped the machine, got off and started moving, that was a different story. The thing that seemed to be disturbing to them was a man walking on foot"*.

Effects on People

Operated in normal, considerate manner, snowmobiles are barely audible from inside a home. From a distance of 50 feet, snowmobiles generate between 68 - 73 dB(A) at 15 mph. Since doors and windows are almost always closed in the winter, snowmobiles operating outside at a distance of 50 feet only create an interior sound level of between 41 and 47 dB(A). From a distance of 200 feet, snowmobiles produce an interior sound level between 29 and 35 dB(A). This is well below the average evening household sound level of 47 dB(A).

Dr. Andres Soom, concluded from his study that the newer, quieter machines can travel within 45 feet of a residence without adverse effect.

Natural sound barriers, careful trail planning and reduced speed limits in residential areas further reduce snowmobile noise. Snowbanks or trees can cause a 20 dB drop in sound levels if they are between the machine and listener. Government and enforcement officials report they now receive few if any complaints from citizens about snowmobile noise.

U.S. Forest Service researcher Robin Harrison, reported that under usual wildland conditions, snowmobile operation is undetectable to the human ear at distances of more than 750 feet. He reported that snowmobiles were barely detectable above normal campground sound levels at a distance of 400 feet.

- **ECONOMIC IMPACT**

Snowmobilers in Canada and the United States spend over \$9 billion on their sport each year. This includes expenditures on equipment, clothing, accessories, snowmobiling vacations, etc.

Surveys show that, on average, snowmobilers taking overnight trips (24% of these surveyed) take 3 - 5 trips a year, spending 2 nights per trip away from home.

The sport of snowmobiling is responsible for "spin-off" economic benefits such as: jobs for tens of thousands of people; jobs which enable those people to further stimulate the economy through additional expenditures on goods and services; jobs which provide significant income tax revenues to provincial, state and federal treasuries and dramatically reduce unemployment and welfare payments.

Comments from the Troy & Libby Snowmobile Clubs

millions of dollars in tax revenues derived from snowmobile-related businesses (including, but not limited to manufacturers, suppliers, distributors, dealers resort and hotel facilities, restaurants, service stations, insurance agencies, hardware stores, etc.).

millions of dollars in winter tourism spending which support local snowbelt economies.

millions of dollars in local and provincial/state sales and gas tax revenues.

The sport of snowmobiling has rejuvenated the economics of many communities.

Provincial and state travel bureaus are now actively promoting snowmobile tourism through such means as the production of snowmobile information guides and trail maps and the establishment of toll free numbers with information on snowmobiling opportunities and conditions.

The New York State Snowmobile Association, in cooperation with SUNY Potsdam, performed an economic impact study in 1998 showing the economic impact of snowmobiling in New York State estimated at \$476.2 million.

The Wyoming Recreation Commission, in conjunction with the University of Wyoming, prepared a report on snowmobiling in the state in 1995. After analyzing monies spent on items like equipment, gasoline, service, lodging and food, the study concluded that snowmobiling is responsible for \$189.5 million in economic impact and "is extremely important to the economy of the State of Wyoming".

The economic significance that the sport of snowmobiling has on the state of Vermont exceeds \$165 million annually, according to a study by Johnson State College in 1995.

The Lebanon Valley College of Pennsylvania in cooperation with the Pennsylvania Snowmobile Association conducted an economic impact study in 1996-97 showing the annual economic impact of snowmobiling of the Commonwealth of Pennsylvania to be approximately \$95.5 million.

The University of New Hampshire and the New Hampshire Snowmobile Association conducted a study that showed the economic impact of snowmobiling in New Hampshire was \$367 million. Snowmobilers in New Hampshire paid over \$1.1 million dollars in registration fees, \$717,000 in gas tax (for snowmobile use alone) and over \$1 million in room and meal tax. It is estimated that 4,637 full time jobs are created as a direct result of snowmobiler expenditures.

In 1997 the University of Maine and the Maine Snowmobile Association conducted a study showing the economic impact of snowmobiling in Maine to be \$225,973,240.00.

Michigan State University, for the Michigan Department of Parks and Recreation, completed an assessment of snowmobiling impact in the State of Michigan in February 1998. That survey showed that:

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The average snowmobiler in Michigan spent \$4,218 annually on snowmobiling activity, equipment, vacationing in the state of Michigan.

With 290,000 snowmobiles registered in the state, that results in over a \$1 billion economic impact in Michigan generated by snowmobiling.

It is estimated that over 6,455 full time jobs are created by snowmobiling in Michigan.

Economic impact reports across North America show the positive economic significance of the sport of snowmobiling at all levels.

- For 2011, there were 40,000 registered snowmobiles in Montana. Most of which are in the western portion of the state.

Summary

Recreation and Access are important keystone parts to the Forest Plan. The changes identified in our comments will improve the quality of recreation & access opportunities, and promote tourism. By including those areas important to the snowmobile community in the final plan, you will improve the economic benefit to the communities near these recreation areas during the winter months when economies generally slow down. These destination areas will become identified as great places to recreate. The desired future conditions can guarantee these areas for future generations. Our Clubs 200 members, support this document, and ask that you make the changes necessary to improve recreational opportunities for our area.

Sincerely:

Troy and Libby Snowmobile Clubs


Jerry Wandler Troy President


Dave Nitschke Libby President

References and other Documents

A DVD with pictures of the Scotchman area

Google Map #1, for understanding picture taking location

Maps of the Scotchman Peaks area with areas identified

The Brewster Mountain Goat Ungulate Winter Range Report 2003

The USGS Seasonal Distribution and Aerial Surveys of Mountain Goats 2011

The Winter Wildlife map by MTFWP, and associated Metadata documentation

Google Maps #2,3, identifying the heavily managed units in the Scotchman Area

Map #4, provided by KNF identifying the Scotchman Peak boundary (current & Proposed) with some past fire & management activity.

A western States map with percent of Federal land

Troy and Libby Snowmobile Club supporting members (200 total)

Supplemental information from collaboration efforts in 2006 (E-mails, documents)

I have no access to the Mountain Goat Report from Gale Joslin in 1980 but have identified the page numbers, etc. for reference to this study.

