COMMENT ON PROPOSED ACTION FOR FOREST PLAN REVISION NEZ PERCE-CLEARWATER NATIONAL FOREST

I support the SPECIAL RECREATION MANAGEMENT AREAS PROPOSED OPTION for the following reasons:

In the winter months there is virtually no user conflict with snowmobile activity. There are almost no other non motorized users in the area and on the rare occasion they do venture in, it is always on a snowmobile.

While there has been a lot of discussion about the correlation between snowmobile activity and wildlife disruption, no evidence has been brought forward to support any of the allegations. Considerable discussion has centered around Mountain Goats. What we do know from factual information Goats DO NOT appear to be disturbed by snowmobile activity. A herd of Goats has wintered on Land Owner Mtn.(Lolo NF) for at least 30 years. They are generally visible within 300 to 400 yards off the 250 road which is the only snowmobile access to Hoodoo Pass and is fairly heavily used. They have never displayed any action to indicate they are disturbed by the snowmobile activity. There have been allegations that snowmobiles are disturbing Goats in the Blacklead Mtn. area. I have snowmobiled in that area since 1988 and have never seen a Goat or a Goat track. There is an average of 12 feet of snow in that area which would make it impossible for Goats to move around and forage for food. Goats winter in areas where they can feed. These winter range areas would not be accessible by snowmobile (too steep and too little snow cover) so it eliminates the alleged conflict/disturbance. The Montana Fish, Wildlife and Parks did a study on Goat mortality in 2008 and found that Goats are flourishing in the Crazy Mtns. where snowmobile activity is allowed and conversely found Goat herds declining in the Bob Marshall Wilderness where snowmobiling is prohibited. The study covered many areas in Montana and the same pattern emerged. Goat population declines did not correlate with snowmobile activity . It was not determined what is causing the herd declines in many areas. Goat hunting was put on hold in the Great Burn from 2007 through 2010. Hunting reopened in 2011 with the same number of permits as in 2006 and prior years in spite of the fact snowmobiling was ongoing during that time frame. I would suggest that hunting activity would be more stressful on Goats than snowmobiles. The 2012 Clearwater NF Travel Plan ROD noted (pg 52, 2.b.) that no evidence of Lynx were found in the area. The FS biologist at a collaborative forest plan meeting stated that there is no hard evidence of snowmobile activity bothering Wolverines. In my experience from snowmobiling in all the Great Burn area, starting in the HOODOO AND SURVEYOR areas in 1985 the only wildlife I have seen in the alpine areas, outside of a rabbit or a squirrel was a coyote in the Doe Cr. drainage late one spring. I have occasionally seen Moose in the lower, timbered, Kelly Creek drainage. I have also seen many wolf tracks since their introduction into the area.

Snowmobiling has been ongoing in the Great Burn area for over 30 years. There has never been any cause to consider that activity has caused any ecological impact to the area. This is substantiated by the fact the area has qualified for RWA status….in spite of the historic snowmobile activity.

The 2012 Forest Planning Rule does not prohibit snowmobile activity in a RWA. The guidelines are:…”management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation”. Winter use Special Recreation Management Areas certainly satisfy this guideline because the ecological and social characteristics are not degraded from over the snow vehicle use activity. When the snow melts all trace of snowmobile activity is erased which fully meets a guiding principle of the 1964 Wilderness Act, “ ....with the imprint of man’s work substantially unnoticeable…”. RWA summer use trails improved with the use of chainsaws and rock drills certainly do not meet the “unnoticeable” standard. The 2012 Forest Planning rule also must over-ride the Region one policy of managing RWA’S as de facto wilderness eliminating all motorized use.

I respectively request ONE CHANGE TO THE PROPOSED ACTION: SMAGB2 needs to be expanded to include: Goat Lake and surrounding bowls, Blacklead Mtn. and surrounding bowls, Doe Cr. drainage and surrounding bowls , Deer Cr, drainage and surrounding bowls. This contiguous area needs to be added to the Williams Lake cherry stem access. No access would be provided on the west side of Blacklead Mtn. off road 581.

I have snowmobiled in the Great Burn for approx 30 years. I enjoy it because it is one of the most spectacular, and challenging primitive access snowmobile areas in North America. I like the solitude. I usually ride with a group of 4 or 5 riders and we may see one or two more small groups through the day, but in a few minutes we are alone again. We know there are other riders in the area because we see their vehicles in the parking lot but the area is so large and segmented that we simply don’t cross paths. There are no trails to follow so each trip in is like a new experience. A large part of the challenge is to find the route to get in each time if it has snowed and there are no tracks to follow.. I was one of a handful of snowmobilers who pioneered the access routes into the Williams Lake/Blacklead Mtn. area and it took two winters to finally figure out how to get all the way in. I still find new routes to explore (well , I did until March 2014). That is the mystic of the area.

The 1964 Wilderness Act talks about not allowing “mechanized” equipment, but it all pertains to summer use. In fact the whole Act is centered around summer use. Snowmobiles were just coming into existence at that time and were certainly not designed to access the back country. I think lack of over the snow vehicles in 1964 was a valid reason they were not considered in the Act, but in 50 years a lot has changed…and the time has come to embrace change. I believe that boundary adjustments to support winter use Special Recreation Management Areas within an RWA is an excellent solution to satisfy all users of this very special area and still maintain the ecological and social values that make it special.

Thank You

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