

Nez Perce-Clearwater National Forests
Attn: Zach Peterson, Forest Planner
903 3rd Street
Kamiah, ID 83536

April 18, 2020

Dear Zach,

We are writing today to express a few comments in regard to the Nez Perce-Clearwater National Forests (NPCNF) Forest Plan Revision effort.



While we are Montanans, we want you to know that we DO recreate on the NPCNF side of Great Burn/Hoodoo recommended wilderness area. Our primary access points include two in Montana, and two in Idaho. Most often these are Schley Saddle and Hoodoo Pass; and Blacklead Mtn. and Kelly Creek. While we recreate elsewhere across the NPCNF, our comments today will focus on this very special *wild* historic landscape, and what we see being proposed in the Forest Plan Revision DEIS.

Recommended Wilderness Designation & Management

First, we found it quite interesting, and unusual, that the Forest (NPCNF) decided to invent their own evaluation criteria for recommended wilderness (even though they were titled “measurement indicators”). These are:

1. impacts on wheeled motorized opportunities
2. impacts on motorized over-snow vehicle opportunities (snowmobiles)
3. impacts on trails that allow mechanized transport
4. impacts on commercial use of permanent structures
5. amount of under-represented ecosystems in the wilderness system

While it’s creative, it seems to greatly skew recommended wilderness discussions in a manner that would benefit summer *and* winter motorized recreation, and mechanized recreation. This appears to be in blatant disregard of FSH 1909.12, Chapter 70. (“*This chapter describes the process for identifying and evaluating lands that may be suitable for inclusion in the National Wilderness Preservation System and determining whether to recommend any such lands for wilderness designation.*”) The direction contained in Chapter 70 clearly outlines the 5 steps **to be taken** in evaluating an area for possible inclusion into the National Wilderness Preservation System. Those are:

1. Apparent naturalness;
2. Opportunities for solitude or for a primitive and unconfined type of recreation;
3. Areas at least 5,000 acres or sufficient size to maintain characteristics in unimpaired condition;
4. The degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value;
5. The degree to which the area may be managed to preserve its wilderness characteristics.

In addition, the FSM (1923.03) clearly says that the Responsible Official shall follow the policy direction outlined in FSH 1909.12 Ch. 70. It is distressing that the DEIS appears to be so biased towards acceptance of non-conforming uses in recommended wilderness areas. This is out of step with other recent Forest Plan revisions; with Forest Service direction; and even with your own fairly recently completed Travel Plan. We’re not sure why the Forest decided this skewed approach would work—perhaps when the Forest’s Recreation Program Manager

retired, you just didn't have anyone to finish what she started; or someone to advocate for a balanced recreation analysis during the IDT process. Regardless, it needs to be corrected—either in a S-DEIS, or a completely re-written section for the FEIS, using the established criteria set forth in FSH 1909.12, Ch. 70. A thorough analysis must go beyond the positive and negative impacts to motorized and mechanized recreationists. There are much-beloved benefits to “quiet recreationists” that didn't seem to be considered in the effects analysis. Things such as solitude, quiet, “apparent naturalness,” viewing healthy populations of native wildlife, and a more ‘primitive’ experience *without* motorized or mechanized vehicles---these are all very real values that many people love about the Great Burn (and other large roadless lands, and Wilderness Areas). And yet there seems to be little credence given to these values in the Effects Analysis in the DEIS.

Recommended wilderness areas should not have non-conforming uses, and thus Alternative Z is in direct conflict with current Forest Service direction; recent court cases; and even the recent Clearwater NF Travel Management Plan. The DEIS has different Standards for summer and winter use in recommended wilderness areas—this is unnecessary. According to FSM 1923.03 (3), Policy: “*Any area recommended for wilderness or wilderness study designation is not available for any use or activity that may reduce the wilderness potential of an area.*” In addition, I didn't find any clear proposed standards that would limit *mechanized* uses within recommended wilderness areas. This should be rectified with a standard as simple as: *The use of motorized or mechanized forms of transportation or other devices [e.g. drones, bicycles, scooters, wheeled carts, etc.] is not allowed in recommended wilderness areas.*

Please ensure that in the FEIS and ROD that all recommended wilderness is managed for no motorized & no mechanized use.

Wildlife Habitat and Connectivity

The Great Burn recommended wilderness area is perfectly situated on the landscape to provide a critical piece of landscape-level connectivity for wide-ranging animals such as grizzly bears, lynx and wolverines. As you know, in recent years, grizzly bears have been documented in the Great Burn. Many state and federal wildlife managers are of the opinion that grizzly bears will use this landscape as they make their way to and from the Bitterroot Recovery Zone.

