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First name: Skip

Last name: Kowalski

Organization: Montana Wildlife Federation

Title: Board Director

Comments: January 19, 2024

RE: Addendum to MWF Response to Nez-Clearwater Forest Plan Revision On behalf of the Board of the Montana Wildlife Federation, we request that you accept this response as an addendum to our initial letter of Objection to the Draft Revision of the NezPerce-Clearwater Revised Forest Plan dated January 13, 2023, signed by Board President Chris Servheen. This addendum provides specific information to support our Objection to your proposed Revised Plan. For the record, please include this letter as part of our Official Objection.

Basis for Standing

The statements below are taken directly from our comment letter dated April 20, 2020,

submitted to the U.S. Forest Service:

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 the importance of this area 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 (except for administrative use of chainsaws by the USFS and partners). Non-conforming uses should include all forms of mechanized travel, over-snow travel, and e-bikes.
3. The degradation caused by mechanical and motorized recreation would directly contribute to impacts on solitude and primitive settings and could preclude RWAs from wilderness designation.
4. Winter habitat for mountain goats is especially critical and must be considered when proposing winter recreation within a backcountry setting (IDFG Mountain Goat Management Plan 2019). The Blacklead herd is one example of why mountain goats must be actively managed as a priority species. This herd has experienced significant declines that could lead to a complete population loss. Significant evidence suggests that illegal over-snow recreation has been the primary cause of population decline within this herd. For these reasons, it is imperative that the Hoodoo Roadless Area, and the entirety of the Great Burn, be managed as recommended wilderness.
5. Though this forest is located in Idaho, Montanans have enjoyed the lands and waters affected by this forest plan for countless years. Many of our members across western Montana travel to Idaho to experience the opportunities found in the Nez Perce-Clearwater National Forests. Additionally, wildlife moves freely between our states, and land management in Idaho will ultimately influence land management in Montana.

Rationale for Objection

We have significant points to make regarding the Objection:

1. In addition to our 1/13/2024 comments, we do not believe that the Forest Service's proposed Revised Plan gives due consideration to the CEQ recommendations dated March 21, 2023, in "Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors" (see Appendix 1). This document

states: "Connectivity and corridors should factor into high-level planning and decision-making at Federal agencies as well as into individual decisions that lead to well-sited and planned projects." It further states: "To the maximum extent practicable, Federal agencies are expected to advance the objectives of this guidance by developing policies, through regulations, guidance, or other means, to consider how to conserve, enhance, protect, and restore corridors and connectivity during planning and decision-making, and to encourage collaborative processes across management and ownership boundaries."

In the ROD on page 31, the Forest Supervisor asked disparate "groups to come together and propose an alternative solution regarding the Hoodoo Roadless Area that everyone could live with, and promised to analyze an action alternative with those boundaries should they be provided. Yet, no collaborative compromise solution was reached." The inability of the groups to reach a consensus indicates how much each of these groups values the Hoodoo Roadless Area.

It is in the best long-term interest for wildlife to retain the wildland character of the Hoodoo Roadless Area as a large core area enhancing connectivity between Mallard-Larkins Recommended Wilderness and the Selway-Bitterroot Grizzly Bear Recovery Area. The Hoodoo Roadless Area should be managed as Recommended Wilderness until Congress resolves the issue. We are concerned that if specific user groups, such as motorized over-the-snow recreationists, that do not support Wilderness designation are permitted to become established vested interests, it would be politically impossible to designate those lands as Wilderness.

2. We also believe that mountain goats deserve to be identified as Species of Conservation Concern (SCC) for the Nez Perce-Clearwater National Forest. An SCC is "a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area" (Sec. 219.9(c)).

The Regional Forester identified the mountain goat as an SCC for the Lolo National Forest in October 2023. Since the same mountain goats share habitat across the Idaho/Montana boundary, it stands to reason that these animals receive similar management priority across both National Forests.

3. Decisions made in the Nez Perce-Clearwater National Forest are significantly precluding options for the Lolo National Forest to recommend Wilderness for the Lolo National Forest. Edge matching of similar management direction across adjacent National Forest boundaries is a reasonable expectation and makes sense from public understanding and law enforcement perspectives. However, with the Nez Perce-Clearwater permitting motorized winter over-the-snow recreation use on the Idaho side of the divide, it practically commits the Lolo National Forest to eliminate significant acreage from the recommended Wilderness classification for a central portion of the Hoodoo Roadless Area in Montana.

4. On pages 31 and 32 of the ROD, the Forest Supervisor discusses her rationale for deciding on management direction for the Hoodoo Roadless Area. Her statements include: "I heard the need to protect sensitive ecosystems and habitat for at-risk species, including wolverine and grizzly bear." "I have concluded that two areas, in particular, could be managed for over-the-snow motorized use while meeting all regulatory obligations for maintaining the diversity of plant and animal communities and the persistence of native species in the plan area. Thus, I have decided to find suitable winter motorized use for a portion of the Hoodoo Roadless Area in the south of Williams Peak near Goat Lake Williams Lake, and Williams Creek and exclude that area from the portion I'm recommending for wilderness designation. Similarly, the area North of the Fish Lake trail was excluded for the same rationale.

It is our view that, with the recent listing of wolverines and the potential for painting the Lolo into a corner regarding their potential options for recommending Wilderness for the Hoodoo Roadless Area, it is in the long-term best interest of wildlife conservation and habitat connectivity that all of the Hoodoo Roadless area should be

managed as recommended Wilderness until the U.S. Fish and Wildlife Service makes its determination regarding Critical Habitat for wolverines and/or Congress takes action on potential Wilderness designation for the area.

Thank you for the opportunity to comment on the Draft Revised Forest Plan. We look forward to working with you to resolve the issues identified in this Objection.

Sincerely,

Skip Kowalski

MWF Board Director & Official Objector Designee

Montana Wildlife Federation

See Attachment: 3/21/23 Federal Connectivity Guidance Memo contained with the objection letter