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Nez Perce Clearwater National Forest
Forest Plan Revision
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Via email: fpr_npclw@fs.fed.us

Dear Forest Plan Revision Team,

The Great Burn Study Group (GBSG) appreciates the opportunity to comment on the Nez Perce Clearwater National Forests (NPCLW) Proposed Action. Representatives of the Great Burn Study Group were involved in RARE I and II, and in the first round of forest planning in the early 1980's. Since that time, GBSG directly participated in the Clearwater's 2004 planning effort, as well as the recent collaborative group convened in September 2012. Thank you for holding plan revision public meetings in Lolo, MT, as there are many people on the Montana side of the Stateline that care deeply about the wilderness values of the Great Burn.

Through education, advocacy and on-the-ground stewardship, GBSG has worked for over forty years to permanently protect the wild and remote character and ecological integrity of the northern Bitterroot Mountains in western Montana and northern Idaho. In particular, GBSG strives to maintain the wilderness characteristics of the proposed Great Burn Wilderness, a 250,000-acre roadless area along the Stateline. GBSG staff and 150 volunteers spend many hours in the backcountry (see greatburnstudygroup.org for more information) mitigating and restoring recreation impacts and improving wildlife habitat.

Together with the NPCLW and Lolo National Forests, we are partners in this landscape that we jointly care very much about. The Great Burn has been recommended wilderness on both sides of the Stateline for a very long time, and these wilderness values will be in jeopardy if any special management areas for winter motorized use are allowed to move forward.

In the words of President Johnson, upon the signing of the Wilderness Act on September 3, 1964, "True leadership must provide for the next decade, and not merely the next day."

If you proceed with the two options presented, we support Option A which maintains the forty-year legacy of recommending the Great Burn Wilderness and guarantees traditional, untrammled quiet recreation opportunities, critical winter habitat and connectivity for sensitive species like mountain goats, wolverine, Canada lynx and grizzly bears. However, here's how the NPCLW can make Option A better: Option A+ would recommend the following

roadless areas for wilderness: Moose Mountain, Meadow Creek Upper North Fork, Rawhide and eastern Bighorn Weitas. GBSG supports the inclusion of Option A+ as an alternative in the draft EIS.

We ask that you eliminate the SMAs in the Great Burn in Option B, which creates a motorized recreation management nightmare for the NPCLW and Lolo National Forests by carving unenforceable boundaries in recommended wilderness.

Of the two options presented in the Proposed Action, Option A best provides for ecological integrity and sustainability. The SMAs in the Great Burn in Option B diminishes the size and value of the Great Burn as recommended wilderness. Two of the proposed special management areas that allow snowmobile use in the Great Burn are on the Idaho/Montana Stateline. The Lolo National Forest on the Montana side of the divide is recommended wilderness and is managed as such. Allowing snowmobile use on the Idaho side would degrade potential wilderness values on both sides of the divide, could be detrimental to fish and wildlife resources, and would likely result in illegal incursions into recommended wilderness on the adjacent Lolo National Forest. It is critical to consider adjacent land management ownership and uses during the forest planning process for a holistic approach. Maps in the planning documents should reflect adjacent ownerships and land use designations.

In addition, we would like to comment on several other issues related to the NPCLW Proposed Action, which are highlighted below.

We have some grave concerns with the way this process has unfolded, one of which is that two options have been presented similar to the way alternatives are presented in a draft environmental impact statement, and yet there has been no effects analysis.

