

April 20, 2020

Comments: USDA Forest Service  
Nez Perce-Clearwater National Forest  
Attn: Zach Peterson, Forest Planner and Cheryl Probert, Forest Supervisor  
909 3rd Street  
Kamiah, Idaho 83536

Dear Mr Peterson and Ms. Probert,

Thank you for extending this opportunity to comment on the Nez Perce-Clearwater National Forest's Draft Forest Plan DEIS. Although I lived in Montana for ten years, I worked on the Clearwater NF in 2009 and have traveled extensively in the areas I will address in this comment letter.

There is an otherwise unremarkable sign on the shore of Kid Lake at the junction of Trails 567 and 738 in the Hoodoo/Great Burn Recommended Wilderness (RWA) that says all one needs to know about how special this landscape is: "Road 255 TRHD: 22 miles." From this sign, all 22 of those miles are downstream. Meanwhile, to the north along Stateline Trail 738, it's thirty miles to Hoodoo Pass. This is a wild area of staggering size and irreplaceable value.



Figure 1 - Sign near Kid Lake, Hoodoo/Great Burn Recommended Wilderness

On a beautiful summer day in 2017, Kid Lake became my daughter's first introduction to the Great Burn. We munched on huckleberries and enjoyed lunch in the shade after a hike through the headwaters of Kelly Creek. I couldn't think of a better place to acquaint her with wilderness. If my daughter's future is to include mountain goats, wolverine, or grizzly bears, the Great Burn is perhaps one of the most important unprotected wildlands remaining in the US.



Figure 2 - My wife and daughter at Kid Lake, Hoodoo/Great Burn Recommended Wilderness

As the Nez Perce-Clearwater National Forest (Nez-Clear NF) states in the draft Forest Plan:

*The Nez Perce-Clearwater serves a unique national role, providing vast, contiguous wildland areas, including the Selway-Bitterroot, Gospel-Hump, and Frank Church-River of No Return wilderness areas with regional linkages in the Hells Canyon Wilderness area and Idaho Roadless Rule areas, such as the Great Burn (Hoodoo) and Mallards-Larkin. Together, these areas comprise the largest complex of unroaded lands in the lower forty-eight states. (Draft Plan, page 10)*

This wildlands complex – and the Hoodoo RWA in particular – harbors an immense area of core habitat, home to rare and imperiled species including mountain goats, wolverine, lynx, bull trout, and ocean-going salmon. This complex of roadless areas is also among the most significant wildlife corridors anywhere in the US. If grizzly bears stand a chance of reestablishing their historic habitat in central Idaho, they will travel from the Selkirk-Cabinet-Yaak and Crown of the Continent Ecosystems south through the roadless areas between US Highway 12 and I-90, including, most importantly, the Hoodoo/Great Burn, as at least two male grizzlies have in recent years.

Despite the critical value of this vast complex of unparalleled wildlands, the Draft Forest Plan DEIS fails to investigate the ecological benefits of areas in consideration for RWA status. Instead, five “measurement indicators” are used that have no grounding in FSH 1909.12, Chapter 70. (“*This chapter describes the process for identifying and evaluating lands that may be suitable for inclusion in the National Wilderness Preservation System and determining whether to recommend any such lands for wilderness designation.*”) The direction contained in Chapter 70 clearly outlines the 5 steps to follow in evaluating an area for inclusion into the National Wilderness Preservation System:

1. Apparent naturalness;

2. Opportunities for solitude or for a primitive and unconfined type of recreation;
3. Areas at least 5,000 acres or sufficient size to maintain characteristics in unimpaired condition;
4. The degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value;
5. The degree to which the area may be managed to preserve its wilderness characteristics.

Instead, the “measurement indicators” stack the deck against the Great Burn and other IRA’s fish and wildlife, pre-European cultural history, carbon storage value, and opportunities for solitude and primitive and unconfined recreation. If you read the Draft EIS without knowing any better, you’d think the greatest impact of recommending an area for wilderness designation would be the reduction of trail miles for motorized and mechanized uses. Never mind the fact that these areas are home to a rich and irreplaceable ecological heritage.

