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Friends of Scotchman Peaks Wilderness

FSPW
PO Box 2061
Sandpoint, ID 83864

Board and Staff

Phil Hough
Exec Director
(208) 946-9127

Doug Ferrell
Chairman
(406) 827-4341

Carol Jenkins
Secretary
(208) 265-9204

Jacob Styer
Treasurer
(208)-265-7206

Neil Wimberley
East Bonner County
Director
(208) 264-5379

Bill Martin
Board Member
(406) 295-5258

Will Valentine
Board member
(208) 255-1114

Sandy Compton
Program Coordinator
(208)-290-1281

Molly Kieran
Lincoln County
Coordinator
(406) 293-2934

Kristen Nowicki
Projects Coordinator
(208) 627-2448

Nov 25th, 2013

USDA Forest Service
Objections Reviewing Officer
EMC, RPC-6th Floor
Attention Judicial and Administrative Reviews
1601 N Kent St
Arlington, VA 22209

Via email to: objections-chief@fs.fed.us

Responsible Official:
Faye Krueger
Regional Forester, U.S Forest Service Northern Region

Subject: *Objection to Revised Land Management Plan for the Kootenai National Forest*

Dear Ms. Krueger:

I would first like to thank you for the opportunity that the "Objection Period" provides to address concerns we have about the Kootenai National Forest's Revised Land Management Plan. Regardless of outcome, we believe that dialogue and communication can both lead to improvements in the plan as well as help move us all towards a better public understanding of, and support for, the final forest plan.

The **Friends of Scotchman Peaks Wilderness** is a group of concerned residents from Northern Idaho and Northwestern Montana who believe that the 88,000-acre Scotchman Peaks Roadless area deserves permanent protection as wilderness. Since 2005, we have engaged in education, outreach, advocacy and stewardship, building community support for the Scotchmans.

We seek to develop a community consensus where wilderness protection for the Scotchmans is valued highly and sought after by a broad spectrum of the public. As of Nov 2013, we have over 4,500 supporters, of which over 80% live within just a couple hours' drive of the Scotchmans, testimony to the broad support for wilderness for this special area.

On behalf of the board, staff and 4,500 supporters of the Friends of Scotchman Peaks Wilderness, I wish to submit the following objection.

STATEMENT OF ISSUE/OBJECTION

We, the Friends of Scotchman Peaks Wilderness (FSPW), appreciate the generally thoughtful approach the Revised Land Management Plan takes in Land Management Allocations. Overall, we believe that both the Kootenai and Idaho Panhandle National Forests demonstrate in these revised plans recognition of the wilderness qualities of the Scotchman Peaks Roadless area. The allocations made to the Scotchman Peaks Recommended Wilderness provide a strong basis for preserving the wilderness value of this special place. We understand these plans must balance competing interests, fulfill many needs and address many values. There is one place in which we would respectfully suggest that the plan could be improved upon, an area in which the wilderness character of the Scotchman Peaks would be better protected and in which there would be no negative impact on other needs, stakeholders or interests. Let's look at Blue Creek.

We believe that the Revised Land Management Plan (RLMP) for the Kootenai National Forest (KNF) makes a poor and unsubstantiated choice in changing the boundary of the Scotchman Peaks Recommended Wilderness (SPRW) in the vicinity of the East Fork of Blue Creek (on the southern end of the Scotchman Peaks road-less area near the boundary of the Kootenai and Idaho Panhandle National forests).

This area is currently managed under the 1987 KNF Land Management Plan, which established a boundary for the SPRW closer to the IRA boundary. The RLMP moves this boundary substantially back from the IRA boundary with no discernable benefit.

Please see Appendix 2, 3 and 4 for maps which should be helpful on this topic. Appendix 3 is an overview of the Scotchman Peaks Recommended Wilderness (in the RLMP), Appendix 4 is a close up of the vicinity of Blue Creek (From Alternative B of the RLMP) and Appendix 2 is a Map comparing the boundaries for the SPRW as they are under the 1987 plan and as they are under the proposed by the RLMP with our suggestions.

