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Organization:

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Comments:

Dear Planning Team,

Thank you for the opportunity to comment. I encourage the Forest Service to remember that you are managing these lands for all of America, and developing plans that will extend decades into the future. This is a monumental task, and I appreciate the immense amount of work required to produce a thorough final management plan. I am a hiker, skier, mountain biker, horseman, and backpacker. Most of my comments will center around the Great Burn Recommended Wilderness, where I recreate in all seasons.

I noticed the recent Clearwater travel plan was not mentioned in the Need For Change statement. I believe this to be an oversight, as the document went through an extensive comment and review period, was litigated, held up in court, and is current (October 2017). Although it only focuses on the Clearwater portion of the forest, it seems that this decision should at least be taken into account.

I encourage the Forest Service to maintain recommended designation for the current Hoodoo Inventoried Roadless Area (IRA) boundaries. I also hope to see Mallard Larkins retain its recommended status, and Bighorn Weitas recommended for wilderness designation. These areas are key habitat for grizzly bear expansion into the Interagency Grizzly Bear Committee (IGBC) identified Bitterroot Recovery Zone. In 2019, there were at least 2 accounts of grizzly bear on the Clearwater National Forest. These bears were traveling through non motorized, low road density, recommended wilderness areas. The natural dispersion of grizzlies must be supported by the Forest Service, especially when taking into account that the Bitterroot Recovery Zone is the only uninhabited recovery zone.

The Great Burn received one of the highest wilderness value scores of the entire RARE II analysis. The area offers unprecedented primitive backcountry recreational opportunities, as well as important wildlife and fish habitat. I felt the analysis in Chapter 3 made no effort to examine the potential negative effects of motorized and mechanized recreation within these areas. In fact, the entire analysis seemed heavily skewed towards motorized and mechanized recreational users. Not only will my recreational experience be displaced if the area is opened to motorized use, but more importantly so will many sensitive wildlife species. The opening paragraph in Chapter 3 mentions, "species diversity, protection of threatened and endangered species, protection of watersheds, scientific research and other ecological processes, and social values" as qualities recommended wilderness provides. However there was no discussion of potential effects on wilderness value or character if these values are lost. I would like to see further discussion on how these values will be affected by the proposed alternatives.

Opening the Blacklead/Williams Peak/Goat Lake area to motorized interests is a huge mistake. Not only is it the home range for a native mountain goat herd that has experienced a drastic population decline in the last decade, but it also provides breeding habitat for female wolverine, and has been identified as prime lynx habitat. With a changing climate, these late season snow reserves are important for winter dependant species, as well as providing cool clean water for bull trout in Kelly Creek. Both mountain goats and wolverine are extremely sensitive to human disturbance in winter, and have very few options to escape motorized users. The result is low annual recruitment and drastic population declines. I encourage the Forest Service to carefully analyze the effect of over snow vehicles (including new technology like snow bikes) on wolverine and mountain goat before opening the area to motorized winter travel.

Additionally, the proposed areas identified for snowmobile use around Blacklead Mountain have no easily identifiable "on the ground" geographic markers, making the likelihood of trespass high. Lack of law enforcement

in these remote areas makes the risk of trespass into adjacent protected areas even higher. This is the same for the proposed snowmobile area off of Hoodoo Pass. The Forest Service will not be able to enforce boundaries in these areas, making it likely snowmobilers will ride into the adjoining Lolo National Forest and remaining recommended Great Burn wilderness. If opened, this could be pre-decisional for the Lolo if there is no way to prohibit snowmobiles coming from Idaho. I encourage the Nez Perce Clearwater NF to consider the adjoining forests in their plans, and work together to create manageable areas. I also encourage the planning team to analyze and learn from other forests in Region 1 that have similar challenges of managing closed areas with adjacent snowmobile areas. The Bitterroot NF and Beaverhead Deer Lodge NF are just two examples that experience management issues every winter, with sparse law enforcement to maintain and enforce closures.

Finally, mountain bikes have no place in recommended wilderness. Allowing bikes on the Stateline Trail, mainly from Hoodoo Pass to Kid Lake, sets up a dangerous scenario with stock users and wildlife. Mountain bikers travel farther, faster, and change the primitive and remote experience for users. Additionally, quiet recreation at speed has been shown to displace wildlife. A 2018 study showed elk displacement highest from ATV and mountain bike use compared to hiking and horse use (Wisdom, et al. 2018). In Montana, there have been fatalities from bikers running into bears (Servheen, et al. 2017). Mountain bike technology, much like snowmobile technology, is allowing users to travel longer distances and reach terrain not possible even 10 years ago. I am a mountain biker, but I realize and respect that bikes don't belong everywhere- especially in primitive roadless areas with high wildlife value. Non conforming uses in recommended wilderness not only reduce the solitude and backcountry user experience, but make future designation unlikely.

The Great Burn is an incredible and unique place that I hope will maintain its primitive character for many years to come. Thank you for the opportunity to comment on the Forest Plan.

#### References:

Servheen, Chris,; Manley, Tim,; Mucklow Starling, Deb,; Jacobs, Amy,; Waller, John. 2017. Board of Review Report: The death of Mr. Brad Treat due to grizzly attack June 29th on the Flathead National Forest. [http://igbconline.org/wp-content/uploads/2016/03/160629\\_BOR\\_Report\\_Treat\\_NCDE.pdf](http://igbconline.org/wp-content/uploads/2016/03/160629_BOR_Report_Treat_NCDE.pdf)

Wisdom, Michael J. Preisler, Haiganoush K.; Naylor, Leslie M.; Anthony, Robert G.; Johnson, Bruce K.; Rowland, Mary M. 2018. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management*. 411: 223-233. <https://doi.org/10.1016/j.foreco.2018.01.032>.