Illegal snowmobile use in the Blacklead/Rhodes Peak area, which I most recently visited in 2018, could soon extirpate goats from the southern region of the Great Burn. Now the Nez-Clear risks legitimizing their illegal actions by opening sensitive habitat to machines. The question is, for what? There are plenty of other areas available to snowmobilers in Region One, including for high marking. What’s more, wintertime access to the Great Burn is already a privilege reserved for those who have snowmobiles. None of the Great Burn’s trailheads are accessible with a passenger vehicle or within a day’s ski of a plowed road. Is it too much to ask snowmobilers to park their machines at the same summer trailheads that are the limit of motorized access for all other members of the public? Or are a few reckless riders entitled to special access that endangers denning wolverines, or mountain goats with limited winter range?



*Figure 3 – The wild Blacklead/Rhodes Peak area of the Hoodoo/Great Burn Recommended Wilderness*

As the coronavirus slows our frenetic world down to 3 miles an hour, I'm stirred by the writing of a friend and hero, Smoke Elser, legendary horse packer, wilderness philosopher, and advocate for wild places. In a new collection of essays, *A Wild Land Ethic: The Story of Wilderness in Montana*, Elser invokes his mentor, Tom "Hobnail" Edwards, in recounting the story of the 1972 designation of the Scapegoat Wilderness. Speaking to Congress in defense of his beloved Lincoln backcountry, Edwards shared:

*Into this land of spiritual strength I have been privileged to guide on horseback literally thousands of people. ... I have harvested a self-sustaining natural resource of the forest of vast importance. No one word will suffice to explain this resource, but let us call it the 'hush' of the land.*

As the first citizen-initiated wilderness designation, a model for wilderness campaigns since, the campaign for the Scapegoat Wilderness became an example for others to follow. Today, few places deserve the same commitment and recognition more than the Great Burn, a 275,000-acre proposed wilderness on the Idaho-Montana border, one of the largest unprotected wildlands in the U.S.

What the Great Burn offers in spades – in addition to irreplaceable habitat for mountain goats, bull trout and, soon, grizzly bears – is the renewable resource that Smoke and Tom refer to as the “hush of the land.” Just like the Scapegoat, the Great Burn is a fountain of “spiritual strength” that can help us through turbulent times, even if we never set foot in its old-growth forests or alpine meadows.



Figure 4 - Old growth western red cedar grove in the Hoodoo/Great Burn Recommended Wilderness

Since the 1970s, the Lolo and Nez Perce-Clearwater National Forests have managed the Great Burn as the largest “Recommended Wilderness” in the Northern Rockies. In RARE II, the Hoodoo Inventoried Roadless Area scored higher on the Wilderness Attribute Rating System than any other area in the lower-48.

Because of the wide the open terrain linking the two Forests along the Northern Bitterroot Divide, decision on the Nez-Clear directly impact the Lolo, and vice versa. There was no analysis to be found in the Draft Forest Plan and DEIS addressing the management nightmare that would be created if motorized or mechanized use was suddenly permitted on one Forest but not the other.

Since the early 1980s, the Ninemile Wildlands Training Center at the historic Ninemile Ranger Station on the Lolo NF has offered the nation's premier courses on wilderness skills, using the Hoodoo/Great Burn Recommended Wilderness as its proving ground. Those courses rely on a Great Burn that is free of mountain bikes and motors. As any packer who has traveled in the Great Burn knows, a surprise encounter between a pack string and a bicycle on the Stateline Trail could be deadly for horse and rider.

Beyond the consequences of mixing incompatible uses on trails, the danger of legalizing or turning a blind eye to non-conforming uses is that the social characteristics become incompatible with wilderness designation. If you give someone something, it's hard to take it back.

The Forest Service Manual states, "Any area recommended for wilderness or wilderness study designation is not available for any use or activity that may reduce the wilderness potential of an area" (FSM 1923.03(3)). The Forest Service Handbook states, "[w]hen developing plan components for recommended wilderness areas, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation" (FSH 1909.12, sec. 74.1).

The 2012 Planning Rule requires the Forest Service to protect and maintain the wilderness suitability and character of recommended wilderness areas. Likewise, Forest Service planning directives make recommended wilderness areas unavailable for any use that may reduce a recommended area's wilderness designation potential.

In Montana, the allowance of non-conforming uses has resulted in untenable wilderness proposals, at best. At worst, it has resulted in the stripping of recommended wilderness status from areas that had been granted administrative protections. Put simply, non-conforming uses make a wilderness recommendation meaningless.

