

John & Christa Finney
3396 Selle Road
Sandpoint, Idaho 83864
Day: 208-263-7712

August 21, 2023

Kootenai National Forest
Attn: Over-snow Motorized Travel Plan
John Carlson, Planning Staff Officer
31374 US Highway 2
Libby, Montana 59923-3022
Submitted via project webpage comment link only

Re: Kootenai Over-Snow Motorized Use Travel Plan

Mr. Carlson:

Thank you for the opportunity to comment on the Kootenai National Forest Over-Snow Motorized Use Travel Plan scoping released July, 2023. I am an avid and lifelong over-snow vehicle user. I snowmobile throughout the western United States and Canada. I am a lifelong resident of Bonner County and I have continuously participated since the early 1990s in the U.S. Forest Service's management of over-snow vehicles throughout North Idaho and Western Montana, including various actions involving caribou, lynx, grizzly bear, road damage and repair projects, and snowmobile grooming and access. I am a strong advocate for multiple-use and access for all to use public lands. I have participated in the various Idaho Panhandle National Forests over-snow vehicle (OSV) planning efforts, which is after decades reaching its final decision and implementation this calendar year. I also participated fully in the Kootenai Idaho Panhandle Zone (KIPZ) Forest Plan revision process started in the early 2000s through adoption in 2015.

I make this comment in an individual capacity and also as the access chair of the Sandpoint Winter Riders, Inc. snowmobile club. I am also a member of the Idaho State Snowmobile Association and chair of the East Bonner County Snowmobile Advisory Committee.

In the Kaniksu Over-Snow Vehicle Use Designation Project on the Idaho Panhandle National Forests (IPNF), I participated in the North Idaho Working Group (NIWG) which brought together diverse interest groups and citizens. The group reached a consensus recommendation, with a single dissenting position. The recommendation was largely adopted by the IPNF (Kaniksu), and which with very slight modifications, is the action moving to implementation. The various interest groups in reaching the recommendation worked hard to understand the various wants and desires of and to provide for each specific interest. The groups each gave up aspects of their desired outcome to provide for a proposal that met the minimization criteria and other requirements of travel planning. The decision area for the Kaniksu plan shares the forest border with the Kootenai National Forest on the Three Rivers Ranger District and a portion of the Cabinet Ranger District.

Having participated in the long drawn out KIPZ Forest Plan revision process, I have specific information which directly bears on the Kootenai OSV travel planning. First, the announcement letter dated July 12, 2023 issued by the Forest Supervisor's Office indicates that the Forest is proposing to open 1,257,633 acres. This is a misstatement. I understand the Kootenai National Forest to consist of approximately 2,219,100 acres. To my knowledge there is not presently anywhere near 1,257,633 acres closed on the Kootenai to over-snow vehicle use. The process needs to correctly identify the current existing number of acres open to over-snow vehicle use (which is significantly greater than 1,257,633 acres). This is the existing condition. Then the process needs to identify the number of acres being proposed to be closed (which will end the existing access and use). This is the only way to properly identify the proposed action and collect data and information, receive comment and make a decision consistent with multiple-use management.

Next, the Draft Minimization Criteria Screening document, on page 4 states that the baseline started with is based upon the Kootenai National Forest Land Management Plan, excluding the areas identified as "unsuitable" in the plan by Management Area. This starting point is an error. Please find attached a copy of my November 13, 2013 Objection presented in the Forest Plan revision process (identified in the lower right hand corner as 14-13-00-0009) without its enclosure (resulting in 6 pages attached here). Please review on page 2 and on page 5 the portions marked regarding using MA5a, MA5b, and MA5c designations to make on the ground closures to over-snow vehicles. Next, please find attached the cover page to the APPENDICES Final Environmental Impact Statement for the Revised Land Management Plan Kootenai National Forest and pages 326 and 448 thereof. Page 326 is from Appendix G – Response to Public Comments and it identifies my letter as Unique LTR#/Number Coded as 295 where indicated. Page 448 of Appendix G sets forth Public Comment 264 (with my letter number 295 indicated parenthetically) and the Forest Service's Response. The Response provides that Forest Plan management areas do not close any existing or potential over-snow motorized use except in recommended wilderness (MA1b) and research natural areas (MA4) because those are the only areas that were analyzed in the decision making process. The response indicates that "No other routes or areas on the Forest will be closed to motorized access because of forest plan management direction, standards, or guidelines." To reiterate, in the Forest Plan process and adoption, there was no site specific analysis, public process, or decision made in adopting the 2015 Forest Plan that can be the basis for starting with the exclusion of over-snow vehicle use in MA5a (or MA2 or MA3). The blanket starting point exclusion of over-snow motorized vehicle use is contrary to the Forest Plan and the applicable laws and rules for this pending travel plan decision. The Draft Minimization Criteria Screening document must be started over recognizing that the MA designations, direction, standards, or guidelines are not grounds for closure to OSV use.

Therefore, the Scoping Packet and Preliminary Proposed Action Map needs revised and updated to correctly start by including all Mas and the existing condition. The various areas of existing OSV use that primarily originate from the IPNF (Kaniksu) have been ignored and proposed for closure. Those areas should be specified, added, and

provide for as open. These areas include Canuck/Spread Creek, Calder/Purdy/Willard, Mt. Pend Oreille/Callahan/Estelle/Smith, and Benning/Lafoe/Moose/Lost.

Next, there has been insufficient time to review the 130 pages of the Draft Minimization Criteria Screening document, particularly given the flawed "Step 4. Develop the Preliminary Proposed Action" as identified above. A correctly prepared preliminary proposed action needs developed, and then a sufficient public review period is appropriate and necessary.