We do not believe that anything has changed on the ground since 1987 in regard to the wilderness character or management needs of this part of the Scotchman Peaks Roadless area. There are no conflicting needs, uses or stakeholders which would benefit from the boundary change contained in the RLMP. Moving this boundary would change the area to 5a (non-motorized backcountry), which does not carry a recommendation for wilderness. This action would not acknowledge the value of the wilderness character which we believe defines this area and which we believe is the most appropriate management option for this area.

We also believe that the Environmental Impact Statement, its appendices and the underlying Wilderness Assessment do not provide adequate site specific information to understand the reasoning behind this proposed change or that they adequately address the impacts from this proposed change. The process by which this decision was made appears to be incomplete and/or flawed. The forest plan documentation (EIS) lacks any site-specific analysis and does not demonstrate sufficient public input for making such a major change.

EXPLANATION OF OBJECTION AND SUGGESTION FOR IMPROVEMENT

In the RLMP, on page 33, in the section “Human Uses and Designations of the Forest”, **GOAL-AR-01** states, in part: *“Manage large areas on the Forest that accommodate opportunities for solitude, and self-reliance. Provide traditional recreational opportunities such as hunting, fishing, gathering products and hiking.....”*

We believe that the best uses of the area of the Scotchman Peaks IRA in the vicinity of East Fork Blue Creek would be to continue, and possibly expand, its management as Recommended Wilderness. This option would move the forest plan towards achieving GOAL-AR-01. Relegating this area to “5a” does not seem to further any other goal contained in the RLMP.

We provided extensive comments in a letter submitted on May 6th, 2012 as part of the review and comment period on the draft RLMP (See Appendix 1). Rather than repeat the full text of that letter here, I would refer you to Appendix 1 at the end of this letter for our most basic comments, suggestions and rationale. I would like to take this opportunity to expand some on the information in that letter.

One of our concerns is that despite what we believe were very reasonable, practical and positive suggestions, based in on-the-ground knowledge and experience, the response to our comments about Blue Creek (in the RLMP EIS Appendices document on page 33) did not provide any substantive rationale for the change. The response found in that document: “Under the Revised Forrest Plan, the boundary for the Scotchman Peaks Recommended Wilderness area was drawn to be identifiable on the ground and manageable.”

We appreciate the goal of clearly defined boundaries where and when they are helpful in reducing conflicts. In this particular case we believe that if this is the sole reason for the proposed change, that the change is both unnecessary and not appropriate.

There are no conflicting uses in this area which would require this level of topographical distinction. There are no mechanized or motorized recreations interests in this part of the road-less area – there is no mountain biking, off highway vehicle use or snowmobiling on these slopes. And since the area would be managed as “5a” Back Country Non-Motorized then the future direction for this area would not include any motorized use. The decision of where to draw the boundary (inside the IRA) between Recommended Wilderness and 5a should depend on the wilderness character, a factor that the RLMP does not seem to adequately address. Indeed if there is a concern of conflict between motorized and non-motorized use – it would be at the IRA boundary outside of which the KNF lands are managed as “General Forest”. This would be best addressed with signage. However, we do not know of any likely conflict which would make even this necessary.

While it might allow some so-called “active management” or mineral exploration, the 5a Backcountry Non-motorized management option has been applied in areas where neither of these uses is envisioned. If for some reason, in the future, road building, timber or mining activities where to be conducted they would all require precise GIS coordinates, again rendering the perceived need for a topographical feature secondary to the attributes of the area. Once again, we would suggest the attributes of far greatest value are the wilderness character of the area.

Our conclusion is that there is no actual need for a boundary in this area that is “identifiable on the ground.” The planning record to our knowledge does not substantiate the need for this type of boundary in this area.

