

Data Submitted (UTC 11): 4/26/2020 7:00:00 AM

First name: Stan

Last name: Spencer

Organization: Backcountry Sled Patriots

Title:

Comments: See attachment for additional materials included in mail. Scanner made pictures too dark. Original on file.

Hi Zach

I'm submitting a slightly modified version of my original comment. Please disregard the previous comment(s) submitted.

My name is Stan Spencer. I am commenting on the Nez-Pere Clearwater National Forest Plan Revision. I am the President of Backcountry Sled Patriots (BSP). This comment represents the position of approx. 2000 snowmobiling members and another 2,800 associate members.

The Draft Environmental Impact Statement (DEIS) speaks to four alternative approaches to managing the Great Burn and several additional management areas plus a "no-action" alternative. BSP does not consider itself to be qualified to speak authoritatively on suggested RWA areas outside of the current Great Burn (Hoodoo) RWA geographic boundaries and two smaller RWA areas: North Fork Spruce[shy] White Sands and Sneakfoot Meadows . The DEIS suggests that components of the draft alternatives may be re-configured to develop a final alternative.

BSP is not in favor of any Recommended Wilderness (RWA) designation because all RWA's in Region one are being managed as Wilderness. BSP does not agree that management prescription follows the intent of the 2012 Forest Planning rules and in fact seems to be an end run around Congressional intent.

The Great Burn (Hoodoo) is a special place that should be protected from any activities that would impair the physical characteristics that define it. All users, non-motorized and winter motorized, appreciate the area for the same reasons: CHALLENGE, SCENERY, SOLITUDE.

The Great Burn (Hoodoo) is roughly 200,000 acres, depending upon which map is referenced. Approximately 20,000 acres, or 10%, can actually be accessed via snowmobile due to terrain restrictions. See attached map. Some of those restrictions include: too heavily timbered, too steep (rock cliffs) and many drainages get severely wind drifted making access impossible or at the least, impractical. One specific example: Williams Creek has a waterfall near the confluence of Frog Creek and Kelly Creek that makes through passage impossible via snowmobile because the sides of the narrow canyon at that spot are steep and timbered disallowing any bypass. North Fork Spruce-White Sands and Sneakfoot meadows are more accessible via snowmobile. I would estimate approximately 50% of that RWA total is accessible.

BSP RECOMMENDED ALTERNATIVE: the current Hoodoo RWA acreage be reclassified as: SEMI[shy] PRIMITIVE MOTORIZED. Access would be limited to snowmobiles, snow-bikes, and mtn bikes. North Fork Spruce-White Sands and Sneakfoot Meadows RWA's would be eliminated. A more appropriate designation might be primitive motorized however the ROS system as designed does not allow that experience (DEIS 3.4.2-22)}

The above re-classification for the HOODOO RWA will protect and preserve the physical characteristics of the area, yet allow a broader spectrum of uses. North Fork Spruce-White Sands and Sneakfoot Meadows do not have significant attributes that qualify for RWA designation. A residual advantage to the above proposed

designation is it would allow and provide a means for wildlife biologists to access the Great Burn in the winter season to conduct actual on the ground wildlife studies. I can't imagine how they would reasonably access the area in the winter unless by snowmobile.

When BSP examined the Record of Decision (ROD) for the current Travel Plan for the Clearwater National Forest one thing became apparent. The decision to prohibit all motorized activity in the Hoodoo RWA ultimately was based on SEGREGATION of users, not for any specified or quantified protective measures. In other words, the non-motorized users did not want any motorized users in that area. Not because of environmental impact, but because they simply don't like them. That form of discrimination is not allowed in the work place. It is not allowed in business establishments serving the public. Yet it is being practiced on publicly owned lands. One consequence of segregating snowmobilers out of the high back country is it forces them into more concentrated user areas. An example would be Lolo Pass. This area has a number of groomed trails and many are shared with cross country skiers.

Pushing more snowmobilers into that area can only raise the expectation of more user conflicts. There is a lot of language in the Travel Plan ROD referencing "SOCIAL VALUES", which can lead to many interpretations, the most favored is "user conflict". Subsequent to the 2012 Forest Planning rules being implemented a footnote (2) to a 2017 9th Circuit Court of Appeals stated in part "we need not address the question of whether on-snow user conflicts are outside the scope of the agency's required NEPA analysis entirely because they are 'citizens' subjective experiences" (Wild Wilderness V. Allen) in the case of snowmobiling in the HOODOO RWA how can any impact on social values, whatever that might entail, be quantified when the single user activity in the winter is (was) snowmobiling?. The time has come to DESGREGATE back country access. IT IS A TIME TO EMBRACE A TOLERANCE FOR RECREATIONAL PREFERENCES.

WILDLIFE MYTH AND FACT IN THE GREAT BURN

I snowmobiled in the Great Burn for 35 years (I'm 76 years old) before it was closed to snowmobiling. I am one of a handful of people who pioneered a snowmobile access route into the Williams Lake and Goat Lake areas.

