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Comments: Please see file upload

Dear Doug Nishek:

I am writing on behalf of the Idaho Conservation League (ICL) to comment on the Draft Environmental Assessment (EA) 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.

ICL would like to thank the Forest Service for publishing the EA for the Kaniksu Winter Travel Plan. We are pleased that the agency appears to be on schedule to complete the travel plan before the end of the calendar year.

We would also like to reiterate our support for the Proposed Action. As the Forest Service is aware, the Proposed Action more closely represents the recommendations of the North Idaho Working Group than Alternative A. ICL recognizes that not all snowmobilers are happy with aspects of the Proposed Action. While limiting over-snow vehicle use to designated routes beginning April 1st in nearly two-thirds of the planning area is a source of concern, we hope that over-snow vehicle users will recognize that not all wildlife advocates and non-motorized users are satisfied with aspects of the Proposed Action either. For example, there are many backcountry skiers who have expressed opposition to the proposal to open the Upper Pack River to over-snow vehicle use. Additionally, there are some wildlife advocates who feel that more acres should be closed all winter to protect caribou, wolverine, and lynx. ICL believes that the Proposed Action strikes an appropriate balance between the demand for winter recreation opportunities and the needs of wildlife.

In contrast, we feel that Alternative A falls short of protecting grizzly bears. Alternative A includes additional areas that would be open to snowmobile use until May 31st in Wellington Basin, Porcupine Basin, and Jeru Ridge. There is not enough core habitat in the Scotchman and North Lightning Bear Management Units to absorb the deductions that would be required to provide for motorized access to these areas after April 1st. Therefore, limitations on over-snow vehicle access are warranted at that point in the season.

Alternative A also falls short of protecting grizzly bears in BORZ Areas because this alternative would allow OSV travel off of designated roads and trails in BORZ Areas until April 15th. This option is nonsensical because grizzly bears do not recognize BMU and BORZ boundaries, and regardless of whether they are in a BORZ Area or a BMU, April 1st remains a critical date in the middle of the time period when they are emerging from hibernation. April 1st is also the date used for the Access Amendment and grizzlies remain a federally-protected species whether they are in or outside of recovery zone boundaries.

It is also important to recognize that the state endowment lands on the east side of Priest Lake have no over-snow vehicle restrictions. Since restrictions on over-snow vehicle use are unlikely to be adopted on state endowment lands, the restriction on cross-country travel on Forest Service lands is of added significance in the Selkirk Ecosystem.

Allowing cross country travel in BORZ Areas until April 15th also introduces additional complexity to the travel plan that will only complicate efforts to adequately implement and enforce the final plan. Alternative A would

allocate the planning area into four separate sets of dates. It would be much easier for the public to understand and the Forest Service to implement and enforce a plan where areas are closed all winter, open all winter, or open until April 1st. Then where is the issue of the motor vehicle use map (MVUM) which does not use April 15th for any route that is open to vehicles with wheels. Whereas, April 1st is a frequently used date on the MVUM.

This leads me to our final point, which is the need for an implementation and enforcement plan to accompany the final EA. The Draft was incredibly limited and vague with respect to how the Forest Service intends to educate the public about the new travel plan and ultimately, how the agency will enforce it. Unless there is a thoughtful approach to implementation and enforcement, the plan will not be worth the paper it is printed on.

I want to conclude by thanking the Forest Service and its staff for their hard work on the Kaniksu Winter Travel Plan. Please let me know if you have any questions about my comments.

Sincerely,

Brad Smith

North Idaho Director