

Data Submitted (UTC 11): 3/31/2020 8:26:22 PM

First name: Greg

Last name: Munther

Organization: Montana Chapter of BHA

Title: Volunteer Board Conservation Dir.

Comments: March 31, 2020

The Montana Chapter of Backcountry Hunters & Anglers

PO Box 9257

Missoula, MT 59807

Zach Peterson - Forest Planner

Nez Perce-Clearwater National Forest

903 3rd St

Kamiah, ID 83536

zacharyapeterson@fs.fed.us

Re: Nez Perce-Clearwater National Forests Plan Revision

Dear Mr. Peterson:

The Montana Chapter of Backcountry Hunters & Anglers has a particular interest in the Nez Perce-Clearwater Forest Plan. Many of our Chapter's 3,200 Montana sportsmen and women use and cherish the resources of the Great Burn region, as well as streams found within the CNFP such as the South Fork of the Clearwater and Kelly Creek. Both the Idaho and Montana portions of this contiguous state-line landscape currently offer incredible ecological values, exceptional backcountry opportunities and potential Wilderness designation. Much of the Montana side of the Great Burn has been recommended for Wilderness designation by the Lolo National Forest since the 1982 Lolo Forest Plan.

It is both important and logical that the entire contiguous unroaded portions of the landscape on the Idaho side of the state line be recommended as Wilderness in this Forest Planning process. The Montana portion of the Great Burn is already managed as Recommended Wilderness and it is important that the Idaho side be consistent with this management. A Recommended Wilderness allocation would protect wildlife, ecological and watershed values while respecting the increasingly scarce non-motorized integrity of the landscape that serves our members and others with quiet recreation opportunities, specifically backcountry hunting and angling.

Such Recommended Wilderness designation would also assure both habitat protection and connectivity for rare and declining iconic backcountry species such as mountain goats and wolverines. The wolverine in particular has been a candidate for listing as a Threatened species and their habitat deserves protection from disturbing motorized activities. It has also been predicted that both mountain goats and wolverines will be further stressed in the foreseeable future by climate change's negative impacts on snow depth and snowpack duration.

Disturbing human activities, including off-road vehicles and snowmobiles, have been well documented to lead to declines in mountain goat populations. Especially in winter, mountain goats cling to survival in small and geographically isolated parcels prone to be windblown and free of snow. Motorized disturbance can lead to displacement of goats into less-suitable winter range leading to higher rates of mortality, especially for young-of-the-year kids. It is our understanding that Idaho Fish and Game has documented that mountain goat populations have already declined dramatically in the Black Lead portion of the planning area while snowmobiling in the same area has been increasing considerably. Further challenging the wolverine's survival, it's worth noting that mountain goats are an important winter food source for wolverines, so their population numbers are intrinsically linked; if mountain goat populations continue to plummet, so goes the wolverine.

We have observed the rapid capability increase of both off-road vehicles and snowmobiles to penetrate the most rugged terrain which has previously been inaccessible to them. We can logically expect technological advances to further increase the ease and capability for over-snow machines to continue to infiltrate valuable mountain goat and wolverine habitat. Without reasonable restrictions, over-snow use can be expected to substantially increase over the life of this Forest Plan which would most certainly lead to adverse consequences to both mountain goats and wolverines.

Therefore, the Montana Chapter of BHA opposes any alternative proposal to allow snowmobile use in the Blacklead area and/or the narrow strip south of Hoodoo Pass. A Forest Plan that allows motorized uses in areas previously protected as potential Wilderness also likely dooms these places' future considerations as Wilderness. We note that the previous Forest Plan closed both of these areas mentioned above to motorized uses. We urge Plan direction that insists both of these areas will be managed as Recommended Wilderness in the final selected Alternative. Both of these areas contribute to wildlife connectivity, support both wolverines and mountain goats, and would be difficult to manage and contain legal motorized uses within these areas without illegal uses penetrating adjacent recommended Wilderness areas which would remain closed to motorized uses.

Our Montana members are also attracted to the South Fork Clearwater due to its rare B run steelhead, which happens to be among the closest steelhead fishing opportunities for Montanans. This beleaguered fish run needs all the habitat protection possible. We urge you to recommend the South Fork for Wild and Scenic River designation to prevent future dams in multiple identified locations.

Likewise, we urge Wild and Scenic designation for Kelly Creek which supports an outstanding wild westslope cutthroat fishery relatively close to our Montana membership. Additional dams or other damaging modifications would threaten this valuable fisheries resource.

We appreciate both the opportunity to communicate our interests in the Nez Perce-Clearwater National Forests Plan Revision and your careful consideration of these concerns.

Sincerely,

Greg Munther, Volunteer Board Conservation Director  
The Montana Chapter of Backcountry Hunters & Anglers