Myth: snowmobiles impact the mortality rate of Wolverines. FACT: Wolverines den in areas not accessible by natural predators, and by default, not accessible by snowmobiles. I have seen Wolverines (from a long distance), and Wolverine sign, in the back reaches of the Great Burn. They den in cliff or rugged access areas that are simply not even close to where a snowmobile might be able to access. I am not aware of any Wolverine study done in the winter season in the Great Burn which renders any assumptions about snowmobile impact in that area moot. Even if the proposed listing of the Wolverine as threatened or endangered were to materialize it would not change the FACT that there is NO SCIENTIFIC evidence snowmobiles are bothering Wolverines in the Great Burn. Much reference to Wolverine habitat and potential disturbance is based on modeling results, not actual study/finding FACTS. (DEIS 3.2.3.3-63)

Myth: snowmobiles invade Goat winter habitat and impact the mortality rate of Mtn Goats. Fact: Mtn Goats winter range will be an area where they can find forage (DEIS 3.2.3.2-77) such as dried grasses and lichen as a food source. This will predicate areas that typically have less than two feet of snow depth. Snowmobiles need about five feet of snow to be able to travel on top of down fall and boulders etc. to access the high terrain back country. Fact: Goat winter ranges in the Great Burn have not been identified except for Land Owner Mt. (which is adjacent to the Great Burn). There is a small herd that winters on Land Owner Mtn. off the Forest Service road going to Hoodoo Pass. They are visible from that road and have readily adapted to snowmobile traffic (see attached picture). The take away from the attached picture is the goat had to hear the snowmobile approaching the truck to load, yet it did not try run away. This dispels the subjective argument put forward by the wilderness advocates that Mtn Goats are being displaced from their natural habitat by snowmobile noise and activity. Mtn Goats have become very adaptive to human activity. Fact: I have never seen a Mtn Goat or a Mtn Goat track while snowmobiling in the Great Burn over a 35 year period except on the Land Owner Mtn. winter range. I have never

heard of anyone seeing a Mtn Goat while snowmobiling in the Great Burn except as noted above.

Fact: Mtn Goat levels continue to decline at a higher rate in the Bitterroot Selway Wilderness than in the Great Burn RWA even though there is ZERO motorized activity allowed in the Bitterroot Selway. (DEIS 3.2.3.4-32).

FACT: there is no scientific evidence of correlation between snowmobile activity and Mtn Goat mortality rates.

MYTH: Increased snowmobile activity is increasing wildlife disturbance. FACT: snowmobile sales in the

U.S. have decreased 42% from 2006 to 2019 according to a report released by Wells Fargo Securities on Dec 27, 2019. (see attached). Over a million back country acres in Mt. and Id. have been closed to snowmobiles during the above time frame. That might just have something to do with reduced snowmobile sales! Chapter (3) Affected Environment and Environmental Consequence (DEIS 3.4.2-9) projects 'motorized snow activities' will be low growth.

THE GREAT BURN SNOWMOBILE EXPERIENCEThe Great Burn really is the "last best place" to snowmobile in the lower 48 States (DEIS 3.4.2-22). The access into the three riding areas are all primitive non-groomed trails which in itself limits the number of riders willing to go into the pristine back country. It is not uncommon to enter an area and see no other snowmobile tracks. That is part of the "solitude" experience. Riding with a small group and not seeing any other riders all day is another part of the "solitude" experience. Remember the three defined riding areas disperse riders over a large area which limits interaction. Being able to get into spectacular bowl configurations such as the headwaters of Frog Creek or the headwaters of Silver Creek are sights few snowmobilers (and summer users) get to see. Seeing them in the winter with the pristine snow contrasting with the rock formations is unbelievable. Climbing to the top of a ridge and being able to view wild country for miles in all directions is the "scenery" experience. It gives one the same sensory experience Lewis and Clark probably felt when they viewed this country from a high vantage point. The "challenge" of the area for snowmobilers can be just getting there. Some days the fresh snow depths have you, and your sled, working so hard you might only make a few miles. On good days being able to cut a line through the trees or being able to climb through a bowl to the top, follow a ridge line and then drop into another bowl or drainage on untracked snow is the Holy Grail of snowmobiling. And the bonus added to this experience is: when the snow melts all trace of activity is gone.

CONCLUSIONAt the end of the day it comes down to the Clearwater National Forest Revision Plan considering recreational uses to be allowed in the Great Burn that will not impair the WILDNESS of the area. It cannot be about segregating user access to satisfy a single category of recreational user preference. It comes down to considering impacts to wildlife based on FACTS and scientific studies, not modeling studies or assumed subjective and unproven impacts.**IT COMES DOWN TO MANAGING PUBLIC LANDS FOR THE GREATER GOOD OF THE PUBLIC.**