The Troy & Libby Snowmobile Clubs Comments To the Idaho Panhandle National Forest Draft Land Management plan Preferred Alternative B

The Preferred Alternative B has areas that are identified as 5C and MA3. We wish to thank you for including them in this alternative, we also want you to include all of those currently identified 5C's as part of the final document, without change. The Northwest Peaks MA 3 is also very important to the snowmobile community. We want that designation to remain unchanged also. The 5C's, Backcountry Winter Motorized and MA 3 Recreation/Scenic Area designations are premier winter recreation play areas, that have, current, established, historic, and traditional use. These areas provide majestic views and scenic beauty found only in these winter playgrounds.

We wish to address concerns regarding other areas, considered centerpieces to the snowmobile community. The main concern is the Scotchman Peaks Area. This area is on both forests, and straddles both states. This makes for confusion when explaining how to change the designations. Our approach is to change the KNF side as identified on the **included Scotchman map** with areas marked in **red**. There are two areas, the Savage Peak area, and the Dry Creek area. The Savage Peak area needs to have either a 5C, Backcountry Winter Motorized or a MA3, Scenic Recreation area designation like Northwest Peaks that allows winter motorized use. The other area on the IPNF is adjacent to the savage peak area, and north of East Fork Creek it needs to be a **1E (Primitive)** designation, returning winter motorized use to this area. We know that there seems to be concern that our winter use is in mountain Goat winter Range. The MTFWP polygon sheet submitted by them, (identified as Winter Wildlife) a **copy is included**, shows the polygons going through the Savage Peak area as well as to the north towards Drift Peak. **The label "Winter Wildlife" is false.** The State Metadata information is for both General & Winter Distributions. The MTFWP GIS Manager, Lydia Bailey stated that all of the polygons for Mountain Goats throughout the state are for General & Winter distributions. **There is no Winter only Distribution Polygon.** The Entity and Attribute Information page gives an Attribute definition, it states **USE TYPES: Note: Species occur in areas of suitable habitats within their overall distribution, however not all areas will have animals or sign at all times every year. The specific areas occupied may expand or contract through time as seasons, population levels and habitat conditions change.** There is also an Attribute Value which states: **Winter Distribution - Depicts areas where populations of this species tend to concentrate during the winter season, commonly December through April. These areas are also considered part of the General Distribution. NOTE: Not all populations concentrate on specific ranges during the winter season. In areas where no winter distribution is delineated animals depend upon and occur across their General Distribution area during the winter season, or they may occur in localized concentrations that can not be depicted at the scale of these maps. Keep in mind that weather extremes can have a large influence on winter distribution in any given year.**

Comments from the Troy & Libby Snowmobile Clubs

A study done in June of 2003 by the Mackenzie Forest District Omineca Region, called Brewster Mountain Goat Ungulate Winter Range (UWR), (U-7-004) Report. **A copy is included**, states on page 4. Ecology They are considered non-migratory although **there is often a vertical movement from high elevation summer ranges to lower elevations during winter**. The report also states: Mountain Goats are not territorial. Home ranges vary, depending on the degree of seasonal movement (tagged goats in Olympic National Park, USA are known to have made seasonal movements of up to 16KM). Page 5 of the report identifies winter habitat. **Mountain goats generally avoid snow depths greater than 50 cm or 20 inches**. In deep snow areas, they may have to winter in areas with 100 cm or more. **In the interior mountains, many goats move from the high alpine and sub-alpine meadows down to the upper areas of timber on steep south and west-facing slopes, gaining protection from the severest winter conditions. Others seek high elevation wind-blown ridges where forage is exposed or covered by little snow.** Also on page 5 Thermal Cover: **Both coastal and interior ecotypes will use lower elevations to escape heavy snows and cold temperatures but interior populations may also move upslope to wind swept ridges to find exposed herbs and grasses if the snow is dry enough.**

A USGS Report dated 2011, Titled, Seasonal distribution and Aerial Surveys of Mountain Goats in Mount Rainier, North Cascades, and Olympic National Parks. Washington. **A copy is included.**

In this report, on page 12 **Timing of seasonal transitions between summer and winter ranges varied among individuals (fig. 7)**. Due to sample size constraints, we were unable to discriminate differences among parks in the seasonal timing of altitudinal movements of mountain goats. Data pooled among parks indicated that the median date of seasonal transition to summer range was June 11 for females and June 19 for males, although these transition dates ranged from April 24 to July 3 for both males and females. The median date of transition from summer to winter range was October 26 for females and November 9 for males, but these dates ranged from September 11 to December 16 for females and from September 28 to December 23 for males. Although females typically moved to summer and winter ranges over a week earlier than males, both sexes were on winter ranges approximately equal durations, generally more than 200 days

On page 13 **Altitudinal distributions also varied among individuals within seasons (fig. 8)**. Median altitudes used by individual GPS-collared goats ranged from 817 to 1,541 m during winter in Olympic and North Cascades National Parks, and from 1,215 to 1,787 m during winter in Mount Rainier. By contrast, median altitudes used by GPS-collared goats during summer ranged from 1,312 to 1,819 m in Olympic and North Cascades National Parks and 1,780 to 2,061 m in Mount Rainier National Park (fig. 8).

The Appendix 3, **Maps, pages 29—46, showing seasonal distributions of 17 selected GPS-collared mountain goats in Mount Rainier, North Cascades, and Olympic National Parks, Washington. Each map shows summer and winter range, and every map shows a definite, significant, change from summer to winter range. Both in elevation, and distance. All GPS-collared goats made the transition from Summer Range to Winter Range.**

Comments from the Troy & Libby Snowmobile Clubs

The Troy and Libby Snowmobile Clubs comments for the
Mountain Goat Study

By
Gayle Joslin
1980

The 1980 Mountain Goat Study, although outdated, contains information repeated by more recent studies that are also submitted as references for the Preferred Alternative B of the Forest Plan Revision by the Troy and Libby Snowmobile Clubs. The page # and paragraph references and notes will help justify our winter use areas in the three areas identified on the Scotchman Peaks IRA/ Proposed Wilderness map.

P3. P22.

All areas identified as possible winter range are known to have supported goats during other seasons, and during mild years, these areas may continue to be used into winter. The Spires of Mount Vernon is documented as an important kidding ground. P22. Kidding ground are not winter range.

P6. 2nd paragraph

Management situations 1,2,3, identify areas used by mountain goats. 2 and 3 are areas where goats may have had populations, but do not currently support them.

