

Data Submitted (UTC 11): 8/8/2014 12:00:00 AM

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Organization: Montana Backcountry Hunters and Anglers

Title: Co-chairman

Comments: Nez Perce Clearwater Forest Plan Revision

Please find attached a letter from Montana Backcountry Hunters and Anglers re the Proposed Action Alternative B re snowmobiling in the Great Burn and vicinity.

Greg Munther, Co-Chairman

Montana Backcountry Hunters and Anglers

1295 Lena Lane

Missoula, MT 59804

August 7, 2014

Forest Plan Revision

Nez-Perce Clearwater National Forest

903 3rd St

Kamiah, Idaho 83536

RE: Nez Perce Clearwater Forest Plan Revision

Montana Backcountry Hunters and Anglers welcomes the opportunity to provide comment on the Proposed Action that includes four (4) areas that would be open to snowmobile operation along the Idaho-Montana Stateline as identified in Option B. These areas include Blacklead, Beaver Ridge, Hoodoo and Surveyor. Our 350 Montana members are committed to public land management that assures protection of wildlife habitats and opportunities for non-motorized hunting opportunities. Any decision to allow snowmobiling in these areas will affect Montana wildlife and wildlife habitats.

We are opposed to Option B which would create these 4 snowmobile areas in the intact Great Burn ecosystem for the following reasons:

- A. Any boundaries established for snowmobiles would be largely unenforceable. Signs would be ignored or snowed over, enforcement would be minimal and prosecution would be difficult if not impossible.
- B. Creating snowmobile areas would invite other uses incompatible with Wilderness to assert their activities in the same area, including ATVs, motorcycles or mountain biking.
- C. Permitting any motorized use now would politically preclude future designation of these areas as Wilderness.
- D. The Montana portion of the Great Burn Roadless Area is now largely non-motorized except for the Schley Mountain Road, which may be further restricted in the future as it compromises the integrity of the proposed Wilderness.
- E. The proposed snowmobile areas are and will be used primarily by Montanans. Montana snowmobilers currently have millions of acres of authorized high country areas for snowmobiling in western Montana. They do not need more areas, especially at the expense of an intact ecosystem such as the Great Burn.
- F. The impact to historic mountain goat habitat security cannot be overstated. Mountain goat habitat and historic mountain goat use is well established in Blacklead, Surveyor and Hoodoo areas. Mountain goats winter range is extremely limited and often consists of a single windblown ridge in a drainage. Displacement due to snowmobile

disturbance will mean goats will perish in unsuitable habitat, especially for young of the year. Current goat distribution is less than existed even 20 years ago. Whether snowmobiling or the winter of 1996-97 was responsible can be debated. The point is that snowmobilers who say they do not see goats or wolverines does not mean suitable habitat does not occur where they ride.

G. We know wolverine and lynx occupy the Great Burn. I personally saw a female lynx with young cross the Surveyor road in the 1990s. Snowmobiling creates hard surfaced travel corridors on the snow that allow coyotes and other competing predators to penetrate wintering areas for these species.

H. Authorized snowmobiling in the Idaho portion of the Surveyor and Hoodoo areas will undoubtedly lead to illegal high marking snowmobiling in the Montana as the cirques of each basin are the primary focus for snowmobiling activity in the Great Burn.

My personal experience with the Great Burn is extensive. I was District Ranger for Ninemile District which is responsible for managing much of the Montana portion of the Great Burn from 1988 to 1998. I also was a Lolo Forest Plan core team member representing biological resources from 1979-1982 when the Lolo Forest Plan designated the Montana portion to be managed as non-motorized. I was also the 1986 Travel Plan Coordinator which brought the Travel Plan in compliance with the Forest Plan, which excluded motor bikes/atvs and later snowmobiles. Also in the 1990s I first documented via air flight the extent of snowmobiling in the Great Burn at that time. For the last 25 years the management direction of the Montana portion has always been non-motorized with uses contrary to Wilderness characteristics largely precluded.

For the above stated reasons, we again request that Option B be dismissed as a viable proposal as the Forest Plan revision moves forward.

Sincerely,
s/greg munther

Greg L Munther, Co-chairman
Montana Backcountry Hunters and Anglers