Next, a general concern that effects the ability to meaningfully review and comment is that the Preliminary Proposed Action Map fails to meaningfully identify all the lands of the Kootenai National Forest. While the project Boundary (the entire KNF) is shown with a light grey line, the lands managed by the KNF which are proposed to be closed to OSV use are shown in white along with all the private and other governmentally managed property. Lands to be closed must be specifically identifiable. There are extremely large areas proposed to be closed which have no distinguishing map identifiers (whether MA1a, MA1B, MA4, MA5a MA5b, MA5c, MA6, or such). There are extremely large areas that are open to OSV use in the existing condition which are now proposed to be closed without any distinguishing map identifiers. This prevents the ability to review and provide timely specific analysis, review, and comments. A different map format needs to be used for a correctly prepared preliminary proposed action.

Next, a general concern that effects the ability to meaningfully review and comment is that the Preliminary Proposed Action Map in many areas appears to use section lines, rather than identifiable geographic features to have areas closed or open to OSV use. An OSV plan and map needs to provide users on the ground identifiable open and closed areas. Anything else fails to be useable, reasonable, or enforceable.

Next, the Minimization Criteria are used to minimize, not eliminate, avoid, or prohibit the items identified in the list of 4 objectives. Minimization itself is not a basis for closing OSV use. Minimization recognizes the multiple-use required of U.S. Forest Service managed public lands. The characterization that this plan will "open" the forest to OSV use when in actuality the existing lands are open (unless specifically closed) and this plan will close much of the existing open condition, shows an impermissible bias and predetermination to prevent multiple use by OSV.

Next, for specific on the ground comments, attached are a series of maps, labeled and described, with comments, as follows:

Map 1 (1 page) – the Kaniksu OSV Designation Project map for the pre-April 1 OSV use. The blue and green areas are the areas open to OSV use before the grizzly bear restrictions of April 1. The yellow areas are the areas closed to OSV use year round.

Comment: The plan on the Kootenai National Forest should take into account the plan on the Kaniksu portion of the IPNF and the long standing existing uses of the Kootenai

from the Kaniksu. Consistent adjacent Forest planning and mapping is fundamental to national standards and multiple-use.

- Map 2 (1 page) – this is the portion of the Kaniksu map adjacent to the Three Rivers Ranger District from the Canadian border at the north to approximately Highway 2.
- Map 3 (1 page) – this is the portion of the Kootenai Three Rivers Ranger District KNF map from the Canadian border at the north to approximately Highway 2.
- Map 4 (1 page) – this is the portion of the Kootenai National Forest Land Management Plan Map of the approximate same area.

Comment: There are significant areas that have been long accessed and used by over-snow vehicles from the IPNF (Kaniksu) which are proposed to be closed on the Kootenai. There is a groomed route for Canuck Basin which hooks into the Spread Creek road and area and upper Hellroaring Creek. There is significant OSV use in the Spread Creek, Hellroaring Creek, Northwest Peaks, Davis Mountain, and Rock Candy Mountain areas from both the IPNF and the Kootenai that should be recognized and preserved in this OSV plan. The Preliminary Proposed Action Map would basically eliminate the vast majority of the existing and desired riding areas. I have consistently used OSVs in these areas since the 1990s. In regards to the minimization criteria, I have not observed any conduct that is identified in the list of 4 objectives. There has not been any damage, harassment, disruption, or conflicts in these areas. There are no documented impacts to justify closure or other restrictions to OSVs. These areas should remain open to provide desired public over-snow vehicle use and enjoyment.

- Map 5 (1 page) – this is the portion of the Kaniksu map adjacent to the Three Rivers Ranger District from Highway 2 at the north to approximately Drift Peak (near the north end of the Scotchmans).
- Map 6 (1 page) – this is the portion of the Kootenai Three Rivers Ranger District KNF map that has been labelled (erroneously) as all being the “Keeler Area.” The Keeler Area is at the southern end based around the Keeler Creek Road Warming Hut and adjacent areas on the IPNF (Kaniksu) in the head end of Rattle Creek. The middle area is the “six lakes” area and the northern end is the Callahan/Mt. Pend Oreille and Willard/Purdy/Calder areas north.
- Map 7 (1 page) – this is the portion of the Kootenai National Forest Land Management Plan Map of the approximate same area.

Comment: There are significant areas that have been long accessed and used by over-snow vehicles from the IPNF (Kaniksu) which are proposed to be closed. These areas provide diverse OSV terrain and opportunities from beginner to extreme riders and for snowmobilers and snowbikers. These lands are physically located in the State of Idaho and share a common divide. There is a groomed route to the Moose Lake trailhead that provides for access to the Lightning Creek Warming Hut and the “six lakes area” consisting of Moose Lake, Blacktail Lake, Lake Estelle (on the Kootenai), Gem Lake, Lake Darling, and Smith Lake (on the Kootenai). This area also includes the north and

south forks of Callahan Creek, significant portions of which have been burned (whether old or new fires), and Mt. Pend Oreille. This area also includes the access from the Warming Hut at Keeler Creek Road on the Kootenai (physically located in the State of Idaho) from Rattle Creek, East Fork of Lightning Creek, and through Benning and LaFoe Mountain. There is significant OSV use in all of these areas spanning from north of Calder Mountain all the way down to Drift Peak from the Kaniksu Forest side. These should be recognized and preserved in this OSV plan. The Preliminary Proposed Action Map would basically eliminate very significant connecting areas and routes for the Kaniksu, as well as destination riding areas on the Kootenai. I have consistently used OSVs in these areas since the 1990s. In regards to the minimization criteria, I have not observed any conduct that is identified in the list of 4 objectives. There has not been any damage, harassment, disruption, or conflicts in these areas. There are no documented impacts to justify closure or other restrictions to OSVs. These areas should remain open to provide desired public over-snow vehicle use and enjoyment.

In addition to the specific comments with maps, additional comments regarding the draft Preliminary Proposed Action Map are:

Dry Creek OSV access should be maintained in this area adjacent to the recommended Scotchman Peaks wilderness area. Additional adjacent areas should remain open as well. There is no reason to create buffers to wilderness (designated or recommended). This makes those areas defacto wilderness without congressional designation. It also limits access for those seeking to get to the wilderness or areas with restrictions by their preferred mode of transportation.