If this need is valid, again, we would suggest that the EIS contain more substantive information supporting this need. One of our concerns is the lack of this information.

In the EIS, Chapter 3 “Affected Environment and Environmental Consequences”, section “Designated Wilderness, Wilderness Study Area, Recommended Wilderness” provides a very short summary of the consequences of the decisions which allocated lands to recommended wilderness. In fact, there is no site specific information pertaining to the decisions regarding changing the boundaries of the Scotchman Peaks recommended wilderness area in the vicinity of Blue Creek.

The Wilderness Evaluation for the Scotchman Peaks Roadless Area, found In Appendix C on page 192 – 193 of the Appendices to the EIS, is short (5 paragraphs) and very general in nature, containing no site specific details. The summary of Environmental Consequences by Alternative found on page 193-194 simply notes that the “Boundary is moved to a more identifiable location on ridge in Blue Creek, Billiard Table Mountain area.” There is no discussion of the consequences of this action.

If we assume for the moment that the need does exist for a boundary which is “identifiable on the ground”, then we would suggest the RLMP still does not meet this need. Here is why. While an administrator looking at a topographical map may draw a boundary along what they perceive to be a ridgeline, we would suggest that a walk on the ground would demonstrate the ridgeline chosen is actually not that prominent; in fact it is a much less discernable feature on the ground than the base of the steep slopes where the recommended wilderness boundaries established by the 1987 currently exist.

There are parts of the IRA boundary at mid-slope or adjacent to patented mine claims (which are no longer active). In these areas, this issue would be best resolved if the RLMP adopted the desired condition found on page 36, under Lands and Special Uses. Here, desired condition **FW-DC-LND-01** states, in part: “...Boundaries are surveyed and clearly posted and occupancy trespass is reduced.” As we have stated above there are no conflicting uses in this area which would require a better boundary definition than currently exists and no conceivable future uses which would not be remedied by following FW-DC-LND-01.

CONCLUSION – OUR RECOMMENDATIONS

We believe that there is no need or benefit to reducing the area recommended for Wilderness in this vicinity by the 1987 Land Management Plan. We could understand and support the RLMP if the boundary remains where it currently is under the 1987 management guidelines. However, we would suggest that the best boundary in this vicinity would actually be the IRA boundary, as it is already a legally surveyed boundary. If there is a need to mark this IRA boundary on the ground, that could be done and it would be more efficient to make distinction in use once rather than twice. If there is a desire to look at a “better” geographical boundary we would suggest that the base of the steep slopes provides a very identifiable

topographical feature in some areas and that contour lines are more than sufficient in other areas. See Appendix 2 for a map detailing these boundaries, observations and suggestions.

PREVIOUS COMMENTS ON TOPIC

During the Kootenai Forest Plan revision process, on May 6th, 2012, the Friends of Scotchman Peaks Wilderness submitted a letter providing comments on a number of substantive comments. Our detailed comments regarding the boundary of the proposed wilderness in the vicinity of Blue Creek begin on page 15 and continue through page 17 of this letter. In addition, we provided a map of the Blue Creek area on page 21 of this letter showing current management, the proposed action and our recommendation. For convenience, I have extracted these sections and present them here as Appendices 1 and 2 for your consideration.

We look forward to having further discussion on this issue during the next phase of the objections process and thank you again for the opportunity to engage in this dialogue.

Respectfully Submitted,



Philip Hough
Executive Director
Friends of Scotchman Peaks Wilderness
PO Box 2061
Sandpoint., ID 83864

Cell/Work: 208-946-9172
Email: phil@scotchmanpeaks.org

Appendix 1

FSPW Comments on Blue Creek Area From pages 15-17 of FSPW Letter May 2012

BLUE CREEK

"In the vicinity of East Fork Blue Creek, alternatives B and C of the current DLMP remove significant wilderness recommendations currently in place. We cannot find that these changes are justified anywhere in the plan or the wilderness assessments conducted as the basis for the plan. This area needs to be returned to recommended wilderness. And the remaining portion of the IRA in this vicinity not recommended in 1987 needs to be considered for inclusion in the final draft as recommended wilderness.

