

February 08,2016

RE: Objections to the, Alternative D, St Joe Travel Plan Draft Decision Notice and FONSI – St Joe Ranger District, Idaho Panhandle National Forests.

Dear Reviewing Officer:

Objector Dwight H Clift files this objection to the Draft Decision Notice and Finding of No Significant Impact (Draft DN and FONSI) for the St Joe Travel Management Plan, dated January of 2016. Matthew A. Davis, District Ranger, St Joe Ranger District, Idaho Panhandle National Forests, Responsible Official.

Objector is a retired Forest Service employee having dedicated thirty four years to the Forest Service. The objector has hunted the particular area of concern for over forty years which has afforded him a comprehensive familiarity of the area, geography and wildlife habitat of the area. The objector has filed timely comments on the first Draft Environmental Assessment for the St Joe Travel Plan and scoping comments. Objector incorporates these comments into this objection.

SPECIFIC OBJECTION:

Re-designation of Turner Creek Trail 191 from “Open STM” to “seasonal STM”.

The decision for this designation is flawed in that the decision is based on assumptions and suppositions that are not supported by fact. The following objections will pertain specifically to Turner Trail 191.

Under **Purpose and Need** the **DN** addresses “the potential for wildlife harassment by considering elk security, mortality risk, habitat avoidance and displacement, and disruption of wildlife linkage/movement”. These issues are the premise of “seasonal designations will be used to minimize effects to wildlife security areas”. No evidence is brought forth to display or support that there is a problem in this regard under the present designation of “open to STM” use of this trail. Since no factual verification of use, type of use, nor impacts to wildlife are presented the Forest Service presents the supposition that since the trail is open to motorized use there must be an unacceptable impact on elk security. These issues are addressed in the “wildlife analysis”; however conclusions of studies done elsewhere are generically applied to this analysis and resultant EA as supporting justification for the proposed change in designation. These studies should not be referenced as they were done through documentation of actual site specific observations as to use, types of use, amount of use, terrain and cover, as well as actual direct impacts. The wildlife analysis and resultant EA are not based on actual site specific observations nor does the Forest Service have any such documentation on which to base this

decision. In short the Forest Service is proposing to fix a problem for which it has no factual evidence available that supports the supposition that wildlife security is being unacceptably compromised by motorized use of this trail during hunting season.

By generically applying the results of studies done under dissimilar circumstances without applying verified data the Forest Service could essentially fabricate just cause to exclude motorized use of any trail within the forest.

The DN also states that they worked extensively with a **focus group** in reaching “common ground”. As the objector I can point out that this group emphasis was primarily trails in which they have a vested interest for their particular use and it was left it to the Forest Service to designate management direction of all others. The broader spectrum of users who submitted comments were not given due consideration.

Furthermore if motorized use of Trail 191 during hunting season were creating unacceptable impacts to elk security such as excessive harvest “mortality risk” the Idaho Department of Fish and Game would have addressed this concern, it is they who have responsibility to regulate harvest numbers not the Forest Service. Unlike the Forest Service the objector is witness to the fact that motorized use of this trail during hunting season has not resulted in increased harvests of big game animals in the area and any decline in elk numbers for the entire ST Joe area can be attributed to introduction of the grey wolf (Idaho Fish and Game).

In summary the Forest Service EA has not presented supportable cause for changing the Turner Creek Trail 191 from its present designation of “open STM” to “seasonal STM” and the change of designation is based solely on flawed hypotheses and bias within the Forest Service.

As the objector I sincerely hope that as the reviewing officer you can see that there is no credible science presented to support a decision to re-designate Trail 191 from “Open STM” to “Seasonal STM” and this trail will remain under its present designation.

Please incorporate the attached letter of comment dated September 01, 2015 in further support of my objection.

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