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November 23, 2013

USDA Forest Service
Objection Reviewing Officer
EMC, RPC-6th Floor
Attn: Judicial and Administrative Reviews
1601 N. Kent St
Arlington, VA 22209
Submitted via U.S. Mail and via E-mail to: objections-chief@fs.fed.us

Re: **Final Environmental Impact Statements and
Revised Land Management Plans
Draft Records of Decision
Idaho Panhandle National Forests and Kootenai National Forest**

Dear Reviewing Officer:

This is in response to the September 20, 2013 letters from the Idaho Panhandle National Forests and the Kootenai National Forest regarding the Final Environmental Impact Statements, Revised Land Management Plans, and Records of Decision for the Idaho Panhandle National Forests and the Kootenai National Forest. As directed for this pre-decisional review process (objection process) the following information is included:

The objector's contact information is set forth above.

The objector's signature is set forth on the submittal by U.S. Mail and indicated after the /s/ symbol on the submittal by electronic mail.

The lead objector is John Finney, in an individual capacity and also the access chair of the Sandpoint Winter Riders, Inc. snowmobile club, a member of the Idaho State Snowmobile Association, and as chair of the East Bonner County Snowmobile Advisory Committee.

Name of plan revisions being objected to and the name and title of the responsible officer:

Idaho Panhandle National Forests – Faye Krueger, Northern Regional Forester
Kootenai National Forest - Faye Krueger, Northern Regional Forester

Enclosed/Attached is a true and correct copy of my Comments letter dated May 4, 2012 (12 pages total) submitted during the comment period to both the IPNF and KNF.

Please consider the following issues and parts of the plan to which the objections apply, the statements explaining the objection and suggestions for improving the decision, and the link to the prior substantive comments (demonstrated by the enclosure/ attachments):

On The Ground Changes:

The FEIS, the Revised Land Management Plan, and the draft Record of Decision for each forest will have specific on the ground effects not subjected to proper analysis and public input. For example and of utmost concern is that under the current existing 1987 IPNF forest plan and existing IPNF travel management plan, there is no restriction to over-the-snow vehicles (winter motorized recreation) in recommended wilderness (MA1b). Over-the-snow vehicle use is and has been prevalent in these areas for decades without any adverse effect to the management of the areas "to preserve their wilderness characteristics." Under the revised forest plan documents, MA1b identifies winter motorized as generally not suitable and as specifically prohibited. This has an undeniable specific on the ground effect and a change in travel management.

The objections set forth below regarding specific portions of the IPNF map will identify the existing over-the-snow recreation that exists which would violate the new policy set forth in the plan for MA1b in the Scotchman Peak area of the Pend Oreille GA and the portion of the Selkirk Crest in the Kootenai GA which has been lumped into the Long Canyon/Parker area.

In addition, on the Kootenai National Forest, the MA5a Backcountry – Non-motorized designation similarly makes on the ground changes to existing snowmobile use and/or would pre-determine a decision in the future for travel management pursuant to the revised plan. To compare, the IPNF only uses MA5 Backcountry as a designation, which does not pre-determine the suitability of motorized use. The KNF uses MA5a, MA5b, and MA5c to predetermine suitability without doing actual specific travel management planning or process.

The objections set forth below regarding specific portions of the KNF map will identify the existing over-the-snow recreation that exists and which needs approval and authorization in the plan.

These MA designations on both the IPNF and KNF (MA1b, MA5a, MA5b, MA5c) are site specific decisions made without adequate NEPA or public process. In addition, such restrictions are contrary to the Idaho Roadless Rule.

Idaho Panhandle National Forests Alternative B Modified Map And Plan Specific Proposals and Rational:

All GAs

Proposal: Change all MA1b Recommended Wilderness to MA1e Primitive Lands.