The Bloom Peak/Ninety Three Mile Lake area is recognized in the plan for its historic Idaho and Montana access from, and use of, both sides of the divide. This illustrates and supports that the existing condition in the specific areas identified above should remain open to OSV use.

The Eureka/Ten Lakes map area excludes the Ten Lakes Management Area, but proposes to close almost all remaining lands to OSV use. There is use that is both existing and significant outside of the Ten Lakes Management Area that should remain open.

Consistency for over-snow vehicle map and summer motor vehicle use maps (MVUM) routes are important. All roads and trails open under the MVUM should be open under the OSV plan and map.

The Kaniksu Over-Snow Vehicle Use Designation Project and recommendation developed by the North Idaho Work Group is considered a success at bringing decades of dispute, litigation, and disagreement to a place of agreement for a community developed OSV plan and map, taking into consideration the resources of the forest, the needs of wildlife, and addressing potential conflicts among uses and users. No group or party was able to get everything it wanted, but a solid plan that is accepted and supported was developed and adopted by the Forest Service. I request the formation of collaborative groups to develop recommendations for all of the Ranger Districts involved

Kootenai National Forest
Attn: Over-snow Motorized Travel Plan
August 21, 2023
Page - 6

(whether on a district by district basis, or groups of districts). I want to be a part of at least the Three Rivers and Cabinet Ranger Districts as those are the areas I am most familiar with from my decades of OSV use in the area.

The April 1, 2022 grizzly bear based closures to over-snow vehicle use on the vast majority of the forest is severe, and many are understandably upset. I look forward to continued possible refinement now and in the future of this aspect of the OSV planning and travel management map. Grizzly bear management will evolve based on its population status, further scientific research and study as to den emergence and use of spring time high elevation snow (or the lack thereof), and further understanding that there are no documented instances of any OSV use that has actually negatively impacted a grizzly bear or the viability of the bear populations in our region. The Travel Management Rule provides for minimization, not absolute avoidance, as to any actual or potential wildlife conflicts and the other values identified for consideration. The Proposed Action already does and should continue to clearly provide that the April 1 restrictions are grizzly bear based. This allows for future modifications of this aspect of an adopted travel management plan, without having to revisit the balance of the plan or start from scratch.

In conclusion, once again, thank you for the opportunity to provide analysis, information, and participation in this process in addressing the need for the National Forests to provide multiple-use including trails and areas for over-snow vehicle recreation and experiences. With an updated preliminary plan and revised map (both as to substance and format), I can have the ability to meaningfully participate in the process. I look forward to continuing to work through the process to the decision and implementation for OSV use.

Sincerely,

/s/ John Finney

Enclosures

John & Christa Finney
3396 Selle Road
Sandpoint, Idaho 83864
Daytime Telephone: 1-208-263-7712
E-mail: jfinney@imaxmail.net

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



United States
Department of
Agriculture

Forest
Service

August 2013



APPENDICES

Final Environmental Impact Statement

For the Revised Land Management Plan

Kootenai National Forest



UNIQUE LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
107	01+	DUNCAN	HAROLD	DUNCAN TRUCKING	107
59		DUNFIELD	TODD		59
384		DURGLO	JOE	CONFEDERATED SALISH AND KOOTENAI TRIBES OF THE FLATHEAD NATION	384
131		EDWARDS	HELEN/DON		131
260		ELLWOOD	DON/CHRISTI		260
44		EMERICH	LORNA		44
108	01+	ENGHUSEN	NANCY		108
289		ERICKSON	DAVID		289
232		ERWIN	DEAN		232
251		FAIRBROTHER	JENNIFER	FOREST SERVICE EMPLOYEES FOR ENVIRONMENTAL ETHICS	251
254		FANCHER	JEREMY	INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION	254
216		FANSLER	WILLIAM		216
73		FENNESSY	ANN		73
155		FERGUSON	LAURA		155
39		FERRELL	PETER		39
285		FERRELL	PETE		285
319		FERRELL	DOUG		319
372		FERRELL	MELINDA		372
261		FIELDER	PAUL		261
330		FIELDER	JENNIFER		330
132		FIELDS	EDWIN		132
295		FINNEY	JOHN		295
174	01+	FISH	DORENE		174
213		FISH	DONN		213
217		FLANSAAS	ROBERT		217
243		FOOTE	CAM		243
133		FORD	MICHAEL		133
258		FRANCIS	WENDY	YELLOWSTONE TO YUKON CONSERVATION INITIATIVE	258

preferred alternative. The Forest Plan revision process has followed NEPA and given full consideration to recommended wilderness, wildlife habitat, and other resource concerns. Under Alternatives B and C, timber harvest is a result of the desire to move vegetation towards desired condition. Only under Alternative D was timber harvest considered first and movement towards desired condition considered second;

I) The criteria for project consistency with the revised Forest Plan are appropriately stringent to provide for implementation of the Forest Plan. If a project is found to be inconsistent with plan direction, the project must be redesigned to be compliant or amend the Forest Plan. Compliance with the Forest Plan is described in the site-specific NEPA, and subject to public review;

J) The KNF went through two scoping periods and a comment period on a proposed plan (released in 2006). This scoping and the comment period on the proposed plan did not bring forward the issues of fuel management in the watersheds surrounding the town of Eureka or Border Patrol access. The issue with Border Patrol access was included in the plan revision, with incorporation of plan direction to coordinate with the Border Patrol on projects. The revised Forest Plan will not close any roads, trails, or areas currently open to motorized use, with the exception of over-snow motorized vehicle use in recommended wilderness and research natural areas. These areas (recommended wilderness and research natural areas) are not found along the northern border with Canada. The concern regarding possible fuel treatment in the watersheds surrounding Eureka has been partially addressed in Alternative B Modified in the FEIS. Any fuels treatment decisions would be made by site-specific projects. The plan revision is consistent with all NEPA and NFMA requirements. For an explanation of FLPMA and the revised Forest Plan, see the response to Public Comment 249B; and

