

Data Submitted (UTC 11): 4/24/2023 12:00:00 PM

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Comments: Kinnikinnick Native Plant Society letter attached

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. 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. Whitebark pine is under substantial duress from multiple stresses by white pine blister rust, mountain pine beetles, increased fire regimes, and climate change, as highlighted in the draft Botany Report for the Kaniksu Over-Snow Vehicle Designation Project (Regula, 2023). This report states: "A key consideration for whitebark pine trees in areas of over-snow vehicle use is protecting immature exposed trees so they can develop into cone-bearing individuals capable of sustaining the local population." (p. 10). The report also states: "The Proposed Action may result in loss of some incidental whitebark pine trees." (p. 13). Under either the Proposed Action or Alternative A, it is stated that there is only 1.3% and 1% of existing whitebark pine habitat open to OSV use, respectively (Regula, pp. 13 and 15). We think that excluding this small area from OSVs would not adversely impact OSV recreational use. Furthermore, any additional insult to immature whitebark pine trees can doom them, as mountain pine beetles are quick to take advantage of wounds, as from those caused by OSVs. At the very least, we encourage forbidding OSV travel in all whitebark pine habitat in the area covered by the Kaniksu OSV Travel Plan. We favor an even more precautionary approach, in which all OSV activity is prohibited until existing and potential whitebark pine habitat can be comprehensively mapped, and adequate funding and personnel are available to monitor and enforce OSV use. Sincerely, Shawna Parry, President, Kinnikinnick Native Plant Society. Reference: Regula, V. Jan. 13, 2023. Botany Report - Draft for Public Comment. Idaho Panhandle National Forest.