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Northern Region 1, Regional Forester Northern Region Office

26 Fort Missoula Road Missoula, Montana 59804

Re: Nez Perce-Clearwater Forest Plan Objecton Dear Region 1 Regional Forester,

Thank for this opportunity to object on the released Nez Perce-Clearwater Final Environmental Impact Statement, hereafter referred to as FEIS, and draft National Forest Plan. I first became involved in this planning process as a participant in the public collaborative workshop held at the University of Montana in Missoula in January 2018. I have since participated in the DEIS public meetings in St. Regis and Missoula. During the DEIS public comment period I submitted comments on behalf of my then employer, Wild Montana.

Please note that these objection comments are wholly my own viewpoints and arguments and are not associated with those of Wild Montana.

As a Montana-based user of the Nez Perce-Clearwater National Forest my use and interest is primarily in the Hoodoo Roadless Area and adjacent lands in the Lochsa and Clearwater River basins, and these objections are focused on concerns I have about FEIS components related to this area.

The FEIS and draft National Forest Plan proposes reducing the portion of the Hoodoo Roadless Area managed as recommended wilderness, notably in the Hoodoo Pass and Blacklead Mountain areas on the north and south ends of the Hoodoo respectively. I have visited these areas extensively in a variety of seasons, including several human-powered winter visits. My objections draw from my personal experience on the ground visiting these areas, as well as my reading of the forest planning documentation released by the Nez Perce-Clearwater National Forest, things I learned through attending scoping and DEIS public meetings, and my knowledge of the scientific literature relevant to this area and the species that reside there.

My objections are as follows:

1. There is inadequate consideration of the impact in change of management in the Hoodoo Roadless Area on sensitive and threatened species, namely mountain goats and wolverine.

The FEIS proposes reducing the portion of the Hoodoo Roadless Area managed as recommended wilderness to allow winter motorized use in the Hoodoo Pass and Blacklead

areas. The plan does not adequately consider the impact of this change in management on key species.

Mountain Goats

Both mountain goat populations found in the Hoodoo Roadless Area are known to utilize habitat on both the Montana and Idaho sides of the roadless area. Statewide research in Montana has demonstrated that Montana's native mountain goat populations are in decline.¹ The Nez Perce-Clearwater's DEIS documentation acknowledges that the Blacklead mountain goat population has experienced significant decline in the 21st Century, and numbers so few individuals that it is likely at threat of extinction if stressors are not reduced in the coming decades. Idaho Fish and Game biologists quoted in the DEIS indicate that one of the likely stressors contributing to this herd's decline is illegal winter motorized use in the Blacklead area. The Nez Perce-Clearwater Forest should seek to protect this herd of mountain goats, which is identified as a Species of Conservation Concern when it utilizes habitat on the Montana side of this roadless area.

Wolverine

The day after the FEIS and draft Final Forest Plan were released the U.S. Fish & Wildlife Service released an Endangered Species Act listing for the wolverine. This warrants the Nez Perce-Clearwater creating plan components to address impacts of management decisions on this threatened species. The maps and models referenced in the DEIS indicated that the highest quality maternal denning habitat for the wolverine across the entire Nez Perce-Clearwater National Forest was found on the Stateline area of the Hoodoo Roadless Area, and this entire zone was high quality wolverine habitat more generally. This science, therefore, suggests that the Blacklead and Hoodoo Pass areas should not be opened for winter motorized use, given that wolverine studies have shown that wolverine are sensitive to winter motorized use, especially denning females.

1. Plan rationale and Forest Supervisor media communications indicate a belief that this plan utilizes best available science, but plan documentation doesn't adequately address economic potential of non-motorized recreation. In addition, wildlife-based science presented in the plan documentation is in direct conflict with the decision to allow motorized and mechanized use in Hoodoo and Blacklead areas.

In spite of a Facebook post on 01/27/2024 and a guest editorial from Forest Supervisor, Cheryl Probert, the Forest has not adequately demonstrated a full range of economic and ecological data were used to inform the FEIS and draft Final Plan. Tables such as the one on page Summary-14 in the DEIS provide enormously simplified data that does not acknowledge nor account for the economic value of non-motorized recreation.

