

Data Submitted (UTC 11): 1/31/2024 2:46:33 PM

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Organization:

Title:

Comments:

Linda Jackson, Supervisor

Payette National Forest

500 North Mission Street

McCall, ID 83638

Dear Supervisor Jackson:

These comments are made on behalf of the Idaho State Snowmobile Association whose statewide membership supports responsible use of our National Forest Service and believes that not one user group has greater rights than another.

On behalf of ISSA, I have been a participant in the Winter Recreation Collaborative since the beginning when Supervisor Alexander directed the user groups to meet regularly to work on how we can better share the resources and work together. The start was rough but eventually we did exactly as directed, we worked together for the benefit of all.

On behalf of the membership, I urge you to remove the closure and not reconsider it at a later date with a different NEPA document for the following reasons:

*The closure on Granite Mountain, which was approved by the Winter Recreation Collaborative was never intended to be a year around closure and the current members have not supported that concept. Making it a year around closure may benefit a few but at the expense of many.

*As we heard repeatedly at the Winter Rec meeting, the closure is not working. Closures cannot be successful unless they are manageable and definable, this area may have proven to not meet that requirement.

*To propose the closing of snowmobile access in one area when there is a proposal, The Brundage Master Plan, that is likely to close snowmobile access in an adjacent area should be considered as a "foreseeable action" under cumulative effects, which is both spatial and temporal.

FSH 1909.15 Chapter 10

15.1 - Cumulative Effects states:

For the definition of "cumulative effects" and other terms (see zero code, sec. 05). Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions may have collective or cumulative impacts that are significant. Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, who may have a measurable and meaningful impact on particular resources. The following regulation applies to analysis of cumulative effects of past actions:

Thank you for the opportunity to comment.

Sandra Mitchell

Public Lands Director
Idaho State Snowmobile Association