



Nez Perce-Clearwater National Forest

Supervisors Office

Attn: Forest Plan Revision

903 3rd Street

Kamiah, Id. 83536

Please accept this comment letter on behalf of Backcountry Sled Patriots (BSP). We are a 501 C (3) Non-Profit Corp. dedicated to preserving responsible backcountry snowmobiling. We currently have approx. 700 members. Our membership seeks riding areas that offer: challenge, scenery, and solitude. Many of our historic back country riding areas in Idaho and Montana have been closed to snowmobiling over the past 15 years or so. Potential closing of the riding areas within the Great Burn area in the Clearwater NF would cause a loss of the best primitive back country snowmobile areas in the lower 48 States.

BSP supports the Clearwater NF Proposed Action to make boundary adjustments within the Great Burn RWA that will create SPECIAL MANAGEMENT AREAS to accommodate snowmobiling . There is one omission to the proposed action that needs to be addressed: Goat Lake and surrounding basin bowls, Blacklead Mtn. and surrounding basin bowls, Doe Creek drainage and surrounding basin bowls, and Deer Creek and surrounding basin bowls need to be included with the Williams Lake cherry stem access. (see attached map)

Considerable speculative rhetoric has been offered about snowmobile activity disturbing wildlife. While no evidence supports these allegations, they remain on the table. Over the past two years several members of BSP have attended the collaborative meetings for the Clearwater Forest Plan Revision. What became obvious was the wildlife disturbance allegations were never substantiated by any "on the ground" winter observations. In fact the Forest Service noted on the 2012 Travel Plan ROD that no evidence of Canada Lynx was found (2.b page 52). A FWS biologist at one of the CNF collaborative meetings stated as a matter of record that they have not found any evidence that snowmobile activity disturbs Wolverines. A lot of time has been spent on allegations that snowmobiles activity disturbs Mtn. Goats. The FWS admitted they did not have any documentation or evidence to substantiate these allegations. To further refute those allegations, Goats have been wintering on the Land Owner Mtn. area for at least 30 years. This is adjacent to the 250 road in the Lolo NF that is the only access to the Hoodoo snowmobile area. Much of the surrounding area burned a few years ago which now places the Goats in a direct sight line around 300 to 400 yards from snowmobilers passing by. They have not shown any

evidence of being disturbed. *I have attached a picture of a Goat taken by Mike Gullette last spring from the snowmobile trail adjacent to Land Owner Mt.. The Goat was lying down and Mike had to whistle to get it to stand up so he could get a better picture. The Goat walked a few yards and then just started grazing. It is common to see herds of 12 to 14 goats in this area. There has also been considerable discussion about goats being disturbed in the Blacklead Mtn. area. I have snowmobiled in the area for approx. 30 years and have never seen a Goat or a track in that area. There is an average of 12 feet of snow which makes it impossible to them to move/travel in the terrain accessed by snowmobilers during the winter months. Conversely, terrain that Goats will winter in is generally too steep and sparsely snow covered for snowmobiles to access. I have attached a 20 min. DVD documentary that highlights the Great Burn features during the winter months.*

In Region One the Forest Service has generally managed RWA'S as wilderness for many years. The current Forest Planning rules do not mandate that practice. The guideline is: *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.* Snowmobiling in the Great Burn for the past 30 or so years has not caused any documented negative impact on the wilderness characteristics of the area. In fact the imprint of snowmobiling is gone when the snow melts. There are no other user conflicts in the area. The only practical way to access the area in winter is by snowmobile. In listening to the opponents of snowmobiling, the unspoken argument really is: the area should be preserved for only human powered activity....regardless of the fact no other humans or wildlife are in the area in the winter months. It also seems unfortunate that winter and summer motorized activity tends to get lumped into one category, yet there are huge impact differences that need to be differentiated when evaluating the best use of an area.

In taking the step to consider SPECIAL MANAGEMENT AREAS to allow snowmobiling in the Great Burn RWA the Forest Service appears to recognize that change is needed in the management of RWA'S. These changes that protect historic use within a RWA will help achieve Congressional approval for a Wilderness Bill down the road. At the end of the day decisions need to be made from facts, not innuendo.

Primitive back country snowmobiling has the same appeal that the summer user seeks: *CHALLENGE, SCENERY, AND SOLITUDE.* The snowmobile areas in the Great Burn are spacious enough that while one knows there are other riders in the area it is common to never see them. The challenge is not to climb a steep hill, but to be able to get back into the area(s). There are no defined trails. Heavy snowfall can virtually stop any sled some days. I have snowmobiled the area for about 30 years and can still get lost trying to find a route after a heavy snowfall. That is the challenge!. There are no comparable areas in the lower 48. The closest similar primitive riding would be in the Selkirk Mtns. near Revelstoke B.C.

