



Kinnikinnick Native Plant Society

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OFFICERS

August 28, 2023

President

Shawna Parry

Attention: Doug Nishek

Vice-President

Preston Andrews

Re.: Kaniksu Over-Snow Vehicle Winter Travel Plan

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The Kinnikinnick Native Plant Society (KNPS) is an active and large group (100+ members) based in Bonner County since the late 1990s. We educate the public about the benefits of native plants, work to identify and protect sensitive plant populations, and engage the public and institutions in the support of native flora, from small to forest-sized landscapes. We appreciate the opportunity to comment on the proposed Kaniksu Over-snow Vehicle (OSV) Travel Plan. We recognize our region as one of the few, and largest, remaining inland temperate rainforest ecosystems in the world, with a unique array of native plant species that comprises its diverse plant communities.

BOARD MEMBERS

Sherry Ennis

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With the listing of whitebark pine (*Pinus albicaulis*) as a threatened species under the Endangered Species Act by the U.S. Fish & Wildlife Service on December 14, 2022, every effort should be taken to protect these trees in the area covered by the Kaniksu OSV Travel Plan.

Our Objection:

We appreciate the great work and effort which went into the draft final OSV Travel plan. However, our objection is based on the need for the plan to do more in regard to mapping of whitebark pine habitat, as well as enforcement of potential OSV use in restricted areas or during seasonal closures. Attached, for reference, is the response from the Forest Service to our original comments.

FOUNDER

Lois Wythe

(deceased)

Monitoring and Enforcement: While we appreciate that the Forest Service is considering options for monitoring and enforcement, we believe the draft OSV plan needs to be amended to include greater direction for these efforts as well as

establish some benchmarks for monitoring and enforcement. Placing an emphasis on monitoring and enforcement in the plan would demonstrate the agency's commitment to these activities. Monitoring and enforcement of activities during the seasonal closure period is important for the agency to carry out the protections it cites for whitebark pine. Including this as a desired condition of the plan will help to ensure adequate funding and personnel are available to monitor and enforce OSV use restrictions.

Mapping: We realize mapping may take some time, but it is important that existing and potential whitebark pine habitat be comprehensively mapped. This information will help the agency to direct the limited resources necessary for monitoring and enforcement efforts. Including this as a plan objective, with some reasonable timelines, will underscore its importance. After mapping is completed, we request that the IPNF exclude OSVs from the mapped whitebark pine areas until it is removed from its Threatened status under the ESA, and a project specific recovery plan is in place.

Sincerely,

Shawna Parry

President, Kinnikinnick Native Plant Society

Kaniksu Over-Snow Vehicle Use Designation Project
Response to Comments (Updated Jul 13, 2023 by JOSHUA A BAKER)
<https://www.fs.usda.gov/project/?project=53091>

Comment Response #29 (pp. 306-7) to KNPS Letter #83 (p. 15):

“The project area is 1,046,460 acres. Effects to modeled existing (1.3 %) and potential (11%) whitebark pine within the project area that is open to OSV use is low given the size of the project area and topography is steep and OSV access isn’t feasible to all of the terrain within this area. Mountain pine beetle typically attack stands having close spacing and large mature, reproductive-aged trees, generally greater than eight inches diameter at breast height (Perkins and Roberts 2003; Negron et al. 2008; Gibson et al. 2009;). OSV’s are likely to avoid large trees due to the possibility of injury to the rider or damage to their OSV. Although blister rust infection can occur in whitebark pine trees of all sizes and ages, young trees are often more easily infected. This is due to infection of blister rust through the needles and in younger trees there is not much distance from the needles to the main stem of the tree. In general, conditions are more favorable for infection close to the ground because needles stay wet longer. Allowing OSV use would not likely create conditions that contribute to worsening mountain pine beetle or blister rust infestations in the project area.

The Roman Nose Lakes area has been a regional destination for OSV use for over 30 years and provides one of the primary riding areas on the east side of the Selkirk Mountains. It is currently accessed by three different groomed trails, two of which are non-Forest Service trails outside of National Forest System lands. The Botany Report analyzed effects from the alternatives to whitebark in the South Selkirks where Roman Nose is located. Modeled existing and potential whitebark pine habitat in the area open to OSV use identified approximately 3-4 % of the area as existing habitat and 21-25 % of the areas as potential whitebark pine habitat. The three whitebark pine plus trees in the Roman Nose area are greater than 40 feet from any trail. The majority of young whitebark pine trees would be under snow during OSV use. Incident damage or loss of some seedlings and saplings may occur but overall effects would be low. Threats to whitebark pine are greater from mountain pine beetle, blister rust, fire severity, and climate change.

Comprehensive mapping of whitebark pine at this time is not feasible. There are over 5 million acres of potential whitebark habitat within the Forest Service’s Northern Region (Region One) and approximately 385,000 acres in Idaho on National Forest System lands. Many of the areas where whitebark pine trees grow are challenging and unsafe to access. The whitebark pine effects analysis is based on Region One data to determine modeled potential and existing whitebark pine in the project area. This represents the best available science for this analysis.

The forest is considering monitoring options to assess potential OSV damage to whitebark pine within the project area. Winter motorized travel on National Forest System lands is subject to federal regulations related to damage of natural features on federally owned lands (Subpart A 36 CFR part 261.9). Additionally, the Forest Service has the authority to issue closure orders for areas where OSVs have damaged whitebark pine to prevent further damage, and to cite OSV operators who cause such damage.

As disclosed within the Botany Report, overall impacts to whitebark pine from OSV use is low incidental and would not contribute significantly to threats from blister rust, mountain pine beetle, fire severity, and climate change.

Whitebark pine is expected to persist within the project area even if there is an incidental loss of a few individual trees. Given that whitebark pine trees are hardy and flexible, seedling and sapling branches above the snow base are unlikely to snap or break if contact is made with an OSV. A Biological Assessment will be submitted for consultation to the U.S. Fish and Wildlife Service.

A minimum snow depth would be challenging to enforce. To protect grooming equipment, in the past the Idaho Department of Parks and Recreation has required that grooming only occur when 18 inches of snow is present at the lowest elevation that will be groomed. With grooming not occurring until this depth at lower elevations, the higher elevations where whitebark pine occurs (above 4,600 feet) would have even greater snow depths.

Figure 13 shows a photo of several dead trees and a few trees that are difficult to tell the species. The photo states “there is a *Pinus* sp. probably whitebark in the center of the photo and subalpine larch in the upper right center quadrant.” The photo does display OSV use around the area of dead and live trees but does not show damage nor does it appear OSV tracks running into or over trees.”