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Organization:

Title:

Comments: Dear Objection Reviewing Officer:

Please accept my formal objections to the Final EIS and Record of Decision for the Nez Perce-Clearwater National Forest (NPCNF) Plan Revision issued on November 28, 2023. I previously submitted comments on the Framework for Alternative Development and on the 2014 Proposed Action. My objections follow the comments made to the draft and focus primarily on the Hoodoo Roadless Area (Great Burn).

OBJECTION: Removing recommended wilderness designation of key area in Hoodoo IRA

The Hoodoo IRA, commonly known as the Great Burn, has been recommended for wilderness since the original 1987 Clearwater Forest Plan. The wilderness qualities of the area have been recognized by the USFS since RARE I. These qualities were once again recognized in the wilderness assessment that was completed for the NPCNF Forest Plan Revision. The scores are high for all of the qualities of wilderness character that were considered in your assessment. In your description you state, "[Outstanding scenery, the variety and abundance of wildlife and the high quality west slope cutthroat fishery are all major attractions in the area.] Furthermore, 42% of the area consists of ecological types that are currently underrepresented in the National Wilderness Preservation System (NWPS). The vegetation includes over 17,000 acres of white bark pine (WBP) habitat, WBP being a recently added T & E species.

It is extremely rare to find a roadless area of any size, let alone one of the size of the Great Burn, that has literally no existing uses that would jeopardize its consideration for inclusion in the NWPS. Certainly, that is true in the USFS Northern Region.

Yet, you made the decision that snowmobiling and mountain biking are higher uses of the area than wilderness, with no rationale in your EIS to justify this decision.

The 1987 Clearwater Forest Plan recommended the entire Hoodoo for wilderness but was silent on appropriate recreation uses. This is because at the time, snow machines and bicycles were not capable of traveling into this high elevation area. The 2012 travel plan closed Hoodoo to motorized and mechanized recreation to protect wilderness character. Snowmobiles began accessing the Great Burn in the mid-1990s. The forest, admittedly, didn't patrol backcountry, so it's impossible to know how many snowmobiles used the area prior to 2012, we only have your analysis to confirm that it wasn't very many.

Your DEIS states that a 2016 survey found that just 2.6% of the forest's users engage in snowmobiling. This reference is on page 3.4.2-8. On the following page the DEIS indicates that "activities expected to show low growth include motorized off-road activities and motorized snow activities (White et al. 2016)". Your analysis also states that the majority of snowmobiling on the forest occurs on groomed trails.

All IRAs, with the exception of the ones recommended for wilderness designation (Hoodoo, Mallard Larkins, North Fork Spruce-White Sand and Sneakfoot Meadows) remain open to snowmobiling so there will continue to be opportunities for over-snow motorized recreation in back-country areas. The 2017 travel plan Record of Decision states that there are 988 miles of trail and 4354 miles of road open to bicycles. The travel plan also asserts that there "is little mountain bike use within the areas recommended for wilderness by the forests plan" the remaining areas of the forest will provide a wide variety of bicycle opportunities of varying challenge and in a variety of settings. Yet, you propose opening a 150' corridor for the purpose of allowing mountain biking on the Stateline Trail. You also provide no specificity on the 150' corridor. Is this 150' from the center of the trail? If so, you have now made a decision that includes portions of the Lolo National Forest. Since when is the NPCNF Supervisor authorized to make decisions on the Lolo National Forest?

Furthermore a local survey conducted by USFS Region 1 to determine the preferences for motorized and mechanized access to federal public lands showed that 61% of local respondents indicated there are adequate or too many accessible sites for snow machine use, additionally 32% of respondents indicated they didn't know whether there were too many or too few sites available. 51% of local respondents indicated there are adequate or too many accessible sites for mountain biking and 40% indicated they didn't know whether there were adequate sites. Although the survey reflected data from across the entire NPCNF, and not just the communities adjacent to the Hoodoo Roadless Area, the high numbers indicate that there is currently adequate winter motorized and mountain biking opportunities and there is not adequate demand or need to reduce recommended wilderness acreage for the Hoodoo Roadless Area.

