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Supervisor, Nez Perce-Clearwater National Forest
ATTN: Forest Plan Revision
903 3rd Street
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This letter contains comments from the Bitterroot Ridgerunners Snowmobile Club (BRR) concerning the proposed revision of the Nez Perce-Clearwater (NPC) National Forest by the settlement of the ISSA/BRC lawsuit. BRR is a group of about 150 snowmobile enthusiasts located primarily in Ravalli County. Many of our members pursue their winter sports interests in the Great Burn area as well as other areas in the NPC National Forest. Several of our members are backcountry skiers who access their areas of interest by snowmobile. We request that BRR be considered an "interested party" for this action and that these comments be included in the administrative record for this action.

Managing Growth

In the existing NPC Forest Plan, it is correctly noted that snowmobile use has **increased** since the last Forest Plan was adopted in 1987. The new Forest Plan proposes to manage this growth by **reducing** the area available to snowmobile use. We submit that this is an irrational, arbitrary, and capricious strategy to manage growth. The Agency is directed to provide adequate opportunities for all recreational opportunities in response to public demand. The existing NPC Forest Plan fails to fulfill this most fundamental directive.

We therefore recommend that the Great Burn, Goat Lake, Blacklead Mountain, Doe Creek, and Deer Creek areas be designated for snowmobile use in the NPC Revised Forest Plan.

RWA Management

The existing NPC Forest Plan institutes the Region 1 De Facto Wilderness policy (c'mon – lets call it what it really is): Areas identified as Recommended Wilderness (RWAs) will be managed as Wilderness. That means all motorized recreation is prohibited in RWAs. There are a variety of inconsistencies and contradictions associated with this policy.

The processes used by the Agency to identify areas suitable for RWA designation are not necessarily consistent with the requirements for Wilderness contained in the 1964 Wilderness

Act. RWAs are evaluated based upon *Capability* (the extent to which the area meets Wilderness criteria), *Availability* (the degree to which existing non-Wilderness activities degrade Wilderness characteristics), and *Need* (The perceived need for more Wilderness). These are highly subjective criteria and can result in areas being identified as RWAs with moderate *Capability* ratings but high *Availability* and *Need* ratings. Implementation of the De Facto Wilderness policy can then result in managing areas as though they were Designated Wilderness that in fact don't contain Wilderness characteristics consistent with the Wilderness Act.

The inclusion of *Need* as a criterion for identifying RWAs is especially troubling. Not only is *Need* a wildly subjective parameter, but the 1964 Wilderness Act specifically reserves the determination of *Need* to Congress. Only Congress can determine the *Need* for more Wilderness Areas.

There is an inherent contradiction in the application of the De Facto Wilderness policy. Let's take the Great Burn Area as an example. The Great Burn probably received a high *Capability* rating (the area contains many Wilderness characteristics), a high or moderate *Availability* rating (existing motorized uses do not interfere with Wilderness characteristics), and a high *Need* rating (we would emphatically disagree). So the question is this: If existing motorized uses in the Great Burn area do not degrade its consideration as an RWA, why is it necessary or desirable to prohibit those uses once it is designated as an RWA? In other words, if motorized activities in the Great Burn area are so damaging to the Wilderness characteristics of the area that they need to be prohibited, why and how did the Great Burn area meet the criteria for RWA designation in the first place?

BRR recommends that the management prescriptions for RWAs contained in the 1987 NPC Forest Plan be implemented in the Forest Plan Revision. Specifically, existing uses in an RWA can continue until Congress designates the RWA as Wilderness, existing motorized and non-motorized routes can continue to be used and maintained, but no new motorized or non-motorized routes can be created or designated for use.

This management prescription appropriately preserves the existing non-ephemeral wilderness characteristics of an RWA and maintains the area for potential Congressional designation as Wilderness in the future; it does not disenfranchise motorized visitors; and it prevents the creation of De Facto or pseudo Wilderness areas by arbitrary and capricious administrative fiat.

Impacts of Concentration of Uses

The **increase** of motorized visitors is documented in the NPC Forest Plan. The **reduction** of motorized areas and routes by the Plan are likewise documented. However, the cumulative environmental, social, and economic impacts of this irrational management strategy are not analyzed in the Plan.

Crowding motorized and non-motorized visitors into increasingly smaller and smaller space has adverse environmental, social, and economic consequences, and the Agency is obligated to carefully evaluate those impacts.

The National Visitor Use Monitoring (NVUM) program clearly documents very low visitation rates for Wilderness Areas. These data clearly show that the vast majority (about 97%) of all forest visitors prefer a non-Wilderness experience. Designating more Wilderness Areas or De Facto Wilderness Areas displaces visitors to other areas of the forest or causes them to forego forest activities altogether. This concentration of uses clearly has adverse environmental, social, and economic impacts.

A fundamental tenant of dispersed recreational management is to keep those activities as widely dispersed as possible. This allows natural processes in the forest to counteract whatever adverse environmental impacts might result from those activities. Concentrating those activities into increasingly smaller and smaller areas can overwhelm the forest's ability to naturally repair resource impacts and can have long-term adverse environmental impacts. Similar arguments can be made for wildlife management. All state wildlife management agencies use the North American Model to manage the abundance, health, and diversity of wildlife through hunting, trapping, and fishing regulations. This model requires sportsmen access to forest lands. Virtually all sportsmen utilize motorized vehicles (including snowmobiles and OHVs) to access public land. Only a tiny handful of sportsmen access Wilderness or De Facto Wilderness Areas, as documented by the NVUM results. Concentrating sportsmen activities into smaller and smaller areas results in vast under-managed areas with consequent wild fluctuations in animal populations, threats to endangered species, and poor predator/prey relationships.

The majority of motorized visitors to the NPC forest prefer a semi-primitive recreational experience. Sportsmen clearly prefer areas that have road access or access by snowmobile or OHV vehicles. Crowding more and more people into smaller and smaller areas results in a dramatic reduction in the quality of the recreational experience for both motorized and non-motorized visitors.

The Round 2 NVUM results indicate that recreational visits to the NPC National Forest infuses about \$20.5 million into local economies every year. This does not include benefits to the local economies resulting from equipment purchases. Clearly, recreational activities in the NPC Forest contribute significantly to the local economies. To the extent that concentration of uses causes visitors to relocate their activities to other places and/or encourages them to abandon their use of public lands altogether, crowding more and more visitors into smaller and smaller areas has significant economic consequences.

We recommend that the proposed NPC Forest Plan Revision include an in-depth, analytical, unbiased analysis of the environmental, social, and economic short term and cumulative impacts that result from the concentration of recreational uses.


Conclusion

BRR appreciates the opportunity to make comments and provide recommendations for the upcoming NPC Forest Plan Revision. We believe that the incorporation of our suggestions into the Revised Forest Plan will make the Plan more palatable for the public and correct some of the shortcomings of the existing plan. We submit our comments in the sincere spirit of constructive criticism and we hope that NPC management and staff will consider them in that same spirit.

To summarize, BRR offers the following recommendations:

- The Great Burn area, and other traditional and historical motorized use areas should remain open;
- The Revised Forest Plan should adopt the management prescriptions for RWAs contained in the 1987 Plan; and
- The Revised Forest Plan should include an analysis of the adverse environmental, social, and economic short term and cumulative impacts of the concentration of uses.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Dan Thompson".

Dan Thompson, Treasurer
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