



December 22, 2023

Objection Reviewing Officer
USDA Forest Service Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=44089>

Re: Nez Perce-Clearwater National Forest Plan Revision # 44089 objection

Dear Objection Reviewing Officer,

Objector Winter Wildlands Alliance (WWA) files this objection to the Nez Perce-Clearwater (NPC) Forest Plan revision Draft Record of Decision (draft ROD), revised forest plan (draft plan), and Final Environmental Impact Statement (FEIS), noticed November 28, 2023. Cheryl Probert, NPC Forest Supervisor, Responsible Official. Our objection relates to the NPC's decision to reduce the size of the Hoodoo (Great Burn) Recommended Wilderness Area and the forest's related determination that the areas formerly classified as part of the Hoodoo Recommended Wilderness are suitable for over-snow vehicle use, as well as concerns over the forest's approach to the Recreation Opportunity Spectrum and a lack of plan direction on wolverine habitat. We raised these topics in our February 9, 2018 comments on the NPC Wilderness Evaluation and throughout our April 16, 2020 comments on the revised plan's Draft Environmental Impact Statement.

We object to reducing the size of the Hoodoo Recommended Wilderness Area and opening currently-protected areas to motorized recreation.

We commented on issues pertaining to the Hoodoo Recommended Wilderness Area on pages 5 and 6 of our DEIS comments, and this area was the focus of our Wilderness Evaluation comments as well. While we appreciate that the draft plan prohibits non-conforming uses – motorized and mechanized travel – in Recommended Wilderness Areas, we strongly object to reducing the extent of the Hoodoo Recommended Wilderness Area to accommodate over-snow vehicle (OSV) recreation in areas that are critically important for wildlife and have long been protected and managed to maintain wilderness character. The areas that the NPC has proposed to remove from recommended wilderness protection – between Fish Lake and Hoodoo Pass in the north, and the area around Blacklead Mountain in the south – provide extremely high-quality habitat for wolverine and mountain goats. While the draft plan talks about protecting habitat, the plan does not actually contain any standards for doing so for these sensitive species. By neither providing binding habitat protection standards nor protecting critical habitat areas as recommended wilderness, the draft plan fails to uphold the ecological integrity of the NPC, especially considering the threats the forest, and its resident wildlife, face as the climate changes.

As detailed in the US Fish and Wildlife Service's recent listing decision, snow-dependent species such as wolverine are at particular risk as snowscapes shrink in a warming climate. We are already witnessing reductions of spring snowpack and climate models predict that this reduction will continue to occur. Meanwhile, consistent spring snowpack is crucial to wolverine survival, as female wolverines dens in areas with deep, persistent spring snow cover. Female wolverines are also extremely sensitive to over-snow recreation and will avoid areas where these activities occur, leading to functional habitat loss. As



snow cover shrinks across the NPC, and the West, wolverines and winter recreationists will be forced to compete for ever-shrinking habitat. We – the winter recreation community – can adapt and recreate in areas that don't hold high wildlife habitat values. Wolverine and other snow-dependent species cannot change their habitat needs. Thus, it is our responsibility to cede or adjust our recreation preferences to the very real habitat needs that underlie the continuity of wildlife species and populations. The Hoodoo Roadless Area contains the most acres of high-importance wolverine habitat in the Nez Perce-Clearwater National Forest, and maintaining current Recommended Wilderness Area, with corresponding prohibitions on OSV use, is crucial to the continued existence of wolverines in this area.

For many the same reasons, protecting the entirety of the Hoodoo Roadless Area as recommended wilderness is important to ensuring the continuity of the mountain goat population in this area. Unlike wolverines, mountain goats are not snow-dependent but their habitat niche is one that is dominated by snow by many months of the year. In contrast to wolverines, mountain goats endure the snowy months, slowly starving their way until summer when they're able to access high-quality food resources and rebuild their energy reserves. In order for this survival strategy to work it is critical that goats (like other ungulates) not be disturbed during the winter months. As we describe in our DEIS comments, the mountain goat herd within the southern portion of the Hoodoo Roadless Area is declining, in part due to illegal OSV use that has continued to stress these animals.

