Lolo National Forest Scoping Comment

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Representing Backcountry Sled Patriots

The Great Burn RWA is a historically highly desired riding area that has been closed to snowmobiling since the inception of the 1986 Lolo Forest Plan . No reason was ever given to justify closing the area to snowmobiling other than Region One unilaterally decided RWA's should be managed as wilderness..

Snowmobiles cannot access much of the Great Burn RWA. The two areas that are snowmobile accessible encompass approximately 8,800 acres out of an estimated 96,000 acres in the current Gt Burn RWA, or approximately 9% of the total acreage.

I propose that these two areas (see attached map) be removed from the Great Burn RWA for the following reasons:

The area surrounding the Heart Lake area does not meet RWA criteria. There is an extensive man made boardwalk through wetlands in the SE portion. In addition this boardwalk was renovated a few years ago and all non salvageable material was discarded and left along the trail. A mechanized rock drill was utilized to improve a trail along a hillside closer to Heart Lake. An outhouse has now been installed at the head of Heart Lake. Snowmobiles are not allowed in this area because it is supposed to be managed as wilderness. Yet all the conveniences installed for summer users fly in the face of any description of "wilderness management". A RWA is set up to preserve ecological attributes of an area until Congress decides the suitability to be added ,or not, to the Wilderness Inventory. The 1964 Wilderness act did not contemplate substantial man made conveniences as a wilderness attribute.

"Untrammeled by man" does not fit here. For these reasons this specific area would never pass muster to be included in any future wilderness bill.

The second area is known as Irish Basin and would extend to include Cedar Log Lakes and Mud Lake. There is corridor over Schley Mtn to allow snowmobile access through the current RWA to the Clearwater NF. This corridor could be expanded `into a "cherry stem" that would include the areas noted above. (see attached map). The area could be connected by two different routes. One would follow the geographic State line. We used this route back in the 1980's when we couldn't pull the hill out of Kid Lake. The other would drop into Kid Lake in the Clearwater NF and the cut NW to the lakes. This is possible because the Clearwater RWA boundary is the State Line Trail that is on the West side of Kid Lake. This area would provide a more primitive and challenging back country riding experience as compared to the Heart Lake area.

No Mtn Goats winter in this high elevation area. It is suspected they winter in the lower reaches of Kelly Cr. The Irish Basin- Cedar Log Lakes area is a scenic and challenging area that will attract experienced back country riders, not only from Mt., but also Id. and Wa.

Both of the areas I am proposing to be removed from the existing RWA are considered "world class" snowmobile areas. Outside of the Williams Lake-Blackl; ead mt area in the Clearwater NF the experience can't be duplicated anywhere else in the west. There is no conflict with other users. No ecological impairment. The portion of the Clearwater NF adjacent to Hoodoo Pass that will be removed from RWA status and allow snowmobile access is contiguous with the Heart Lake area.

Snowmobiling is the least invasive form of any back country recreation, winter or summer. Snowmobile areas should not be closed because other back country users simply don't like them. Back country skiing is the fastest growing segment in the snowmobiling industry. Closing areas to snowmobiling also closes access to the back country skier who needs to access the same areas via snowmobile.

During the early stages of the current Lolo NF plan revision I heard a lot of talk from the public about how this plan should follow the direction and/ or management prescriptions of adjacent plans for purposes of consistency. My proposal would accomplish that objective by mimicking the Clearwater NF plan to re-open world class snowmobiling areas. Remember, when these areas were designated RWA status, snowmobiling activity was already established there and because that activity obviously HAD NOT IMPAIRED ECOLOGICAL VALUES the FS deemed the area met RWA criteria.

Lastly I have also heard a lot about wildlife connectivity and how snowmobiles must be at cross purposes to that end. While there have been a few substantial wolverine-winter user activity studies, none have conclusively stated or proven that snowmobiles must be kept from wolverine areas. In fact all have noted that skiers and snowshoers cause more angst to a Wolverine than a snowmobile. The larger issue is all of the studies I am aware of have been conducted in groomed snowmobile trail areas which result in a concentrated amount of activity. I suspect these areas were selected because of easy access by the researchers. To my knowledge there has never been a sanctioned scientific Wolverine study in the Great Burn area. This is important because this moves to a dispersed activity study area as opposed to a concentrated activity study area. Every study I have read has unequivocally concluded that there is no significant impact on Wolverines from human activity in a dispersed setting. Even the FWS which has issued an interim listing of the Wolverine admits dispersed settings are no cause for alarm. All other wildlife in the Great Burn winters in low level snow conditions that do not conflict with snowmobile activity. I think connectivity, if an issue at all, should be much more focused on summer users interfering with wildlife that migrates to the high country in the summer season.

I suspect those who spout rhetoric about impacts on Wolverines by snowmobiles in the Great Burn have never seen where a Wolverine dens. I have and it is impossible for a snowmobile, or a human, to get anywhere near a den. They are usually on the leeward side of a Mtn on rugged rocky cliffs.

They will move food from a cache site to the den, generally from the top of the mtn down to the den site.

In conclusion, Back country snowmobilers seek the same experience as summer back packers: challenge, scenery, solitude. In addition, when the snow melts our tracks are gone....leaving the area appearing "untrammeled by man".

STAW SPONZOR