

TO: Nez Perce/Clearwater National Forest
RE: Formal objection to the Forest Plan Revision #44089

January 28, 2024

Dear USFS Nez Perce/Clearwater Planning Team:

These comments are a follow up to my comments submitted during scoping.

Enforcement: Issue #1

My comments for Issue #1 are based on my personal observations and official duties as a Montana Game Warden and later as the Montana Fish, Wildlife and Parks Region Two Supervisor based in Missoula, Mt. I retired in 2013.

As a Montana Game Warden Captain, I worked jointly with the Idaho Conservation Officers and the USFS Law Enforcement on joint patrols (both summer on horseback and winter on snowmobiles), along the Montana and Idaho Border in the Great Burn/Hoodoo RWA. I can attest to the difficulty in enforcing regulations in remote wild areas and the negative impacts that occur. **While enforcement may be difficult, there is no excuse to not protect our natural resources that you are responsible for.** I will provide one example.

In 2010, after receiving several complaints of illegal snowmobile activity of Idaho snowmobilers coming into the Montana side of the Great Burn RWA we initiated a joint patrol with Idaho F & G and the USFS. After several hours of pursuing the illegal snowmobiles on the ground with no luck, I contacted our aviation unit and enlisted the use of our helicopter. We located the snowmobilers and after several attempts to avoid us, we got them stopped on a remote frozen lake. Subsequently, 11 snowmobilers were charged with operating in a closed area. All 11 snowmobiles were modified with improved engines, specialty tracks and extended range fuel tanks. There were virtually nowhere these sleds couldn't go and did go. We followed them or their tracks over high elevation ridgetops, through deep snow basins and along steep alpine ridges.

That was 11 years ago. Technology today makes access to high mountain remote areas common. My concern is the impacts to critical wintering areas and stress placed on wildlife during the critical winter period, especially now with Global Warming in our future.

I currently snowmobile and support snowmobiling. There are many areas open to snowmobiles and mechanized use. That said, there are only a "few" places left where the landscape qualities are so great, that they should be protected and preserved, not just for wildlife but for future generations of Idahoans and Montanans as well as all Americans to enjoy. While the MT/ID

State Line and the Forest Service Boundaries separate the Nez/Clearwater portion from the Lolo, these lands are connected and function as one. Management actions on one side will and does affect the other.

Remedy Requested for Issue #1:

Given the advances in snowmobile/bike technology, incursion into critical wildlife areas is certain and will have negative impacts. Removing protections will exacerbate the problem. Minimize disturbance by maintaining non-mechanized use. Provide adequate enforcement.

Preserve Wilderness Character: Issue #2

The entire (Idaho Portion) Hoodoo Roadless Area should be managed as a recommended wilderness due to its outstanding wilderness characteristics. The entire area possesses some of the best characteristics of any area left in the lower 48 for potential consideration as future Wilderness.

Non-conforming uses should not be allowed within any RWA (Blacklead, Williams Range and Hoodoo) so as not to preclude the RWA from congressional wilderness designation. Non-conforming mechanized uses should not be allowed.

Opening these areas to motorized recreation is a permanent loss of important and/or critical wildlife habitat and the wilderness character of these areas. This is not acceptable.

Remedy Requested for Issue #2:

The Forest Service should revise the FEIS and the Forest Plan to include the Idaho portion of the Great Burn RWA and designate and manage it as a RWA. The FEIS and measurement indicators should incorporate the benefits of wilderness and wilderness character.

Impacts to Wildlife and Habitat: Objection #3

The Regional Foresters decision to include Mountain Goats as a species of conservation concern on the Lolo should be applauded. This species should be added to the Nez Clear plan. Goats currently may favor a certain area now, it doesn't mean that other high value habitats won't be utilized in the future if populations increase. Goats will likely never be in high numbers, but occupying additional habitats could be critical to long-term survival.

The uniqueness of the Great Burn with its high elevation ridges and rugged landscape makes this area extremely valuable to a multitude of wildlife and their habitats. Wolverine, Mountain Goats, Grizzly Bears Lynx and Whitebark Pine are species that are present at least seasonally on

both sides of the Great Burn. Maintaining linkage and connectivity between the Great Burn and other ecosystems is essential.

The FEIS should be revised to incorporate the best science available.

Remedy Requested for Objection #3:

The FEIS should be revised to incorporate the best available science and provide protection for Species of Conservation Concern.

Potential conflicts between mechanized and non-mechanized: Objection #4

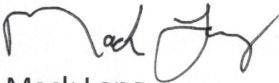
The Nez Clear portion has been managed as a non-mechanized use area since 2012. The area has been utilized by horsemen/women, hikers, backpackers, and skiers. Given the nature of the many steep, curvy, low visibility trails, the potential for dangerous trail conflicts will increase significantly if higher speed mechanized travel is allowed.

Remedy Requested for Objection #4:

The FEIS and Forest Plan should not allow mechanized travel.

Thank you for the opportunity to express my concerns.

Sincerely,



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