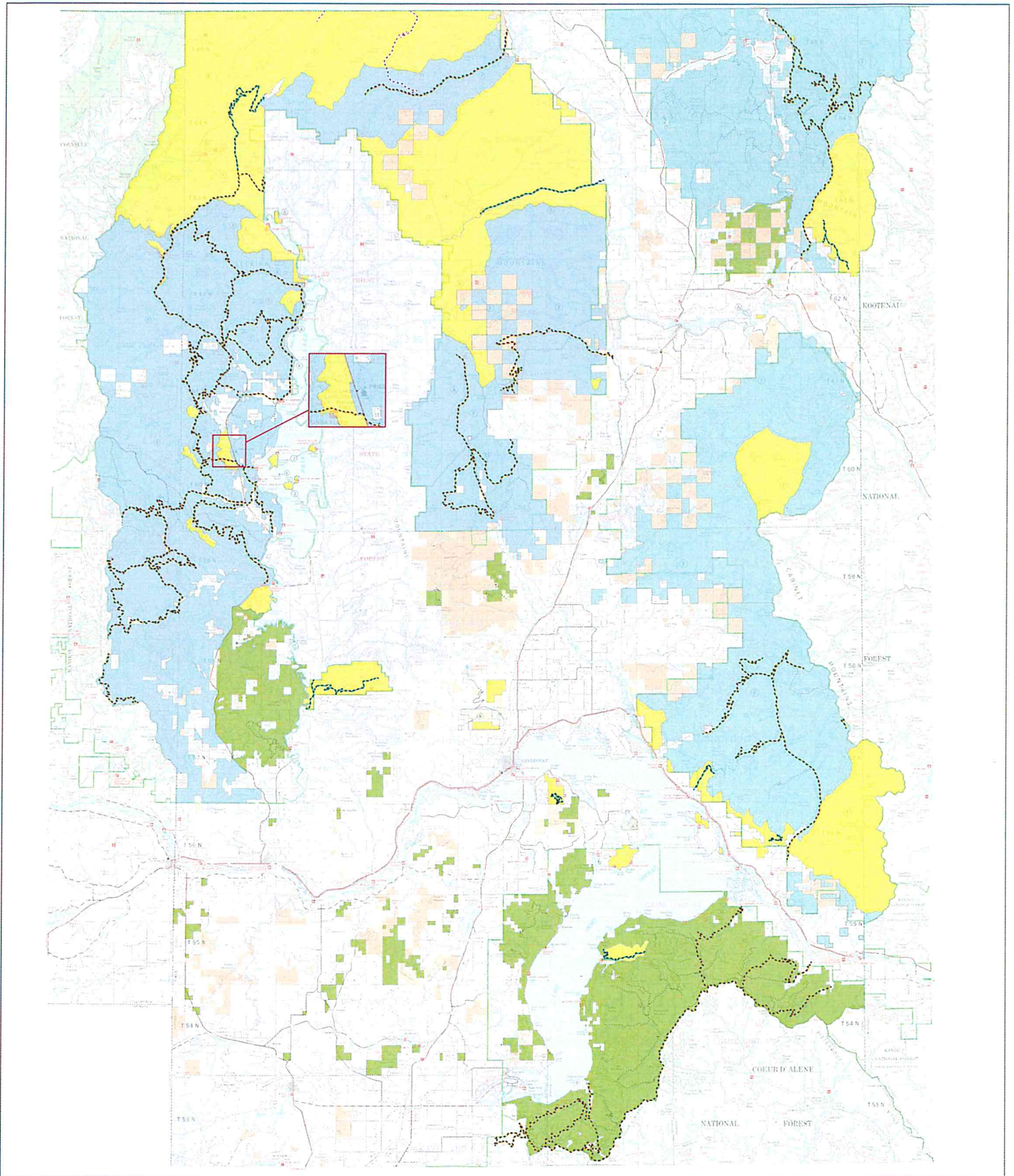
K) Alternative D provided more motorized access than under all alternatives including Alternative A (the No-action), thus addressing public comment for increased access. See the “Access and Recreation” section of chapter 3 of the EIS. In addition, there was an alternative not considered in detail in the DEIS that looked at additional motorized access (see page 30, the Access and Roads Alternative). The effects of the alternatives have been described in chapter 3 of the EIS.

Public Comment 264: (Letter Number(s): 146, 246, and 295)

The Forest Service has not completed the site-specific analysis as required by NEPA. Site-specific analysis is required at the point when an irretrievable commitment of resources is made (40 CFR § 1502.24). The application of the various management area directions, standards, and guidelines mandate the closing of routes and/or closed snowmobiling areas, representing site-specific decisions. The effects and rationale for that decision must be disclosed and cannot be deferred.

Response:

The revised Forest Plan will not close any roads, trails, or areas currently open to motorized use, with the exception of over-snow motorized vehicle use in recommended wilderness and research natural areas. The closing of these areas to over-snow motorized vehicles is site-specific and effects have been disclosed in the EIS. No other routes or areas on the Forest will be closed to motorized access because of forest plan management area direction, standards, or guidelines. The KNF has published motor vehicle use maps (MVUMs) which display those roads, trails, and areas designated for motor vehicle use in compliance with 36 CFR 212 Subpart B. Additional travel management designations or modifications are outside the scope of the revised Forest Plan. Any future site-specific travel management planning will comply with the 36 CFR 212 and NEPA and public involvement.



Map Disclaimer:
 This product is reproduced from geospatial information prepared by the U.S. Department of Agriculture Forest Service. GIS data and product accuracy may vary. They may be developed from sources of differing accuracy, accurate only at certain scales, based on modeling or interpretation, examples while being created or revised, etc. Using GIS products for purposes other than those for which they were created may yield inaccurate or misleading results. The Forest Service reserves the right to correct, update, modify, or replace GIS products without notification. For more information, contact the Idaho Panhandle National Forests Supervisor's Office.