1. Recommended wilderness and special management areas

Forestwide Direction, Desired Conditions

In the Proposed Action, there is no forestwide direction for recommended wilderness. We support the addition of the following standards under Human Uses:

- A. *An area recommended for wilderness carries with it a determination and recommendation that the best future use of the area is to preserve it as wilderness. Having determined the highest and best management use of such areas as Wilderness, the areas should be managed consistent with these finding. Areas recommended for inclusion in the National Wilderness Preservation System (NWPS) are managed to protect not only the attributes that resulted in their recommendation but also those areas' potential for inclusion in the NWPS.*
- B. *Non-conforming uses within recommended wilderness areas are not allowed. This is consistent with the analysis and decision previously made by the Clearwater National Forest Travel Plan which states:*

“Motorized and mechanized use in these RWAs has increased over the years as technology for motorized and mechanized equipment has advanced and this trend is likely to continue. The primary goal for RWAs in the Forest Plan is: ‘Manage recommended additions to the wilderness system to prevent changes in character which would be inconsistent in wilderness until Congress makes classification decisions,’ (FP p. II-23). I believe there is a need to address current and projected motorized and mechanized recreation uses in areas recommended for wilderness. To meet the primary goal for recommended wilderness...I have decided to exclude motorized and mechanized vehicles from all areas of recommended wilderness...I believe that this action best addresses the overall intent of the Forest Plan regarding the future of these areas.”

The Clearwater has made a determination through its Travel Plan that non-conforming uses are not to be allowed in recommended wilderness areas. Adding this as a forestwide standard would be consistent with previous decisions and appropriate if the Forest Service is going to manage recommended wilderness consistent with the management area desired condition of preserving opportunities for RWAs to be included in the National Wilderness Preservation System, and protecting the wilderness character of the area until Congress acts.

We fully support the proposed desired condition MA1-DC-RWILD-01. The Wilderness Act states that “a National Wilderness Preservation System [is] to be composed of federally owned areas designated by Congress as “wilderness areas”, and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character...” Based on this language, it is unreasonable to place three winter motorized areas in the heart of the Great Burn recommended wilderness. Those areas (i.e. Option B) are not compatible with wilderness recommendation for the Great Burn.

We urge the NPCLW to remove desired conditions MA1-DC-SMA-01 and MA1-DC-SMA-02 from the EIS. Each of these desired conditions intrinsically contradicts themselves. It is impossible to have motorized use in the heart of a recommended wilderness and conclude that “otherwise these areas are managed for their “wilderness character and potential for the area to be included in the National Wilderness Preservation System” (which is what MA1-DC-RWILD-01 states). It is impossible to manage these SMA’s for motorized use and at the same time for their “wilderness character and potential for the area to be included in the National Wilderness Preservation System.”

The Great Burn

The Great Burn has long been recognized for its suitability and inclusion in the NWPS. We request that the boundaries of the Great Burn (in the Proposed Action as 148,584 acres) be

increased to be consistent with the Idaho Roadless Rule Wildland Recreation theme which totals 151,000 acres.

The Lolo National Forest manages its portion of the Great Burn as recommended wilderness and does not allow motor vehicle use. We urge the NPCLW to work with the Lolo to provide consistent management for the Great Burn on both sides of the Stateline.

We strongly oppose any special management areas that would allow snowmobile use in the recommended Great Burn Wilderness. The three proposed special management areas in Option B would essentially cut the Great Burn Wilderness in half. Designating snowmobile areas would seriously harm the values that make this area suitable as wilderness. The impact of these snowmobile play areas would vastly diminish the Great Burn's wilderness potential. Looking at the bigger picture, Option B permits motorized access into the heart of a recommended wilderness area, and precludes those sections (and possibly the *entire* Great Burn) from inclusion into the Wilderness Preservation System.