In the wildlife portions of the DEIS the Forest acknowledges that wildlife including elk (page 3.2.3.4-48), mountain goats (page 3.2.3.4-29), and wolverine (pages 3.2.3.3-62 and 68) are negatively impacted by mechanized and/or motorized recreation. In the DEIS conclusions are drawn that directly conflict with data provided several pages before. For example, in the case of mountain goats,

Page 3.2.3.4-31

"Recent night counts by the Idaho Department of Fish and Game in areas occupied by goats in the Great Burn area documented snowmobile tracks near historic mountain goat areas and counted below 20 individuals where past winter counts were in the low 100s."

Followed by this contradictory conclusion on page 3.2.3.4-44

"Results suggest low amounts of overlap between snowmobile use and known mountain goat population areas. This makes sense because most mountain goat habitat is too steep for comfortable snowmobile use."

This conclusion also does not take into account the additional accessible terrain that can be used by more nimble snow bikes.

The science cited in the DEIS indicates the following regarding wolverine, lynx, and ?sher:

Connectivity has been identified as an important factor to wolverine conservation, and the most important areas for connectivity are along the Idaho-Montana border[ellip]. These recommended wilderness areas also appear to be an important connectivity area for lynx, ?sher, and wolverine. (Page 3.2.3.3-70)

Yet the decision to not manage this area as recommended wilderness per the FEIS is in contradiction to this science.

1. The FEIS management decisions cater to a very small segment of recreation users (cite Stan Spencer and John Steigmaier from Missoulian article), with high potential of irreversible impacts to wildlife populations and a significant increase in negative user experiences on the Stateline trail in the summer.

Data provided by the planning process indicates that 2.6% of Nez Perce-Clearwater Forest users engage in snowmobiling. The recreation activities expected to show low growth, as indicated in the DEIS, are motorized off-road activities and motorized snow activities (page 3.4.2-9). When thinking about providing winter motorized access it is important to acknowledge that the terrain in this area further restricts the number of users capable of and interested in using this area. The decision, therefore, to open this area for winter motorized use is catering to use requests from a very miniscule portion of forest users. It also indicates that there is no compelling economic reason to open this area for winter motorized use, as the number of users will be of a small volume.

Ecological impacts of a small number of winter motorized users can still have large negative impacts on winter challenged wildlife, such as mountain goats who operate in a caloric deficit during this season and whose mortality rates rise when they are pushed or frightened by the sound or sight of motorized use.

Stan Spencer, leader of the Missoula Snowgoers Association, and a publicly vocal proponent of increasing winter motorized access in the Hoodoo Roadless Area was recently quoted in The Missoulian acknowledging that interest by snowmobilers and snow bikers in this area is low, saying that "only a sliver of snowmobilers trek to the Great Burn."²

Management that allows non-conforming uses nearly always negates an area's suitability for future consideration for inclusion in the National Wildlife Preservation System. The decision to favor recreation preferences of a small subset of one of the smallest user groups on this forest (winter motorized users who seek highly remote, technically challenging terrain) inappropriately weighs the value of recreation against irretrievable loss of habitat security and long-term potential for protection of the resource.

Mountain bikers have also indicated during this objection period that the opening of the Stateline Trail for bike use will only provide opportunities to a small percentage of their user base as well. John Steigmaier, executive director of MTB Missoula was quoted in the Missoulian indicating, "It's a small segment of the sport that this is going to appeal to," he said, "it's not that close to Missoula. It's hard. The trail is in deteriorating condition."³ In this same article, John discusses how the mountain bike community isn't interested in using the Stateline Trail for out-and-

back style rides, but instead they use the trail to complete loops. The loops mentioned in the article reference the Heart Lake basin on the Lolo side of the Hoodoo Roadless Area, but there are also loops that mountain bikers could begin frequenting on the Nez Perce-Clearwater side of the Hoodoo. Even though mountain biking on this trail has been illegal since 2012, I have encountered mountain bikers between Hoodoo Pass and the Heart Lake trail frequently. When other hikers I was traveling with let the bikers know that mechanized use was not allowed the bikers refused to return to Hoodoo Pass and continued past us. This suggests to me that the Nez Perce-Clearwater and Lolo will have significant enforcement issues in opening up legal mountain bike use on the Stateline Trail, as the cherry stem is likely not to be respected and to be the only local use of use.