Finally, reducing the Hoodoo Recommended Wilderness to accommodate OSV use simply rewards those who have illegally trespassed into this area for years despite the decades of Recommended Wilderness protection and the clear direction in the Clearwater Travel Plan. This sends a message to the public that if you ignore the Forest Service's rules long enough, eventually those rules will bend to your desires. This hardly sets the agency up for success when faced with difficult management challenges.

Resolution:

- Designate and manage the entire Hoodoo Roadless Area as Recommended Wilderness, with motorized and mechanized transport prohibited.

We object to the draft plan's lack of specificity regarding winter Recreation Opportunity Spectrum settings and suitability.

We addressed the Recreation Opportunity Spectrum on pages 3-5 of our DEIS comments. In those comments, we asked the NPC to develop winter-specific ROS settings and plan components describing the desired conditions and suitability of various activities in each (summer and winter) ROS setting. This is the approach that other Region 1 forests have taken to the ROS in their revised forest plans, and it provides far more clarity for plan implementation than Table 15 and the maps in Appendix 1 in the draft plan. For example, absent winter-specific ROS descriptions, the plan does not provide guidance on where winter trail grooming or warming facilities are suitable. Furthermore, because only the Clearwater portion of the forest has an Over-Snow Vehicle (OSV) Plan, the revised forest plan should clarify that ROS suitability is not the same as a travel management designation, and that site-specific travel planning in compliance with the Travel Management Rule is required to designate routes and areas for motorized use in areas where Subpart C of the Travel Management Rule has not been previously applied. The revised plan should also set a timeline for when this site-specific travel planning will occur.



Resolution:

- Include the following plan components to describe winter-specific ROS settings in the final revised plan:
 - FW-DC-REC: Winter recreation settings provide a range of opportunities as described by the recreation opportunity spectrum.
 - FW-DC-REC: Winter primitive recreation opportunity spectrum settings are large, remote, wild, and predominantly unmodified. Winter primitive recreation opportunity spectrum settings provide quiet solitude away from roads and people. There is no motorized activity and little probability of seeing other people. Constructed trails that are evident in the summer months are covered by snow, making these settings appear even more natural and untouched by human management.
 - FW-STD-REC: Over-snow vehicle use is not permitted in primitive areas.
 - FW-DC-REC: Winter semi-primitive non-motorized recreation opportunity spectrum settings provide backcountry skiing, splitboarding, Nordic skiing, fatbiking and snowshoeing opportunities. Trails are un-groomed and often not marked. Rustic facilities, such as historic cabins and yurts may exist but are rare.
 - FW-STD-REC: Over-snow vehicle use is not permitted in semi-primitive non-motorized areas.
 - FW-DC-REC: Winter semi-primitive motorized recreation opportunity spectrum settings provide backcountry skiing, splitboarding, Nordic skiing, snowshoeing, fatbiking, and snowmobiling opportunities. Routes are typically un-groomed but are often signed and marked. There are vast areas to travel cross-country in designated areas, offering visitors an opportunity for exploration and challenge. Occasionally, historic rental cabins are available for overnight use, and warming huts are available for short breaks.
 - FW-DC-REC: Winter roaded natural recreation opportunity spectrum settings support higher concentrations of use, user comfort, and social interaction. The road system is plowed and accommodates sedan travel. Winter trails are routinely groomed and may have ancillary facilities such as warming huts and restrooms. System roads and trails often provide staging to adjacent backcountry settings (primitive, semi-primitive non-motorized, semi-primitive motorized). Guided winter recreation activities may also be present.
 - FW-DC-REC: Winter rural recreation opportunity spectrum settings provide high-use areas. These areas are accessed from paved and plowed roads and are generally close to population centers. User comfort facilities such as toilets, restaurants, heated shelter facilities, and information and education are commonly present. Parking areas are large and plowed. Entry points and routes are signed and direct over-snow vehicles to adjacent roaded natural and semi-primitive motorized settings. Non-motorized trails are also typically groomed for Nordic skiing and fatbiking. Rural winter settings provide access for communities and families to celebrate holidays, conduct racing events, and skiing.
 - FW-STD-REC: Over-snow vehicle use is not permitted off of designated routes within rural ROS areas.
- For consistency, the final plan should also include components similar to what we have described above (and as described in the Flathead, Custer Gallatin, and Helena-Lewis & Clark forest plans) for summer ROS settings.