Reasons the NPCLW should eliminate the SMAs in the Great Burn in Option B

- GBSG has had both an aerial and an on-the-ground winter monitoring presence for over a decade. We've partnered with USFS law enforcement and seen minimal use by snowmobilers in the backcountry in the winter.
- A divided Great Burn recommended wilderness would greatly diminish wildlife connectivity between ecosystems and eliminate wildlife security and winter habitat for sensitive species like mountain goats, wolverine, Canada lynx and grizzly bears.
- The USFS has a responsibility not to preempt congressional discretion and it is the USFS's job to maintain wilderness characteristics and values. By proposing SMAs, the USFS is preempting the Great Burn from congressional consideration.
- The terrain of the special management areas in Option B creates a nightmare for those responsible for enforcing travel restrictions.
- GBSG volunteers routinely find gas cans, trash, windshields, rubber and other snowmobile parts – even a complete machine abandoned in Kid Lake - during our field season. All of these discarded items radically affect wilderness character.
- GBSG volunteer monitoring evidence suggests that snowmobiles lop off the tops of whitebark pine, a species under consideration for protection under the Endangered Species Act.

Not only did the State of Idaho recognize the Great Burn's wilderness values in the Idaho Roadless Rule by designating the Great Burn under its Wildland Recreation theme, but the Clearwater National Forest Travel Plan also reaffirmed what the public has long sought for this special place: management consistent with the protection of wilderness values. If the SMAs in the Great Burn in Option B are chosen, it would undermine recent and historic public

processes that have, for many years, affirmed that the highest and best use of the Great Burn is wilderness.

We've done our own monitoring (38 flyovers and 92 on-the-ground trips) and we're expecting and assuming the NPCLW has done the same. Most of what we've found is illegal motorized use even prior to the promulgation of the Clearwater National Forest travel plan. We've seen a minimum of 55% illegal use on both the NPCLW and the Lolo National Forest.

Support for additional recommended wilderness

GBSG would like to see the Draft EIS include an analysis of the following inventoried roadless areas as recommended wilderness, and we support recommended wilderness for each of them: Rawhide, Meadow Creek Upper North Fork, Bighorn Weitas, and Moose Mountain. In the Proposed Action Appendix B, Upper, Middle and Lower Cayuse, Upper, Middle and Lower Weitas Creeks (all in Bighorn Weitas) are listed as Population Stronghold Watersheds. Similarly, Moose and Elizabeth Creeks are Potential Population Stronghold Watersheds (Meadow Creek Upper North Fork and Moose Mountain, respectively). Protecting Bighorn Weitas, Meadow Creek Upper North Fork and Moose Mountain as recommended wilderness will inherently protect these watersheds and fisheries. We incorporate by reference Appendix A and B in the comments submitted by TWS/ICL dated 8/15/14. Almost all of these areas received high a Wilderness Attribute Rating (WARS) with the exception of Rawhide. Rawhide deserves to be considered for recommended wilderness given its location between Meadow Creek Upper North Fork and the Great Burn, and these three areas would provide contiguous security for far ranging wildlife.

Research Natural Areas (RNA)

GBSG supports the recommended Rhodes Peak RNA. Please add a standard for Rhodes Peak which prohibits motorized and mechanized use in recommended and designated RNAs.

Wilderness Inventory and Evaluation

GBSG requests that you update the NPCLW wilderness inventory using the latest version of the Chapter 70 directives and to conduct the required evaluation of wilderness suitability for the roadless areas on the forests.

Need for Change

As stated earlier in our comments, the NPCLW has produced two options for consideration without any accompanying effects analysis or full completion of the required assessment. The required Need for Change is supposed to be based on the assessment. The NPCLW should develop a more comprehensive Need for Change statement that reflects the information in the assessment. This draft Need for Change should be available for public comment and incorporated into the draft EIS.

On Page 4, the Proposed Action states, *"The need to change a plan should be predicated on the status of key ecosystem characteristics, the needs and opportunities for restoration or maintenance of these characteristics, and the potential for plan components to promote*

ecological integrity within the terrestrial, riparian, and aquatic ecosystems relevant to the plan area.” Based on this definition, we do not see how motorized use in existing recommended wilderness is warranted by a need for ecological change. We ask the NPCLW to explain why they feel there is a need to change the recommended wilderness for the Great Burn based on promoting the ecological integrity of the Great Burn’s terrestrial ecosystems.

