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Comments: re: Nez Perce-Clearwater Final Environmental Impact Statement and Draft Final Forest Plan #44089. I believe I commented very early in the planning process with public meetings near Missoula re motorized use and wildlife. My objections re the omission of the previously recommended wilderness designation pertain to the use of motorized vehicles.

For background I was District Ranger on the adjacent Ninemile Ranger District from 1988 to 1998, as well as served as a core team member representing biological resources in the development of the Lolo Forest Plan from 1979-1986. I also assumed the role of Travel Plan coordinator in 1986 to bring the travel plan in compliance with Lolo Forest Plan decisions and allocations.

The omission of the 40,000 acres from Wilderness protection in the Draft Final threatens mountain goats as well as TES species.....specifically wolverines and grizzly bears. I have been professionally involved with mountain goats on the Sawtooth NF as well as the Lolo for over 40 years and am familiar with recreational related impacts on mountain goat distribution. Summer recreational use can displace mountain goats, particularly on trails and at human concentration area such as lakes. Literature documents that goats use habitat without human disturbance. The most impactful is winter human use because the severe winter conditions restrict goats to a tiny portion of their total habitat that is blown free of snow or too steep to hold snow. Energy conservation is a survival strategy for goats. Goats displaced from such preferred micro habitats are forced to occupy or cross heavy snow unusable habitats. Young of the year are particularly vulnerable. New snowmobile technology allows and encourages high marking into previously unusable snowmobile terrain. The steep terrain is the same habitats occupied by mountain goats. High Lead country has been favorite goat habitat and now will have no protection from motorized intrusions.

The other factor is enforceability of motorized closures. From my 32 year Forest Service career I learned that motorized use does not stop at closures located far from access points. Even in the 1990s with less capable snowmobiles we (Lolo) had repeated violations originating from the Clearwater side of the divide. Law enforcement simply does not and will not have the presence to enforce closures beyond vehicle access points. Riders on more powerful capable machines commonly leave designated routes and often seek of trail extreme terrain to play. Their noise degrades the solitude sought by others.

The recent listing of wolverines as a threatened species should mandate additional protections of terrain most secure from global warming adverse effects on retention of deep snow into the reproductive season. Literature documents the importance of this habitat feature that the Great Burn provides. Motorized use is incompatible with wolverine reproductive activities. In addition, studies document that mountain goats are an important food source for wolverines and a reduced goat population will have adverse effects on wolverine populations well being.

Finally, the Great Burn has provided grizzly bear habitat for thousands of years. In recent decades grizzly bears have occasionally occupied the Great Burn area. Studies have proven that bears are out in snowy seasons and can be disturbed with spring snowmobile use. Both the secure habitat and opportunity as a linkage corridor to the Selway Bitterroot from more northern populations cannot be denied. Wilderness designation of these 40,000 acres is the only way to provide secure protection of this habitat.

The Proposed Plan has failed to offer satisfactory protection to key wildlife species and has proposed boundaries for motorized use that are not enforceable.