P9. 3rd paragraph

Precipitation levels of 30 to 110 inches of snow and snow packs of 14 feet. Mountain Goats prefer snow depths of 20 to 40 inches.

P24. P40. End of 1st paragraph

Winter range is selected for its snow shedding qualities which exist because of favorable combinations of slope, aspect, and elevation. Our winter use areas hold the snow and are not generally south or west aspects.

P35. 2nd paragraph

Few goats if any spotted in these areas.

P41, last paragraph

Fall brings the first snows and signals a return to winter range.

Comments from the Troy & Libby Snowmobile Clubs

P57. Table 7

Winter Range slope 80% a roof pitch of 9:12, or for every 12 inches horizontal a vertical rise of 9 inches yields a 75% slope. A 10:12 pitch yields a 83 % slope. The elevation we ride in is in the range of 45 to 65 hundred feet on aspects of 0 to 180 degrees. Most of the winter range is on aspects of 180 to 300+ degrees, these are mostly south and primarily west facing slopes.

P59, 60. Table 8

Defines probable and possible winter range. The table identifies the areas and their management situation.

Probable sites are identified by a W2, dashed lines on the map. These sites are suitable terrain when snow depths are 20 inches or less.

Possible sites on W2 are dotted lines on the map are not likely used consistently, since environmental parameters indicate unsuitable habitat. These areas may be used during other seasons and during mild winters with 20 inches or less of snow.

P84,5,6. Chapter 6, Recommendations.

Management Situations 1,2,3 Situation 1 is the most important habitat if the snow depth, aspect, and slope, are conducive for goat winter range. Situations 2 and 3 are not as important because of their past history. Winter Range is defined from November to April, 3000 feet and above with exceptions where suitable terrain extends lower. Slopes are generally 80% and exposures vary, with critical areas occurring on southerly, east or west aspects.

Observations:

This study was undertaken at the same time logging was a priority. Many of the statements are directly related to road building and logging activities. This study along with the other two studies included in our comments, all reflect the same conclusion.

Mountain Goats prefer snow depth from 20 to 40 inches, prefer windswept slopes, and prefer southerly or west facing slopes.

Our winter use is in areas where the snow depth is in excess of 6 feet to depths of 12 or more feet. Our area is generally wind loaded slopes, and our primary riding occurs on east and north facing slopes.

As you can see we are the opposite of the Mountain Goat winter range as identified. This should make changing designations an easy process based on these facts.

A concern might be the goat population and the hunting permits for this area. There has also been the elimination of doe tags, and the number of elk cow permits have been reduced in the same hunting district. There is no correlation between snowmobile use and these hunting permits. Maybe predators are to blame for the demise of these ungulates.

In all 3 studies, Mountain Goats move from high elevation summer range to lower elevation winter range. These ungulates prefer lower elevations during winter and also seek, steep, South & West facing slopes. They may also seek high elevation wind-blown ridges where forage is exposed or covered by little snow.

The areas we identified for our winter use are not wind swept ridges, they are usually not south or west facing slopes. The preferred areas are most often east or north facing, where snow depths usually reach 8 to 12 feet or more. These areas provide no thermal cover, no escape terrain, and no food source. Pictures taken during a flyover in April 10, 2008 by both Jerry Brown of MTFWP and myself, Jerry Wandler, and by Cesar Hernandez on April 13, 2008 show no signs of mountain goats or tracks in either sets of pictures. Snow depths at this time were in the range of 10-12 feet. A hint of snowmobile tracks can be seen on the IPNF side of the Scotchman Peak area. An additional series of pictures taken February 6, 2012 from the 2000 fire (see Google map #1) area looking towards the east, showing the steep, west facing, windswept areas from Savage Peak to Drift Peak in a sequence of pictures. There are no mountain goat tracks visible in any of these pictures the snow depths at this time were in the range of 12 feet. A DVD is included with all of the pictures labeled. The best way to view these pictures is with Picasa, a free download from Google. This will allow you to zoom in to have a better look at the terrain.

This should answer the questions related to the issue of mountain goat winter range, and our proximity to it. Since the goats are not in our identified winter riding area, there is no reason to restrict snowmobile access to the Scotchman identified areas. Changing the designation in these areas still protects the road-less & wilderness qualities, while allowing additional recreational access.

The Dry Creek Area has a long history of snowmobile use. The 1987 Plan had boundaries that were acceptable to the snowmobile community. For some unknown reason, new lines were drawn, removing a major portion of this established, traditional use area. We would like these boundaries returned to the 1987 Plan boundaries with only slight modifications to include the ridge lines as the boundary, as identified on the included Scotchman map.

There was a removal of some Scotchman PW near the southern boundary, by the Clark Fork River. We have no problem with re-including this area to the Scotchman PW. It is currently identified as a 5A. This is not ride-able terrain.

The Alternative B of the Draft Plan also shows some previously heavily managed areas in the Scotchman Peaks PW these areas are identified on map #4, second page. The new boundary identifies these areas as part of the PW. These areas should not be included in the PW boundary. A PW designation should not contain visible past management activity. These areas can also be seen from maps #2 & 3. Make the right decision, remove these areas from the PW.

Comments from the Troy & Libby Snowmobile Clubs

Additional issues are identified in the **Appendices of the Draft Environmental Impact Statement**, for the KNF. There is mis-representation in a few areas that are of concern to the snowmobile community. Table 24, on page 93, has some definitions/criteria that are confusing. It seems strange that under Skiing and Snowshoeing Opportunities, using snowmobiles to reach an area is ok, but if you are a snowmobiler you cannot enter that same area once you reach that boundary. Seems like a dual standard, the quiet, solitude recreation deemed important for the ski & snowshoe recreationist is broken by the sound of a snowmobile, brought on by their own choice, and use. The snowmobiler makes a choice, and doesn't see a problem accessing the area to enjoy the scenic beauty, the same scenic beauty enjoyed by the ski/snowshoe individual. A true ski & snowshoe recreationist would start at the trailhead and enjoy the quiet solitude as they progressed up the trail.