Congress in designating Wilderness Study Areas has allowed/approved existing motorized summer and winter use, as well as mechanical tools and mechanized uses. These uses have been found to not detract from possible future inclusion as Designated Wilderness. There is no place in the management plan for de facto wilderness. Unless Congressionally designated as Wilderness, management should be based upon multiple use, with site specific decisions made at the travel management plan level, not the forest plan level. Alternatively, the plans should allow for and approve the existing motorized summer and winter use, as well as mechanical tools and mechanized uses and maintenance.

Lower Kootenai GA

Proposal: Change MA1b "Selkirk" name to "Long Canyon/Parker" and change the South boundary for MA1b Recommended Wilderness for "Long Canyon/Parker" (on the map "Selkirk") to match the existing Travel Management Plan.

The 1987 plan did not have a Long Canyon/Parker proposed wilderness. There was proposed wilderness for the "Selkirk Crest", the northern portions of which ran partially into the Long Canyon/Parker area. At some point the Long Canyon/Parker area was closed to all motorized use without any public comment or process. Although closed to motorized use, there has been significant mechanized use (mountain bikes) and associated mechanical trail maintenance. The western and southern two-thirds of the Selkirk Crest are now proposed as MA5 Backcountry or MA1e Primitive Lands. Only a small portion of the Selkirk Crest is actually in the Long Canyon/Parker area. It is necessary to appropriately designate an area to aid in management on the ground and education of the recreating public. Call it what it is, the "Long Canyon/Parker" recommended wilderness. Using the designation causes confusion with the area known as the Selkirk Crest.

Also, the south boundary of the Long Canyon/Parker Recommended Wilderness should match the existing Travel Management Plan with Long Canyon Pass being the southern boundary for the MA1b designation which is located in Section 30, T63N, R2W. The portion of the Selkirk Crest lying south of that location should be MA1e or MA5, consistent with the remainder of the Selkirk Crest, and particularly to recognize the existing motorized uses, mechanized uses, and maintenance operations. It does not foster public awareness or consistent management to have the portion of the Selkirk Crest from Long Canyon Pass, south to the Sandpoint Ranger District as MA1b, and then MA1e Primitive Lands from there south. Also the portion of the Selkirk Crest lying west of Long Canyon is MA5. It is only logical to also change that center portion that connects the areas to recognize existing motorized and mechanized uses, for public education, and for consistent management and maintenance on the ground.

I recognize that the MA1e designation on the Sandpoint Ranger District and the MA1b designation on the Bonners Ferry Ranger District was an attempt to find a workable middle ground by the USFS for the future management of the "Selkirk

Crest.” Notwithstanding the comments above, the portion of the Selkirk Crest designated as MA1e should remain MA1e to allow for the long standing historical snowmobile use and other motorized and mechanical uses of this area. The area designated as MA1e should not be changed to MA1b recommended wilderness for any reason.

Proposal: Change Northwest Peak MA3 Special Interest Area to MA5.

The Northwest Peaks scenic area on both the IPNF and the KNF receives existing motorized winter use. Whether categorized as MA3 or not, winter motorize use should be allowed.

Proposal: Change MA4a Research Natural Area **suitability to include Motorized – Winter.**

The MA4a near the West Fork cabin and near Boulder Mountain (Hunt Girl) each receive existing motorized winter use, which does not detract from the areas. The current Travel Management Plan has allowed that use and it should be able to continue, until or unless a specific on the ground decision is to be made.

Pend Oreille GA

Proposal: **Change MA1b Recommended Wilderness boundary on the north end of "Scotchman Peaks" to MA5**

The portions of the Scotchman Peak recommended wilderness lying in T29N, R35W, Sections 11, 12, 13, 14, 23, & 24, and in T29N, R34W, Section 19 and in T57N, R3E, Sections 15, 22, & 27 (the Twin Peaks, Char Creek, Thunder Creek areas) receive existing Motorized – Winter uses. An easily identifiable location on the ground for management and public education for the north boundary of the recommended wilderness is East Fork Creek in that location. This matches up with the existing Motorized – Winter use in the area on and from the KNF. The area has a large volume of use from the KNF into this portion of the IPNF. From the IPNF this area is a destination for advanced snowmobilers and snowbikers. The opportunity to ride in this type of terrain is needed. The proposed middle ground as to the recommended wilderness boundary by the USFS should be tweaked in this area to address the actual on the ground use.