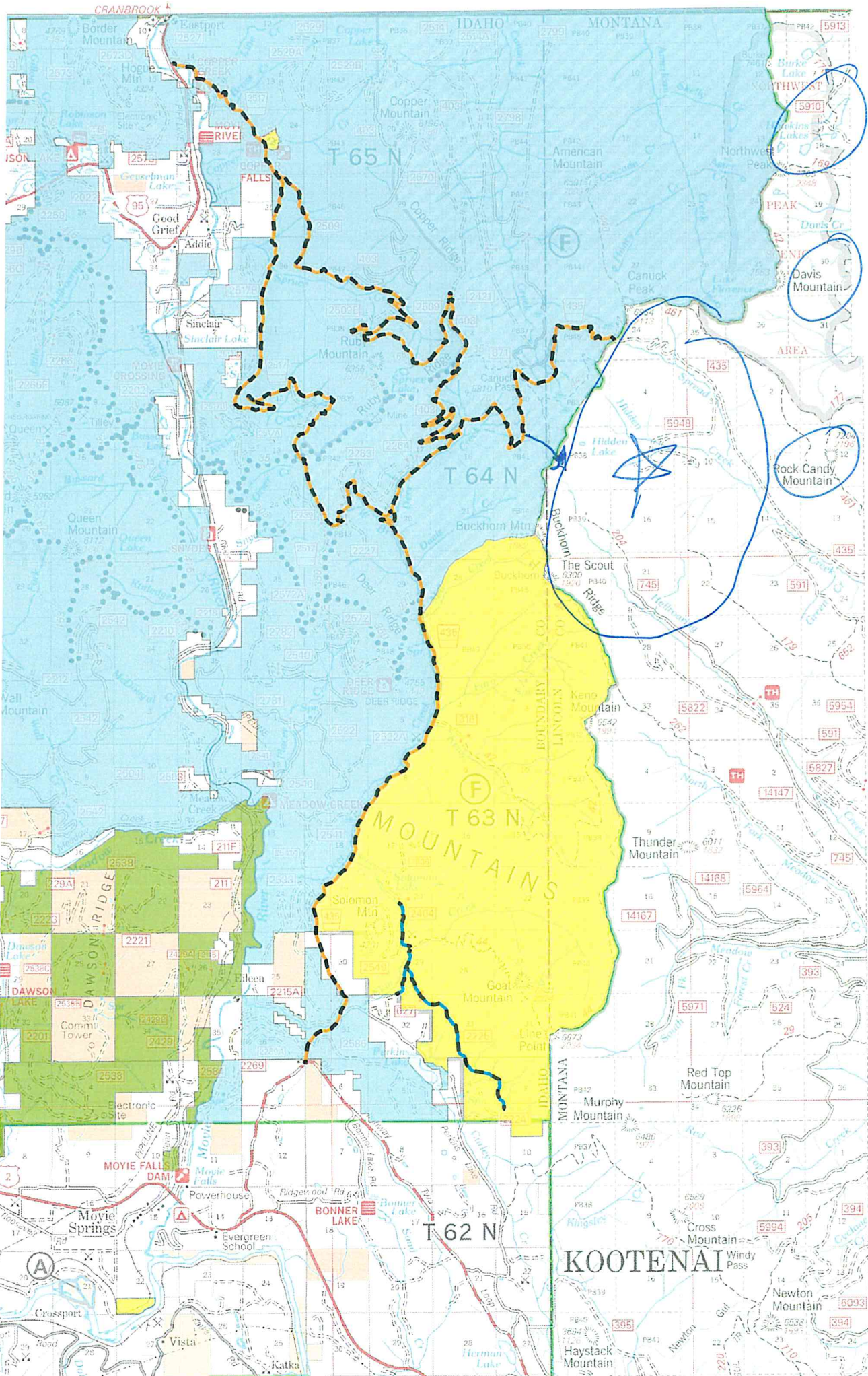
Kaniksu OSV Designation Project:
Proposed Action: Suitable Snow - March 31
Idaho Panhandle National Forests
 March 2023



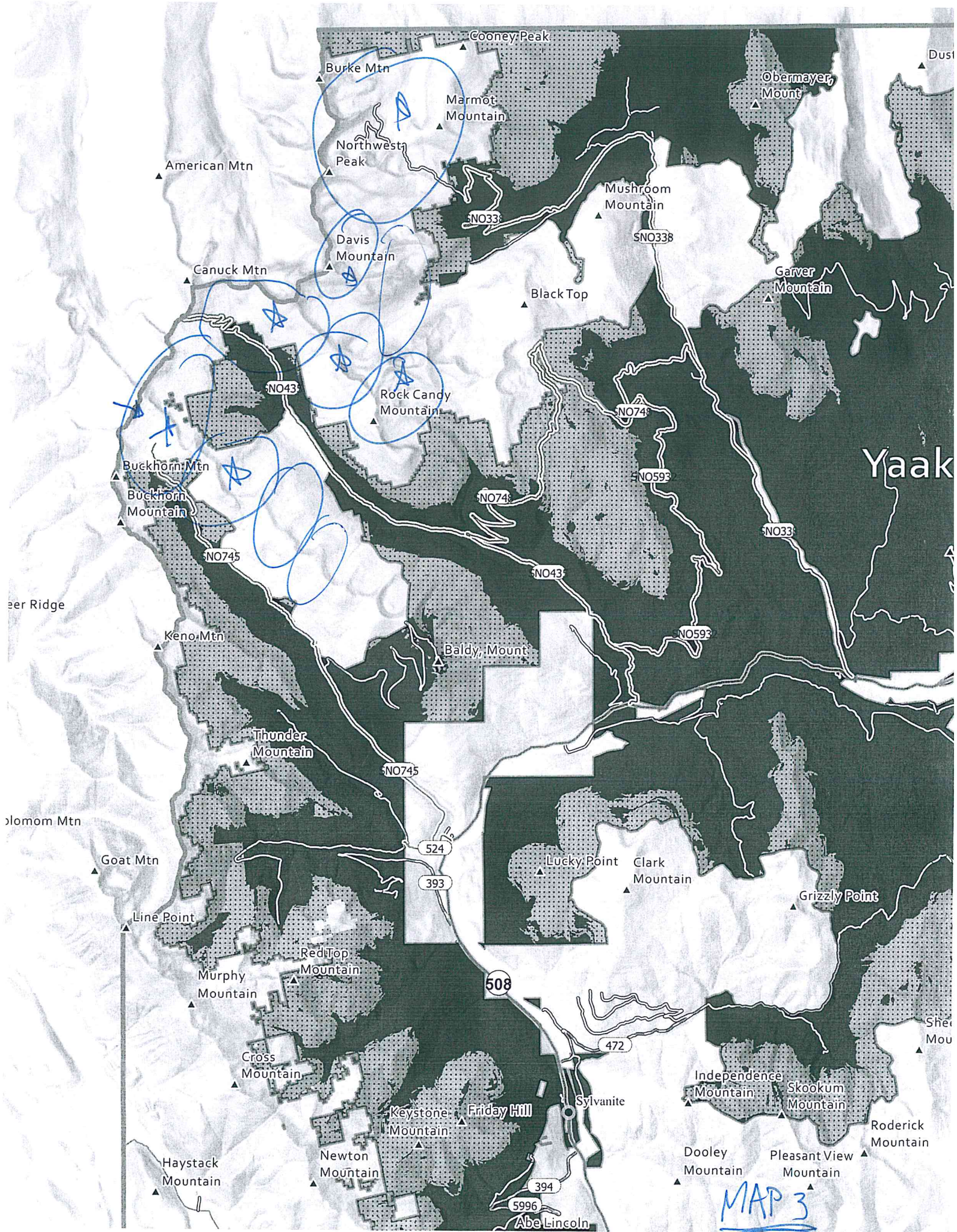
Designated OSV Routes
 --- Gravel
 --- Ungravelled
 --- Road Admin'd by Boundary County

