August 26, 2014

Nez Perce Clearwater National Forest

Forest Plan Revision

903 3rd St.

Kamiah, ID 83536

Greetings,

Please accept our comments on the Nez Perce-Clearwater National Forest Proposed Action for the Forest Plan Revision from the Ninemile Wildlife Workgroup.

The Ninemile Wildlife Workgroup is a group of Huson/Ninemile/Alberton residents committed to promoting knowledge and stewardship of wildlife and habitats within these communities and surrounding public lands. Details about us can be found on our website: <http://www.ninemilewildlife.org/>.

Many in our group visit the Nez Perce-Clearwater National Forest, and especially the Great Burn to enjoy its wild and remote character in a quiet and beautiful setting close to home. Members often take visitors there to share some of the highlights of our area. The trail along the state divide is especially notable as it is accessible to most abilities and you can visit lakes or mountains, pick berries, or just enjoy the scenery and wildlife viewing from the trail.

One of the goals of the Ninemile Wildlife Workgroup is to “maintain and enhance the ability of wildlife to move freely and securely through the mixture of public lands, private lands, and transportation routes”.

The Ninemile is one of two Demographic Connectivity Areas identified in the *NCDE Grizzly Bear Conservation Strategy* that are “to benefit other grizzly bear populations within the lower 48 States that retain their “threatened” status (i.e., the Cabinet‐Yaak and Bitterroot ecosystems) by supporting female occupancy and potential dispersal to these other populations. In these areas, habitat protections on Federal and Tribal lands will focus on limiting miles of open road and managing current roadless areas as stepping stones to other ecosystems. Hunting opportunities in these areas in the foreseeable future would be compatible with the objective of female occupancy”. Both of these connectivity areas are for the “…eventual dispersal to other ecosystems in the lower 48 States (i.e., the Cabinet-Yaak and Bitterroot ecosystems)”.

This connectivity area depends upon multiple partners and ownerships. Besides the connectivity designation, Plum Creek Timber Company recently divested large blocks of land which are now in federal and state ownership. Many of the larger tracts of private lands in this connectivity corridor are protected by conservation easements, preventing further development. Wildlife passages built into highway 93 reconstruction enable wildlife to cross more easily. These all contribute to the effectiveness and importance of this wildlife corridor for grizzly bears and other wide ranging species.

The Hoodoo or Great Burn is a critical link in this corridor. This biological bridge permits migration and genetic exchange between these vast islands of security for far-ranging species of wildlife to persist. Wildlife and fish dependent on large wildlands would have their habitat diminished with fragmentation. The Great Burn straddles the Idaho, Montana border and is recommended wilderness in existing forest plans on both the Lolo and Clearwater National Forests. It is vital that the Nez Perce-Clearwater National Forest Plan provides for connectivity, not only on the forest, but to adjacent and nearby lands.

It is most important to the Ninemile Wildlife Workgroup that the wildlife, fish, and wilderness values for the Great Burn are protected. The best way to provide wildlife connectivity and security is to not allow motorized access of any type into existing recommended wilderness areas. The Preliminary Need for Change section on page 4 emphasizes that the need for change should be predicated on ecological characteristics, integrity and sustainability. We do not see how motorized use in existing recommended wilderness is warranted by a need for ecological change but believe motorized use in the existing proposed wilderness would cause adverse ecological changes by reducing the effectiveness of the corridor and potentially harming grizzly bears, mountain goats, Canada lynx and wolverines, all species listed as Idaho’s Species of Greatest Conservation Need. Snowmobile use in the Great Burn would not contribute to social and economic sustainability of nearby communities. We support the 2004-2007 Recommended Wilderness Option (A), mapped on page 70 and not the 2012 Reinitiated Wilderness Option (B) mapped on page 71. Of the two options, option A best provides for ecological integrity and sustainability. Option B diminishes the size and value of the Great Burn as recommended wilderness. Two of those special management areas that allow snowmobile use in the Great Burn are on the Montana border. The Lolo National Forest on the Montana side of the divide is recommended wilderness and is managed as such. Allowing snowmobile use on the Idaho side would degrade potential wilderness values on both sides of the divide, could be detrimental to fish and wildlife resources, and would likely result in illegal incursions into recommended wilderness on the adjacent Lolo National Forest. It is critical to consider adjacent land management ownership and uses during the forest planning process for a holistic approach. Maps in the planning documents should show adjacent ownerships and land use designations to better illustrate the impacts of land use changes proposed in the forest plan.

