Data Submitted (UTC 11): 8/22/2023 6:00:00 AM
First name: Edward
Last name: Gevrekian
Organization:
Title:
Comments: Dear Forest Supervisor Chad Benson,

I am writing to share feedback regarding the Kootenai OSV Travel Management Plan. I enjoy recreating on public land and want to express my support for keeping access open in the Panhandle Forest for all types of recreation uses, including OSV use. I believe through proper management and education trails roads and areas can remain open without negative impacts. Proper access will help mitigate damage by preventing concentration of use and impacts.

Wildlife is an area of concern within the management plan. Many species were identified and measures were proposed to ensure protection for these animals and their denning habitat. The USFS needs to use best available science in setting boundaries and making decisions. Currently bear populations are being managed appropriately therefore the need to designate more wildlife habitat or enact more restrictions in the name of preservation is inconsistent and unnecessary. Yellowstone NP conducted a study on motorized winter use on wildlife and showed no significant impact. Areas should not be restricted due to potential denning habitat.

These forests include wilderness areas and other restrictive designations. In other words, there is already very restrictive management in the areas bordering the forest and Forest Service lands should be managed for the greatest good for the greatest number of people. Currently approximately one million acres of the forest is set aside from this planning process due to restrictive management designations. Restricting OSV use to specific dates is arbitrary and capricious. The USFS should develop an alternative that allows the date-restricted areas to be managed when motorized access standards are met. Dry Creek Area should not be removed due to proximity to Wilderness. USFS cannot create buffer zones.

The USFS should finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities. Travel management policies focused on "minimizing" the environmental impacts of motorized recreation have resulted in a dramatic increase of lands that are closed to those who can only access public lands with motorized assistance. OSV access allows those with mobility impairment disabilities to enjoy winter recreation on USFS lands.

While the scoping proposal doesn't identify using minimum snow depth requirements to allow for snowmobile use, I am opposed to any recommendation that snow depth be used as a motorized access standard. Snow depth isn't a reliable standard for motorized access. Managers should have discretion to allow OSV use if the use won't result in meaningful environmental impacts.

I am opposed to the USFS closing any areas to OSV use for alleged user conflict. USFS shouldn't be basing its decisions off of the subjective preferences of users who want to restrict the use of others. Areas that are currently closed to motorized users for cross country skiing should be analyzed to be opened to OSV use. It is clear in other areas these uses can co-exist.

In conclusion, I believe in shared use and that there is enough public land for all to enjoy as long as agencies use best practices. Please refrain from closures as roads and trails are critical to the forest.