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Comments: I would like to express my strong opposition to the Kootenai National Forest Over-Snow Motorized Use Travel Plan.

The preliminary proposed action summary states that the USFS is proposing to open 1,257,633 acres to over snow vehicle use. This statement is not only deceptive and misleading but blatantly false. Currently there are roughly 1.9 million acres that are open to over snow vehicle use within the Kootenai National Forest. So, if this plan were approved there would be a reduction in ~600,000 acres of current access, not a creation of 1,257,633 acres of access. The maps included in this plan only show what the use area would be not what they currently are. The public should visually be shown that this plan reduces current access and does not create access as it portrays. This plan should be rescinded until maps showing the current areas accessible to over snow vehicle use are provided.

From a wildlife protection standpoint there are some serious oversights in the Over-Snow Motorized Use Travel Plan. While common sense would say that over snow vehicle use is disruptive to wintering big game populations and should be limited as proposed in this plan it completely overlooks the beneficial impacts to ungulate populations by allowing legal and sustainable trapping and hound hunting. If areas are excluded from over snow vehicle use, you would also exclude hound hunters and trappers from accessing these areas. Either a special exception needs to be included that allows over snow vehicle use for all who are involved in legal hunting or trapping, or these areas need designated as big game winter range just need to remain open to over snow vehicle use. A similar scenario has unfolded around Hungry Horse Reservoir near Spotted Bear. MT FWP worked directly with the USFS to establish restrictions on over snow vehicle use to protect big game winter range along Dry Parks, Spotted Bear River and along the base of Spotted Bear Mountain. All know wintering areas. These vehicle restrictions were all established with good intentions and worked well until the reintroduction of wolves and steady rise in mountain lion populations. The unintended consequence of the over show vehicle restrictions was trappers and houndsmen are unable to properly manage predator populations and as a result (along with decreases in habitat health) ungulate populations in the South Fork of the Flathead River Drainage are at a 100-year low. Calf recruitment over the last 15 years has dropped to an average of 13.8 calves per 100 cows down from a historic average of 25.3 calves per 100 cows. 25 calves per 100 cows' results in a stable elk population or slightly growing so the elk population is at an negative 11.2% growth rate in part due to excessive predation and an inability to manage large carnivores due to over snow vehicle use restrictions. FWP Region 1 overall has dropped from a historic average calf recruitment of 29 calves per 100 cows and over the last 15 years has dropped to 20 calves per 100 cows (i.e. negative 5% growth rate). Habitat quality plays a role in that growth rate as well but survivability in the first year of an elk's life is largely driven by predation and the propose Over-Snow Motorized Use Travel Plan will have unintended negative impacts by not considering a reduction in access to hunters, trappers and houndsmen.

The Over-Snow Motorized Use Travel Plan cites that it is utilizing Montana Fish Wildlife and Parks information to identify ungulate habitat to be consistent with FW-GDL-WL-08. However, the comments submitted by the Region 1 Director to FWP stated "After reviewing the Draft Minimization Screening document, we would like to have more in depth discussion with the USFS to better understand the determination of some areas designated as having no BGWR, areas of BGWR with little or no mitigating actions, and areas listed as BGWR allowing use through May 32nd". So obviously FWP has not officially designated these Big Game Winter Range areas and there is a disconnect between agencies that needs to be reconciled before the travel plan was proposed for public comment.

The Over-Snow Motorized Use Travel Plan proposes reductions in over snow vehicle use areas and durations in

order to Grizzly Bear denning habitat. What scientific studies have been conducted in this specific area that have documented that over snow vehicle use has had a detrimental effect on Grizzly Bears. It is well documented that Grizzly Bear populations in the Cabinet Yaak Recovery Zone have been steadily increasing despite the current over snow vehicle use, so how can we say without additional scientific evidence that the current over snow vehicle use is having a detrimental impact on Grizzly Bears?

The land covered by the Kootenai National Forest Over-Snow Motorized Use Travel Plan is owned by the taxpayers of this nation and the local individuals that routinely engage in over snow vehicle use in this project area are being robbed of opportunity through this plan. Reading through the comments on this plan, there is support for it, but all the support comes in the form of a cut, copy, paste form letter from folks who are not currently engaged in recreation in these areas. Everyone has a voice and should be heard, but the locals who are going to be negatively impacted by this plan should be heard first. This plan is of poor quality and lacks scientific backing and support of the local community. This plan should be discarded, and the current over snow vehicle use should be adopted as what is proposed in this plan.

Thank you for the opportunity to provide comments.