Table 33, page 110, #25 & 26, Hiking Opportunities for the Scotchman Peaks. The terrain is listed as medium, yet the same terrain for snowmobiles is high. There are obviously areas where a hiker will encounter terrain that is impassable, yet the evaluation criteria as a whole considers the terrain gentle. The trails class3? Regularly maintained, Ross Creek and Little Spar are the only two I know of and both only go a short distance into the area. On Page 33, We have some definite concerns over how the Primitive and Unconfined Recreation, Elements and Criteria are identified and weighted for all of these. Many of the ratings should be moved to Medium, because of the disparity in the identification methods. One type should not be given priority over another in any of the Elements and Criteria ratings.

The Availability Resource Assessment for the Scotchman Peaks area should have a Moderate rating. Understanding that a low rating, across the 8 Resources equates to a high Availability Rating. If you look at Roderick they are all low with 1 low/mod, which equates to a high. The Scotchman Peaks has 4 low, 3 low/mod, and 1 high, yet the rating is High?? Ten Lakes has 5 low, 3 moderates and the rating is Moderate. Rock Creek has 6 low, 1 low/high and 1 high but rates a Low??

The Suitability Determination on page 136, Scotchman Peaks should show a **no** because all ratings should be Moderate..

On page 111, Scotchman Peaks, #37, not all of the Terrain is steep or is the vegetation too dense to make travel difficult. Realize, that in winter most underlying vegetation is covered, and only those trees of stature would impede travel. More importantly the premier areas we have identified can be reached in winter without difficulty. This rating needs to be a Medium. #38, this is currently the correct statement. Our comments identify those changes, we need, to allow access to specific portions of the Scotchman Peaks area.

On page 109 of the Area Capability Assessment, Northwest Peaks #37 & #38 are identified as Low but the rating came out as Med?? How is this explained? Other areas with Low and Low have a Low as a rating, this makes sense. How many other summary ratings might also be questioned?

Comments from the Troy & Libby Snowmobile Clubs

On page 123, under Northwest Peaks #663 the word **some** should be removed, because it under represents the actual area used by snowmobiles in this MA 3. Wording that more accurately reflects the current use is necessary. This MA 3 area is heavily used by snowmobilers, the bowls associated with Hawkins Lake, to the South end of Rock Candy, are premier riding areas enjoyed by winter snowmobile enthusiasts.

On page 126, Table 48, Resource Criteria, Number 5. States that the number of wilderness acres within 100 miles of Kalispell or Coeur d'Alene. This reference as it relates to the Scotchman Peaks Area should fall to low as identified, but the same criteria used by the IPNF portion says High. This IRA is considered 1 IRA, Scotchman Peaks #662. Since 60,000 of the 85,000 acres are in Montana, it only makes sense that the overall rating be a Low for both forests. The Cabinet Mountain Wilderness is across Hwy 56 as well as other Wilderness areas near Kalispell.

On Table 60, page 136, Suitability Determination, map #16, Roderick, & map #25, Scotchman Peaks, have public comment & public support as a determination. I believe that these terms should be dropped from the determination and then re-evaluate them. We as a snowmobile community did not support the Scotchman Peaks as a proposed wilderness. We are in-fact identifying those areas we would like to see open. I believe the statement that **this is not a vote** should be reason enough to remove those terms. Specific information and facts should guide you towards the correct Suitability Determination. One additional point of information, if there is wildlife winter range along Clark Fork face, why was this area removed from the Scotchman Peaks IRA/PW?

The IPNF **Appendices of the Draft Environmental Impact Statement** also has some false information on Table 33. Page 104, Scotchman Peaks, #37, not all of the Terrain is steep or is the vegetation to dense to make travel difficult. Realize, that in winter most underlying vegetation is covered, and only those trees of stature would impede travel. More importantly the premier areas we have identified can be reached in winter without difficulty. This rating should be a Medium. **#38. This is false information snowmobile use has been allowed since at least the 1987 Plan on the IPNF portion of the Scotchman Peaks area. This should be changed to a Low rating.**

The Kootenai & Idaho Panhandle National Forest, should consider the following, in the Preferred Alternative B of the Forest Plan Revision:

- The FS should take critical steps to ensure a quality motorized recreational experience that is socially sustainable – specifically snowmobile use and access.
- The FS should include increased motorized recreation and access resulting from increased population and recreational needs in all alternatives - specifically snowmobile use and access.
- The FS should address that there is a preoccupation with documenting what impacts snowmobile use can have or may have to various resources, at various points in time, while ignoring the relevant environmental analysis. Environmental impact analysis documents often include statement after statement regarding various negative impacts while including little or no information about what the existing condition is, or how the existing snowmobile use is actually impacting resources, or whether that impact is significant, let alone a meaningful contrast between the current condition and the various alternatives. Impacts should be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of snowmobile use should be compared and contrasted to baseline data in order to establish a threshold on which the significance of the impacts of the Preliminary Proposals can be determined. Impacts should be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions and, ultimately, the decision reached by the Deciding Officer.
- Numerous scientific studies have shown that man on foot causes more stress in wildlife than a man on a snowmobile (Canfield 1999, Freddy 1986, Eckstein 1979, Richens 1978, Lavigne 1979, Bolling 1974). Numerous studies in Yellowstone and Glacier National Parks regarding the impact of snowmobiles on wildlife have come to the same conclusions. Even the lead biologist for the U.S. Fish and Wildlife Service says “the agency doesn’t consider snowmobiling to be a problem in lynx habitat”. (S. Sartorius 2009) Yellowstone Wolverines were not displaced from their dens by snowmobile activity (Iriman 2007) and the Yellowstone studies have concluded “responses by wildlife to over-snow vehicles were relatively infrequent and of minor intensity” (White 2005). Strong consideration should be given to these scientific studies in the planning process.
- An assumption that was often proffered by other stakeholders is that closing roads and trails to motorized uses would dramatically improve the effectiveness of wildlife habitat. In our opinion, much of the rationale expressed for restricting motorized vehicle use is tied to incomplete research and grossly excessive extrapolation of research data, and is often directly contradicted by the current condition on the ground today. The agencies must not automatically assume that closing roads and trails to motorized use will instantly increase habitat effectiveness. The analysis must not improperly assume or overestimate the beneficial affects to wildlife resulting from motorized route closures. Research done at the Starkey Experimental Forest and Range is the most recent and

