Friends of Scotchman Peaks Wilderness

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May 6th, 2012

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RE: KIPZ Draft Land Management Plan(s) released December 2011, for the Idaho Panhandle National Forest and the Kootenai National Forest

On behalf of the board, staff and 4,000 supporters of the Friends of Scotchman Peaks Wilderness, I wish to submit the following comments regarding the Draft Land Management Plans (DLMP) released by the KIPZ planning team in December 2011 for the Idaho Panhandle National Forest (IPNF) and the Kooetnai National Forest (KNF).

Background

The **Friends of Scotchman Peaks Wilderness** is a group of concerned residents from Northern Idaho and Northwestern Montana who believe that the 88,000-acre Scotchman Peaks roadless area deserves permanent protection as wilderness. Since 2005, we have engaged in education, outreach, advocacy and stewardship, building community support for the Scotchmans.

We seek to develop a community consensus where wilderness protection for the Scotchmans is valued highly and sought after by a broad spectrum of the public. As of April 2012, we have over 4,000 supporters, of which over 80% live within just a couple hours' drive of the Scotchmans, testimony to the broad support for wilderness for this special area.

In the northern 5 counties of Idaho (where most of the Idaho Panhandle Forest is located) there are many rugged, wild, roadless areas; none are permanently protected as designated wilderness. Less than 4% of the Kootenai National Forest has been designated as wilderness, the lowest amount of any National Forest in Montana. In fact, no new area has been designated as wilderness on the Kooteani since 1964 when the original Wilderness act established the Cabinet Mountain Wilderness.

Agency recommendations for wilderness are one of the most important steps in the process of achieving permanent protection for wilderness through congressional designation. While congress is not constrained by agency recommendations, the course of actions congress has taken over the last 48 years clearly demonstrate that they weigh heavily the recommendations made by the United States Forest Service (USFS).

One of the things which will prompt congress into taking action on agency recommendations is a demonstration of public support, or community consensus for recommended wilderness. In addition to considering ecological values, recreation values and economic values, the USFS must consider social values in recommending wilderness. The USFS both helps to create, as well as responds to, public support in the process of recommending wilderness.

We appreciate that this is often a delicate dance, especially when the lines blur between local communities, regional needs and national constituencies which must all be considered by both the USFS as well as congress. In our comments we also try to balance these concerns and hope to offer insights from our experience, both on the ground, as well as in public conversations, which may assist the IPNF and KNF in finding an appropriate balance in making wilderness recommendations for the Scotchmans.

General Comments for Both the Idaho Panhandle and Kootenai National Forests

We would first like to thank the forest service for the many years of work and which have gone into developing the recently release Draft Land Management Plans (DLMP) for both forests. We appreciate the many opportunities for public input and discussion.

We generally support the desired conditions, goals and objective, standards and guidelines outlined in the DLMP. The adoption of these management prescriptions should improve the overall management of both forests. There are some changes which may yet still improve the standards, guidelines and management direction offered by the DLMP.

We are not against active management for timber, nor are we against grazing, mining, managed OHV recreation or other uses of the national forest. We believe that on the 2 million acres of the Idaho Panhandle National forest and on the 2 million acres of the Kootenai national forest we can find lands suitable for sustainable timber production and forest product jobs and other

natural resources industries such as mining and grazing as well as managed recreation (both motorized as well as primitive) AND the benefits of natural resource conservation, both environmental as well as economic. We also believe that wilderness is an important component of this balanced use of the land and that the Scotchman Peaks represents one of the areas where clearly the greatest benefit is to be found in Wilderness designation.

Notably, we would encourage both forests to work towards a final plan that would propose achieving a higher percentage of the ASQ as a means of accomplishing many of the desired objectives outlined in the plan. We also believe that this can be accomplished using alternative C as a staring place for the land use allocations and addressing opportunities elsewhere to fine tune the suitable timber base and include useful updates to the management prescriptions. Alt C can also be improved upon through both additional improvements in the land management (map) allocations. We will leave detailed suggestions on how to improve the DLMP's management prescriptions and other land use allocations to other groups. We will focus our comments on the wilderness recommendations for the Scotchman Peaks IRA (Scotchmans).

Ecological Values

The Scotchmans' steep and deep valleys hold diverse communities of plants and animals, clear flowing streams and precious solitude. The Scotchmans are at the center of a unique convergence of habitats: northern Rocky Mountains and Canadian boreal forest habitats overlap here, while Pacific Maritime influences bring an abundance of rain, creating unique plant habitats and some of the southernmost reaches of the inland temperate rain forest. Wilderness designation offers the highest level of protection for this key area, in the heart of the Yellowstone to Yukon corridor, vital to the conservation of threatened, endangered, and sensitive species including: Grizzly Bear, Bull Trout, West slope Cutthroat Trout, Canada Lynx, Wolverine, Mountain Goat, Bald Eagle and Grey Wolf.

The Scotchmans are wild, rugged and roadless, with alpine vistas and clear streams flowing into the Clark Fork and Kootenai River drainages. Leaving this special place undisturbed protects plants, wildlife and water quality. And we believe that our communities deserve the many benefits wilderness would bring. Faced with growth and change we want to make sure that the Scotchmans remain a special place.

Recreation

The Scotchmans hold unparalleled opportunities for traditional activities such as backpacking, hiking, snowshoeing, cross country skiing, hunting, fishing, foraging for wild foods (huckleberries and mushrooms abound. High basins hold remote campsites. Hikers are spellbound by scenery that has been described as "like walking into heaven." Lingering snowmelt nurtures prized huckleberry patches before flowing clear and clean into Lake Pend Oreille. Wilderness Designation would protect these opportunities for our communities and our future generations.

We would like to present the following table, from the Comprehensive Evaluation Report, Social Assessment, Table 4, from the Forest Service's own Visitor Participation and Activity Study:

Table 4: KNF &IPNF Visitor Activity Participation & Primary Activity

Activity	IPNF *% Participating	IPNF % as Main Activity	KNF % Participating	KNF % as Main Activity
Developed Camping	10.89	2.98	8.9	4.5
Primitive Camping	7.42	1.34	1.1	0.5
Backpacking	3.20	0.59	1.5	0.4
Resort Use	4.08	1.55	0.3	0.1
Picnicking	13.98	2.51	8.1	1.5
Viewing Natural Features	58.04	6.87	40.3	8.5
Visiting Historic Sites	8.42	0.67	3.8	1.2
Nature Center Activities	4.21	0.12	5.7	1.2
Nature Study	5.38	0.00	3.3	0.1
Relaxing	58.60	11.55	38.2	9.5
Fishing	15.53	7.84	12.2	10.5
Hunting	18.70	18.07	29.0	28.7
OHV Use	17.24	6.42	2.0	1.0
Driving for Pleasure	40.87	7.30	22.4	5.6
Snowmobiling	1.10	1.07	4.4	4.3
Motorized Water Activities	2.37	0.57	5.3	0.8
Other Motorized Activity	0.80	0.67	0.0	0.0
Hiking / Walking	44.10	11.87	33.4	13.9
Horesback Riding	1.34	0.96	1.7	1.2
Bicycling	6.71	4.70	1.8	0.3
Non-motorized Water	2.94	0.92	0.8	0.2
Downhill Skiing	2.88	2.81	1.3	1.3
Cross-country Skiing	0.47	0.33	0.1	0.0
Other Non-motorized	10.58	2.28	8.3	4.6
Gathering Forest Products	17.09	8.60	11.7	8.9
Viewing Wildlife	56.24	7.02	40.8	4.5

*Note: this column may total more than 100% because some visitors chose more than one primary activity.