We were saddened to see in the DEIS that the NPCNF did not display a broader “30,000 foot” view of the Great Burn, and the critical connectivity that this landscape provides for grizzly bears, as they venture outward from the Selkirk-Cabinet-Yaak Recovery Zones *and* the NCDE Recovery Zone. We believe this to a serious flaw in your effects write-up, as you apparently only looked within the confines of the NPCNF, and did not consider the larger picture. Over the life of this planning period, dispersing grizzly bears will make their way into the Bitterroot Recovery Zone. And the Great Burn recommended wilderness can provide a critical piece of habitat to facilitate that recovery. That's why we ask that in the ROD you do not allow any motorized, or mechanized uses in the Great Burn (RARE II boundary).

Additionally, you wrote “Food storage is unnecessary at this time because the Bitterroot Ecosystem is currently unoccupied by grizzly bears.” While this may currently be true, it appears evident that it is only a matter of time before grizzly bears do occupy not only the Bitterroot Ecosystem, but other parts of your Forest as has already happened in recent history. Food storage orders not only protect grizzly bears; but black bears and public safety are also positively affected by their use. Pat Sweeney made the following recommendation in a letter sent to you, dated January 23, 2018. “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.” We recommend that you adopt a food storage order now to proactively prevent future conflicts with bears and people.

Over-snow vehicle use in the incredibly large Blacklead Mountain/Rhodes Peak OSV area and from Hoodoo Pass into the heart of the Great Burn will not end well for mountain goats and wolverines. Recent research, that the Forest Plan Revision Team should be using, has shown that these two species are clearly sensitive to winter recreational activities. The Blacklead mountain goat herd has notably diminished over the last several years, dropping from 56 in 2011, down to just 7 in 2017 (both counts by IDFG). Although there has not been direct research done on this herd to study why this precipitous decline has occurred, it is well known that the number of *illegal* over snow vehicles using this area is on the rise. Can we with 100% certainty draw a direct line between the decline of mountain goats and the rise of over snow vehicle use—no. BUT we can, and should use this new Forest Plan to help preserve safe winter habitat for this mountain goat population, before they're completely extirpated from the area. Mountain goats in this area of Idaho are an iconic alpine species; highly valued by both hunters and non-hunters., and should be treated as such throughout the life of this Forest Plan. We would refer you to the *Idaho Mountain Goat Management Plan 2019-2024* for threats and direction on managing recreation in or near occupied mountain goat habitat.

Wolverines have recently been shown to be very sensitive to winter disturbance, and may be completely displaced from their rare habitat as a result of winter disturbance. And of greatest concern is over-snow vehicle use in maternal denning habitat—which does exist in the Great Burn. It is not acceptable that the NPCNF might select an alternative that allows of over-snow use in the Great Burn, at the expense of wolverines. We urge you to select an alternative in the ROD that does not permit over-snow motorized or mechanized uses in the Great Burn, or other areas with known or suspected wolverine habitat.

Manageability

The two proposed over-snow vehicle (OSV) use areas located inside the current boundaries of the Great Burn recommended wilderness are ecologically and environmentally unacceptable. The area off of Hoodoo Pass is completely beyond reason. This would result in a narrow cherry stem into the northern end of the Great Burn, and, had you looked *beyond* your own boundaries, you would see that it puts an unmanageable hole into the middle of the recommended wilderness. We believe this is merely a ploy by the snowmobile community to more readily gain access to the ridges and bowls on the Lolo side of the divide—which remains non-motorized. The Lolo will not be able to enforce all of the trespass that will occur because of a poorly planned decision on behalf of the NPCNF. The western boundary of this OSV area is completely unenforceable, with no geographically defined boundaries, and will only encourage motorized use throughout the Great Burn. This is an unacceptable management decision, which just never should have gotten to this point; and it should disappear in the FEIS.

The large OSV area that stretches from Rhodes Peak to Blacklead Mountain and all the way to Kelly Creek is also ecologically and environmentally unacceptable. Our comments, above, also apply here—OSV use in this large area will have negative effects on mountain goats and wolverine. This area has high wilderness values and has been recommended for wilderness for years. And now it needs to remain within the Great Burn recommended wilderness area—and be closed to all motorized and mechanized use.

Part of the wilderness evaluation process (FSH 1909.12 Ch. 70) includes a look at “*Opportunities for solitude or for a primitive and unconfined type of recreation.*” If snowmobiles were permitted in either of the two areas being proposed within the Great Burn, then there would most definitely be encroachment into other areas beyond the OSV areas, with a resultant diminishment of solitude, and the primitive, unconfined recreation experience. When you are in the solitude of the backcountry, the noise from snowmobiles can be heard from over a mile away—even further depending on topography. For many years we have skied the Yellowstone region, and are very knowledgeable of how far the noise from snowmobiles can carry. The wilderness evaluation process also directs managers to look at “*The degree to which the area may be managed to preserve*

its wilderness characteristics.” As previously noted, wildlife populations, especially mountain goats and wolverine, would likely be negatively affected by increased winter use. As wildlife vacate areas of the Great Burn, and as snowmobile use continues to push beyond what’s legal, we anticipate pressures in these OSV use areas to also increase from *summer* motorized and mechanized users—who likely will also push beyond those boundaries. This puts the entire expanse of the Great Burn recommended wilderness area into jeopardy, as the wilderness characteristics for which the Great Burn is so famously known slowly are removed: intrusion by intrusion.