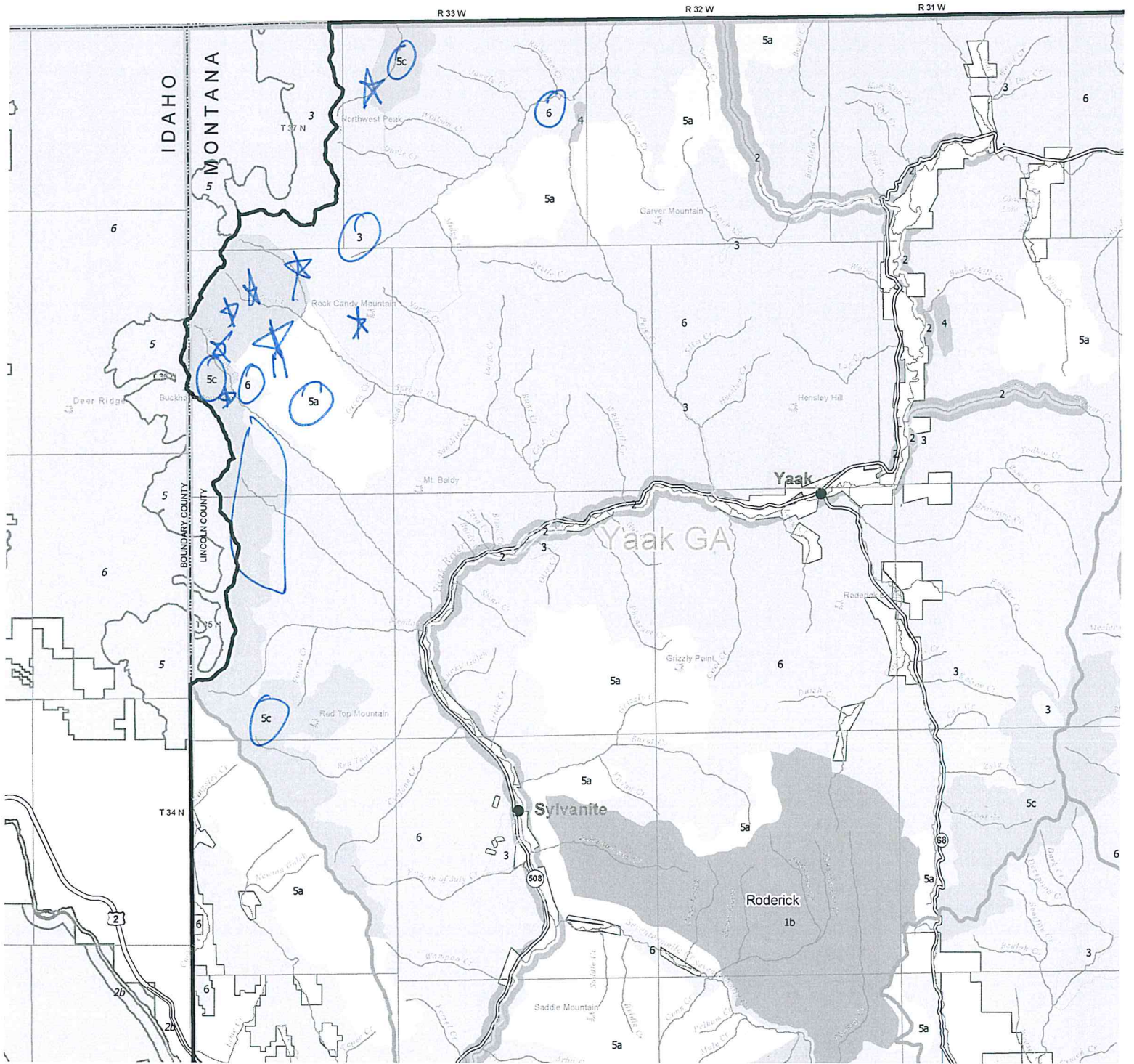
OSV Travel Management Areas
 Yellow: Closed to off-road OSV travel
 Green: Open to OSV travel November 16
 Blue: Open to OSV travel November 14