While there are differences between the KNF and the IPNF in activity patterns, these data show that for each of these national forests, the most common activities are wildlife viewing, viewing other forest resources, relaxing, hiking, driving for pleasure, and hunting.

We have added highlights to illustrate the very low percentage of primary users represented by motorized recreation and the relatively high percentage of primary users whose experience would be enhanced in a wilderness setting, free from mechanized activity (hiking, hunting, fishing, viewing natural features.)

It warrants highlighting that on the IPNF, snowmobiling is a primary activity for only 1% of all users, while hiking is the primary activity for almost 12%; on the KNF the difference is roughly 4% to 14%. Additional opportunities for quiet recreation should be identified and protected by the forest plan(s). When determining areas suitable for motorized recreation and areas suitable for wilderness even from a social (non-biological) point of view, a large amount of the region's primary users (hikers, hunters, fishermen, and those interested in relaxing away from civilized sounds) are underserved. Increasing the acres of recommended wilderness within the

Scotchmans IRA would provide for the social areas most in need, as determined by this forest service survey.

Rare and Sensitive Plant Species

The Kinnikinnick Native Plant Society has supported and endorsed wilderness designation for the Scotchmans since 2006. Among the many reason for their support is the botanical diversity of this roadless area. From the dry southwestern facing ponderosa covered slopes of Goat Mountain to the deep, steep valleys of Spar Creek, Ross Creek and Dry Creek which represent some of the most southern reaches of interior rain forest this area contains a unique, diverse collection of native plant species and habitats. Preserving these resources will be best achieved though the strongest possible wilderness recommendation for this area.

The draft plan's supporting documentation, the Comprehensive Evaluation Report (CER), which was used as a basis for developing these draft plans contains information useful to review as we submit these comments. The "Wilderness Assessment" found in the CER "Supporting Documents" contains the following chart regarding native plants in the USFS "Region 1" (of which both the IPNF and KNF are a part):

Results

The following table summarizes the number of rare plant species in the Idaho and Montana portions of Region 1 that are found in wilderness areas (of any ownership), Forest Service IRAs, or both.

Rare Plant Species Category	Total # of rare plant species in Natural Heritage Program databases (ID + MT)	# of rare plant species occurring in Wilderness (any ownership)	# of rare plant species occurring in both Wilderness and FS IRAS	# of rare plant species occurring in FS IRAs (but not in Wilderness Areas)
A -- FS Sensitive Species (globally rare)	45	3	17	**19**
B -- FS Sensitive Species (state rare)	118	3	36	**52**
C -- Non-FS Sensitive Species (globally rare)	64	4	13	**13**
D -- Non-FS Sensitive Species (state rare)	299	24	65	**78**
TOTAL	**526**	**34**	**131**	**162**

Note: This table is found on page 8 of the Wilderness Assessment in Supporting Docs of CER

Please note that a "TOTAL" line at the bottom has been added for the convenient reference.

This same report, on page 9, describes the conditions found in the above referenced table: *"For rare plant species that are not designated as sensitive by the Forest Service, 13 globally rare species and 78 state rare species have occurrences in IRAs but not in designated wilderness areas. Thus, designation of additional wilderness acreage in the Region could also provide a greater level of habitat security for 91 additional plant species that are rare at the global or state level according to the state Natural Heritage Programs."*

We would like to point out that this same chart indicates a total of **162** rare and sensitive plant species would fall into the category described above where the *"designation of additional wilderness acreage in the Region could also provide a greater level of habitat security."* We would urge both the IPNF and the KNF to evaluate their plans to assure that the wilderness recommendations for the Scotchmans have the greatest benefit for native plant species, a need recognized by the forest service's own conclusions.

Ecosystem Needs

Page 20 of the *Wilderness Needs Assessment* contains the following table:

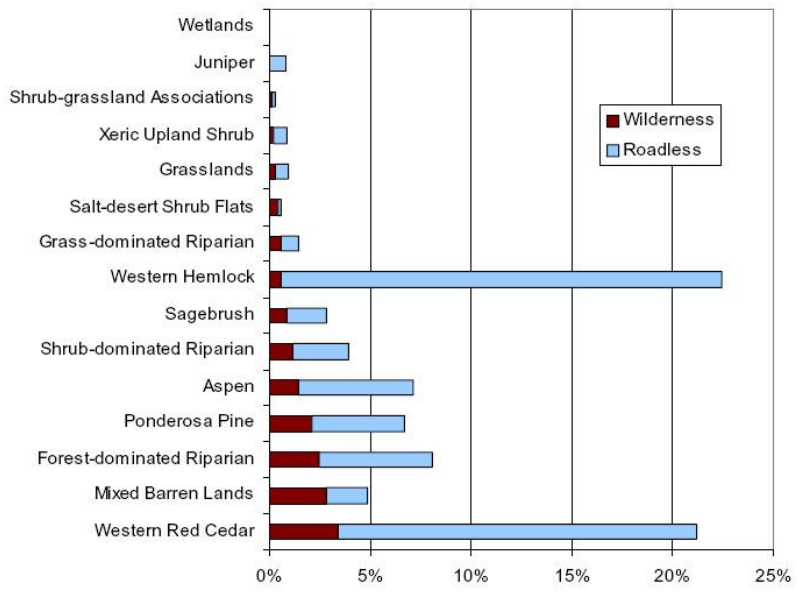


Figure x. Bars represent the percentage of selected land cover types in designated wilderness and inventoried roadless for all lands in Montana and Idaho which are within the Northern Region boundary. For example, there are 3.3 million acres of Ponderosa Pine (all land ownerships) within the Montana and Idaho portion of the Northern Region; of these 3.3 million acres, approximately 70,000 acres are in designated wilderness, (i.e., 0.07 / 3.3 = 2.1%) and approximately 151,000 acres are in inventoried roadless (i.e., 0.15 / 3.3 = 4.5%)