Conditions on the ground have not changed since 1987. The IRA in this areas remains free of roads. Natural disturbance has not changed the wilderness character of this area. In fact, our Rare Forest Carnivore Study over the winters of 2010-2011 and 2011-2012 turned up evidence of Fishers in this area. No uses conflicting with wilderness exist in the IRA. No other stakeholders have come forward to the best of our knowledge with a request for greater access to this area. The IRA is bounded in 2 places by non-active mining claims. Current and previous owners of these patented claims have continuously expressed interest in their development potential, not their mining potential. These claims were in place in 1987 when the original recommendations for wilderness were made.

Yet, alternative B and C move the recommended wilderness boundary to the top of the ridge, removing this potential protection from the valley's hillsides. Such actions are what gives rise to the critique that wilderness only protects "high elevation rock and ice". Yet, we believe that it is the forest service's goal to protect more than rock and ice. Here is an easy place to demonstrate the agency's commitment to protecting wilderness quality lands.

As noted earlier, the forest service's own assessment states that: "*warm moist western red cedar and western hemlock forests in north Idaho and northwest Montana*" as well as "*riparian types*" are under-represented (and would benefit from inclusion) in the National Wilderness Preservation System. Protecting more of the East Fork Blue Creek drainage as recommended wilderness would help to achieve this objective.

The West and East forks of Blue Creek, and most especially the land between the two, has a high level of botanical interest. The topography in this area creates conditions for special precipitation patterns which receive an abundance of moisture. The unique soil and mixed aged forest which includes some old growth retains a high level of moisture in the soil as well as generally humid conditions. The effect is that the Blue Creek area contains occurrences of very rare lichens, especially near the convergence of the two forks. Survey work done in the year 2000, as well as more recently, by University of Montana lichenologist Toby Spribille has turned up evidence of several rare lichens and the potential for many more species unique to Montana and Idaho, should more survey work be done. This area deserves the highest level of protection. In short the entire Scotchman Peaks IRA in this vicinity should be recommended for Wilderness.

At the open houses and other meeting in January and February introducing the forest plan, agency officials present were unable to clearly articulate the reasons for the proposed change in boundaries in this area.

One person was not sure (but guessed) that the boundary might have been redrawn to a more geographically definable boundary. To a certain point, we agree the advantages of geographically definable boundaries where lands adjacent to wilderness are being managed for mechanized recreation uses and where it would otherwise be hard to tell where the recreationist was in relation to wilderness.

Such reasoning simply does not “ring true” in the area around East Fork Blue Creek, for several reasons:

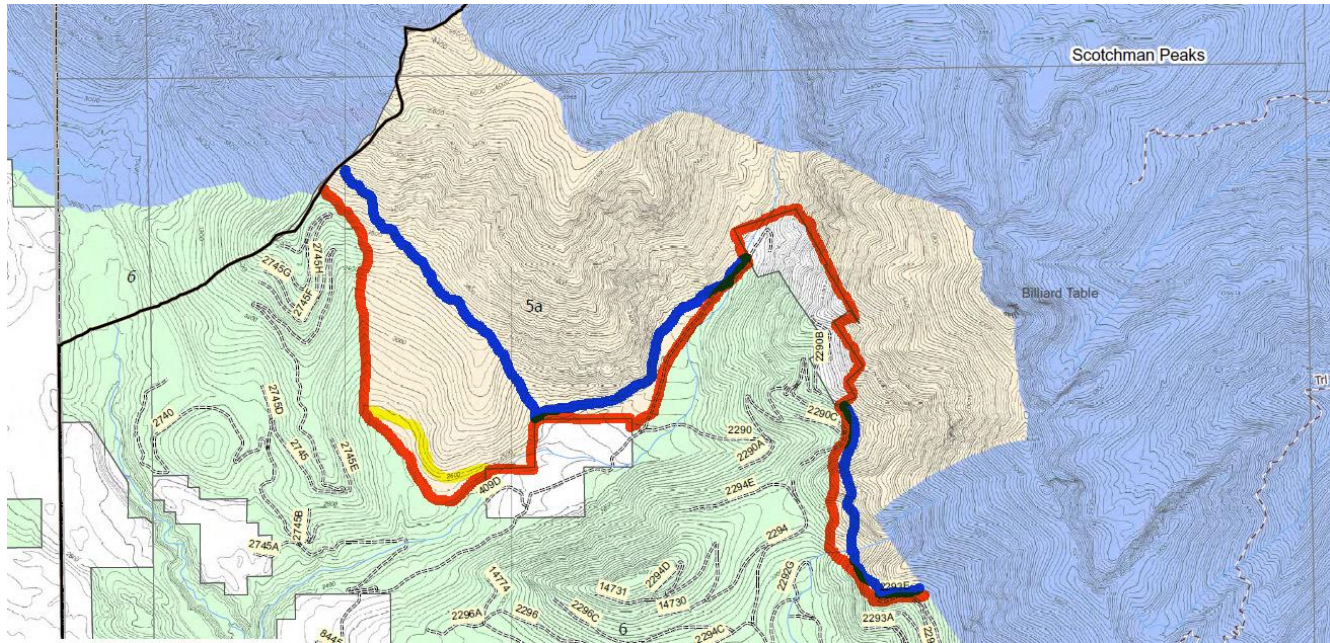
1. In Alt B and C the Scotchmans IRA lands adjacent to the new recommended wilderness boundary would be managed as 5a, non-motorized, so no such potential conflict or problem with recreationists identifying a recommended wilderness boundary would exist.
2. The boundary of the IRA would, of course, remain intact, so the concern, if any, would be incursions into the IRA from general forest or private property, regardless of where the recommended wilderness boundary were to be drawn; moving the recommended wilderness boundary to the top of the ridge would have no positive impact on this.
3. We see no evidence of interest by snowmobilers or OHV users in the surrounding general forest lands outside the IRA, so even the potential for incursion into the IRA is speculative at best.

At a minimum we would ask that the recommended wilderness boundary be returned to the location determined by the 1987 plan, as there appears to be no reason for removing protections from these lands. Furthermore, we would suggest that the boundary for the recommended wilderness be drawn to the edge of the IRA in this area. (See Map 3 in the appendix).

Along the southern boundary of the proposed Scotchman Peaks Wilderness area, the 1987 recommended wilderness boundary, in the vicinity of East Fork Blue Creek, would better incorporate warm moist western red cedar and western hemlock forests than either the current alternative B or C. We would recommend that the 1987 boundary in this vicinity be the baseline for the final plan with the additional parts of the IRA given serious consideration for inclusion in recommended wilderness.

The edge of the IRA offers very visible geographic boundaries along most all of its length (the east fork blue creek forest service road and the patented mining claims boundaries are clear. In the Southwest portion of this area, where the IRA is adjacent to General Forest, any active management conducted by the forest service would include detailed GIS data, ground truthed by surveys and GPS in which again, the boundary concern with regards to the IRA would already be a factor, made no more significant by recommending wilderness. Having said this, in many places a contour line can be used to define the geography and we would find it suitable to use a contour line a minimal way upslope – such a suggestion is to be found in the yellow line on our Map 3 include in the appendix.”