The Need for Change should be based on the best available science, and it should be vertically integrated. We urge the addition of language supporting a need for additional wilderness, to provide for connectivity across the landscape. There is no designated wilderness on the NPCLW north of Highway 12.

2. Recreation and ROS

The Proposed Action’s summer and winter ROS delineations are not congruent with the MA1 allocations. MA1 is comprised of management areas that offer wilderness character. The NPCLW has categorized significant amounts of land within the MA1 allocation for semi-primitive motorized recreation. The proposed desired condition for recommended wilderness areas and the proposed desired condition for semi-primitive motorized areas are incompatible. Categorizing recommended wilderness as semi-primitive motorized will cause confusion for forest visitors in knowing where and how to recreate on the NPCLW. It also appears that the NPCLW is encouraging motorized recreation in the same areas that it’s recommending for wilderness designation.

We request the NPCLW classify recommended wilderness as primitive ROS to move those areas towards their desired future condition. This will help eliminate any competing desired future conditions and also clarify any ambiguity surrounding how these areas should be managed in the future. In addition, classifying recommended wilderness as primitive will not degrade the wilderness character of these areas and safeguard the areas’ wilderness potential.

Besides the conflicts that NPCLW staff will have to manage if motorized and mechanized use is allowed in recommended wilderness, GBSG is concerned about the reduction in wilderness potential and the compromise of wilderness values for these areas, especially the Great Burn.

Congress is far less likely to designate an area as wilderness that contains long-established motorized or mechanized vehicle use, regardless of whether or not the agency has recommended the area for wilderness designation.

Wilderness values (solitude, naturalness, undeveloped, untrammeled) would diminish with the increase in motorized and mechanized use. As the Clearwater National Forest observed in its travel management plan:

“Where motorized trail use (either ATVs or motorcycles) does occur (in the Hoodoo and Mallard Larkins RWAs) it can affect the naturalness of an area and

the feeling of being undeveloped. Motorized use can be associated with “modern” civilization, because it is a mechanized form of travel that was not available in historic times. This use can affect the primitive character of an area. The noise associated with motorized use can affect the feeling of solitude.”

On page 48 of the Proposed Action standard FW-STD-REC-01 states that “no new motorized routes or areas shall be constructed or designated in desired primitive and semi-primitive non-motorized settings.” Is this standard for both the winter and summer ROS? How does this affect the NPCLW proposed SMAs in Option B?

Furthermore, we request that the NPCLW analyze and align summer and winter ROS classifications with management area categories in the EIS for all alternatives. We request that all designated Wilderness, Recommended Wilderness, and Research Natural Areas be classified as ‘primitive’ in the summer and winter ROS maps, and that the NPCLW categorize all other lands in the MA1 scheme as either primitive or semi-primitive, non-motorized.

GBSG recommends a standard for winter ROS which states that mountain goat habitat is excluded from winter motorized use areas.

Finally, there is very little discussion in the proposed action about scenic integrity. That's one (of many) reasons people recreate on national forest lands--they enjoy the view of large, untrammeled landscapes. Please include the importance of maintaining scenic integrity in your analysis.

Factors to Consider in the Environmental Analysis

We request that the Forest Service analyze the following in the EIS:

- The ability for the agency to achieve the desired condition for MA1 areas if these areas are classified for motorized recreation under the ROS. Specifically, we request that the EIS include an analysis of the ability for MA1 areas to “contribute to wildlife movement within and across the Forest” and to “provide foraging, security, denning, and nesting habitat for wildlife” if these areas are made available to ORVs. PA, MA1-DC-02. p. 68.
- The impacts on Recommended Wilderness Areas if these areas are classified for mechanized and motorized use under the ROS scheme. Specifically, the EIS must analyze the impacts on wilderness character, including impacts on solitude, naturalness, undeveloped character, and opportunities for primitive recreation. The EIS must also analyze whether and the extent to which allowing motorized use in a Recommended Wilderness Area will impact the area’s potential to be designated wilderness.
- How the Forest Service *applied* the Executive Order’s minimization criteria when classifying areas for snowmobile use when making ROS allocations. It is not enough

to simply consider the minimization criteria with respect to area designations; the agency must also demonstrate how the minimization criteria were then implemented or applied in the designation decision process, consistent with the objective of minimizing impacts. We are particularly interested in how the agency will minimize conflict when classifying recommended wilderness areas for snowmobile use in the ROS scheme.

