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Title: Public Lands Director

Comments: The Idaho State Snowmobile Association (ISSA) offers these comments for your consideration concerning the Granite Goose Project. I have been a member representing ISSA, on the Winter Recreation Coalition since its creation.

ISSA is a statewide organization representing approximately 4,000 people, including thirty-six clubs, individuals, and many businesses from throughout Idaho. All our members highly value the opportunity to ride snowmobiles in the Payette National Forest. The Payette provides some of the best riding areas in Idaho.

Our Comments:

\* The 451 Road is historically an access route for snowmobilers from the neighborhoods from Warren Wagon Road to the most popular snowmobile riding areas. The proposed boundary changes from an easily definable boundary on the road to an arbitrary one in the woods that will be much harder to maintain or enforce. The 451 should be maintained as is, the proposed change will cause confusion and lead to enforcement issues.

\* The entire west side of Granite should not be included in the closure.

Recreation Management (Scoping Document):

"Recreational use has increased in the project area resulting in conflicts between user groups and causing detrimental impacts to other forest resources from dispersed recreation and unauthorized motorized use. There is a need to address recreational use in the project area to meet forest plan desired conditions to address user safety and recreation conflicts while maintaining recreation."

36 CFR, part 295, Sec 295.2(b) Requires plans to minimize "conflict among users". Wisely, it does not set the standard to elimination of conflict. Notice also that it says, "among users" not "between users."

Recreation allocation decisions are usually driven by the desire to alleviate someone's 'perception' of conflict. Those who claim the most conflict, those who say they are the most offended by other users are usually rewarded with restrictions on the other parties. 'Conflict' is often used to justify a closure that is desired by an agency. However, exclusive use leads to regulations, creating a need for enforcement. Citizens and taxpayers do not take kindly to being excluded from their public lands unless there is a clear and persuasive reason to do so. In the case of the Granite Closure, it will only create more hard feelings among the user groups and will be difficult to enforce. For any closure to be successful the area must be definable and manageable. If the closure does not meet that standard, it should not be approved.

This proposed closure violates all the agreements that were agreed upon in the past by the Winter Recreation Group. It simply should not be implemented.

\* Roads, 50056, 50839, 50052, and all roads west of 54 should remain motorized. These roads are important to the motorized community. The motorized community cannot afford to lose access, we need to increase access. These roads are well used and needed. Both motorized and non-motorized recreation have experienced a surge in the number of users, however, it makes no sense to take from the motorized community access and give to the non-motorized community. We all need more access not less! On page 1, of the economic analysis, which is attached, it shows by each forest in Idaho the loss of motorized trails. Now is not the time to take from one user group and give to another.

\* A permanent Bear Basin Closure is not acceptable because it will eliminate access for the neighboring property owners to access the groomed trails on the north side of Bear Basin. The existing seasonal order was hammered out by the Winter Recreation group and it has worked for the most part. The proposed closure is not manageable or definable and will simply lead to problems. The closure benefits only a few and the majority are locked out. The current problems can be managed with education and proper signage, the closure is extreme and is not necessary.

\* The proposed enlarged closure on the east side of the Bear Basin Road is another example of a closure that is not definable and manageable because the closure borders the 'motorized' Idaho Department of Lands. The reason for the closure is the need for groomed trail system for fat tire bikes? Fat tire bikes are welcome to use the snowmobile groomed trail system which is a shared trail system used by backcountry skiers, mushers, fat tire bikers, etc. We share our system but now it is necessary for each user group to have their own? If you create it for one, are you then not obligated to give every user group their own?

Thank you for the opportunity to comment. We look forward to working together for the benefit of all the users of the Payette National Forest.

ATTACHMENT Articles regarding motorized recreation in Idaho (pages 6 - 8)