Comments from the Troy & Libby Snowmobile Clubs

most detailed and complex research done on deer and elk in relation to human travel modes consisting of ATV/trail bike, bicycle, hiking, and horseback. Previous studies dating back to the 1970s indicate that these animals flee from all of these travel modes. Starkey research quantifies the different rates, times, and distances. However, they admit that the resultant impact on individuals has not been determined and no scientific conclusions are reached in the studies on how this disturbance affects individual health or survivability. Likewise, no relationship has been made between the four disturbance modes and herd health. All that is known is that deer and elk run from humans using any form of travel. Nothing in the Starkey research proves the existence of motorized trails actually results in a decrease in habitat effectiveness or in an individual animal's poor health and survivability, nor is this evidence that current vehicle use is negatively impacting herd health factors. It should not be assumed that the elimination of motorized use would drastically reduce disturbance of wildlife or improve "wildlife vulnerability" when walking persons, persons on horses, mountain bike use, bird watching, hunting and numerous other uses that are documented to disturb, harass or kill wildlife are still allowed.

- The FS should consider that tourism and recreation play an important role in the economic viability of our area specifically snowmobile use and access. The word tourism suggests that people have both time and money to visit new places. With high unemployment, closed lumber mills, businesses struggling, improved trailheads like those found on the Kootenai, Idaho Panhandle and Colville National Forest should be developed and supported by both the FS and volunteers from local snowmobile clubs – perhaps through existing grants.

IRA Changes and Information

The Forest Service should not recommend and/or designate any additional lands as wilderness. When areas are given special designations such as recommended wilderness, wilderness study areas, wild and scenic rivers, research natural areas, backcountry non-motorized they become in fact "Wilderness" and are managed as such. Idaho is almost 50 percent federal land. (See attached map) The local economy is dependent on multiple use of the forest. Additional wilderness is a hindrance to local economies - no more wilderness.

Comments from the Troy & Libby Snowmobile Clubs

The IPNF has a "5" designation. Those areas that have traditional, established, and historical, snowmobile use, must continue to allow snowmobile use. Those areas that border IRA's on the KNF need to have the same designation to allow for the current use in those areas, once the plan is complete. Travel planning will be a critical part of recreation and access for the snowmobile communities in both states.

The Roberts, Mount Henry, and the bottom half of the Saddle IRA's, should be 5C, this designation will allow continued use of these areas to snowmobilers. All of the areas have current snowmobile use in a large portion of these IRA's. The Flagstaff IRA needs to have a boundary adjustment. The Libby snowmobilers access the 5C portion of the Flagstaff area from Quartz Creek, but according to the current boundary settings this area is 5A. To allow continued access a 200 foot corridor or buffer along the ridge is necessary. Two additional IRA's also need a change. The Trout Creek #664 needs to be a 5C to reflect current use from both the Idaho and Montana snowmobile communities. The Willard Estelle IRA #173 needs to have an additional portion included as a 5C. The head end of Callahan Creek where the pink area of Callahan Cr. and Glad Cr. form the top of a T. That portion that connects the Benning area and major portion of Willard Estelle needs to be a 5C. All of this is located in T59N, R3E. This area has current and historical use by both the Idaho and Montana snowmobilers.

Snowmobile use only occurs when there is sufficient snow. Generally speaking the "season" starts December 1st and goes until the middle of May depending on the winter. Since the usable snow season is about 6 months, any area designated a 5 should be open to snowmobile use. Some may say that they need areas of solitude, but they can't get there in the depths of winter unless they use a snowmobile. Not many people are going to ski or snowshoe 5-6 miles just to reach those IRA areas, to enjoy the solitude. I believe there are 4 or 5 areas set aside for cross country skiing or snowshoeing in the Libby/Troy area. This does not mean that they cannot use the rest of the forest including the 5 designations. Snowmobilers respect those individuals who truly venture out and use the forest in winter. There also seems to be a concern that snowmobilers will drive game animals out of "their" area. If these same people were to reach these areas they would find that the game animals have already moved to their winter range, because of the snow depths of 6 to 12 feet or more. The winter range is significantly lower than the areas we enjoy, and are not any of the destination riding areas.

All of the destination riding areas are located in the higher elevations, with few trees and are mostly rock surfaces. Due to the lack of timber management at the higher elevations, caused by many reasons, Lynx, Grizzly Bear, litigation, the higher elevation previously managed areas are quickly becoming overgrown and will soon not support a desirable riding area. The only remaining possibility is fire in those higher elevations that will open up the forest for destination areas in the future. Since this is also not predictable, the only viable option is to allow the "5" designations to be open to snowmobile use when adequate snow cover exists. If you were to look at the "5" designation on Google Earth you can see the areas we are talking about, and you will be able to identify the high elevation areas that support winter motorized use. Snow still exists in some of the destination areas when the satellite images were taken.

- **Snowmobile Facts:**

- The following facts are from the American Council of Snowmobile Association, International Snowmobile Manufacturers Association, and the EPA. These facts, some of which may not be relevant to our area, do play an important part in understanding these key issues, and removing the concerns identified by others.

- **Compaction and Vegetation**

Everything we do has some effect on the environment. When a hiker steps on a flower, he affects the environment. When land is paved over for a bicycle path, it affects the environment. Many of the foot paths man has used for centuries still exist and are clearly visible throughout the world.

However, it's a fact that a snowmobile and rider exert dramatically less pressure on the earth's surface than other recreational activities (i.e., just one-tenth the pressure of a hiker and one-sixteenth the pressure of a horseback rider). Average pounds of pressure per square inch exerted on earth's surface:

Object	Pounds Of Pressure
Four-Wheel Drive Vehicle	30
Horse	8
Man	5
All-Terrain Vehicle	1.5
Snowmobile	0.5

(All vehicle weights considered include 210 pounds estimated weight of one person and gear).

Moreover, the snowmobile's ½ pound of pressure is further reduced by an intervening blanket of snow.

In many jurisdictions, snowmobiles are not classified as off-road vehicles. By both definition and management policies, these jurisdictions have completely separated snowmobiles from off-road vehicles. As the U.S. Department of the Interior concluded in an environmental statement: "A major distinction is warranted between snowmobiles and other types of off-road vehicles. Snowmobiles operated on an adequate snow cover have little effect on soils - and hence cause less severe indirect impacts on air and water

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quality, and on soil-dependent biotic communities, than other ORV's do". Given adequate snowfall and responsible operation, all evidence of snowmobile operation disappears when the season changes and the snow melts.

