

Data Submitted (UTC 11): 8/21/2023 4:53:28 AM

First name: Kathaleen

Last name: Krass

Organization:

Title:

Comments: I know how important public access to our lands is to you and I appreciate your efforts to ensure all users have access to our forests.

I fear this issue may not have made it to your attention and it is extremely important to ensure we do not allow closure for the sake of closure. From what I can tell, you are attempting to enlarge a wilderness area by default, without having to actually scope or study for it. In fact, the study area, if that is closed currently, if I understand correctly, should already be released as a study area and shouldn't be closed anymore unless, and until, they prove the need for closure.

Closing lands because of 'species of concern' is saying that you think there might be a problem, but you don't know so you're going to, again, default and say no to use.

This gross overreach and underworking of our systems cannot be tolerated especially in traditionally low-income, economically challenged areas! Families in these areas, and current FS Permittees will lose vital income for their staff and families with these egregious closures.

The meeting held by the KFS had no speakers, no presentation, no information other than to tell attendees to walk around and look at the maps and if you have any questions or concerns, to let them know.

That is not an informational meeting that allows for true public comment.

The maps still are not exactly forthcoming either, so we are not actually certain what the KFS is proposing. What we can tell- is that some of the closures are for no real reason other than they need to finish a project from years ago and in order to check the box completed... they have to do 'something'.

We ask that this closure of the Kootenai National Forest be reviewed before being implemented as there is no submission of fact from any study to come to the conclusions presented here.

There are a lot of blanket statements that are tantamount to saying 'If'.

"Three significant areas of concern are:

The Dry Creek area west of Bull River is a historically used snowmobile area that is being closed because " it is close to the Scotchman's Peak wilderness and people may trespass".

'People may trespass' is the reason given for the requested closure. That is not a reason, that is a fear and a speculation. There is, to date, no evidence presented that would corroborate this statement.

This is a "guilty until proven innocent" process currently used in RWA management and/or acquiescing to wilderness advocates' demands. It effectually, outside of Congressional designation, expands Scotch Peaks Wilderness Area.

The second area of concern: areas closed for snowmobiling include all RWA's and Scenic River designations. There is nothing in the 2012 planning rules that say RWA's must exclude snowmobiling. Too, not all scenic river designations preclude over the snow vehicle access."

Third area of concern: Wolverine (PERCEIVED) habitat closed to snowmobile access even though USFW has not designated the Wolverine as endangered. Nor shown any evidence that provides basis for concern.

This proposed action does not adhere to the 2012 planning rules.

It looks like this is a preview of travel planning for the Lolo NF planning review. It is the never ending "creep" to close back country snowmobiling on NF lands regardless of congressionally approved planning rules. Another words- this plan is a plan laid out across the Forest Service and the wording is such that it is identical to each location, with little items changed (which animal/species is of concern for example.)

Every snowmobiler needs to have a realistic opportunity to engage in this. The KFS meeting did not allow for that, with the mid-day meeting that was not a presentation or a meeting but a fend-for-yourself print-out push. Several people have asked for access/information to better mapping. Unfortunately, there wasn't access to the maps until just recently.

What information I am getting is from members who have attended some of the public meetings at the end of July and August. Those folks asked for clarification; however it was not forthcoming. When asked for

documentation that shows the reason for conflicts or concerns of animal or end-user disagreement that brings this to a head, as they suggest, there are no reports. Not a report for the animal, agriculture, cultural, or even police reports to show for the supposed conflicts.

We are in a situation where the FS is apparently trying to push through snowmobile closures outside of the 2012 planning rules. There has not, to our knowledge, been any reason(s) given for many of these arbitrary closures. This is disconcerting: Montana Wild has a substantial informational on its website asking for comments on the over snow travel plan including suggestions for more closures. Some of their suggestions mirror the current FS proposals, again without documented research or evidence for the blanket statements of concern. Particularly, closing historic snowmobile areas adjacent to RWA's and Wilderness to prevent "trespass" into those areas. To review these potential changes in the off season for snowmobiling, and during the middle of the work day, and without information or other documentation gives the appearance of a land grab by the Forest Service. Many small businesses in the areas of the requested closures benefit from the over-the-snow tourism dollars that come in from these open areas. To turn around and close these down without evaluating the impact to the communities is a gross misrepresentation of the full impact these closures will have. We request these actions be stopped until and if such a time as can be proven to be a necessity and that the FS go through the proper channels to congressionally close or increase the wilderness designated areas and not just arbitrarily shut them down to appease a portion of the public that is harassing them as they certainly do not represent the end-users in this instance. Fair use is required by law. The closures you are requesting to implement deeply limit the use of one set of users while exponentially increasing the use by others. Knowing full well the other user groups cannot access these areas by foot or by ski, alone. I thank you for your time.