The above graph is summarized in the conclusion to the Wilderness Needs Assessment, in the "*Representation of Ecological Sections*", which notes that *"warm moist western red cedar and western hemlock forests in north Idaho and northwest Montana"* as well as *"riparian types"* are under-represented (and would benefit from inclusion) in the National Wilderness Preservation System. This conclusion goes on to state that: "*these systems are inherently small landscape components that have high value."*

These habitats are predominant in the Scotchmans, especially in the valleys and we would suggest that both the IPNF and the KNF need to make sure that the recommended wilderness boundaries in the final plan include achieve the objectives for these habitats, as suggested by the forest service's own Wilderness Needs Assessment. *(See specific later comments on East Fork Blue Creek on the KNF as well as Key Drainages on the IPNF).*

Water Quality

The following is an excerpt from a letter sent on Sept 8, 2006 by Dr. Fred Rabe, professor emeritus, University of Idaho, Moscow, to the Idaho Panhandle National Forest as part of the public comments during the 2006 phase of the KIPZ planning effort. Please note the full letter is part of the appendix to our comments and the study he references will be included as an attachment to these comments:

"Five different streams were sampled in the Scotchman Peak region – East Fork Lightning Creek, Lower and Upper Spar Creek, Char Creek, West Fork Blue Creek and Ross Creek. Morris Creek was visited but there was not enough time for an adequate sample. All streams had a high biological integrity and high intolerance of macro invertebrate communities. These invertebrates are sensitive to stressful conditions such as domestic sewage, logging and mining and thus serve as a useful tool for detecting environmental perturbation from point and non-point pollution sources.

A biotic integrity score is determined by using seven different measurements some being number of species, percent dominance, number of mayflies, stoneflies and caddis flies. Based on work by Burkantis (1998), the five streams all ranked high as to biotic integrity. Char Creek in Idaho supports bull trout and had almost a perfect score.

Upper Spar Creek, an outlet to Upper Spar Lake in Montana, likewise had a very high biotic integrity. This stream is one of the most pristine habitats ever sampled. It is shaded by high slopes and tall conifers with the channel consisting of riffles, cascades, small waterfalls and a variety of pool types. The dominant substrate is boulders and cobble-size rocks and the water is gin-clear."

Serving a Growing Population and Transitioning Economies

Despite a decline in the timber industry over the last two decade and even despite the nationwide economic recession of the last several years, out region continues to grow. We must look to the relationships between a growing population and the changing role that the national forests play in accommodating the needs of the region.

Economic growth since the early 1990s has occurred not because of natural resource extraction, but because of the benefits people associate with living in an area with abundant natural areas. Timber and mining still have an important role in our local economy and we support the continuation of these industries in the area and the use of the national forest resources to support these industries. We must also recognize that new job growth has, for the most part, not been created in timber and mining industries. In addition to ecological and recreational goals, the Forest plans should address the question of determining an appropriate scale, balance and location for management options which will yield the highest economic benefit from both natural resource extraction as well as natural resource conservation. Clearly Wilderness protection plays a role in this.

New jobs have come to our region because people *want to live here*. Folks who are buying second homes or retiring bring their personal assets and incomes with them. Their buying power creates jobs in construction, professional services, financial services, education, healthcare and so on. Various businesses such as Coldwater Creek, Encoder, Lighthouse Foods, Laughing Dog Brewery, Quest Aviation are located here in our area because their owners want to live here and they are able to attract managers and workers who cherish the quality of life that our surrounding natural areas provide. They hike, hunt, fish, mountain bike, paddle; many of them prefer quiet recreation. With the internet allowing people to telecommute, many people are employed by companies across the country but can (and do) choose to live and work in an area like ours, areas which provide these same natural resource "amenities". In short: natural resource conservation provides the scenic vistas, the sense of place, and the recreational opportunities which most people want and which, in turn, help to provide economic drivers for our region.

The Sandpoint Chamber of Commerce noted this in a 2011 letter of endorsement (note the full letter is included as an attachment):

> Part of the Chamber's vision statement is to help 'build a future of prosperity through partnerships'. We strongly believe one of the best ways we can build a future of prosperity is to help protect the natural resources and beauty of our area and all it has to offer.

At the same time, with growth comes a need to set areas aside for preservation, to assure that growth does not change the nature of the place. Some areas need to be preserved for opportunities for quiet recreation and solitude, as well as habitat security for native flora and

fauna. In the range of options available to the forest service, managing some areas as recommended wilderness is more important now than ever before.

In the KIPZ "Comprehensive Evaluation Report" (CER) compiled as part of the planning process in 2006, Page 51 of Appendix K "Inventoried Roadless Area Evaluation" notes that: "*in these counties with rapidly growing populations, should look for opportunities to recommend inventoried roadless for wilderness designation*."

Note: The full CER can be read online at:

http://www.fs.usda.gov/detail/kipz/collaboration/?cid=fsm91_056617

Ensuring that the Scotchman Peaks are recommended for wilderness with the strongest boundaries possible would help secure the need for wilderness for our communities and our regions including Spokane and Coeur d'Alene.

Comments Specific to the Idaho Panhandle Forest

In general, we appreciate the support the Idaho Panhandle National Forest's has shown for wilderness in the Scotchmans by making recommendations that are stronger than the 1987 plan. And we would like to thank the forest service for keeping recommended wilderness areas free from snowmobiles. Eliminating uses that are incompatible with eventual wilderness designation provides a stronger recommendation for wilderness and, we believe, brings the forest service into full compliance with its obligation to manage areas as recommended wilderness. We recognize that these are difficult decisions and appreciate that the agency is confronting this potential controversy rather than deferring it to a later date and other arenas.

There is a high degree of community support for the designation of the Scotchman Peaks as Wilderness as defined in Alt B and Alt C, and we generally support the recommendations for wilderness made in Alt B and Alt C. Although we would prefer to see slight modifications that would more closely align the recommended wilderness boundary with the inventoried wilderness boundary along the southwest edge of the Scotchman Peaks, we recognize that the preferred alternative essentially encompasses the key areas supported within the community.

Key Drainages

We appreciate that the IPNF for the adding to the Scotchman Peaks recommended wilderness portions of the East Fork drainage, Savage Creek, Morris Creek and Regal Creek drainages that were excluded in the 1987 Forest Plan. Some of these are outside of the Scotchman Peaks IRA, because of a history of logging or mining exploration which ceased many decades ago. These lands have healed and are so far along the road to reverting to nature that few would notice

any on the ground impact from man. The all retain high ecological values and wilderness characteristics with virtually no opposition from other folks to their inclusion as recommended wilderness and we appreciate that the IPNF has recognized this.

