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First name: Christopher
Last name: Servheen
Organization: Montana Wildlife Federation
Title: President
Comments: January 13, 2024

TO: Nez Perce/Clearwater National Forest

RE: Formal objection to the Forest Plan

We write to you on behalf of the Montana Wildlife Federation (MWF). We are Montana[rsquo]s oldest and largest statewide conservation organization, founded in 1936 by dedicated hunters, anglers, conservationists, and landowners. Many members of the Montana Wildlife Federation are users of the Nez Perce/Clearwater National Forest along the Montana/Idaho border and the upper Clearwater and Kelly Creek drainages.

We previously commented on the draft forest plan on April 29, 2020.

In our comments on the draft Forest plan dated 4/29/2020 we made the following comment:

It is the position of the MWF that:

1. All 151,874 acres of the Hoodoo Roadless Area are managed as recommended wilderness due to not only the outstanding wilderness character of this region, but also because of this areas importance as linkage habitats for species that have large home ranges and disperse over large areas such as grizzly bears and wolverines.

2. Non-conforming uses should not be allowed within any RWA so as not to preclude any RWA from congressional wilderness designation (with the exception of administrative use of chainsaws by the USFS and partners). Non-conforming uses should include all forms of mechanized travel, over snow travel, and use of ebikes.

We note that the final forest plan ignored our comments and expressly promotes activities that are non-conforming uses such as motorized winter recreation throughout the RWA areas including the Hoodoo Roadless Area and the roadless Blacklead and Williams Range areas. We strongly protest this decision and the degradation of these important RWA areas by the promotion of non-conforming motorized winter recreation throughout these areas in the Forest Plan. Wild areas free of motorized access are increasingly rare. For the Forest Service to permanently degrade the wilderness character of the highly important will areas in the upper Clearwater drainage and the Blacklead and Williams Range areas by opening these areas to motorized recreation is a significant and permanent loss of important wildlife habitat and the wilderness character of these areas. This is a mistake, is completely unjustified and should be reversed.

The Montana Wildlife Federation specifically comments on the new Forest plan as follows:

Allowing motorized recreation into the formerly closed proposed Great Burn Wilderness area along the Montana/Idaho divide:

[bull] Many areas along the Idaho/Montana state line and in the Blacklead and Williams Range areas are places of remote mountains and lake basins that receive high amounts of snow that lasts into late May with north facing slopes and wolverine denning habitat. These areas are also connectivity habitat between the southern Idaho and Yellowstone Ecosystem populations and those further north in Glacier National Park and adjacent British Columbia. These areas on the Nez/Clearwater National Forest and adjacent areas of the Lolo National Forest are critical to maintaining and enhancing wolverine connectivity in the Rocky Mountains. The areas where the Forest wants to allow and increase motorized winter recreation (and likely will allow future motorized summer recreation as well) have all the characteristics of excellent/good wolverine denning habitat [ndash] usually north-facing rocky basins with snowpack that persists into late May. Such remote areas with persistent spring snow are considered important predictors of wolverine distribution and density (1) and given the listing of the wolverine as a threatened species, it is completely inappropriate and counter to the needs of this rare species for the forest to allow and promote motorized winter recreation in these critical areas for wolverine survival on public lands. Ironically the same characteristics of deep snow, late spring snow retention and open rocky basins that make these areas important wolverine habitat and denning locations are the same features that draw motorized winter recreation users who seek [ldquo]challenging[rdquo] terrain to snow machine up steep slopes in the spring where snow persists.

[bull] Allowing motorized winter recreation into the formerly closed areas in the upper reaches of the Clearwater drainage and in the Blacklead and Williams Range areas will have significant negative impacts on wildlife that winter in this area such as mountain goats and moose and on the denning habitat and presence of wolverines and grizzly bears. This decision will allow high performance snowmachines into fragile high elevation habitats that will displace wildlife though noise and physical disturbance. This decision will increase motorized winter recreation and the resulting negative impacts in areas formerly closed to such uses where wildlife has found a refuge from motorized use in the past.

[bull] This decision will also put motorized winter recreation into the adjacent areas of the Lolo National Forest along the Idaho/Montana border because most of the access to these areas on in the upper Clearwater drainage is through Montana on the Lolo National Forest. Many areas along the state line in Montana also have north-facing rocky basins with snowpack that persists into late May where motorized winter recreation users will congregate. These high performance snowmachine users will inevitably seek steep, open slopes with persistent snow. Many such areas occur on the Montana side of the state line in many north-facing lake basins on the Lolo National Forest.

[bull] The USFS has minimal to no law enforcement capability or presence to manage these motorized users in these remote areas. This means there will be increased violations of adjacent habitats such as in Montana along the state line and throughout all of upper Kelly Creek, which motorized users can access from the Montana side as well as from lower Kelly Creek above the bridge just above Moose Creek. These high performance snowmachine users will inevitably seek steep, open slopes with persistent snow. Many such areas occur on the Montana side of the state line in many north-facing lake basins on the Lolo National Forest.

[bull] Once this area is opened to motorized winter recreation, the next step will be to allow motorized summer recreation in these same areas and along the state line trail in the form of motorcycles, ATVs and e-bikes. There will be little justification for the USFS to keep motorized summer recreation out of the area if winter motorized recreation is allowed. This will bring more users and intensify the disturbance to wildlife into a year-around

disturbance regime. There will be demand for special use permits for winter and summer motorized recreation [ldquo]tours[rdquo] in addition to groups of non-commercial motorized users along the state line trail and to the lake basins along both sides of the state line.

