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Comments: Objections on NPCNF Plan Revision

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I previously submitted comments on the Draft Environmental Impact Statement of the NPCNF Plan Revision and am now putting forward objections based on the Final Environmental Impact Statement and Draft Forest Plan inadequately addressing significant environmental concerns. My previous comments focused on the precedent of legitimizing current illegal snowmobile and the detrimental effects this could have on fragile wildlife populations such as mountain goats and wolverines. This could also significantly impact the long-term protection of the Great Burn.

After immersing into the Idaho side of Great Burn in 2013 on an invasive weed crew and 2014 on a trail crew I've spent significant time nearly every year since then exploring the Hoodoo Roadless Area. Everytime I go into the Great Burn, I'm reminded how there are so few places like it that remain in our country: landscapes that are large enough to support a diversity of native species, that are contiguous with other protected landscapes and that still provide the habitat to many of the same species that Lewis and Clark saw coming through the area over 200 years ago. Most of the other landscapes like the Great Burn left in the continental U.S. have either been designated as Wilderness or fragmented so much that they are no longer eligible for designation.

I object to the final plan the NPCNF because it does not adequately address the impact of winter snowmobile use on wolverines and mountain goats. It also legitimizes current illegal snowmobile use and thus encourages future illegal use in adjacent areas of the Great Burn on either side of the stateline.

Currently, as Idaho Fish and Game notes, there is significant illegal snowmobile use within the Great Burn. This exists in the Blacklead to Rhodes Peak area, in the Hoodoo Pass area, and also fairly deep into the middle of the Great Burn by Leo Lake and Irish Basin. I know this because I have flown over the Great Burn in a Cessna in the spring and seen tracks far back into these basins--ten, even twenty miles from a trailhead. Currently, the NPCNF is ill-equipped to enforce the illegal use of the Great Burn by snowmobiles. If snowmobile use is allowed into the 40,000 acres now proposed, what's to keep them from pushing farther into the recommended wilderness, knowing that the consequences are nonexistent? It would also be very difficult to keep snowmobiles out of the Great Burn Recommended Wilderness on the Lolo National Forest, for, as demonstrated, it is easy to ignore boundaries on a snowmobile.

I am not opposed to allowing snowmobiles on the NPCNF in existing extensive areas where it is legal to ride them including areas stretching from Lolo Pass to Granite Pass and the stateline to the north of Hoodoo Pass. These areas both represent similar topography and wild characteristics of the Blacklead Mtn and south of Hoodoo Pass areas, respectively.

Snowmobiles and snow bikes are not quiet visitors. I have been in the Great Burn up Cache Creek on the Montana side during winter and heard snowmobiles on the ridges above me. Even though I knew they were many miles away, the sound carries remarkably far, especially in the cold winter air and I often expected them to zip around the corner at any minute. Just as noise impacts our sense of solitude, it also impacts species like

mountain goats and wolverines and where they will and will not travel. The Idaho Fish and Game Mountain Goat Management Plan has noted a substantial decrease in mountain goats in the area around Blacklead Mountain and Rhodes Peak, decreasing from 56 goats in 2010 to 7 in 2017. This is in an area in which snowmobiles are currently not allowed, but the Management Plan references concerns about "increasing snowmobile and snow bike access" to the area. Opening up this area to legal use of snowmobiles would potentially be disastrous for the mountain goat population. It certainly merits in-depth study before any legitimizing action is taken.

Wolverines are also a vulnerable species within the Great Burn and one that takes full advantage of the deep snows that fall in the alpine and subalpine zones of the Great Burn along the stateline. Female wolverines den in these deep snows in late spring. Snowmobiles could impact when and where they den which could in turn impact their offspring's viability. With such a low reproduction rate, the impacts of allowing snowmobiles into the area again merits further study. A plan for binding wildlife standards should be added to this final plan to make sure these sensitive species survive into the future.

Thank you for listening to and considering my objections to the Final Forest Plan and Environmental Impact Statement.