In fact these drainages, as well as the entire Scotchman Peaks IRA are an important part of the larger Lightning Creek eco-system and are a key reason why this location was recently selected by the National Forest Foundation as one of their 14 "Treasured Landscapes" across the entire National Forest system.

Northern Boundary Lighting Peak - Twin Peak Area

On the northwest side of the Scotchmans Peaks IRA the boundaries for recommended wilderness proposed by Alt B and Alt C follow topographical features which are useful to mark the location for snowmobile play areas on Lightning Peak. While we believe that the Lightning Peak area of the Scotchman Peaks IRA holds high ecological value, worthy of wilderness designation and while we will continue to advocate for those wilderness values, we recognize that existing, and legal, snowmobile use in the Lightning Peak area will make congressional designation unlikely. The boundary proposed in Alt B and C along Char Creek to the top of Twin Peaks is a compromise that we can live with as a pragmatic reality.

We would also state emphatically that this boundary should erode no further. The adjacent area, inside of the wilderness recommended by Alt B and Alt C (the upper East Fork Creek and Thunder Creek basins) retain high ecological values including critical winter habitat for Mountain Goats, to potential denning locations for Grizzly and Black Bears and habitat security for many other species of flora and fauna. They are also prime areas for undisturbed opportunities for quality hunting, quiet, primitive recreation and solitude.

We have heard from some in the snowmobile community who would want access to this area, as if the only places appropriate for wilderness are defined as those places that they don't want to go. It is not reasonable to define wilderness as only appropriate in those places not desired by snowmobilers. To achieve the objectives for which Wilderness is included as a management option, we must evaluate which areas have the highest value as wilderness and then balance wilderness with those other uses, retaining wilderness in some cases where it offers than other competing uses. Relegating wilderness only to areas with no other interest would not achieve the full value of wilderness.

The Char Creek Boundary represents a compromise which leaves open to snowmobiling *every acre of the West Cabinets to the North and West.* We believe that not only should be sufficient for those interested in snowmobiling; we believe that any further erosion of the Scotchman Peaks recommended wilderness would be an abrogation of the forest service's responsibility to manage for wilderness (under the Multiple Use and Sustained Yield Act of 1960) as well as its obligation to make recommendations for wilderness under the 1964 Wilderness Act.

Southwest Boundary (Goat Peak Area)

On the southwest side of the Scotchman Peaks recommended wilderness, the boundary is located mid-slope, along an elevation contour line. While the neither the DLMP nor the DEIS explain why this boundary deviates from the roadless area boundary along the southwest edge, we suspect that the boundary line in the Alt B and C reflects wild land urban interface concerns. Even with that consideration, it is not clear why the current Alt B and C use a contour line that is higher upslope than the 2006 draft plan map released by the IPNF.

In our opinion, the boundary along the southwest edge of the area should coincide with the roadless area boundary. The topography on the hillsides below Scotchman Peak and Goat Peak is simply too rugged and steep for road building and logging. In fact, this hillside has never been logged nor has any road ever been conceived that could be built upon it.

Private lands in the area are upwind from the roadless area. Fires are more likely to begin on private land and burn onto National Forest System Lands in this location than vice versa. Fire would be more likely to be fought effectively on those private lands, many of which are fielded or roaded. These lands already offer some form of fire protection or buffer to the community of Clark Fork, which is still several miles in the distance. We would suggest that the recommended wilderness boundary be brought down to the IRA boundary along the southwest edge and believe this should pose no threat to lives and property.

In the event that management activity were to be considered for the Scotchman Peaks IRA with the objective of reducing the threat of fire, again the steep topography and mosaic of open rocky cliffs would make mechanical thinning unlikely. The option of prescribed burning was envisioned by the "Rising Cougar" project being drafted several years ago. Should that project be resurrected, prescribed burning would still be an option, even within the recommended wilderness. The guideline for the use of fire in recommended wilderness in the DLPM is as follows:

"MA1b-GDL-FIRE-02. *Prescribed fire may be used as a tool for ecosystem restoration purposes where the need is linked to human-induced changes caused by factors such as fire suppression and/or the introduction of non-native species."*

We would suggest that some serious consideration be given to the best boundary for recommended wilderness in this southwestern corner of the Scotchmans. Although we would prefer the IRA boundary to be used, at the very least the boundary should be lower on the slope, as it was in the 2006 draft plan.

Comments Specific to the Kootenai National Forest

We would first like to thank the Kootenai National Forest for making the right decision in returning the category of Recommended Wilderness to the Draft Land Management Plan and recognizing that the 2006 decision to use "wild lands" as a surrogate category did not sufficiently meet management goals or objectives for the forest.

The forest service faces many challenges in balancing various needs in selecting which areas that it will manage as 1b, Recommended Wilderness, and we know that much care goes into this evaluation and selection process. In general, we believe that Alternative C best reflects the high wilderness value found in the Scotchman Peaks area. We also believe that Alternative C can be improved upon in certain specific areas where wilderness needs can be better addressed and where there is minimal to no impact on other interests. Immediately below are detailed comments on several key areas where boundary modifications can improve the value of the area being recommended for wilderness. In the appendix at the end of this letter we will provide detailed maps for three of these locations. We will start in the north, at the "top" and go clockwise around the Scotchmans.

Northern "Lobes" *(See Appendix Map 1 for details)*

In the Scotchman Peaks Inventoried Roadless Area (IRA) there are several ridges and valleys extending north and East of the Drift Peak ridgeline. These ridges are separated by six drainages: Cliff, Cheer, Briar, Drift, Hyatt and Whoopee. On the map this gives the appearance that the Scotchman Peaks IRA has three "lobes". In the 1987 two broad arcs were drawn across this complex of ridges and valleys and these two arcs were include in the area managed since then as recommended wilderness. Undoubtedly one of the reasons for this 1987 management direction was to protected critical winter habitat for mountain goats. A 1980 MOU between the Kootenai National Forest and Montana Department of Fish Wildlife and Parks agrees to manage this area, along with the "Savage Basin" area to preserve mountain goats and their habitats. Specifically this MOU prohibits road construction and any kind of motorized recreation (summer or winter).

We know that gaining legal access to these areas is a high priority by the snowmobile community. However, if the intention of removing these "lobes" from recommended wilderness is to open them up to snowmobiling we would note that, without enhanced security for mountain goats along the Drift-Savage Mountain complex, this would be a serious threat to mountain goat habitat.