Appendix 2



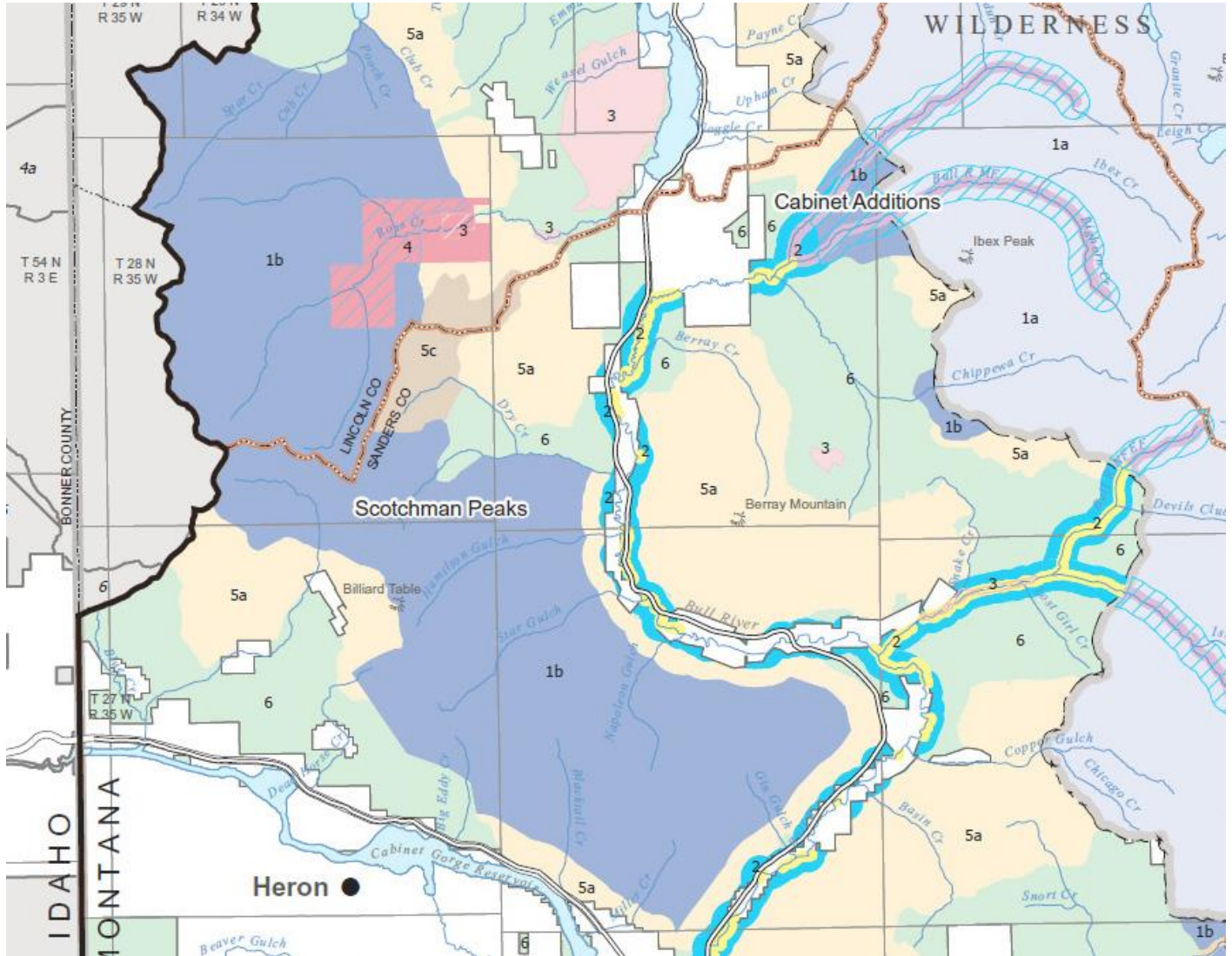
Tan Area = Marked 5a – Backcountry Non-Motorized

Note: the border between 5a and 6 is the boundary of the Scotchman Peaks IRA

Blue Line = the boundary for recommended wilderness in the 1987 plan currently in place.

Yellow Line – A geographically definable boundary based on contour.

Appendix 3



Appendix 4
Close up of Boundaries in the East Fork Blue Creek Area of the Scotchman Peaks