Supervisor Probert says it best in her 2016 Travel Plan Record of Decision:

*Motorized and mechanized vehicles continue to increase in capability and popularity and given this trend, increased pressure on areas recommended for Wilderness seems inevitable unless those uses are restricted. I think that allowing motorized and mechanized use of vehicles in RWAs will reduce the future Wilderness potential of these areas.*

After more than a decade of careful analysis that led to the 2016 Travel Plan ROD, why change course now? All previous actions have strengthened management of the Great Burn. So should the revised Forest Plan. Furthermore, rather than react to the newest technologies and fads

going forward, the Forest Plan should anticipate new and unforeseen forms of recreation by establishing clear standards – without using suitability language or substituting guidelines – that will stand the test of time. Example standards could include:

***Standard.*** *Use of motor vehicles, including electric motors, is not allowed.*

***Standard.*** *Bicycles and other wheeled or mechanical forms of transportation are not allowed.*



Figure 5 - Kelly Creek headwaters, Hoodoo/Great Burn Recommended Wilderness

In meetings, Forest Service officials often say to me: “Why recommend an area for wilderness when the chances for designation by Congress are so small?” In Montana and Idaho, this is a fair question: only Alaska and Utah have suffered the same Congressional paralysis when it comes to federal public lands. Montana has not had a new wilderness area signed into law by a President since 1983.

In 1988, the Great Burn suffered a cruel injustice: Congress designated the Montana portion as Wilderness, only to see it overturned in a politically motivated pocket veto by President Reagan, the sole veto in the 56-year history of the Wilderness Act. In fact, the Great Burn has been a key component of over a dozen bills. Congress’s intentions are clear: the area deserves to be Wilderness. As recently as the last decade, the Clearwater Basin Collaborative agreed that the Great Burn should be designated wilderness.

America’s wilderness resource is more important today than it has ever been. In the face of the climate and extinction crises, wilderness is a bulwark for biodiversity, clean air and water; an insurance policy for future generations. The more we learn about the way the world works, the more we come to appreciate the value of wild nature.

In Idaho and Montana, with so many unprotected wildlands and so many species hanging in the balance, there’s greater ethical obligation for agency staff to take the lead.

Just over a hundred years ago, Arthur Carhart became the first of a distinguished line of Forest Service staff who will go down in history as heroic public servants – not for doing what was expected of them, but for doing what was right.

In the fall of 1919, after a summer of surveying development options, Carhart explained to his boss that the Trappers Lake area of the White River National Forest in Colorado should not be turned into a summer cabin community, as he had been told it would. Today, that area is the Flat Tops Wilderness, and Arthur Carhart is a legendary Forest Service employee whose name was given to the interagency National Wilderness Training Center, located in Missoula.

With Carhart's encouragement, another early-career Forest Service employee, Aldo Leopold, helped establish the Gila Wilderness in 1924. Seven years on, a young Forest Service staffer by the name of Bob Marshall worked to designate the South Fork Primitive Area, later combined with surrounding lands to create the Bob Marshall Wilderness.

Fast forward to 2020. The accomplishments of these visionary Forest Service leaders are celebrated and studied, their names gracing wildlands they helped protect. One thing is for certain: at the time, it took courage to choose wilderness.

Will you have the courage to choose wilderness? Who will be the Arthur Carhart of 2019? Which landscapes will rest on the shoulders of a single employee?

Just as was the case a century ago, a select few Forest Service staff have the power to decide the fate of wild landscapes on the Nez-Clear NF that hang in the balance. As the Draft Forest Plan DEIS states, "The Nez Perce-Clearwater serves a unique national role, providing vast, contiguous wildland areas." Will the Forest Plan rise to the occasion? Will it live up to the Forest's unique national role?

Carhart, Leopold, and Marshall acted without any intention for Congress to ratify the Forest Service's early administrative designations. The Wilderness Act of 1964 was several decades away. Management decisions belonged to the agency in 1919, as they do today. The Forest Service doesn't need Congress's blessing to protect important wildlands in perpetuity.

Grizzlies, mountain goats, wolverine, and bull trout are counting on us to see beyond ourselves. It's time for the next Forest Service champions to come forward.

Thank you for your time and careful consideration.

Sincerely,



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