There has been some discussion in the community (and in fact between our organization and the Troy and Libby Snowmobile Clubs) about the potential for congressionally designated wilderness providing sufficient core mountain goat security that these areas might be determined to be OK for snowmobiling by MDFWP. We would point out that designating

wilderness is a decision that congress would need to make and that opening them up to snowmobiling (as would potentially be done by the 5c designation in Alternative B) would need to have the approval of MDFWP in order to be in compliance with the existing MOU. Any decisions on reducing wilderness recommendations for this area, which would potential impact the overall degree of wildlife security should be made only when increased wildlife security is assured by congressional action designating the remaining area as wilderness.

A further problem with changing the status of this area from Recommended Wilderness to 5C is the question of compliance with the Lynx Management Amendment. The 1987 Forest Plan was amended, to include the Northern Rockies Lynx Management Direction (NRLMD) in 2007. The DLMP proposes to continue with the implementation of the NRLMD.

Among other things, the amendment is intended to address recreational impacts to lynx. Potential effects to lynx as a result of management actions are analyzed at the lynx analysis unit (LAU) scale. Standards and guidelines contained in the NRLMD limit the types or amounts of management actions that may be approved in each LAU. Guideline HU G10 (NRLMD, Page 7) limits the amount of recreational snowmobile use in each LAU*: "Designated over-the-snow routes or designated play areas should not expand outside of baseline areas of consistent snow compaction unless designation serves to consolidate use and improve lynx habitat."*

It seems clear that, to be in compliance with NLRMD, areas closed to over-snow motorized use during the baseline period of 1998-2000 cannot be allocated to 5C. Even if the final DLMP does not make site-specific travel management designations, the NRLMD seems to preclude the Forest Service from designating snowmobile use areas that were closed during the baseline period.

We would prefer that the recommended wilderness boundary be extended to include the remainder of the Scotchmans IRA along these ridges in order to provide the greatest habitat security for mountain goats and lynx. We believe that, at a minimum, the portion of these "lobes" that were recommended as wilderness in the 1987 forest plan should retain that management direction in the final plan (see red lines on Map #1 in appendix). However, should recommended wilderness be removed from these two lobes, we would recommend that they be managed as back country 5A (non-motorized) instead of 5C to remain in compliance with MDFWP's direction regarding mountain goats and with the needs addressed by the Lynx Management amendment.

"Savage Basin"

We appreciate that the forest service has retained the wild basin to the north east of Savage Peak, commonly referred to as "Savage Basin" in the area recommended for wilderness. The remote and rugged basin has high ecological value for many species of flora and fauna. Protecting it as wilderness most notably provides a high level of security for critical winter

habitat for mountain goats and preserves potential denning sites for grizzly bears, wolverines and other sensitive species.

Pillick Ridge (See Appendix Map #2)

We want to thank the Kootenai National Forest for the additions to recommended wilderness contained in Alternatives B and C along the north side of the Pillick Ridge area in the lower Dry Creek Valley. These additional areas offer substantial protection for the wilderness characteristics of this area which contains high ecological value.

Moving towards the Bull River Valley, we have concerns with the boundary for the recommended wilderness along the east portion of the lower slopes of Pillick Ridge. And as we continue counterclockwise along highway 200, we see the same concerns. It would appear that in evaluating this area, the recommended wilderness boundary was set back approximately a half mile from highways 56 and highways 200 without any regard for the topography and without any clear gains in management goals or objectives.

We have not received a clear reason as to why the boundary was drawn in this manner. Oftentimes boundaries for wilderness areas are drawn right down to the road, or to adjoining lands not administered by the USFS. Congress has made it clear on numerous occasions that "sights and sounds" of adjoining lands conflict with the administration of nearby lands as wilderness. In other words, boundaries and buffers which are intended to preserve wilderness characteristics are most properly to be found inside the wilderness area, not outside.

Some folks have suggested this boundary may have been meant to take into account a "Wild land Urban Interface". We'd respectfully point out that the steep slopes, sheer bluffs and cliffs of these lower slopes would prohibit any meaningful "active management" for thinning or other purposes meant to reduce the threat of fire. If there were any projects that were to be considered for fire mitigation it would likely be prescribed burning, which is allowable under the guidelines in the current draft management plan:

"MA1b-GDL-FIRE-02. *Prescribed fire may be used as a tool for ecosystem restoration purposes where the need is linked to human-induced changes caused by factors such as fire suppression and/or the introduction of non-native species."*

We would urge the KNF to re-evaluate the propose boundary for recommended wilderness in this area. We would suggest that in general the boundary come right down to the edge of the IRA (See Map2 in the Appendix). In some places the small amount of valley bottom land in the IRA might be left at 5a Backcountry non-motorized; in this situation the recommended wilderness boundary might be drawn at the bottom of the steep hillsides, or even at a contour line a few feet upslope.

Blue Creek

In the vicinity of East Fork Blue Creek, alternatives B and C of the current DLMP remove significant wilderness recommendations currently in place. We cannot find that these changes are justified anywhere in the plan or the wilderness assessments conducted as the basis for the plan. This area needs to be returned to recommended wilderness. And the remaining portion of the IRA in this vicinity not recommended in 1987 needs to be considered for inclusion in the final draft as recommended wilderness.

Conditions on the ground have not changed since 1987. The IRA in this areas remains free of roads. Natural disturbance has not changed the wilderness character of this area. In fact, our Rare Forest Carnivore Study over the winters of 2010-2011 and 2011-2012 turned up evidence of Fishers in this area. No uses conflicting with wilderness exist in the IRA. No other stakeholders have come forward to the best of our knowledge with a request for greater access to this area. The IRA is bounded in 2 places by non-active mining claims. Current and previous owners of these patented claims have continuously expressed interest in their development potential, not their mining potential. These claims were in place in 1987 when the original recommendations for wilderness were made.

Yet, alternative B and C move the recommended wilderness boundary to the top of the ridge, removing this potential protection from the valley's hillsides. Such actions are what gives rise to the critique that wilderness only protects "high elevation rock and ice". Yet, we believe that it is the forest service's goal to protect more than rock and ice. Here is an easy place to demonstrate the agency's commitment to protecting wilderness quality lands.

As noted earlier, the forest service's own assessment states that: *"warm moist western red cedar and western hemlock forests in north Idaho and northwest Montana"* as well as *"riparian types"* are under-represented (and would benefit from inclusion) in the National Wilderness Preservation System. Protecting more of the East Fork Blue Creek drainage as recommended wilderness would help to achieve this objective.

The West and East forks of Blue Creek, and most especially the land between the two, has a high level of botanical interest. The topography in this area creates conditions for special precipitation patterns which receive an abundance of moisture. The unique soil and mixed aged forest which includes some old growth retains a high level of moisture in the soil as well as generally humid conditions. The effect is that the Blue Creek area contains occurrences of very rare lichens, especially near the convergence of the two forks. Survey work done in the year 2000, as well as more recently, by University of Montana lichenologist Toby Spribille has turned up evidence of several rare lichens and the potential for many more species unique to Montana and Idaho, should more survey work be done. This area deserves the highest level of protection. In short the entire Scotchman Peaks IRA in this vicinity should be recommended for Wilderness.