In Conclusion

We all know this Forest Plan will likely be in effect for the next two, three or possibly more decades. Twenty-five years from now it would be wonderful to look at the beautiful natural landscape around us and be proud that we set a plan in motion that protects wildlife habitat and connectivity; that provided a level of forest management that helped keep our forest healthy and resilient; that protected valuable roadless areas for Wilderness protection; ensured we maintained clean, free-flowing rivers and streams; and a plan that proactively dealt with the recreation issues of the day that had the foresight to reach into the future to restrict ecological harm to fish and wildlife habitat. The NPCNF has an excellent opportunity right now to preserve important large blocks of wildlife habitat and connectivity. If you don’t act now, it will be lost for all time.

To achieve this future vision, we strongly urge the NPCNF to take a hard look at the alternatives described in the DEIS and craft a completely new alternative to be fully described in the FEIS. This new alternative will have the Great Burn recommended wilderness, in its entirety (RARE II boundary) with no snowmobile and other winter motorized use areas delineated. Motorized and mechanized uses will be prohibited—yearlong. By doing so, habitat will be conserved for mountain goats, wolverines, grizzly bears, fishers, lynx, and much more. Also we would encourage you to brainstorm what new motorized or mechanized ‘toy’ might impact the NPCNF, and how can you address that right now. Will it be increasing drone use? Or how about snow bikes? ATV’s with track-ski attachments? Or how about E-bikes? PLEASE, save future managers, future users, and future fish and wildlife populations all the aggravation that this explosion of technology can bring. Find a way to deal with this now—possibly through management area guidelines, or specific goals & standards. Future managers will praise you for it.

In addition, the Forest should analyze effects to wildlife by looking at a much broader scale—look north to the NCDE and the Selkirk-Cabinet-Yaak ecosystems, and look just over the border to the Lolo N.F. Look south to the Selway Bitterroot Wilderness, and the grizzly bear Bitterroot Recovery Zone. And imagine the difficult unmanageable position you are putting the Lolo in if the Hoodoo ‘snowmobile area’ was allowed to stand. This area on the Lolo is closed to motorized use, but if the NPCNF allowed over-snow motorized use, the amount of illegal use on the Lolo would be impossible to control.

The Great Burn has been recommended for wilderness for over three decades, and it maintains a high level of wilderness characteristics thanks in part to both National Forests (NPCNF and Lolo NF), and many in the public who love to fish, hunt and hike in the Great Burn. And now, in 2020 it continues to have high wilderness characteristics, and should be included in the National Wilderness Preservation System—in its entirety out to the RARE II boundaries. This is likely the most deserving area to be recommended for wilderness on the NPCNF—followed closely by the Mallard-Larkins.

In short, we’re saddened to see a lack of foresight in this DEIS. We know you can craft a new alternative out of the comments you receive on this Draft—the question will be if the resource specialists have done enough analysis to support a new alternative. They may need to sit down for additional analysis, but that is what is needed. An alternative that fully supports additions to the National Wilderness Preservation System—especially for the Great Burn and Mallard-Larkins; an alternative that supports important habitat and connectivity for mountain goats; wolverines; lynx; elk; grizzly bears; cutthroat trout; and salmon. As our population grows, and

as we develop more powerful and nimble motorized and mechanized methods to gain access to the backcountry, our wildlife populations get pushed closer and closer to the brink of their survival. We all have an obligation to not let that happen—you as managers, and us as users.

We know that the entire process of revising a Forest Plan is difficult, complex and fraught with disagreement both internally and externally. But, this is your once-in-a-lifetime opportunity as managers to set in motion a plan that can positively affect this gem of the National Forest System for decades to come. As you move toward the FEIS and ROD we *strongly* urge you to remove the biased analysis in the Draft EIS, and develop alternatives that will yield a strong, healthy ecosystem with viable wildlife populations that are able to have good genetic interchange because you were forward thinking enough to provide excellent habitat connectivity on the Nez Perce-Clearwater National Forests. This starts with a Great Burn Recommended Wilderness Area—and no motorized or mechanized use in all recommended wilderness areas.

Thank you for the opportunity to comment.

Sincerely,

Sharon Sweeney

Lolo National Forest District Ranger, retired

Pat Sweeney

Western Montana National Forests Planning Wildlife Biologist, retired