3. Connectivity and Wildlife Habitat

The Great Burn is a vital biological core area for grizzly bear, wolverine, mountain goat, and other wide-ranging wildlife in the northern Rockies. The proposed Great Burn Wilderness is part of several roadless areas that form a biological link between the Salmon-Selway and Northern Continental Divide ecosystems, facilitating the genetic interchange needed for these species to persist. Scientists believe that habitat loss due to fragmentation and isolation caused by human activity—which impedes movement and alters local climate and cover—is a major cause of extinction. Wildlands like the Great Burn serve as biological bridges, permitting migration and genetic interchange...without which species vigor will diminish.

On page 5, the Proposed Action mentions the use of Best Available Science, yet it seems to us that the NPCLW could have taken a broader view when considering the strategic importance of the Great Burn and its relationship to other important blocks of secure habitat to provide connectivity across the greater landscape. The Great Burn has been identified as recommended wilderness in existing forest plans on both the Clearwater and Lolo National Forests. To ensure this area continues to function as an important link in this broader connected landscape, GBSG strongly urges the NPCLW to continue to manage *and* recommend this area for inclusion in the National Wilderness Preservation System. This is of the utmost importance.

On page 14, *“The extensive acreage of undeveloped lands both on the Forest and interconnected with neighboring public lands provide important habitat security and linkage for wide-ranging species such as Canada lynx, wolverine, and other carnivores.”* While GBSG appreciates the idea and sentiment behind this statement, it doesn’t appear to be supported by the Proposed Action. For example, when looking at the landscape-level picture, the SMAs in the Great Burn in Option B could threaten security for mountain goats and grizzly bears. How would the SMAs in the Great Burn in Option B not threaten wildlife security for wide-ranging species or species dependent on critical secure winter habitat?

GBSG suggests that the NPCLW include in Chapter 2 of the Proposed Action (forestwide direction) likely under Physical and Biological Ecosystems, a better discussion of how our changing climate may/may not impact the reasonably foreseeable future of the planning area.

On page 41 of the Proposed Action, FW-DC-WL-01 states that *“Wide-ranging species are able to move freely across and between habitats, allowing for dispersal, genetic interaction, and species recruitment.”* Option B (SMA’s that allow for winter motorized use) will preclude this

desired condition from being successful. How will this desired condition be attained if the Great Burn is bisected?

On page 41 of the Proposed Action, FW-DC-WL-03 states that “individual animals that establish nests or den sites near areas of pre-existing human use... are assumed to be accepting of that existing level of human use...” This statement is preposterous. It is a scientifically indefensible rationale for permitting disturbance when it’s convenient for who/whatever; it is not a desired condition. Animals may use habitat near human use because they must, because other suitable habitat is no longer available or animals are being squeezed into less-than-suitable or preferred habitat. We request that you remove FW-DC-WL-03 from the draft EIS.

GBSG requests that you add a standard for wildlife habitat which states: over-snow motorized travel is not suitable in mountain goat winter range. The threat to highly-susceptible mountain goats from winter recreation is a serious and real issue and should be treated as such. With reference to FW-DC-WL-03, because goats remain in certain habitat, the NPCLW cannot infer goats “accept” or tolerate that disturbance because the goats’ habitat niche is very narrow and available habitat is limited; they have nowhere else to go. The long-term biological effects of disturbance on mountain goat recruitment, health, survival and population sustainability of highly-susceptible goats confined to those limited habitats is a larger issue than presence alone may indicate.