At the open houses and other meeting in January and February introducing the forest plan, agency officials present were unable to clearly articulate the reasons for the proposed change in boundaries in this area. One person was not sure (but guessed) that the boundary might have been redrawn to a more geographically definable boundary. To a certain point, we agree the advantages of geographically definable boundaries where lands adjacent to wilderness are being managed for mechanized recreation uses and where it would otherwise be hard to tell where the recreationist was in relation to wilderness.

Such reasoning simply does not "ring true" in the area around East Fork Blue Creek, for several reasons:

1. In Alt B and C the Scotchmans IRA lands adjacent to the new recommended wilderness boundary would be managed as 5a, non-motorized, so no such potential conflict or problem with recreationists identifying a recommended wilderness boundary would exist.

2. The boundary of the IRA would, of course, remain intact, so the concern, if any, would be incursions into the IRA from general forest or private property, regardless of where the recommended wilderness boundary were to be drawn; moving the recommended wilderness boundary to the top of the ridge would have no positive impact on this.

3. We see no evidence of interest by snowmobilers or OHV users in the surrounding general forest lands outside the IRA, so even the potential for incursion into the IRA is speculative at best.

At a minimum we would ask that the recommended wilderness boundary be returned to the location determined by the 1987 plan, as there appears to be no reason for removing protections from these lands. Furthermore, we would suggest that the boundary for the recommended wilderness be drawn to the edge of the IRA in this area. (See Map 3 in the appendix).

Along the southern boundary of the proposed Scotchman Peaks Wilderness area, the 1987 recommended wilderness boundary, in the vicinity of East Fork Blue Creek, would better incorporate warm moist western red cedar and western hemlock forests than either the current alternative B or C. We would recommend that the 1987 boundary in this vicinity be the baseline for the final plan with the additional parts of the IRA given serious consideration for inclusion in recommended wilderness.

The edge of the IRA offers very visible geographic boundaries along most all of its length (the east fork blue creek forest service road and the patented mining claims boundaries are clear. In the Southwest portion of this area, where the IRA is adjacent to General Forest, any active management conducted by the forest service would include detailed GIS data, ground truthed by surveys and GPS in which again, the boundary concern with regards to the IRA would already

be a factor, made no more significant by recommending wilderness. Having said this, in many places a contour line can be used to define the geography and we would find it suitable to use a contour line a minimal way upslope – such a suggestion is to be found in the yellow line on our Map 3 include in the appendix.

In Conclusion – General for Both Forests

The Multiple Use Sustained Yield Act of 1960 (MUSYA) directs the Forest Service to consider wilderness as one of the multiple used for which it manages the forest and grasslands. The forest service has an obligation to manage for wilderness under this act, a point often lost on those who claim forest service creates "defacto wilderness" and usurps the right of congress to designate wilderness areas. The forest service has a further obligation under the 1964 Wilderness Act to recommend areas for Wilderness.

Wilderness remains a vital component of sound, healthy ecological forest management. Roadless, undeveloped wild lands represent some of the rarest landforms on both Forests, and therefore one of their most valuable assets.

We appreciate the DLMP for both forests again contain recommended wilderness. We believe that with the suggestions we have made the IPNF and KNF will fully achieve their objectives in regards to Wilderness in the Scotchman Peaks IRA.

We hope that both forests will recognize and through enhanced recommendations for wilderness protect the highest level of habitat possible in the Scotchmans for both flora and fauna that represent threatened, endangered, or sensitive species including (but not limited to) the Grizzly Bear, Bull Trout, Canada Lynx, Wolverine and Mountain Goat.

We also believe that opportunities for solitude, scenery, biological integrity, quiet recreation, quality hunting and fishing should be among the ***primary concerns*** in determining boundaries and recommending wilderness for the Scotchman Peaks area.

The Rotary Club of Sandpoint may have summed it up best in a letter of support they sent in 2011 (the full letter is included as an attachment):

"The Rotary Club of Sandpoint would celebrate the designation of the Scotchman Peaks as a Wilderness area, to be protected and managed for our children's children. We must, as a people, have the courage to act rightly today to solve the problems of tomorrow; our members can look at the Peaks and say, "That place is special. That place is worth the cost and effort of protection."

We look forward to remaining engaged in the planning process in a positive way. We would like to request that we continue to be included to receive any information related to forest plan revision process and a copy of the final plan when it available.

Thank you for the opportunity to submit these comments. We understand the hard work that the KIPZ planning team has done on these forest plans. And we recognize the long road ahead in developing the final forest plants. We hope these comments provide some valuable insight and assist with some positive changes. We also hope that they proved sound rationale for adopting our suggestions.