In its environmental statement regarding off-road vehicle use of public lands, the U.S. Department of Interior stated: "*Where snowmobiles are used exclusively over snow on roads and trails, the impact on vegetation is indeed virtually nil*".

A University of Wisconsin study of J. W. Pendleton entitled **Effect of Snowmobile Traffic on Non-Forest Vegetation** discovered that snowmobile traffic had no effect on grain yield of winter wheat, alfalfa, red clover plots or grass legume. Species of turf grass showed slightly reduced yields at first harvest, but were not negatively affected in subsequent harvests.

Research undertaken by Dr. James C. Wittaker and Dennis S. Wentworth of the University of Maine concluded that "**compaction by snowmobiling does not alter the grain weight yields of alfalfa in Maine**".

A Utah Water Resource laboratory study found that snow compaction, caused by snowmobile tracks, does not damage wheat crops. Instead, the compaction increases the yield and eliminates snow mold. Erosion is also reduced.

There is no evidence that snow compaction caused by snowmobiling, ski-touring or snowshoeing has a significant impact on the population of small burrowing animals. Since these recreations take place over a minuscule portion of the total land area, the ecosystem of burrowing animals tends to be overwhelmingly affected by natural forces—such as wind-induced compaction, early and late snowfalls, temperature fluctuations resulting in thaws and freezes, etc.

SOUND & ENVIRONMENT

Sound

EPA Requirements

¹ EPA Family Emissions Limits (FEL) for Snowmobiles are 75 for Hydrocarbons and 275 for Carbon Monoxide (2010 and 2011 model years). (See *Federal Register* Vol. 73, No. 123, Wednesday, June 25, 2008, page 35946)

² Hydrocarbons: certified by EPA to a Family Emissions Limit (FEL) of 15 g/kW-hr or less.

³ Carbon Monoxide: certified by EPA to a Family Emissions Limit (FEL) of 120 g/kW-hr or less. Air emission figures for carbon monoxide and hydrocarbons presented are either the Official Test Results (OTR) or the certified FEL. The Official Test Results are actual measured emissions. FEL's are not-to-exceed levels as certified by EPA.

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⁴ Society of Automotive Engineers testing procedures allow for a 2 dB tolerance over the sound level limit to provide for variations in test site, temperature gradients, wind velocity gradients, test equipment, and inherent differences in nominally identical vehicles. (It has been observed that under some test site conditions, variability in test results greater than 2 dB can be experienced.) Sound emission figures represent an average of Official Test Results.

⁵ YellowstoneBAT certification for all 2007 year model snowmobiles will expire at the end of the 2011-2012 winter. Once approved, a snowmobile would generally be certified in Yellowstone as BAT for a period of six years.

Sound levels for snowmobiles have been reduced 94% since inception. Pre-1969 snowmobiles were noisy. At full throttle, these machines emitted sound levels as high as 102 dB(A) from a distance of 50 ft.

Snowmobiles produced since February 1, 1975 and certified by the Snowmobile Safety and Certification Committee's independent testing company emit no more than 78 dB(A) from a distance of 50 feet while traveling at full throttle when tested under the Society of Automotive Engineers (SAE) J192 procedures. Additionally, those produced after June 30, 1976 and certified by the Snowmobiles Safety and Certification Committee's independent testing company emit no more than 73 dB(A) at 50 feet while traveling at 15 mph when tested under SAE J1161 procedures.

For comparison purposes, normal conversation at three feet produces approximately 70 dB(A).

It would take 256 78 dB(A) snowmobiles operating together at wide open throttle to equal the noise level of just one of the pre-1969 snowmobiles.

Examples of decibel levels are as follows:

Sound	dB(A)
75-Piece Orchestra	130
Car Horn, Snowblower	110
Blow-dryer, Diesel Truck	100
Electric Saver, Lawn Mower	85
Garbage Disposal, Vacuum	80
Alarm Clock, City Traffic	70
Dishwasher	60
Leaves Rustling, Refrigerator	40

Effects on Wildlife

Dr. Andres Soom participated in the University of Wisconsin's comprehensive three-year study on the effects of snowmobile sound levels on deer and cottontail rabbits. His report entitled **Emission, Propagation and Environmental Impact of Noise from Snowmobile Operations**, concluded that *"only minor reactions were noted in the movements of cottontail rabbits and white tailed deer to moderate and intensive snowmobiling activity"*. He stated that it had not been possible to determine sound levels at which there is clear reaction on the part of the deer *"because snowmobiles must be so close to deer to generate the higher levels that other factors such as visible presence are likely to be more important"*.

The Wisconsin study also compared the reaction of deer to the presence of cross-country skiers. When cross-country skiers replaced snowmobiles on the test trail systems, the deer moved away from the trail more frequently.

A three-year study, **Response of white-tailed Deer to Snowmobiles and Snowmobile Trails in Maine**, conducted by wildlife scientists for the Maine Cooperative Wildlife Research Unit and the Maine Department of Inland Fisheries and Wildlife, revealed that: *"Deer consistently bedded near snowmobile trails and fed along them even when those trails were used for snowmobiling several times daily. In addition, fresh deer tracks were repeatedly observed on snowmobile trails shortly after machines had passed by, indicating that deer were not driven from the vicinity of these trails? The reaction of deer to a man walking differed markedly from their reaction to a man on a snowmobile? This decided tendency of deer to run with the approach of a human on foot, in contrast to their tendency to stay in sight when approached by a snowmobiler, suggests that the deer responded to the machine and not to the person riding it"*.

In a study entitled **Snow Machine Use and Deer in Rob Brook**, conducted by the Forest Wildlife Biologist of the White Mountain National Forest in New Hampshire, snowmobile operations and deer movement were monitored. A summary of the study indicated that deer travel patterns were not affected by periodically heavy snowmobile use. In addition, continued use of established trails was recommended.

The University of Minnesota issued a study by Michael J. Dorrance entitled *Effects of Snowmobiles on White Tailed Deer* which found no meaningful difference in the deer's home range during periods of snowmobile use and non-use.