[bull] As climate change proceeds with resulting warmer temperatures, lower snowpacks and reduced areas with suitable snow for motorized winter recreation, motorized winter users will congregate in high elevation areas where snows will be deeper and snow conditions will persist longer, such as the upper Clearwater drainage along the Montana-Idaho divide and in the Blacklead and Williams Range areas. That means that this decision to open the upper Clearwater drainage and the Blacklead and Williams Range areas to winter motorized recreation will concentrate ever more such motorized users with more and more powerful machines into this important wildlife habitat that was formerly undisturbed by such uses. This will accelerate and compound the damaging impacts of this decision and the harm to this fragile area that will come from this ill-conceived forest plan decision.

[bull] The final rule listing the wolverine as a threatened species in 2023 (2) cites several publications that have documented how winter recreation has negative impacts on wolverines. These research findings are completely applicable to what is proposed in the upper Clearwater drainage along the Montana-Idaho divide and in the Blacklead and Williams Range areas. Winter recreation has a negative effect on wolverine presence and habitat use and recreation, particularly motorized winter recreation. The functional response of wolverines to winter recreation within their home ranges is avoidance. (3) There was an incremental reduction in wolverine numbers in portions of central Idaho where winter recreation is increasing.(4) Forest roads used by snow machines in the Columbia Mountains in Canada were strongly negatively correlated with wolverine distribution.(5) Detection of wolverines decreased with increasing human activity and wolverine density was 3 times higher in protected areas than outside protected areas in the Canadian Rockies.(6) These scientific studies clearly demonstrate that opening the important wolverine habitat and the habitat of mountain goats and other wildlife to motorized winter recreation will have serious detrimental impacts to wolverines. On top of this, these negative impacts will accelerate over time as climate change reduces snowpack and concentrates and increases motorized winter recreation numbers in currently wild places with snow in late spring like the upper Clearwater drainage and in the Blacklead and Williams Range areas. Opening these areas to motorized winter recreation will increase pressure to also open them to summer motorized recreation, creating an accelerating negative spiral for wildlife in these important public lands that serve as the last stronghold for some of the rarest mammals in the lower 48 states.

[bull] This forest plan decision to open important areas used by wolverines on the National Forest to motorized winter recreation disturbance will have severe and irretrievable negative impacts on wolverines and other wildlife species in this very important area. Allowing motorized winter recreation into formerly undisturbed areas of the upper Clearwater drainage and in the Blacklead and Williams Range areas this will result in the [ldquo]take[rdquo] of listed wolverines though direct mortality, reduced reproductive success, avoidance of preferred habitats, reduced movement and dispersal success, and increased winter energetic demands. This decision to open these public lands to motorized winter recreation will significantly reduce any chance of recovering wolverines in the lower 48 states. To place motorized winter recreation into formerly undisturbed public lands on top of some of the best remaining wolverine habitat in Idaho (and by doing so cause similar damage to wolverine habitat in adjacent high elevation areas in Montana on the Lolo National Forest) is a grave mistake and it should not happen.

Thank you for the opportunity to comment on and object to this forest plan and its negative impacts on threatened wolverines and the loss of important wilderness habitat.

On behalf of the Board and membership of the Montana Wildlife Federation

Christopher Servheen, Ph.D.

President and Board Chair

Footnotes:

1 See: Aubry, K.B., C.M. Raley, A.J. Shirk, K.S. McKelvey, and J.P. Copeland. 2023. Climatic conditions limit wolverine distribution in the Cascade Range of southwestern North America. Canadian Journal of Zoology 101:1[ndash]19. https://doi.org/10.1139/cjz-2022-0005 Carroll, K. A., A. J. Hansen, R. M. Inman, R. L. Lawrence, and A. B. Hoegh. 2020. Testing landscape resistance layers and modeling connectivity for wolverines in the western United States. Global Ecology and Conservation 23:13 pp. https://doi.org/10.1016/j.gecco.2020.e01125

2 https://www.govinfo.gov/content/pkg/FR-2023-11-30/pdf/2023-26206.pdf#page=1

3 Heinemeyer, et al. 2019. Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation. Ecosphere 10(2) pp. 1-23. https://esajournals.onlinelibrary.wiley.com/doi/epdf/10.1002/ecs2.2611

4 Evans, D and E. Hagan. 2022. Wolverine persistence in an Idaho core area. Idaho Fish and Game. 18 pp. https://collaboration.idfg.idaho.gov/WildlifeTechnicalReports/Wolverine%20Camera%20Survey_Salmon%20River%20Mtns%202020-21_fnl.pdf

5 Kortello, A., D. Hausleitner, and G. Mowat. 2019. Mechanisms influencing the winter distribution of wolverine Gulo gulo luscus in the southern Columbia Mountains, Canada. Wildlife Biology. https://doi.org/10.2981/wlb.00480

6 Barrueto et al. 2022. Protection status, human disturbance, snow cover and trapping drive density of a declining wolverine population in the Canadian Rocky Mountains. Scientific Reports 12, 17412. https://doi.org/10.1038/s41598-022-21499-4