

## Doug Deaton

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**Subject:** Clearwater National Forest - Supporting SPECIAL RECREATION MANAGEMENT AREAS PROPOSED OPTION

### Clearwater National Forest Comment

I wish to comment on the Clearwater National Forest proposed action relative to mechanized/snowmobile use as follows.

I am supporting the SPECIAL RECREATION MANAGEMENT AREAS PROPOSED OPTION (SRMA) within the RECOMMENDED WILDERNESS (RWA)

There is no conflict of users in the winter, no proven disruption to wildlife in winter, areas have been used historically by snowmobilers for the past 30 years, The 2012 Forest Planning Rules call for sustainable recreation use, both motorized and non motorized. The 2012 rules also DO NOT prohibit snowmobile use in a Recommended Wilderness )RWA.

My specific comments are as follows:

**NO CONFLICT:** There have been very few sightings of skiers or other winter users in the Gt. Burn. The skiers that were seen have accessed the area via snowmobile.

**NO DISRUPTION OF WILDLIFE:** While there have been allegations of disruptions to wildlife, there has been absolutely no proof of any disturbances. A herd of Goats winter on Land Owner Mtn. in the LOLO NF (about 1/2 way from the parking lot and Hoodoo Pass) and are regularly seen about 300 to 400 yards from snowmobiles traveling on the 250 road.

The Goats do not display any sort of reaction that would suggest they are disturbed. They have wintered in this area for at least the past 30 years. There has never been a sighting of a Goat or a track in this area in the winter. There is an average of over twelve feet of snow in these areas. Goats can't get around in those snow depths. The Goats absolutely do not winter in the historic snowmobile areas. Montana Fish and Game has found that snowmobile activity does not correlate with declines of Goat herds. Goat herds are growing in the Crazy Mtns. where snowmobile activity is allowed and herds are declining in the Bob Marshall Wilderness where snowmobiles are not allowed.

The 2012 Travel Plan ROD states that NO evidence of Lynx was found in the Great Burn Area. (2.b. pg 52) The FS wildlife biologist at a CNF Collaborative meeting stated, as a matter of record, that there is no evidence that snowmobile

activity  
negatively impacts Wolverines.

HISTORIC SNOWMOBILE USE. Snowmobiles have accessed the proposed SPECIAL USE AREAS for over 30 years. During that time there has been no evidence of ecological impact to the Great Burn caused from snowmobiling.

2012 PLANNING RULE: The rule does not prohibit snowmobile activity from a RWA. The guidelines are under section 219.10 (multiple use). There has been NO evidence of any degradation of ecological and social characteristics over the past 30 years caused by snowmobiles. If there were, the area would not qualify for a RWA designation. The rule also calls for "sustainable recreation that includes non- motorized , motorized...". I believe that historic snowmobile use falls under "sustainable".

I believe the 2012 rule trumps Region One policy. That policy can't be used after 2012 to close RWA'S to snowmobiling.

THE PROPOSED ACTION NEEDS ONE MAJOR CHANGE: Several snowmobile areas have been deleted from the maps that the Back Country Sled Patriots submitted showing historic riding areas. CHANGE: "The Goat Lake and surrounding bowls , Blacklead Mtn including the south facing bowls, Doe Cr. drainage and surrounding bowls, Deer Cr. drainage and surrounding bowls need to be added to the Williams Lake cherry stem access. (SMAGB2)"

This means the riding areas would remain the same but there would be no access from the 581 road from Cayuse Jct.

Respectfully,  
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