Addressing the subject of snowmobile operations in Yellowstone National Park, Jack Anderson, a former Superintendent of Yellowstone commented: *"We found that elk, bison, moose, even the fawns, wouldn't move away unless a machine was stopped and a person started walking. As long as you stayed on the machine and the machine was running, they never paid any attention. If you stopped the machine, got off and started moving, that was a different story. The thing that seemed to be disturbing to them was a man walking on foot"*.

Effects on People

Operated in normal, considerate manner, snowmobiles are barely audible from inside a home. From a distance of 50 feet, snowmobiles generate between 68 - 73 dB(A) at 15 mph. Since doors and windows are almost always closed in the winter, snowmobiles operating outside at a distance of 50 feet only create an interior sound level of between 41 and 47 dB(A). From a distance of 200 feet, snowmobiles produce an interior sound level between 29 and 35 dB(A). This is well below the average evening household sound level of 47 dB(A).

Dr. Andres Soom, concluded from his study that the newer, quieter machines can travel within 45 feet of a residence without adverse effect.

Natural sound barriers, careful trail planning and reduced speed limits in residential areas further reduce snowmobile noise. Snowbanks or trees can cause a 20 dB drop in sound levels if they are between the machine and listener. Government and enforcement officials report they now receive few if any complaints from citizens about snowmobile noise.

U.S. Forest Service researcher Robin Harrison, reported that under usual wildland conditions, snowmobile operation is undetectable to the human ear at distances of more than 750 feet. He reported that snowmobiles were barely detectable above normal campground sound levels at a distance of 400 feet.

• **ECONOMIC IMPACT**

Snowmobilers in Canada and the United States spend over \$9 billion on their sport each year. This includes expenditures on equipment, clothing, accessories, snowmobiling vacations, etc.

Surveys show that, on average, snowmobilers taking overnight trips (24% of these surveyed) take 3 - 5 trips a year, spending 2 nights per trip away from home.

The sport of snowmobiling is responsible for "spin-off" economic benefits such as:

jobs for tens of thousands of people; jobs which enable those people to further stimulate the economy through additional expenditures on goods and services; jobs which provide significant income tax revenues to provincial, state and federal treasuries and dramatically reduce unemployment and welfare payments.

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millions of dollars in tax revenues derived from snowmobile-related businesses (including, but not limited to manufacturers, suppliers, distributors, dealers resort and hotel facilities, restaurants, service stations, insurance agencies, hardware stores, etc.).

millions of dollars in winter tourism spending which support local snowbelt economies.

millions of dollars in local and provincial/state sales and gas tax revenues.

The sport of snowmobiling has rejuvenated the economics of many communities.

Provincial and state travel bureaus are now actively promoting snowmobile tourism through such means as the production of snowmobile information guides and trail maps and the establishment of toll free numbers with information on snowmobiling opportunities and conditions.

The New York State Snowmobile Association, in cooperation with SUNY Potsdam, performed an economic impact study in 1998 showing the economic impact of snowmobiling in New York State estimated at \$476.2 million.

The Wyoming Recreation Commission, in conjunction with the University of Wyoming, prepared a report on snowmobiling in the state in 1995. After analyzing monies spent on items like equipment, gasoline, service, lodging and food, the study concluded that snowmobiling is responsible for \$189.5 million in economic impact and "is extremely important to the economy of the State of Wyoming".

The economic significance that the sport of snowmobiling has on the state of Vermont exceeds \$165 million annually, according to a study by Johnson State College in 1995.

The Lebanon Valley College of Pennsylvania in cooperation with the Pennsylvania Snowmobile Association conducted an economic impact study in 1996-97 showing the annual economic impact of snowmobiling of the Commonwealth of Pennsylvania to be approximately \$95.5 million.

The University of New Hampshire and the New Hampshire Snowmobile Association conducted a study that showed the economic impact of snowmobiling in New Hampshire was \$367 million. Snowmobilers in New Hampshire paid over \$1.1 million dollars in registration fees, \$717,000 in gas tax (for snowmobile use alone) and over \$1 million in room and meal tax. It is estimated that 4,637 full time jobs are created as a direct result of snowmobiler expenditures.

In 1997 the University of Maine and the Maine Snowmobile Association conducted a study showing the economic impact of snowmobiling in Maine to be \$225,973,240.00.

Michigan State University, for the Michigan Department of Parks and Recreation, completed an assessment of snowmobiling impact in the State of Michigan in February 1998. That survey showed that:

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The average snowmobiler in Michigan spent \$4,218 annually on snowmobiling activity, equipment, vacationing in the state of Michigan.

With 290,000 snowmobiles registered in the state, that results in over a \$1 billion economic impact in Michigan generated by snowmobiling.

It is estimated that over 6,455 full time jobs are created by snowmobiling in Michigan.

Economic impact reports across North America show the positive economic significance of the sport of snowmobiling at all levels.

- For 2011, there were 40,000 registered snowmobiles in Montana. Most of which are in the western portion of the state.

Summary

Recreation and Access are important keystone parts to the Forest Plan. The changes identified in our comments will improve the quality of recreation & access opportunities, and promote tourism. By including those areas important to the snowmobile community in the final plan, you will improve the economic benefit to the communities near these recreation areas during the winter months when economies generally slow down. These destination areas will become identified as great places to recreate. The desired future conditions can guarantee these areas for future generations. Our Clubs 200 members, support this document, and ask that you make the changes necessary to improve recreational opportunities for our area.

Sincerely:

Troy and Libby Snowmobile Clubs


Jerry Wandler Troy President


Dave Nitschke Libby President

References and other Documents

A DVD with pictures of the Scotchman area

Google Map #1, for understanding picture taking location

Maps of the Scotchman Peaks area with areas identified

The Brewster Mountain Goat Ungulate Winter Range Report 2003

The USGS Seasonal Distribution and Aerial Surveys of Mountain Goats 2011

The Winter Wildlife map by MTFWP, and associated Metadata documentation

Google Maps #2,3, identifying the heavily managed units in the Scotchman Area

Map #4, provided by KNF identifying the Scotchman Peak boundary (current & Proposed) with some past fire & management activity.