BSP believes The Great Burn is a resource that can be enjoyed by multiple users without any conflict or damage to its wilderness characteristics.

Thank You

Stan Spencer

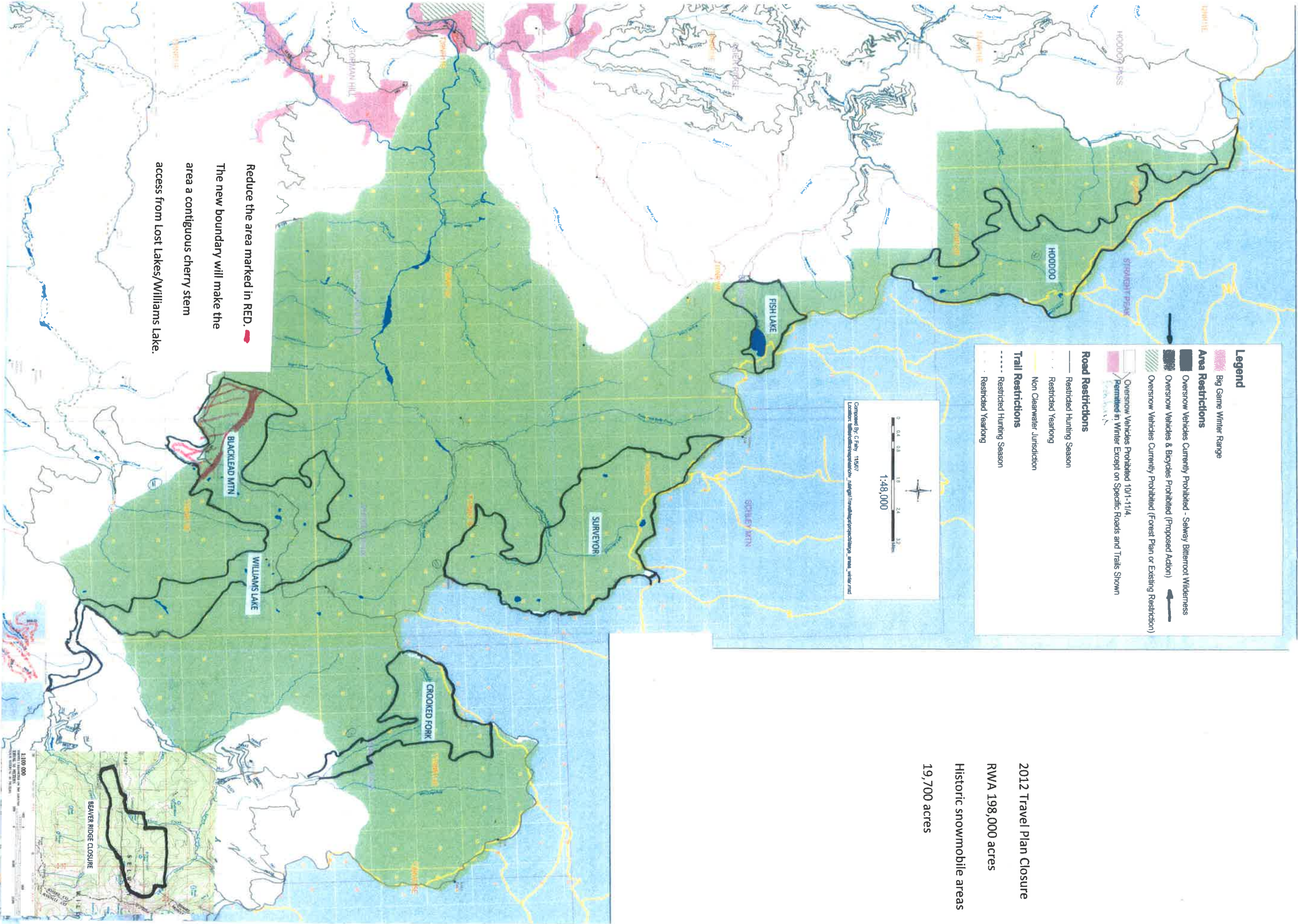
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GREAT BURN SNOWMOBILE CLOSURE



2012 Travel Plan Closure
RWA 198,000 acres
Historic snowmobile areas
19,700 acres

GOAT ON LAND OWNER MTN

This picture was taken in April, 2014 by Mike Gullette, a snowmobiler from Superior Mt.

The significance of it is: the goat was obviously not disturbed by snowmobile noise (there were three sleds in this group). This area burned a few years ago which opened the line of sight to the Goat winter range area from the snowmobile trail. The exposure did not bother the Goats. It is common to see herds of 12-14 Goats during the winter.

I zoomed in on the picture to better show the Goat. There is snow above the Goat in the full picture. Mike estimated the Goat was less than 400 yards from the 250 road (snowmobile access to Hoodoo Pass and Clearwater NF Great Burn area).