Sincerely

Philip J Hough
Executive Director
Friends of Scotchman Peaks Wilderness

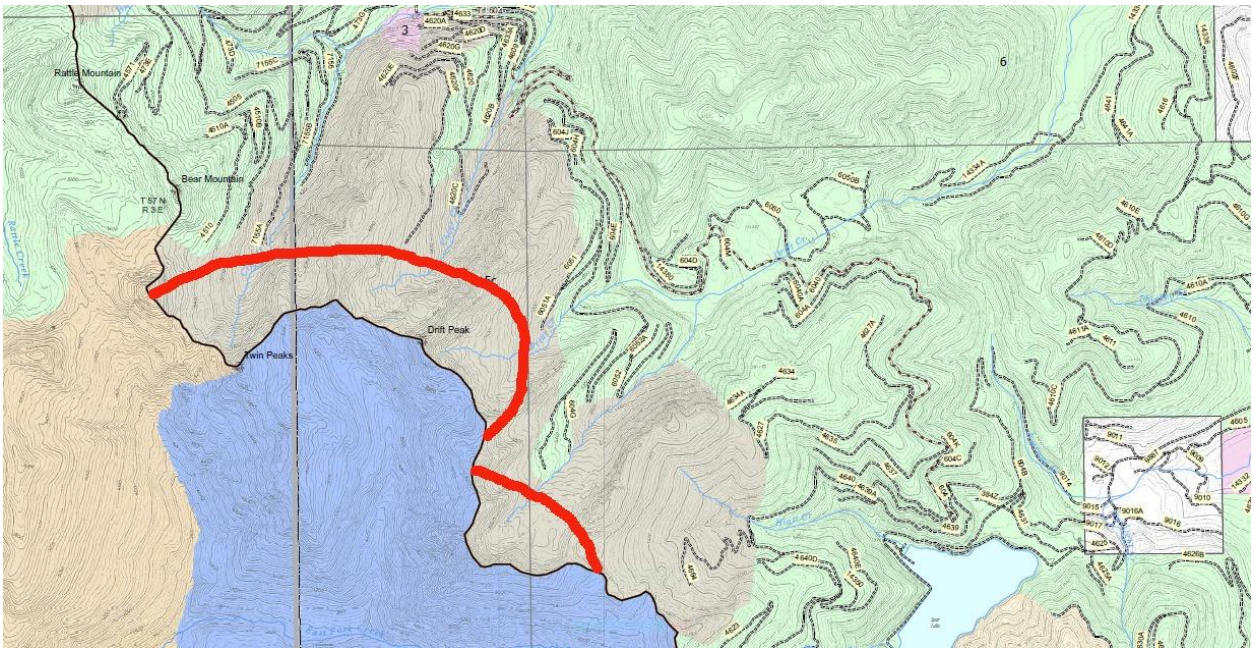
Attachments

3 Jpg files that match the maps listed below
2006 Water Quality Report by Dr. Fred Rabe
Endorsement by the Greater Sandpoint Chamber of Commerce
Endorsement by the Rotary Club of Sandpoint

List of Appendixes included on the following pages

Appendix A Map 1 – Northern Lobes
Appendix B Map 2 – Base of Pillick Ridge
Appendix C Map 3 – Vicinity of East Fork Blue Creek
Appendix D Letter on Water Quality from Dr. Fred Rabe:

Appendix A: Map 1 "Northern Lobes"



Blue Shaded Area = The portion of the Scotchmans IRA proposed for recommended wilderness in the 2011 Kootenai National Forest Draft Forest Land Management Plan in Alternative B and C

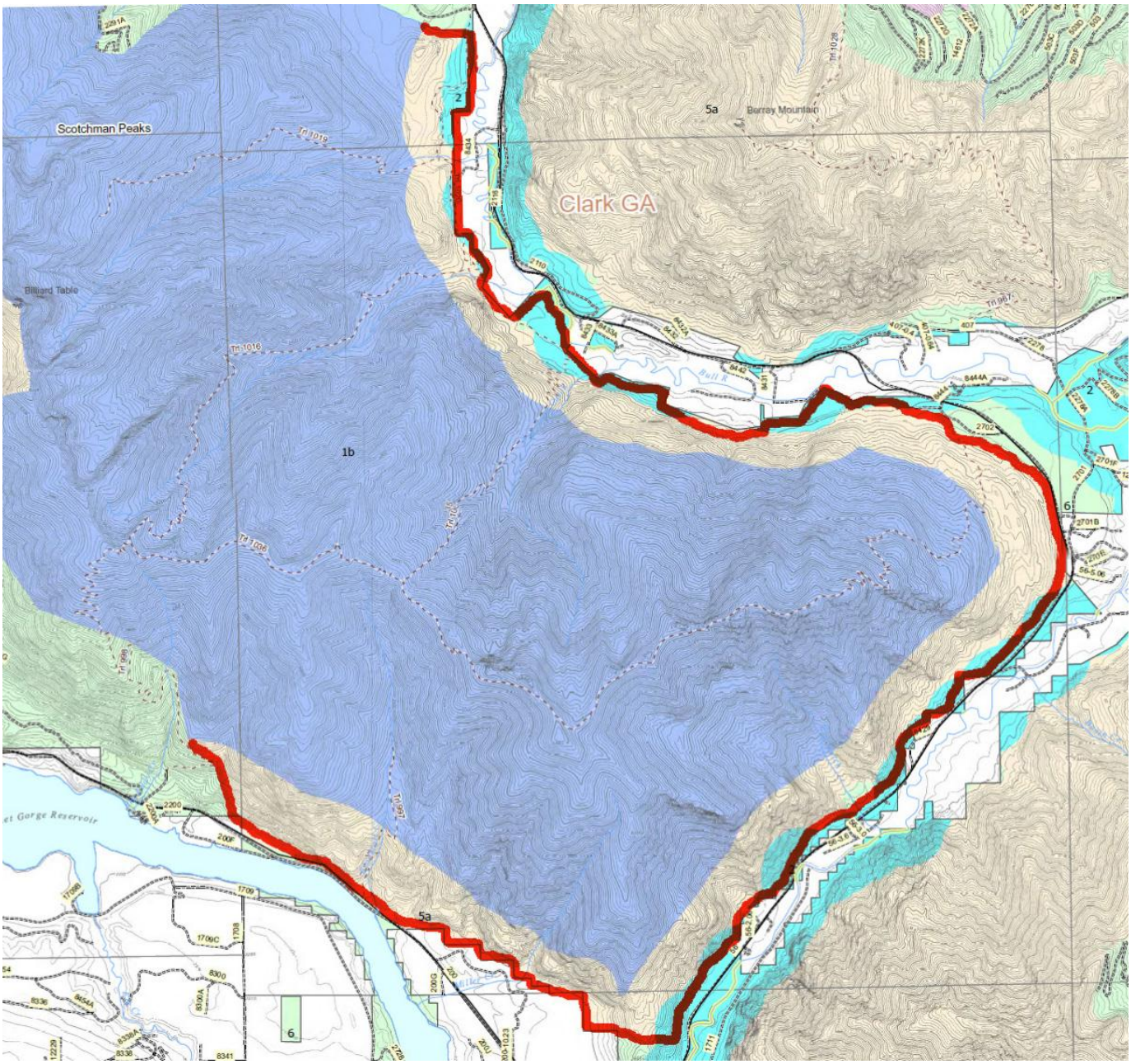
Gray Area = Marked 5c – Backcountry Snowmobiles Allowed

Green Area = Marked 6 – General Forest.

Note: the border between 5C and 6 is the boundary of the Scotchman Peaks IRA in the area north and east of Drift Peak

Red Line = Recommended Wilderness Boundary as defined by the 1987 forest plan, currently in place.

