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First name: Philip

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Organization: Friends of Scotchman Peaks Wilderness

Title:

Comments: Dear Mr. Benson:

I am pleased to submit these comments on scoping for the Kootenai National Forest's Proposed Over-Snow Motorized Travel Plan on behalf of the Friends of Scotchman Peaks Wilderness.

The Friends of Scotchman Peaks Wilderness (FSPW) is a group of concerned residents from Northern Idaho and Northwestern Montana engaged in education, advocacy and stewardship to preserve the Wilderness Character of the Scotchman Peaks. We believe that the Scotchman Peaks deserves Wilderness designation as recommended by both the Idaho Panhandle and Kootenai National Forest in their 2015 Revised Land Management Plans. We have over 11,000 supporters or "Friends"; 80% live within a 2 to 3 hour drive of the Scotchman Peaks. Each year over 150 individuals volunteer for various projects, events or programs.

We are an active community partner participating as a stakeholder in several local collaborations, including the "Kootenai Forest Stakeholders Collaborative" (KFSC).

We appreciate the work that went into preparing such a comprehensive scoping proposal.

Along with Brooke Bolin, our FSPW staff representative in Lincoln County, I personally attended the recent open house in Libby regarding the scoping proposal and engaged in conversations with the forest service representatives. Brooke also attended the Troy open house. We appreciated seeing the information displayed regarding the minimization criteria for various species.

Save the wild Scotchmans.

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After these meetings and reviewing the scoping proposal further, we would like to make the following suggestions for the draft EA.

Mapping Questions and Concerns

The maps as presented need some work to be done so that they are more understandable and more clearly demonstrate the intent of the proposed action. In conversation with forest service staff at the open house, the need for more attention to mapping details seems to be understood. But I'd like to re-iterate here several suggestions. Please refer to attachment A at the end of this letter. It's a screenshot which illustrates several points.

Isolated Polygons - There are small, isolated places which would seem to be open to OSV use, that are perhaps not intended. For example, the small polygons between Sugarloaf and Fatman Mountains as well as between Fatman and Star Peak. They may seem to fit some criteria but are not in locations that are otherwise accessible or even permissible. Also, on this attachment the small area along Bull River Highway that would likely be private property, or if it is forest service land is isolated from any desirable ride-able terrain.

Geographically confusing lines - see for example the areas defined as open for riding near Berray Mountain. Some places are so narrow, small, convoluted that an OSV user

on the ground would not be able to tell if they were in or outside of an area open to riding. Open/closure lines need to be able to be geographically identifiable to the rider. A "an easily definable geographic boundary" was the criteria used during the forest plan amendment process when determining backcountry A, B, C areas. So, there should be a methodology already in use to determine this.

Shading - at the open houses, it was clear that there are problems with incorrect shading - the legend not matching the colors. I won't go into further detail as the forest service team seemed to already be aware of the need to correct this

General Mapping Suggestions: It would be helpful to see in the EA an overlay map of the current OSV travel plan with the proposed action as well as any alternatives. This would make it easier to see any changes.

Details on Suggested Closure Dates: It seems likely that the timing of spring closures, for various areas and routes that are open to over the snow vehicles, will be a controversial issue. We suggest that the rationale for these decisions be clearly explained in the draft EA and include information about best available scientific research and experience on these issues.

Education, Monitoring and Enforcement

We would suggest that the draft plan include ways to approach Education, Monitoring and Enforcement. Cooperation with user groups to assist with education, monitoring and

enforcement will be important.

Education is fundamental to a successful plan implementation. The public may be largely unaware of the plan and certainly are not following the details. Maps, press opportunities, presentations, work with community groups are all ways to educate the public to assure smooth implementation. The plan should at least include vision and goals for how education will be used. Ideally, there would be a section on action steps.

Monitoring needs to take place to know how well the public is adhering to restrictions. This is a way of focusing the limited enforcement capabilities the agency possesses. Monitoring is also a way to determine the actual impact of the plan on whitebark pine as well as wildlife. Without monitoring, how will we know if the plan is achieving its objectives? How will we know where to increase educational opportunities, deploy enforcement or adapt plans?

Enforcement is the last step to ensure compliance. It's also not popular. The more and better Education and Monitoring efforts are, the less enforcement action will be needed and the less user angst. That said, if there are no plans for enforcement, then there's little incentive for users to follow the restrictions. The agency has the ability to have staff trained as Forest Protection Officers (FPOs) and not rely solely on the so called LEO's who are more independent.

We recommend the EA outline a plan, including methods and resources, proposed to enforce the new OSV Travel Plan. It is widely recognized that enforcement of the existing OSV travel plan is a challenge. Introducing a new plan will only increase these challenges. Identifying resources, capabilities, and needs will be necessary to developing an enforcement action plan.

Evaluating the Common Ground Proposal as an Alternative: As you know, the KFSC worked for

many years to find common ground on recommendations for management of Roadless Areas on the Kootenai Forest. In 2015 the KFSC put together a Common Ground Agreement, based on broad consensus, that provides more permanent access for motorized users, and more acres of wilderness. FSPW has been a part of that process and supports the Common Ground Agreement. The three key components of this agreement are:

1. Special management area for winter motorized recreation
2. Special management areas for backcountry non-motorized use
3. Recommended Wilderness

We would ask that the forest service analyze the KFSC Common Ground Agreement as an alternative to the proposed action in the Draft Plan and Environmental Assessment. The KFSC has already sent a map to the forest service to help in this process, but if you need or want resources, please let me, or another KFSC representative know.

We thank you for your consideration and continued work on this important plan.

Sincerely,

Philip J Hough

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Attachment A - Map - Screen Capture (SEE ATTACHMENT)