Mountain goats are listed as imperiled by Idaho. According to *The Idaho Comprehensive Wildlife Conservation Strategy*, “Human encroachment into mountain goat habitat is a threat. The proliferation of roads allowing easier human access into mountain goat habitat has been implicated in the overharvest of some goat subpopulations (Hayden et al. 1990). Several modes of backcountry recreation, including snowmobiling and heli-skiing, have the potential to disturb goats.” Again, allowing snowmobiles into winter range of mountain goats would be a threat to the species.

In 2008, GBSG staff accompanied Montana Fish, Wildlife and Parks wildlife biologist on a 70-mile trek along the Stateline. Five distinct mountain goat populations were ground-truthed over the course of ten days. GBSG requests that the NPCLW add mountain goats to the Forests’ species of concern.

GBSG has contracted with a regional natural resource consulting firm to produce a mountain goat habitat map including escape, rearing and forage areas. We will share this map with the NPCLW ID Team once it is complete.

Also on page 41 of the Proposed Action, FW-DC-WL-04 states that “Habitat conditions... support the recovery of threatened and endangered species...” GBSG strongly supports this desired condition but will the SMAs in the Great Burn in Option B impair it? How will the SMAs in the Great Burn in Option B impact grizzly bear? Canada lynx? Wolverine?

On page 42 of the Proposed Action, we encourage you to add a desired condition for grizzly bear—especially considering that the Bitterroot Recovery Area partially falls within the planning area. There are desired conditions listed for many species of wildlife, and we would suggest that some lesser seen (but no less important) species also receive desired conditions. Please add desired conditions for pika, fisher, wolverine and Canada lynx. In FW-DC-WL-06, Canada lynx should be added to the list of species that habitat management supports.

On page 68 of the Proposed Action, MA1-DC-02 states: *“Habitat conditions within MA1 & MA2 contribute to wildlife movement within and across the Forest. These areas also provide foraging, security, denning, and nesting habitat for wildlife.”* GBSG supports this statement and desired condition, but we suspect that providing winter motorized access into the heart of a recommended wilderness area (SMA’s within MA-1) will work directly against this desired condition and never come to fruition *“within and across the Forest.”* How will the NPCLW assure that habitat conditions will contribute to wildlife movement in winter with SMAs in MA-1?

Grizzly bears, a threatened species, have been detected in and close to the planning area; one was shot in the Kelly Creek area in 2007. Many believe it is only a matter of time before grizzly bears once again become established in the Bitterroot Ecosystem. Grizzly bears should be protected and included in the list of species in FW-DC-WL-06 (page 42). Grizzly bears den in high elevation areas and snowmobile use there could threaten denning or emerging grizzly bears. Many forests have adopted food and attractant storage orders to proactively prevent human-bear conflicts. A good model adjacent to the planning area is on the Lolo National Forest. A similar food and attractant storage order standard should be developed to minimize conflicts with both grizzly and black bears.

Wolverines were recently announced as unwarranted for threatened species listing by the U.S. Fish and Wildlife Service even though their population in the contiguous United States is estimated to be less than 300. Recently, wolverines in the Great Burn recommended wilderness were caught on camera by Montana Fish Wildlife and Parks. Wolverine den in large boulder or talus fields in high elevation cirques which very likely would be threatened by snowmobile use. According to *The Idaho Comprehensive Wildlife Conservation Strategy*, “Human disturbance is among the most important causes of habitat fragmentation and degradation in wolverine habitat. Areas of disturbance create barriers to movement, reduce winter foraging opportunities, and may affect reproductive success (Copeland and Whitman 2004). Increased winter recreation may displace wolverines from potential habitat (Copeland and Whitman 2004). Snowmobiles should be excluded from potential wolverine denning areas to minimize these threats to wolverines.”