A western States map with percent of Federal land

Troy and Libby Snowmobile Club supporting members (200 total)

Supplemental information from collaboration efforts in 2006 (E-mails, documents)

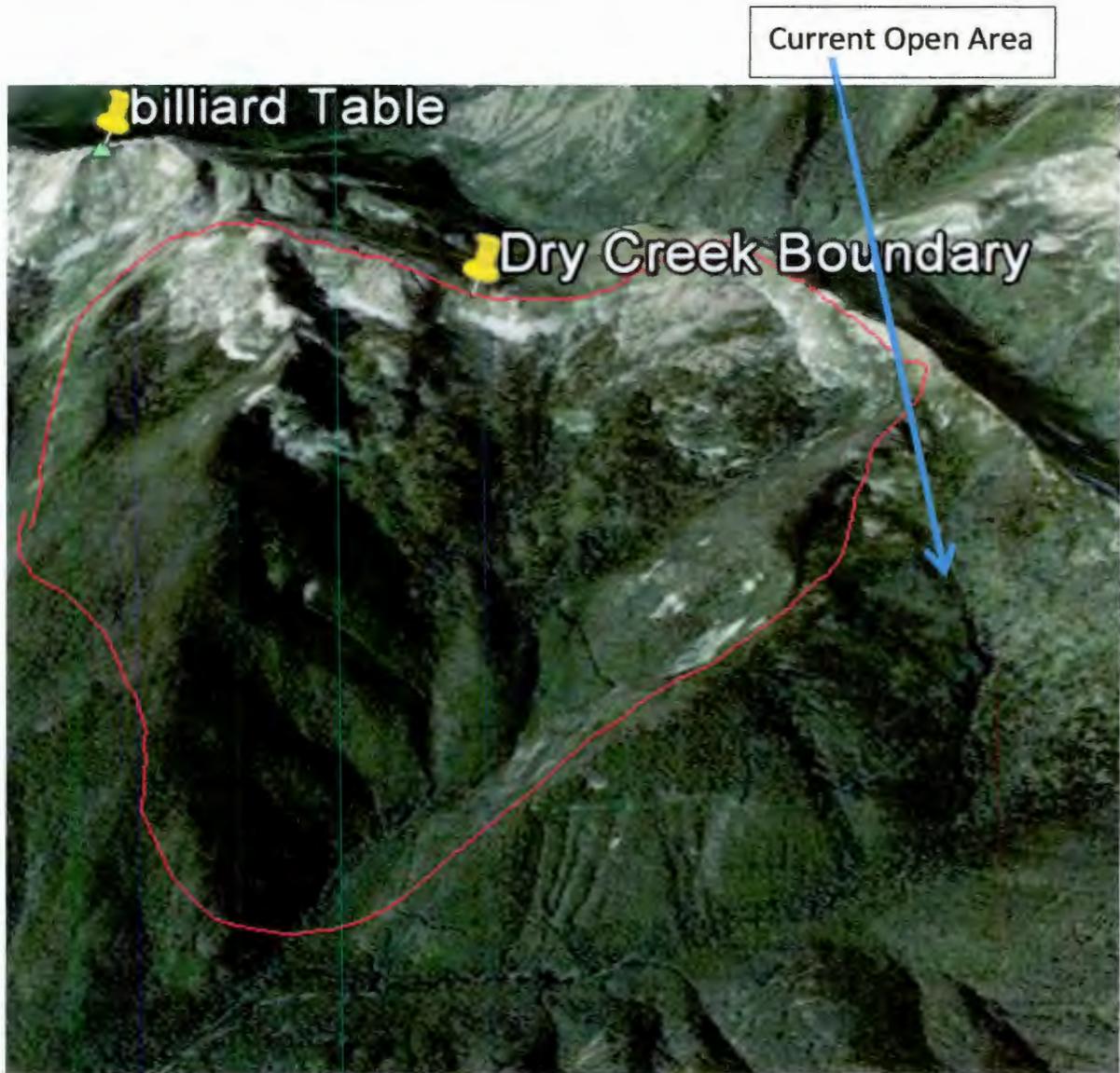
I have no access to the Mountain Goat Report from Gale Joslin in 1980 but have identified the page numbers, etc. for reference to this study.



This screen shot from Google Earth shows a heavily managed area that is now included in the Alternative B Modified, Scotchman Peaks Proposed Wilderness. Since there can be this sort of past activity included in Proposed Wilderness, then changing the boundary for our winter use area as identified on the map submitted to the IPNF, to **Primitive**, allowing Winter Motorized use, can also be allowed, since it has occurred since the 1987 plan, (the last 25 years). Our presence leaves no trace. There has been no conflict with other users, no wildlife displacement, and no sign of our presence once the snow has melted. No study has shown that our presence has been a detriment to the wilderness qualities. In comparison, current use does leave a trace, past logging, managed hiking trails, and horseback use, all have an impact on the proposed wilderness. There is a note attached to the included Scotchman Area Map identifying this area.



This Boundary change removed this portion & more from the Scotchman Peaks PW. Since a change can be made here, it can be made in the other areas we have identified in both forest plans. Changing the boundaries and identifying the IPNF side with a Primitive Designation will still protect the wilderness qualities. The KNF side can be identified as 5C Winter Motorized use or MA3 Scenic, both are IRA designations. There is a note attached to the Scotchman Area Map, identifying this area.



This screen shot from Google Earth shows the boundary that has changed since the 87 plan. The area in red was removed from winter motorized use, and included in the Scotchman Peaks PW. No explanation was given for this change that has eliminated this high elevation recreation area. We would like to see this area returned to the 87 plan boundary. The current open area is identified on the right. There is a note attached to the included Scotchman Area Map, identifying this area.



Past management activity in Spruce Lakes & Cheer Creek

The KNF realized the importance of Winter Motorized Recreation and removed the tops of the mountains/ridgelines that were included in the KNF portion of the Scotchman Peaks Proposed Wilderness. As you can see there was heavy management activity in these 3 areas, (the green portion). The ridge line offers the recreational opportunities winter motorized users enjoy. This is comparable to what a ski area would want for their users. The opportunity to enjoy the open space afforded by the snow covered rocky areas and those areas just preceding them. Unfortunately the IPNF closed the other side of this ridge line that had been open since the 1987 Plan (25 years). The SPPW is in 2 states, and both forests have jurisdiction in each. This change suggests very little collaboration on the Scotchman Peaks Proposed Wilderness by the IPNF & KNF regarding the Winter Motorized use. There is a note attached to the included Scotchman Area Map, identifying this area.