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First name: Hilary

Last name: Eisen

Organization: Winter Wildlands Alliance

Title: Policy Director

Comments: Dear Supervisor Benson,

As backcountry skiers, cross-country skiers, snowshoers, and all-around winter enthusiasts, we care deeply about winter recreation management on the Kootenai National Forest. We are further interested in this plan because of the important winter habitat that the Kootenai provides for wildlife such as Canada lynx, wolverine, fisher, and grizzly bears and the potential impact over-snow vehicle use can have on these species, as well as rare but important vegetation such as whitebark pine.

We appreciate that the Kootenai has already begun to consider how it will apply the minimization criteria as part of its analysis of designated OSV areas and routes. The screening questions you have developed are a good start, but please also include questions that address noise impacts and air pollution, as well as the potential for OSV incursions into adjacent non-motorized areas. These types of questions will help to better assess how each proposal may, or may not, lead to use conflict.

We support the Kootenai's proposal to not designate OSV use in recommended Wilderness, non-motorized backcountry areas, other areas closed in the Forest Plan, and along cross-country ski trails. There are additional areas that should not be designated for OSV due to the important habitat and connectivity they provide for wildlife. This includes the Galena, Barren, and Allen Peak inventoried roadless areas south of the Cabinet Wilderness. We also support the Kootenai's proposed season dates, which will help to ensure OSV use is limited to those times of year when there is sufficient snow, and when it will be least impactful to grizzly bears. Spring closures also help to protect natural soundscapes at a critical time for birds, which rely on their songs to communicate during the breeding season.

As you develop the Environmental Assessment, please also include a robust implementation, monitoring, and enforcement plan that will help the Kootenai National Forest ensure this plan achieves its intended goals once complete.

Thank you for considering these comments on behalf of the Winter Wildlands Alliance members and supporters listed in the attached letter.