Chapter 4 of the Proposed Action asks that the public suggest species to be considered for monitoring. We recommend you follow the 2012 planning rule as published in the Federal Register to develop the focal species list. We believe beavers, elk, mountain goats, whitebark pine and some invasive species are worthy of consideration but would be happy to work with you on appropriate focal species to monitor.

As stated earlier in our comments, we strongly encourage you to eliminate the SMAs in the Great Burn in Option B. The three proposed Special Management Areas in Option B would basically cut the proposed Great Burn Wilderness Area in half. When the area is managed for wilderness, it will also provide wildlife connectivity and security. Motorized use in this area would cause adverse ecological changes by reducing the effectiveness of the corridor and possibly even detrimentally impacting grizzly bears, mountain goats, Canada lynx and wolverines—all species listed as Idaho’s Species of Greatest Conservation Need. Changes in land designations in all alternatives should enhance wildlife connectivity between ecosystems. This would better protect wildlife security, habitat, and connectivity.

4. Wild and Scenic Rivers

In the Proposed Action, Cayuse Creek is listed as an eligible wild and scenic river from mouth to source with the potential classification as wild, scenic and recreational. GBSG urges the NPCLW to recommend that the portion of Cayuse Creek within eastern Bighorn Weitas be classified wild, and that the special management area’s boundaries reflect this classification.

Ninety-two percent of Cayuse Creek is distinctive with unusual scenic quality. It provides outstanding solitude in a primitive setting. The drainage may include any or all of the fifteen sensitive plants listed by the Clearwater National Forest as being present in the North Fork of the Clearwater drainage. In addition, Cayuse Creek is associated with traditional use by the Nez Perce and a segment of the Lewis and Clark trail passes within a mile of the upper reaches. Cayuse Creek is also nationally known for its outstanding westslope cutthroat and bull trout fisheries and contains some of the most important remaining habitat for westslope cutthroat in Idaho. (This information is taken from the Clearwater National Forest WSR Suitability Report and FEIS for Three Rivers in the North Fork of the Clearwater Drainage, Sept. 1995.)

GBSG concurs with the North Fork Clearwater (including Upper North Fork), Little North Fork, the Upper Lochsa River and Kelly Creek as recommended wild and scenic rivers.

5. Areas of cultural significance and special areas

We encourage the NPCLW to consider specific plan components designed to protect the significant resources that include, but are not limited to: the Lolo Trail, Lewis and Clark Trail, Nez Perce Trail, and Southern Nez Perce Trail. Additional plan components are clearly warranted to protect the outstandingly remarkable prehistoric, historical and cultural values associated with these resources. How will winter motorized use affect these resources in the Great Burn recommended wilderness?

6. Botany

The proposed action should have included a stand-alone section that focuses solely on invasive weeds (desired conditions, management actions, etc). GBSG requests that the NPCLW create a desired condition for botanical species that states that no additional botanic species will be added to the Threatened/Endangered list.

Conclusion

GBSG requests that you thoroughly consider these comments in their entirety and sensibly manage the resource. Ecology, solitude and historical cultural values should be promoted over recreation in recommended wilderness. We urge you especially not to fragment the existing Great Burn recommended wilderness with special management areas for winter motorized use.

Keeping the Great Burn wilderness intact - in its entirety - is consistent with past USFS recommendations. The 1987 Clearwater forest plan, the 1986 Lolo forest plan, the 2006 Clearwater forest planning effort, the Clearwater Basin Collaborative, the Idaho Roadless Rule – all of these processes have demonstrated the outstanding qualities and values of the Great Burn. No other designation accomplishes the same goals and protects the land in the same way as wilderness. Anything else compromises the wilderness characteristics and values.

We take a great interest in the NPCLW forest plan revision process and look forward to working with all of you to develop a plan that can meet the goals of ecological sustainability— and also the new challenges that public lands now face – for the next fifteen years.

Respectfully submitted on behalf of the Board of Directors and staff of the Great Burn Study Group.



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