Appendix B: Map 2 - The Lower Slopes of Pillick Ridge

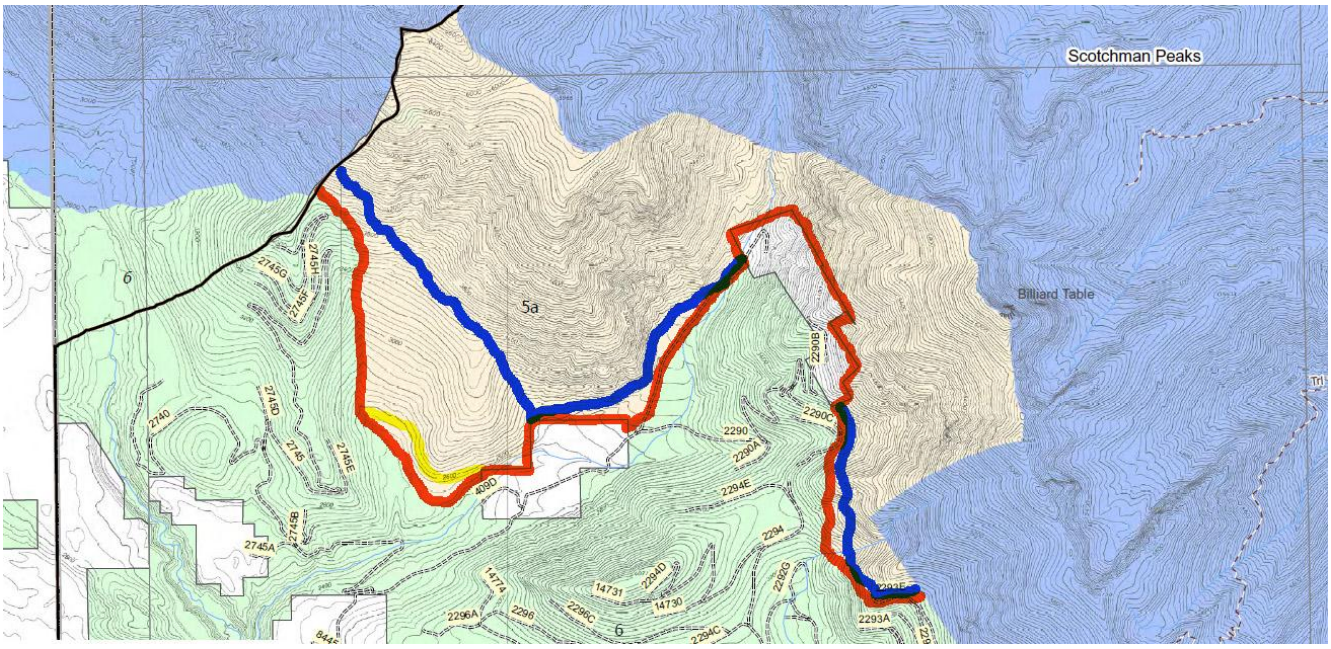


Blue Shaded Area = The portion of the Scotchmans IRA proposed for recommended wilderness in the 2011 KNF Draft Forest Land Management Plan in Alternative B and C

Tan Area = Marked 5a – Backcountry Non-Motorized

Red Line = Recommended Wilderness Boundary as suggested by the Friends of Scotchman Peaks Wilderness

Appendix C: Map 3 East Fork Blue Creek Area



Blue Shaded Area = The portion of the Scotchmans IRA proposed for recommended wilderness in the 2011 Kootenai National Forest Draft Forest Land Management Plan in Alternative B and C

Tan Area = Marked 5a – Backcountry Non-Motorized

Green Area = Marked 6 – General Forest.

Note: the border between 5a and 6 is the boundary of the Scotchman Peaks IRA

Blue Line = the boundary for recommended wilderness in the 1987 plan currently in place.

Red Line = Recommended Wilderness Boundary as suggested by the Friends of Scotchman Peaks Wilderness

Yellow Line – A geographically definable boundary based on contour.

Appendix D: Letter on Water Quality from Dr. Fred Rabe

KIPZ Proposed Land Management Plan
Idaho Panhandle National Forest
3815 Schreiber Way
Coeur d'Alene, ID 83815

September 8, 2006

Dear Forest Service

I support preserving the **Scotchman Peaks** area for Wilderness Designation.

Five different streams were sampled in the Scotchman Peak region – East Fork Lightning Creek, Lower and Upper Spar Creek, Char Creek, West Fork Blue Creek and Ross Creek. Morris Creek was visited but there was not enough time for an adequate sample. All streams had a high biological integrity and high intolerance of macro invertebrate communities. These invertebrates are sensitive to stressful conditions such as domestic sewage, logging and mining and thus serve as a useful tool for detecting environmental perturbation from point and non-point pollution sources.

A biotic integrity score is determined by using seven different measurements some being number of species, percent dominance, number of mayflies, stoneflies and caddis flies. Based on work by Burkantis (1998), the five streams all ranked high as to biotic integrity. Char Creek in Idaho supports bull trout and had almost a perfect score.

Upper Spar Creek, an outlet to Upper Spar Lake in Montana, likewise had a very high biotic integrity. This stream is one of the most pristine habitats ever sampled. It is shaded by high slopes and tall conifers with the channel consisting of riffles, cascades, small waterfalls and a variety of pool types. The dominant substrate is boulders and cobble-size rocks and the water is gin-clear. Upper Spar Creek samples had a higher alkalinity and conductivity than water in the other streams which was extremely soft.

The biotic index is a measurement of species sensitivity to perturbation. A higher number indicates increased tolerance or less sensitivity. The tolerance scale is 0-9. Macro invertebrate communities in the five streams had average indexes less than 3. Char Creek had an index of 2.3. Seven of the 24 species there had 0 tolerance.

Another important measurement is percent intolerant, macro invertebrates with a tolerance score of 2 or below. The presence or absence of these sensitive taxa can be indicative of specific environmental and or habitat factors (Wisseman 1994). Scores ranged from 82-88 percent intolerant, far higher than most stream communities I have sampled closer to civilization.

Communities of macro invertebrates can be characterized functionally as having different feeding groups – predators, shredders, collectors, filter-feeders. Predator species are relatively long-lived and appear to be fairly susceptible to stress. They comprised a relatively large percentage of un-impacted riffle sites in the streams sampled. In Char Creek 54 percent of the 112 specimens were predators.

I was impressed with Upper Spar Lake and scenery and vegetation along the trail (especially the large hemlock trees). Upper Spar is a large subalpine cirque lake over 100 acres in size, very deep especially on the se side, probably in a granite basin, one stream inlet and outlet and many seeps feeding the lake. Aspect is ne, littoral or shallow zone less than 15 % of lake surface, primarily boulder substrate near shore, low shoreline development or irregularity of shore, very soft water and relatively few sedge beds lining shore.

My general impression of the Scotchman Peaks area was that of solitude. Few people were encountered. However this will change with states like Idaho and Montana growing so fast. The pristine waters as described above provide a high quality indicator to the watersheds and land itself, enough of a reason for establishing a wilderness there.

Sincerely,
Fred W. Rabe
Professor Emeritus, 1715 Appaloosa Rd
Moscow, ID 83843

Literature Cited

Bukantis B. 1996. Rapid bioassessment macroinvertebrate protocols: Sampling and sample analysis. Montana Department of Environmental Quality, planning, prevention and assistance. Working Draft. 30 p.

Wisseman, B. 1993. Benthic invertebrate bioassessment. Aquatic Biology Associates. Corvallis, OR. 15 p.