1. Management changes proposed for the Hoodoo Roadless Area do not adequately take into consideration likely advances in winter motorized recreation and mountain biking technology that will occur over the lifetime of this plan.

The existing Nez Perce-Clearwater plan has been in place since the 1980s and it is likely that this new plan will serve to direct management, and set the direction for travel allowances, for at least two decades to come. In the last 30 years we have seen incredible advances in mountain bike technology and the introduction of snow bikes. E-bike technology is advancing rapidly with each passing year, and Steve at MTB Missoula recently shared that it is nearly impossible to discern that some of the newest e-mountain bikes have a motor as a person rides by. The FEIS and draft Forest Plan open up portions of the Hoodoo Roadless Area, and yet do not address how increased capabilities of these technologies is likely to create enforcement issues over time. As mentioned in an earlier section of my objections, the plan documentation also does not acknowledge that increased power, stability, and nimbleness of winter motorized vehicles may allow them to access more mountain goat utilized terrain that they presently can.

Improving e-bike technology is likely to make it possible to travel longer distances in a single day, increasingly the likelihood that larger loops on both the Nez-Clear and Hoodoo sides of the roadless area are utilized by bikers from the Stateline Trail. In proposing opening the Stateline Trail to mechanized use, this potential use is not evaluated and there is no discussion of how use of the Stateline only will be enforced.

1. Management changes proposed for the Hoodoo Roadless Area do not address how enforcement of new boundaries will be managed, which is especially problematic given the known and acknowledged enforcement issues with current boundaries, which are less remote than the newly proposed boundaries.

As I alluded to above, this plan does not address that illegal motorized and mechanized use is a common occurrence presently in the Blacklead area and on the Stateline trail and that current levels of enforcement have been inadequate. The new boundaries, especially in the Blacklead area, are even more remote and complicate enforcement further. The plan does not address what means will be utilized to improve compliance by users, and whether the forest can afford to implement what will be necessary and whether it is prudent to make changes that require additional investment to occur.

1. This draft Forest Plan negligently ignores a significant opportunity to contribute to goals in Executive Order 13990.

Executive Order 13990, Section 216, acknowledges that ecological health, on not only a national

-- but also a global level, is approaching a perilous moment in time and one of the ways to best ensure resiliency against climate change is to preserve large, undeveloped areas where ecological health is currently high.

Executive Order 13990 establishes a goal of conserving 30% of our nation's lands and waters by 2030. The Hoodoo Roadless Area is the largest roadless area managed by the Forest Service in Region 1, and evaluation of its wilderness characteristics by the Forest Service has resulted in one of the highest valuations awarded. The intactness is outstanding, and the species richness and diversity is incredibly high. The area is frequently referred to as The Great Burn in acknowledgement of the area's wildlife history, as it was

burned in the landscape scale fires of 1910. The area is also known to provide refugia sites for plant species that are no longer prevalent in this ecosystem, such as old growth cedar stands. The Hoodoo Roadless Area serves a wildlife and gene flow migration corridor in the larger Yellowstone to Yukon Ecosystem. Maximally protecting the Hoodoo Roadless Area as recommended wilderness, with potential inclusion in the future in the National Wilderness Preservation System would help achieve the Executive Order 13990 targets in Forest Service Region 1.

Thank you for your careful review of the points and objections I raise here. I look forward to the opportunity to continue to engage in the objections process.

All objections raised here can be addressed and resolved by managing the entirety of the Hoodoo Roadless area as recommended wilderness.

Sincerely,

Erin Clark