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Comments: Please see the comment letter that I uploaded.

I am writing on behalf of the Idaho Conservation League (ICL) to comment on the Proposed Action for the Kaniksu Winter Travel Plan. ICL has been protecting Idaho's environment since 1973. We represent over 35,000 members and supporters who care about Idaho's land, water, air, fish and wildlife. ICL protects these values through public education, outreach, advocacy and policy development.

As you know, I represented ICL and participated in the North Idaho Working Group (NIWG), which includes snowmobilers, backcountry skiers, conservation groups, hunters, county officials and other community members that came together and provided recommendations to the Forest Service for the development of the Kaniksu Winter Travel Plan. Those recommendations were compiled by the National Forest Foundation and were delivered to the Forest Service on July 5, 2022. I would like to incorporate those recommendations into my comments by reference.

I would like to thank the Forest Service for drafting a Proposed Action that closely resembles the recommendations of the NIWG. The NIWG reviewed the Forest Service's Proposed Action and submitted comments on the proposal on September 15, 2022. I would also like to incorporate the NIWG comments on the Proposed Action by reference.

The NIWG invested significant time and energy into the development of the proposed over-snow area designations, including areas that would be open yearlong to OSV travel, areas that would be closed yearlong to OSV travel, and areas where OSV travel would be limited to designated routes after March 31st. ICL believes that the proposed area designations submitted by the NIWG in July, as modified by the NIWG's comments on the Proposed Action, strike an appropriate balance between the demand for winter recreation opportunities and the needs of wildlife.

Some snowmobilers have expressed displeasure with the proposal to limit OSV travel to designated routes after March 31st on portions of the planning area. ICL acknowledges that there are aspects of the proposal for everyone to dislike. In fact, many backcountry skiers and conservationists are not thrilled with the concession of the upper Pack River and the Trapper Burn. The recommendations of the NIWG are a result of give and take by individuals from motorized and nonmotorized recreation groups, conservationists and others. Shifting the balance too far in one direction or the other would likely unravel the delicate agreement that is shared by most of the members of the NIWG.

One aspect of the plan that needs more attention is the system of designated routes. While the NIWG carefully considered routes in areas that are otherwise closed yearlong to OSV travel, a thorough review of routes in areas where OSV travel would be limited to designated routes after March 31st is needed. Generally speaking, we believe that the designated system of OSV routes in these areas should be limited to routes designated as open yearlong to motorized travel on the Motor Vehicle Use Map (MVUM). This will ensure that there are no designated routes in grizzly bear core habitat after March 31st and it will also provide a level of consistency in motorized route designations across seasons.

As for groomed routes, we do not think that grooming should be authorized on every designated route. Grooming clearly increases the potential for motorized traffic, and as such, groomed routes cause more impacts to wildlife and resources than ungroomed routes. Grooming should only be authorized on a subset of the designated routes. ICL welcomes the opportunity to work with OSV users, backcountry skiers and the NIWG to refine the

system of designated groomed and ungroomed routes.

In closing, I would like to thank the Forest Service for the opportunity to be involved in the process. I look forward to continued engagement and the chance to review the environmental analysis. The Forest Service might consider preparing an environmental impact statement in lieu of an environmental assessment in order to ensure full compliance with that National Environmental Policy Act.