In conclusion, nowhere in your analysis do you state a need for change to support decreasing the size of the Great Burn recommended wilderness and removing some of the wildest country. In fact, your analysis strongly supports continuing to recommend the area.

Objection: Manageability and enforcement. The NPCNF proposal will make management of adjacent Recommended Wilderness and enforcement of prohibitions impossible

As you state in your wilderness assessment, the Great Burn is characterized as "grassy open meadows and considerable barren land" so unless there is a specific trail, like the Fish Lake Trail, it will be nearly

impossible for recreationists to know the boundaries of open and closed areas. Take the stateline for instance, where the NPCNF adjoins the Lolo National Forest. That area is open, meadowy and fairly flat, making it difficult for recreationists to distinguish when they are on the NPCNF versus the Lolo, particularly when there is snow on the ground. Snowmobiles are prohibited in the Great Burn on the Lolo National Forest. The same could be said for the Blacklead area. Again, snowmobilers will not know when they have gone from the open snowmobile area into the recommended wilderness, where snowmobiles are prohibited.

A basic tenet of recreation management is to make decisions that will be easy for the public to understand and abide by. Your decision sets the public up to fail by making it impossible for them to distinguish between the open and closed areas. Additionally, it is well known that the places that the snowmobiles want to ride is in lake basins and bowls. On the stateline all of those areas are actually on the Lolo, in the area where snowmobiling is prohibited.

Illegal, over the snow vehicle use has persisted since the Clearwater's travel planning decisions and the Forest Service has not properly managed the 1987 recommended wilderness or provided enforcement. Subsequently in this planning process, the Forest Service has decided to simply open up the areas where they were not enforcing the previous decisions. As the Forest Service acknowledged in the 2017 decision, the area is large and rugged and if snowmobiling is allowed, it would be difficult for the Forest Service to control. The decision to change the recommended wilderness boundaries in the Hoodoo Roadless Area provides no assurances that the Forest Service will enforce the new boundaries. Conversations with NPCNF staff at the public meetings held for this planning process suggest that law enforcement availability in this area is not adequate to manage illegal trespass, especially given that boundaries will not be marked and will not be entirely clear to users. When asked about intrusions into the recommended wilderness on the Lolo, the NPCNF staff stated [Id]that's the Lolo's problem.[rd] It certainly will be. The Lolo's problem that was created by the NPCNF Supervisor.

Even if the snowmobilers agree to police themselves and stay out of the closed areas, this will not work. That was proven to be the case in the Mt. Jefferson IRA on the Beaverhead-Deerlodge (B-D) National Forest. The B-D agreed to leave an area open to snowmobilers in the Mt. Jefferson roadless area in the 2009 forest plan. The ROD stated that monitoring would occur and if there were incursions into the recommended wilderness, the forest would re-evaluate the decision. According to a letter dated January 15, 2013 and signed by then Forest Supervisor Dave Myers, [Id]Despite clear boundary marking, intentional trespass is common, as evidenced by tracks, and direct observations riders entering the closure in close proximity to signs.[rd] In looking at the B-D website, there is no indication that this decision has been re-evaluated or changed in any way.

The following is taken verbatim from the B-D National Forest 2011 Monitoring Report.

[Id]Background: The 2009 Record of Decision for the Beaverhead-Deerlodge National Forest Plan recommended the north portion of the Mt. Jefferson/Hellroaring Creek area in the Centennial Mountains as wilderness and left the south portion open to snowmobiling (Figure 14). The decision provides access for snowmobilers on the Idaho side of Mt. Jefferson while providing greater protection for wolverine habitat and other

wilderness values in Hellroaring Creek. The boundary line between winter snowmobiling in Mt Jefferson Management Area and the snowmobiling closure for Centennial Recommended Wilderness Management area is drawn along the 2001 wolverine habitat closure.

The Record of Decision states on page 21, [ldquo]the combination of uses allowed on Mt Jefferson under the Forest Plan represents a management challenge, because the boundary between the motorized and non-motorized use areas does not follow an effective topographical barrier to illegal motorized entry. The success of this compromise decision relies heavily on voluntary compliance with recommended wilderness boundaries by over-snow vehicle users. The Forest Monitoring Plan specifically spells out monitoring requirements that address compliance with restrictions on motorized use in Mt. Jefferson. If monitoring reveals that non-compliance is an issue, the decision to allow snowmobiling on Mt. Jefferson will be re-evaluated.