MAP 1

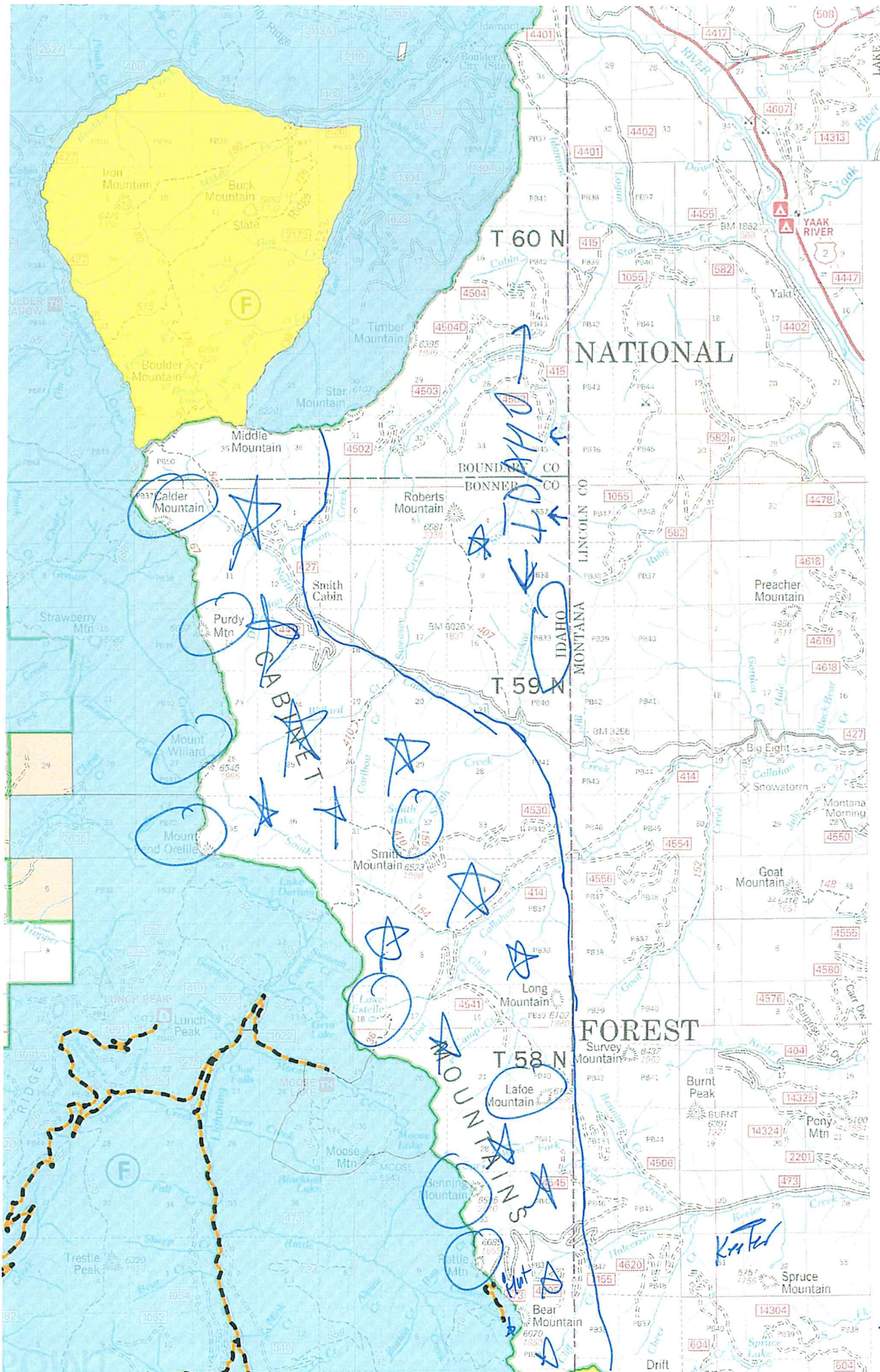


MAP 2





MAP 4



NATIONAL

FOREST

T 60 N

T 59 N

T 58 N

(F)

(F)

