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Comments: On behalf of the undersigned individuals, WildEarth Guardians submits the attached comments regarding the scope of the proposed action described in the July, 2023 Kootenai National Forest Over-snow Motorized Use Travel Plan Scoping Packet.

The Forest Service's proposed action would authorize snowmobiles, snow-bikes and other over-snow vehicles (OSVs) to drive across more than 1,127,600 acres in northwest Montana. It would also designate winter motorized use on 368 miles of ungroomed trails and 274 miles of groomed trails. We appreciate and support the proposed action to protect maternal and primary wolverine denning habitat. In addition, we support the intent to protect high quality and adjacent medium quality grizzly bear denning habitat. However, we urge the agency to consider an earlier closure period given bears can emerge from their dens prior to March 31st, and the potential harm motorized may cause bears even as they hibernate.

Studies show that OSVs can harass wildlife and increase stress when animals are highly vulnerable by causing them to flee areas at a time when they need to conserve energy, effectively reducing the amount of secure habitat. Grizzly bears are susceptible to disturbance, especially during times when they emerge from hibernation starting in late February through April. Further, OSV use may change movement patterns, compacting snow and increasing prey competition for Canada lynx, and the proposed action makes no mention of protecting critical lynx habitat or areas of connectivity.

The Forest Service must carefully consider these harmful environmental consequences in a robust, detailed environmental impact statement. Part of such analysis must account for the significant habitat disruption caused by excessive noise from motorized use. While area closures certainly benefit grizzly bears, wolverine and big-game winter habitat, the Forest Service should include adequate buffers to prevent noise disturbances.

Ultimately, we urge the agency to consider an alternative that includes the following:

- Protect high and medium quality suitable grizzly bear denning habitat from OSV use by adopting area closures beginning March 15 to protect bears emerging from hibernation; clarify protections may be sooner if bears begin to emerge sooner;

- Protect mapped whitebark pine stands and replanted areas from cross-country travel.

Monitor areas of potential whitebark pine habitat to maintain mapped inventories.

- Establish protective buffers around closed areas sufficient to protect them from adjacent OSV noise.

- Establish minimum snow depths should be at least 24 inches for cross-country travel and 18 inches for travel on groomed trails.

- Create and adopt a monitoring and enforcement plan that effectively monitors high use areas, directs issuing citations for violators, and includes automatic closures for areas with repeated violations.

- Protect all recommended wilderness and Inventoried Roadless Areas from OSV use.

Adopting these changes will ensure the Forest Service does not prioritize motorized recreation over the needs of at-risk species, and will effectively comply with regulations that direct the agency to minimize the harm from poorly managed OSV use.

Thank you,

Adam Rissien

ReWilding Manager

Individuals who signed comment are included in attachment