*** Please refer to the maps attached to the comment letter for boundary changes and MA designations requested.**

Proposal: Change MA1e Primitive Lands east of Pack River and West of Roman Nose Divide to MA5 Backcountry.

The area is more appropriately MA5, which includes Motorized – Summer as generally suitable, with specific on the ground decisions made in Travel Management Planning.

Proposal: Change MA1e Primitive Lands boundary at south end to correspond to current Travel Management Plan boundary.

This allows for a buffer between Jeru Loop for Motorized – Summer use and better meets on the ground conditions.

Priest GA

Proposal: Change all MA1b Recommended Wilderness Salmo Priest to MA1e Primitive Lands or MA5 Backcountry.

Congress in designating the Salmo Priest Wilderness could have included this area as legally designated wilderness, but did not. There is no place in the management plan for de facto wilderness. Unless Congressionally designated as Wilderness, management should be based upon multiple use, with decisions made at the travel management plan level, not the forest plan level.

Proposal: Change MA4a Research Natural Area **suitability to include Motorized – Winter**.

The MA4a near and at Gisborne Ridge receives existing motorized winter use, which does not detract from the areas. The current Travel Management Plan has allowed that use and it should be able to continue, until or unless a specific on the ground decision is to be made.

Kootenai National Forest Alternative B Modified Map And Plan Specific Proposals and Rational:

All GAs

Proposal: Combine MA5a, MA5b, and MA5c into a single MA5 Backcountry.

The level of direction needed in the Forest Plan does not support making on the ground decisions by lines on a plan map. Travel management planning is the appropriate level at which to make decisions as to actual motorized (summer or winter) and non-motorized use. A predisposed outcome is inappropriate.

Yaak GA

Proposal: Change Northwest Peak MA3 Special Interest Area to MA5.

The Northwest Peaks scenic area on both the IPNF and the KNF receives existing motorized winter use. Categorizing it as MA3 provides that Motorized – Winter is not generally suitable.

Proposal: Change all MA5a to MA5c.

Several of the MA5a designations, particularly along the border of the IPNF and KNF receive existing snowmobile use from both the Idaho and Montana sides. This needs to be maintained and continued.

Bull GA

Proposal: **Change all or significant portions of MA5a to MA5c.**

Several of the MA5a designations, particularly along the border of the IPNF and KNF receive existing snowmobile use from both the Idaho and Montana sides. Of most particular concern is the area consisting of **Goat Creek, Lake Estelle, Lost Creek, Glad Creek, Lafoe Mountain, Benning Mountain, Rattle Mountain; * See attached maps. This is a very popular and well used area from the IPNF side and this use should be allowed to continue.**

Clark GA

Proposal: Change MA5a south of road 322 to MA5c.

The area along the border from the road south to at least 93 Mile Lake has received historic snowmobile use from both the Montana and the Idaho side of the border. The forest plan level is not the appropriate level to make site specific decisions. A designation as MA5a would purportedly preclude snowmobiling without any site specific analysis or comment. * **See the attached map.**

Tobacco GA

Proposal: Change the Generally Suitable Table for MA3 around the Ten Lakes Scenic Area to provide for Motorized – Winter.

This area receives snowmobile use and that should not change based upon the forest plan level mapping and table of Generally Suitable Management Activities.

Conclusion:

I request to meet to discuss the issues raised in this objection. In addition, I request the ability to participate in each of the objection proceedings as an interested person.

I look forward to hearing from you.

Very truly yours,

/s/ John A. Finney

Enclosures/Attachments: 12 pages