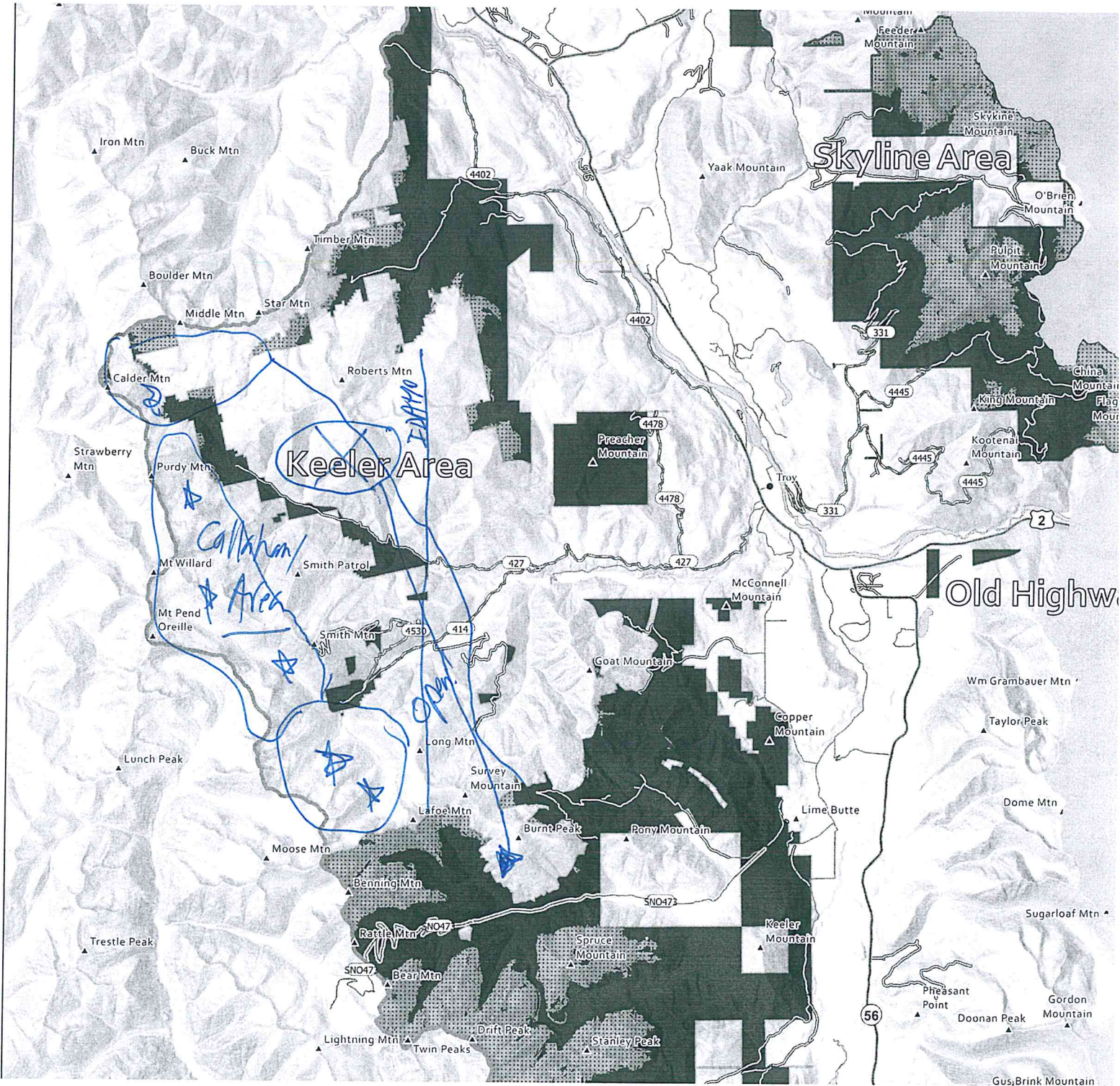
(F)

(F)

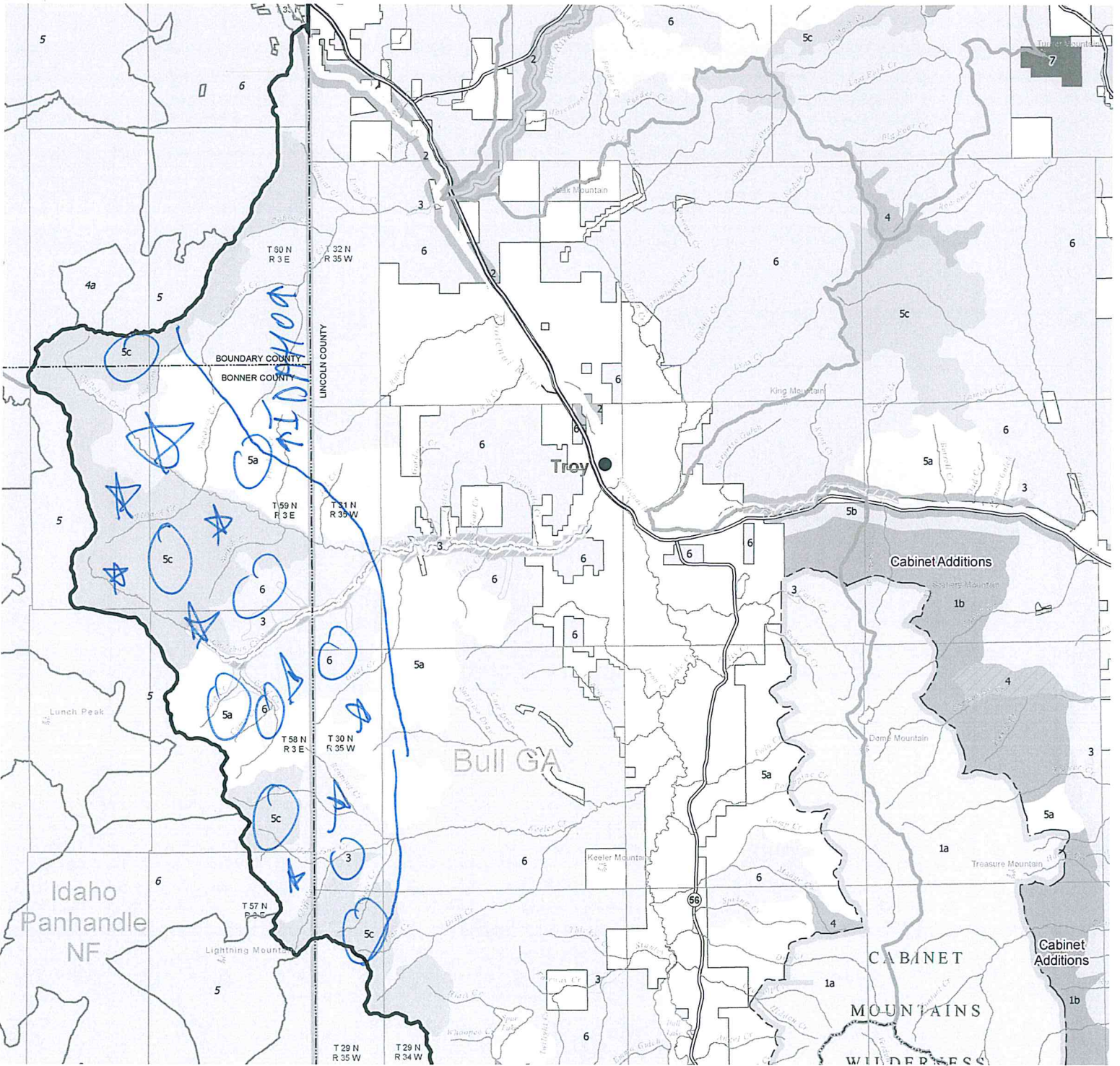
(F)

MAPS

Kester



MAP 6



MAP 7