We also have some recommendations for specific wildlife species and groups:

* At-risk species are to have protections under FW-DC-WL-03 on page 41. What is your definition of at-risk species and do you have a list of the current species on this list? Without this information it is difficult to give meaningful input. We do not believe that areas essential during critical periods to at-risk species should be given no protections simply because they are near areas of pre-existing human use. At the very least, on the ground evaluation of threats should be determined for these sites and mitigation measures should be used if warranted. At-risk species needs to be defined and monitoring protocols need to be developed.
* Grizzly bears, a threatened species, have been detected in and close to the planning area; one was shot in the Kelly Creek area in 2007. Many believe it is only a matter of time before grizzly bears once again become established in the Bitterroot Ecosystem. It could happen before the new plan is signed or certainly during the tenure of the new forest plan. Grizzly bears should be protected and included in the list of species in FW-DC-WL-06 (page 42). Grizzly bears den in high elevation areas and snowmobile use there could threaten denning or emerging grizzly bears. Many forests have adopted food and attractant storage orders to proactively prevent human-bear conflicts. A good model adjacent to the planning area is on the Lolo National Forest. A similar food and attractant storage order standard should be developed to minimize conflicts with both grizzly and black bears.
* Wolverines were recently announced as unwarranted for threatened species listing by the U.S. Fish and Wildlife Service even though their population in the contiguous United States is estimated to be less than 300. Wolverines den in large boulder or talus fields in high elevation cirques which could be threatened by snowmobile use. According to *The Idaho Comprehensive Wildlife Conservation Strategy*, *“*Human disturbance is among the most important causes of habitat fragmentation and degradation in wolverine habitat. Areas of disturbance create barriers to movement, reduce winter foraging opportunities, and may affect reproductive success (Copeland and Whitman 2004). Increased winter recreation may displace wolverines from potential habitat (Copeland and Whitman 2004). An important source of mortality across the range of the wolverine is trapping (Banci 1994). Although harvest of wolverines is illegal in Idaho, incidental trapping may contribute to mortality.” Snowmobiles should be excluded from potential wolverine denning areas to minimize these threats to wolverines.
* Mountain goats are listed as imperiled by Idaho. According *to The Idaho Comprehensive Wildlife Conservation Strategy,* “Human encroachment into mountain goat habitat is a threat. The proliferation of roads allowing easier human access into mountain goat habitat has been implicated in the overharvest of some goat subpopulations (Hayden et al. 1990). Several modes of backcountry recreation, including snowmobiling and heli-skiing, have the potential to disturb goats.”Again, allowing snowmobiles into winter range of mountain goats would be a threat to the species. FW-STD-WL-04 helps to prevent spread of disease from domestic sheep and goats to big horn sheep. This standard should also apply to mountain goat occupied habitats.
* Canada lynx is a federally threatened species. According *to The Idaho Comprehensive Wildlife Conservation Strategy,* “habitat alterations and increased access have also been associated with increased competition with coyotes and bobcats; snow compaction from snowmobiles allows coyotes, bobcats, and other predators to access lynx habitat. Although, there is no legal harvest of lynx in Idaho, mortality may result from illegal or incidental harvest by hunters and trappers The Canada lynx may be especially susceptible to trapping, which has been a significant source of mortality (Ruggiero et al. 2000). Increased winter recreation (snowmobiles, ski area development) may cause disturbance that results in displacement from habitat.” Allowing snowmobile use in the Great Burn would increase the risk of mortality and displacement to Canada lynx.
* Chapter 4 asks that the public suggest species to be considered for monitoring. We recommend you follow the 2012 planning rule as published in the Federal Register to develop the focal species list. We believe beavers, elk, mountain goats, whitebark pine and some invasive species are worthy of consideration but would be happy to work with you on appropriate focal species to monitor.

The Board of Directors of the Ninemile Wildlife Workgroup requests that you consider our comments and especially not fragment the existing recommended wilderness with special management areas for motorized use. Changes in land designations in all alternatives should enhance wildlife connectivity between ecosystems. This would better protect wildlife security, habitat, and connectivity.

Sincerely,

Pat Sweeney

Chair of the Board

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References:

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