

Selkirk Conservation Alliance
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February 25, 2019

Objection Reviewing Officer
USDA Forest Service
Northern Region
26 Fort Missoula Road
Missoula, MT 59804

re: Bog Creek Road Project

Dear Sir:

The Selkirk Conservation Alliance (SCA) has been an advocate for the environment of the Priest Lake/River watershed and Southern Selkirk Mountains for over 30 years. Previously SCA joined voices with a variety of organizations to express our concerns about this project. Please reference the comment letter authored by Marla Fox of WildEarth Guardians dated July 16, 2018. We are deeply concerned that the newly proposed alternative 3 will have a deleterious effect on grizzly bear and other cold climate species survival. We object to the reopening of the Bog Creek Road and to the redesignation of both Bog Creek and Blue Joe Creek roads to Administrative Open. We propose an alternative, to be called alternative 1a, which will allow CBP to fulfill its responsibilities for border security, cause minimal environmental disturbance, and yet be dramatically less expensive than the proposed alternative.

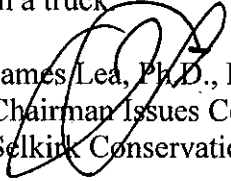
In their letter of Feb 6, 2013, CBP outlines the difficulty they have in fulfilling their mission in a timely fashion if an incident occurs in the eastern range of their jurisdiction. The Meteline Falls office is responsible for the border from the Stevens/Pend Oreille county line to a point 36 lineal miles east along the border. That eastern point is only 6 lineal miles from the Port Hill border crossing. Bog Creek road previously provided access from the Priest River to Kootenai River drainages but has been impassable for several years. Therefore when an incident occurs in the Kootenai watershed, agents from Meteline Falls must perform a near circumnavigation of the Southern Selkirk Mountains, a trip that requires many hours. Ironically this route requires Meteline Falls agents to pass within 250 yards of the headquarters of the Bonners Ferry CBP.

The USFS tends to parcel their forest units based upon clear cut physiographic features such as mountain ranges and drainages. In contrast the CBP jurisdictional regions appear to be arbitrary. The mandate that the Meteline Falls agents patrol the Kootenai drainage would appear to have been onerous. To reach the watershed divide between Priest and Kootenai River required CBP agents to drive 45 miles of mountainous gravel road compared to 31 miles for agents from

Bonnors Ferry. For the Metaline agents to reach the eastern limit of their jurisdiction would have required 72 miles of gravel road transit in contrast to 4 miles for agents from Bonners. This simple exercise in cartography demonstrates that even before the Bog Creek Rd wash out, it would have been more efficient for the Bonners Ferry CBP to respond to incidents in the Kootenai River drainage.

We, therefore, respectfully propose that the Spokane CBP shift enforcement of the Kootenai River watershed to the Bonners Ferry office. With this simple administrative action the Bog Creek Road would not be necessary to provide transit from the Priest to Kootenai watersheds. In addition road closure gymnastics would not be necessary to preserve the existing bear management units. The Spread Creek wash out would not need to be repaired for motorized vehicles, making the repair much less expensive. In fact, not repairing the wash out is highly desirable since it will reduce illegal motorized entry, which inevitably will occur if the road is rebuilt (please see comment letter of Harry Jageman, retired USFS biologist, from June 12, 2018). If the road is not rebuilt, no further action would need to be taken elsewhere.

SCA feels this solution is simple and economical yet allows CBP to fulfill its duties. It also will result in a minimum of disturbance to our grizzly bears and other species. If the goal of the CBP is to prevent smuggling and human trafficking, then the popular perception of a roadless grizzly wilderness will prove to be a greater deterrent to malefactors than the occasional border patrolman in a truck.



James Lea, Ph.D., M.D.
Chairman Issues Committee
Selkirk Conservation Alliance

June 12, 2018
1228 Ponderosa Drive
Moscow, Idaho 83843

Bog Creek Road EIS
P.O. Box 643
Flagstaff, Arizona 86002-0643

Dear Sirs:

I worked as a US Forest Service wildlife biologist on the Priest Lake District from 1983-1988 and arrived on the district shortly after the decision was made to close the Bog Creek road to motorized traffic. Prior to the closure the road was heavily utilized by locals as "backdoor" route into Canada and was considered one of the most important road closures for grizzly bear and caribou recovery in the Selkirk range. My understanding was that the route was often utilized as way for getting relatively cheap Canadian whiskey and other contraband across the border.

The closure was very controversial and initially there were numerous breaches of the gates that were placed to close the road. I suspect this illegal use likely continued until there was a major slide on the road in 2000-2001 and the road became impassable to all but the most determined users. The fact that the road is now grown over in numerous locations suggests that illegal use has declined over time due to the difficulty of motorized access along the route.

As suggested in the DEIS, Grizzly Bears consistently utilized recently burned areas in the old Trapper Creek burn and other areas near the Continental Mine. Several bears ended up being illegally killed during my tenure and in subsequent years following my departure from Priest Lake. Many of these poaching incidents were associated with the gated Bog Creek Road, and I was personally involved in the recovery of a radio collar (in Canada) from a bear thought to have been killed near Upper Priest Lake. Following the Bog Creek Road from Priest Lake and through the breached gate on the Priest Lake side, Idaho Fish and Game biologists and I found the cut-off radio collar deposited a short distance from the road along the route thought to have been taken by the poacher.

While I assume that the Border Patrol could use increased surveillance equipment and personnel to patrol the road, I do not believe the Forest Service has any more resources to monitor the road than I did as a District biologist back in the 1980's. In my mind, opening the road so that it can be used by full sized vehicles actually increases the likelihood that it will be utilized for poaching and other illegal activities.

A grown over road that is untravelable by a motorized vehicle is much less likely to be utilized as a route for illegal immigration than a poorly monitored remote route that is suitable for motorized travel.

Unless Customs and Border Patrol are willing to devote significant resources to monitoring this road once it is opened, I doubt that the intended purpose of reducing illegal immigration can be achieved. Opening the road will only serve to increase risks for listed species like the grizzly bear, mountain caribou, wolverine and lynx. It will encourage illegal use and increase the amount human activity along the road corridor.

I can see no reason why the border patrol needs to drive over the Selkirks, when access is available from both Priest Lake (on the West) and Bonners Ferry (on the East). Why can't an agent be assigned to the Priest Lake area if the risk is so great? It would seem more likely that you would be able to catch someone if have people on both ends of the road. Your idea that people can "blend in with legitimate activities" doesn't appear to be related to the fact of whether the road is open to motorized travel or not. Once people get off of the Bog Creek Road (which they can do quicker with a motorized vehicle) they can make this claim regardless of the road status.

Options for bringing the Blue-Grass Bear Management Unit up to standard are immaterial to the discussion regarding opening the Bog Creek Road to motorized use. The U.S. Forest Service is required to meet these standards by 2019 regardless of what happens to the Bog Creek Road, and opening of the road only contributes to more disturbances in the bear unit. If the road is opened, the Forest Service will be required to close additional roads to offset the losses of habitat associated with the Bog Creek road reconstruction.

In summary, I don't think your stated purpose and need for opening the Bog Creek Road holds much water. The current condition of an "untravelable" overgrown road is a much better deterrent to illegal activities than what would occur if the road is opened so that motorized travel is possible. The road would require constant surveillance if it is reconstructed and linking the opening of the road to need for additional road closures in the Blue-Grass Bear Unit is inappropriate.

Sincerely,

Harry R. Jageman