Winter use in Mount Jefferson has been monitored every year since 2001 when the first partial area (emergency) closure was implemented. Illegal intrusions into the closed areas have been documented in each successive year. Initially, closure boundaries were not adequately marked due to a scarcity of trees suitable for posting boundary markers. To adequately mark the boundary, ten foot long treated posts were hand carried in and set. Marking efforts were completed in the fall of 2009 and clearly identify the closure. There are 24 signs along the 1.25 mile long closure boundary between Hellroaring Creek and the north flank of Mount Jefferson. The closures east of Lillian Lake and south of Cole Creek are also clearly identified with bright orange closure signs. The density of marking is such it is unlikely a snowmobiler will unknowingly enter the closed area.[rdquo]

There is no indication on their website that this situation has changed in the past 10+ years. So, one can assume that Mt. Jefferson recommended wilderness continues to be overrun with snowmobiles. It[rsquo]s quite likely that the Montana side of the Mount Jefferson recommended wilderness will never be considered for wilderness designation.

This is obvious proof that allowing snowmobiling adjacent to a recommended wilderness with a legal closure will not work. Unless there is an obvious barrier that prevents them from physically entering a closed area, which there is not, they will enter that area.

Objection: Managing Across Forest Boundaries The NPCNF proposal is inconsistent with management of the adjacent Lolo National Forest

In the 2017 Travel Plan ROD, the NPCNF Forest Supervisor stated that, [ldquo]I believe that if I decided to allow motorized use in the RWAs, it could preclude further designation or pre-determine what could be included in a

Wilderness Bill.” This statement is absolutely true. But, the same could be said for what this decision will do for the Lolo National Forest Plan revision. It seems the NPCNF has painted the Lolo into a corner on their decision space, because there is no way illegal snowmobiling can be kept out of the Lolo’s recommended wilderness. Also, the Stateline Trail zigzags between the NPCNF and the Lolo. How can the Lolo make the decision to recommend the Stateline for Wilderness knowing that the NPCNF has opened that trail to mountain bikes?

Also, in the ROD, you state that, “The management of boundaries shared by other roadless areas is generally not challenging, since management is similar.” In your proposal, management is not at all similar. You are proposing to allow snowmobiling in an area that is adjacent to recommended wilderness on the Lolo NF where snowmobiling is prohibited. This decision invites trespass into the closed area.

Objection: Visitor Conflicts.

Noise impacts from snowmobiles will have a significant negative impact on skiers and snowshoers in the recommended wilderness, resulting in potential visitor conflicts. Visitors tend to have expectations based on the agency management scheme for an area. When people visit areas that are recommended for wilderness by an agency, they expect to have a wilderness type of experience. The noise from snowmobiles will ruin their wilderness experience. The fact that there are few skiers or snowshoers only exacerbates the problem, because people expect to find solitude and quiet.

Also, the Great Burn meets a significant need for wilderness type recreation in an area with very little designated wilderness (Northern Idaho and Eastern Washington). Much of the recreation use in the Great Burn is from Spokane, Washington because there are so few quality non-motorized recreation opportunities nearby. It is an area enjoyed by many families seeking a quality wilderness experience close to home. The Great Burn is considered to be hiker and equestrian friendly, a quality not easily found in Northern Idaho and Eastern Washington. The addition of mountain bikes will result in major conflicts with existing visitors.

The NPCNF has many other reasonable options for both snowmobilers and mountain bikers outside of the Great Burn. No trails in the Great Burn have been constructed for mountain bikes and the trail standards for mountain bike trails are significantly different than those for hiker or equestrian trails. To convert trails to mountain bike standards would be expensive and not justified considering the very small number of mountain bikes that would ever use the area.

Remedy: I am asking that the original recommended wilderness boundaries from the 1987 Clearwater National

Forest Plan be restored.

I believe that the NPCNF has not provided adequate justification in either the Need for Change or in their analysis to support the drastic change to the Recommended Wilderness boundary.

Sincerely,

/s/Chris McCarthy-Ryan