



Kootenai National Forest
Attn: Over-snow Motorized Travel Plan
31374 US Highway 2
Libby, Montana 59923-3022

To: Chad Benson, Forest Supervisor
John Carlson, Planning Staff Officer

August 19, 2023

We are pleased to submit these comments on scoping for the Kootenai National Forest's Proposed Over-Snow Motorized Travel Plan on behalf of the Kootenai Forest Stakeholders Collaborative.

We appreciate the work that went into preparing such a comprehensive scoping proposal. Many of the KFSC members attended one, or more, of the recent open houses and engaged in conversations with the forest service representatives. We would like to make the following suggestions for the draft EA.

Closures: 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.

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, and that a considerable number of violations occur every year. These violations may significantly compromise the plan's ability to protect wildlife values, which represent one of the major goals of the travel plan. We recommend the FS consider requiring OS vehicles to display highly visible registration numbers, similar to the requirement for motor boats. We also recommend that fines for violating the travel plan be sufficient to provide a significant deterrent to potential violators.

Cooperation with user groups to assist with education, monitoring and enforcement will be important. The plan would benefit from a discussion of cooperation strategies with goals and benchmarks.

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.

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 incorporate the KFSC Common Ground Agreement into one of the proposed actions that is analyzed by the Draft Plan and Environmental Assessment. A map is attached to assist in this.

The Kootenai Forest Stakeholders Collaborative was founded in 2006. Our stakeholders' collaborative is comprised of a diverse community of forest users, hunters, hikers, loggers, timber industry representatives, conservationists, business owners, local governments,

educators, and citizens at large. Our mission is to help craft solutions for public lands management by representing diverse values and providing a venue for productive, inclusive conversations between the Forest Service and the community.

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

Sincerely,

Tim Dougherty
Co-chairman

Doug Ferrell
Co-chairman

The Kootenai Forest Stakeholders Collaborative