- The final plan should include a sustainable recreation objective that sets a timeline for when the NPC will complete Subpart C travel management planning for those districts that are lacking an OSV plan. We suggest: Initiate site-specific winter travel planning in compliance with Subpart C of the Travel Management Rule on the Moose Creek, Salmon River, and Red River Ranger Districts within 3 years of completion of the revised forest plan.

We object to the NPC’s failure to include plan standards relevant to mountain goat habitat.

Pages 7-9 of our DEIS comments addressed mountain goat habitat conservation and we are disappointed that the draft plan does not include standards for mountain goat habitat management. This conflicts with Region’s recent decision to classify mountain goats on the Lolo National Forest as a “species of conservation concern” and the forest’s subsequent decision develop plan standards for this species in their revised forest plan. Considering one of the most important areas on the NPC for mountain goat habitat is the Great Burn – a contiguous roadless area that stretches across forest boundaries – it does not make sense to have different management approaches for this species across forest boundaries. The NPC can remedy this deficiency by developing plan standards relevant to mountain goat habitat. In our DEIS comments we discussed how unauthorized motorized travel incursions are causing harm to mountain goats in the Hoodoo Recommended Wilderness Area. To protect declining goat populations, the NPC should continue to protect the entirety of the Hoodoo roadless area as Recommended Wilderness *and* work to eliminate unauthorized motorized incursions into this area.

Remedies:

- Designate the entire Hoodoo roadless area as Recommended Wilderness and uphold current prohibitions on motorized use.
- Include the following Sustainable Recreation objective in the final plan: Eliminate five existing unauthorized motorized travel incursions per decade.

We object to the NPC’s failure to include plan standards relevant to wolverine habitat conservation.

We discussed the need for plan components that address wolverine habitat on pages 7 and 8 of our DEIS comments. The absence of plan standards relevant to wolverine habitat conservation is especially relevant now that the species is soon to be listed as “Threatened” under the Endangered Species Act. Indeed, even without the pending listing decision, given the large amount of wolverine habitat present on the NPC and the many ways in which forest and recreation management can impact the species, it is shocking that the draft plan barely mentions wolverines. Other national forests in Region 1 that have revised their forest plans in recent years – the Flathead, Custer Gallatin, and Helena-Lewis & Clark – all addressed wolverine habitat conservation and provided specific guidance on this topic. This guidance ranges from broadly addressing habitat connectivity (Helena-Lewis & Clark) to management-specific (Custer Gallatin). We strongly advise the NPC to do the same, especially now that the species will be listed under the Endangered Species Act. We also urge the NPC to continue to protect areas of high-quality wolverine habitat.

Resolution:

- Designate the entire Hoodoo roadless area as Recommended Wilderness and uphold current prohibitions on motorized use.



- As suggested in our DEIS comments, the NPC revised forest plan should include the following guideline, based off a guideline in the Flathead Forest Plan: To limit the risk of cumulative impacts to female wolverines with dependent young, there should be no net increase in percentage of modeled wolverine maternal denning habitat where motorized over-snow vehicle use is identified as suitable on NFS lands at a forestwide scale.
- The NPC should also follow the example set by the Custer Gallatin National Forest and include the following plan components relevant to wolverine habitat conservation:
 - Desired Condition: Forest and alpine habitat characterized by persistent snow cover and cooler temperatures provide high quality reproductive habitat, denning and foraging opportunities for wolverines. High elevation habitat and associated micro-climates provide refugia and habitat connectivity for wolverines in the face of changing climates and emerging threats.
 - Guideline: To provide secure habitat for reproductive wolverines, there should be no increase in special use authorizations or designation of winter routes in maternal habitat for wolverines during the reproductive denning season.
- The revised forest plan should also include monitoring questions that will help forest managers understand population status and trends. We suggest adopting the monitoring questions included in the Custer Gallatin Forest Plan (see page 197 of the Custer Gallatin Forest Plan):
 - What is the trend in persistent snow cover?
 - What is the trend in wolverine population?
 - Outcome indicators: snow residence time, presence and number of individuals, both sexes present

Thank you very much for your consideration of the above objection. Winter Wildlands Alliance would like to meet with the Reviewing Officer at a mutually convenient time to discuss the above concerns. Please inform us in writing of any responses to these objections or of any further opportunities to comment or decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen". The signature is fluid and cursive, with a large initial "H" and "E".

Hilary Eisen
Policy Director