Data Submitted (UTC 11): 4/20/2020 7:00:00 AM
First name: Sharon
Last name: Rose
Organization: Montana Fish, Wildlife & Parks
Title: Admin Asst
Comments: Attached are Montana Fish, Wildlife & Parks comments (Word and signed/pdf versions). Thank you.

ATTACHMENT BELOW

Montana Fish, Wildlife & Parks

Region 2 Office
3201 Spurgin Road
Missoula, MT 59804-3101
Phone 406-542-5500
April 20, 2020

Zach Peterson, Forest Planner
Nez Perce Clearwater National Forests
903 3rd Street
Kamiah, ID 83536
https://cara.ecosystem-management.org/Public/CommentInput?project=44089

Subject: Nez Perce-Clearwater National Forests[mdash]Forest Plan--Draft EIS and Draft Revised FP

Dear Mr. Peterson:

Thank you for the opportunity for Montana Fish, Wildlife & Parks (FWP) to comment on the draft environmental impact statement (DEIS) and the draft revised Forest Plan (DRFP) for the Nez Perce- Clearwater National Forests (NPCNF) in east-central Idaho, adjacent to Montana (Mineral, Missoula and Ravalli counties). FWP is interested in commenting on the draft plan because some of the proposed alternatives could have direct impacts on wildlife populations on the Montana side of the border. Additionally, NPCNF decisions could influence future management direction on the Lolo National Forest (LNF) in Montana. Changes in travel management on the Idaho border would inevitably influence the upcoming Forest Plan revision on the LNF.

FWP does not support any alternative that could open winter motorized recreation along the Montana/Idaho (MT/ID) border in the Hoodoo zone (from Hoodoo Pass to just west of Lolo Pass) because of its potential impacts on wildlife. The Hoodoo zone represents an important core area for wildlife security. These types of core protected areas are extremely important to help maintain resiliency in wildlife populations to climate change and disease while helping keep wildlife populations across the larger landscape connected. The ridgeline along the MT/ID border and the passes, such as Hoodoo Pass, are important for wildlife connectivity. Wolverine, marten, fisher, and Canada lynx use the Trout Creek and Fish Creek drainages on the Montana side in the winter, and the Hoodoo zone provides important connectivity for these populations into Idaho. Motorized recreation in winter risks displacement and stress to wildlife (Joslin and Youmans 1999, Heinemeyer et al. 2019).

Mountain goats are of particular concern along the MT/ID border, especially within the Great Burn recommended wilderness area in Montana, which is adjacent to the Hoodoo roadless area in Idaho. In years past (1980s, [lsquo]90s, and early 2000s), mountain goats could be found in several drainages of the Great Burn (Cache, Straight, West Fork of Fish, North Fork of Fish, and Trout creeks). Today there is just one population remaining in the Trout Creek drainage; it is unknown why the other groups disappeared.

The Trout Creek goats are a small native population that summers along the MT/ID border in the Heart Lake area and winters at lower elevations in the Trout Creek drainage. The long-term viability of this herd is in part dependent on keeping the habitat secure, as well as maintaining connectivity with other mountain goat populations, the nearest of which is the Blacklead herd in Idaho. Maintaining connectivity between these herds is important for genetic diversity and potential rescue (Parks et al. 2015). FWP is concerned that winter motorized use in the Hoodoo could have direct negative impacts on the Blacklead herd and thereby disrupt connectivity with the Trout Creek herd.

The Blacklead herd is also a source population that may one day help to recover some of our vacant habitat on the Montana side. Idaho Fish and Game states that increasing snowmobile and snow bike access is a concern to mountain goats in this area (IDFG 2019).

It would be very difficult for the US Forest Service in Montana, with limited enforcement capabilities, to enforce any spillover of winter motorized use on the Montana side. There is already illegal motorized winter use occurring that has been difficult to curtail, and this problem would likely be exacerbated. FWP is concerned that opening winter motorized use on the Idaho border would place increased pressure on the LNF to open the Montana side because of these enforcement challenges. Motorized use in the winter has changed substantially in recent years. Snow bikes are new and of particular concern because they can access more terrain than snowmobiles, and therefore potentially have broader coverage on the landscape. Where snowmobilers often seek out open basins, snow bikers often ride through denser stands of trees. We are not aware of any assessment of the potential impacts of snow bikes on wildlife and are concerned the technology is developing faster than our collective ability to assess it.

For the wildlife that we share on the Montana/Idaho border, FWP respectfully asks that the NPCNF not open the Hoodoo roadless area to motorized winter recreation.

Thank you for considering our comments.
Sincerely,

Randy Arnold
Regional Supervisor
RA/sr

Literature Cited

Heinemeyer, K., J. Squires, M. Hebblewhite. J. J. O[rsquo]Keefe, J. D. Holbrook, and J. Copeland. 2019. Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation. Ecosphere 10(2): 1-23. https://esajournals.onlinelibrary.wiley.com/doi/10.1002/ecs2.2611
Accessed 16 Apr 2020

Idaho Fish and Game (IDFG). 2019. Idaho Mountain Goat Management Plan 2019-2024. IDFG publication. https://idfg.idaho.gov/sites/default/files/plan-mountain-goat-2019.pdf Accessed 16 April 2020

Joslin, G., and H. Youmans, editors. 1999. Effects of recreation on Rocky Mountain wildlife: A review for Montana. Committee on Effects of Recreation on Wildlife, Montana Chapter of The Wildlife Society, Helena, Montana, USA. http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/91137_FSPLT3_2553015.pdf Accessed 16 Apr 2020

Parks, L. C., D. O. Wallin, S. A. Cushman, and B. H. McRae. 2015. Landscape-level analysis of mountain goat population connectivity in Washington and southern British Columbia. Conservation Genetics

16:1195[ndash]1207. Abstract available at https://link.springer.com/article/10.1007/s10592-015-0732-2 Accessed 16 Apr 2020