Dear Ranger Davies:

This letter concerns the proposed Anna Creek cabin rental referred to in your October 28, 2014, scoping letter, File #:1950. Please include this letter in the official record.

We think the proposed Anna Creek cabin rental needs to be considered carefully for its potential impacts to winter wildlife like wolverine, mountain goat, and elk, denning grizzly bears, closed areas like the Jewel Basin, and lands that may be eligible for recommended wilderness under the revised forest management plan.

**Effects on Wildlife:** The potential greatest environmental impact from this proposal would occur in winter months in part because motorized over-snow (snowmobile) use expands motorized access by orders of magnitude beyond summer motorized use. Closed roads and terrain limit motorized use (both motorcycle and four wheeled) over summer months. In winter months, and particularly in spring under firmer snow conditions, only terrain and heavy timber limit where snowmobiles can travel. Specifically:

- Heavy snowmobile use already occurs on the west side of the Hungry Horse Reservoir. Opening Anna Creek Cabin to year-round use could increase snowmobile use of the area both over a 24-hour period, and geographic extent. Disturbance of grizzly bears and cubs emerging from dens could increase with increased snowmobile use. Snowmobiles were granted an extended season in this area (December 1 - May 31) in Amendment 24. The likelihood of increased disturbance to emergent grizzlies must be assessed, particularly if the FNF makes changes to snowmobiling in the Skyland and Puzzle Creek areas that could shift late season snowmobiling to the west side of the reservoir and Anna Creek areas.
- Increased snowmobile use could also adversely effect wolverine that have been listed as “warranted but excluded” for listing under the ESA by the US Fish and Wildlife Service.
- Providing Anna Creek Cabin for winter use would also likely increase the range of snowmobile use geographically to areas where use is currently allowed under A24 but where little or no use currently exists, based on FNF observations and records. For example, Anna Creek Cabin would provide snowmobilers with closer access to the Quintonkon and Sullivan creek drainages where little snowmobile use currently occurs and could effect mountain goat and ungulate winter ranges in these drainages.

Snowmobiles primarily access just the upper basins of the Quintonkon to Branch creek drainages from the Swan Valley via the Six Mile Road (#9508). They do not tend to go down into these drainages as the play features are located at higher elevations.

**Effects to Jewel Basin and Wilderness Character:** Opening the Anna Creek Cabin for winter use could increase illegal snowmobile incursions into the Jewel Basin Hiking Area. The FNF already has difficulty monitoring and enforcing area closures. Providing a 24-hour base of snowmobiling operations at Anna Creek Cabin may add additional monitoring and enforcement problems for the agency.

*Headwaters Montana* and the Montana Wilderness Association submitted comments on the Wilderness Assessment process in November 2014 to the FNF. Our comments propose “recommended wilderness” for much of the upper Sullivan Creek (from the ridge dividing North Conner and Conner creeks across to Soldier Creek - see attached map) and Bunker Creek drainages down to the existing Bob Marshall Wilderness boundary. These areas possess outstanding wilderness character, remoteness, wildlife values, and absence of human works.

In addition, we recommend that the FNF designate the lower Sullivan Creek, upper Quintokon, and Red Owl, Ball, Branch, and South Fork Branch creeks as “**Backcountry - with wildlife emphasis**,” in order to best manage the outstanding wildlife values and to provide secure habitat between the Bob Marshall Wilderness, Bunker Creek, and the Jewel Basin areas.

Opening the Anna Creek Cabin to winter motorized recreation could lead to decreased wildlife security over a much larger portion of the FNF, an area that currently sees very little if any snowmobile use. Year round operation of Anna Creek Cabin would also harm the wilderness character of a large area that has great potential for recommended wilderness. While not part of the Anna Creek Cabin proposal, we think the FNF should move toward “routes and play area” designations for snowmobiling over the rest of the forest, as was done for the Whitefish Range.

Thank you for the opportunity to comment.

Sincerely,

Dave Hadden, Director
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