

January 29, 2024

Regional Forester (Reviewing Officer)  
Northern (R1) Regional Office  
Attn: Nez Perce-Clearwater Forest Plan Objection  
26 Fort Missoula Road  
Missoula, MT 59804

**Objection to the Draft ROD for the Nez Perce-Clearwater National Forests Land Management Plan (#44089)**

**Responsible Official: Forest Supervisor Cheryl F. Probert**

Dear Objection Reviewing Officer, Regional Forester Leanne Marten:

We are writing to object to the Draft Record of Decision for the revision of the Nez-Perce Clearwater National Forest (NPCNF) Land Management Plan. Specifically, we are submitting these comments to object to the arbitrary and capricious decision to shrink the size of the Great Burn Recommended Wilderness (Hoodoo Inventoried Roadless Area/IRA), and to allow oversnow vehicles and mountain bikes to threaten the area's wilderness character, suitability for future wilderness designation, exemplary wildlife habitat, and other unique features. We implore you to uphold the vision of the US Forest Service leaders who came before you, who managed this resilient land to protect its fish and wildlife, clean water, carbon storage, and solitude.

We previously submitted separate, detailed comments during the scoping and Draft EIS comment periods. We also actively participated in pre-scoping meetings ten years ago in Missoula, MT. We are intimately familiar with the Great Burn and its unique qualities, having traversed it on foot on multiple occasions.

The Hoodoo Roadless Area is one of the absolute wildest places in the lower-48 states. To the best of our understanding, the Great Burn Recommended Wilderness is the largest US Forest Service Recommended Wilderness south of Alaska. To put it simply: wild areas of this size are few and far between. We are deeply concerned that the Forest Service is proposing to decrease the size of this vast wildland, and legitimize illegal motorized and mechanized use, to the detriment of critical wildlife habitat, and in the face of decades of wilderness legislation and collaborative conservation agreements seeking to permanently protect the Hoodoo IRA.

We object to this Draft ROD on numerous grounds, including:

**Breach of public and organizational trust:**

The Draft Record of Decision contradicts and calls into question many years of painstaking, proactive, good-faith collaborative agreements, and violates the trust that the NPCNF had established with partner organizations. For years, the Great Burn Conservation Alliance,

where we actively volunteered for many years, was a key participant in the Clearwater Basin Collaborative, and received federal funds to conduct wilderness stewardship work in the Great Burn Recommended Wilderness. Now, the NPCNF has turned its back on such efforts, essentially suggesting that collaborative conservation is a waste of organizational time and resources. Is this truly the example that the NPCNF wishes to set with its Draft Land Management Plan? If the Draft ROD goes unchanged, why would any conservation-minded nonprofit organization feel motivated to engage in long-term, costly, collaborative conservation ever again?

**The DEIS fails to take a hard look at impacts to wildlife:**

NEPA requires a hard look at environmental impacts, and the NPCNF has failed to take a requisite hard look at impacts to imperiled wildlife by increasing motorized and mechanized uses in the Hoodoo IRA.

In winter, the Great Burn provides important refuge for mountain goats and key denning areas for wolverines. Mountain goats thrive on high elevation, south facing slopes, and – more than most ungulates – are particularly sensitive to motorized disturbances such as snow machines. Similarly, wolverines require quiet denning areas to rear their young. Both species are known to winter in the Great Burn, and both easily disturbed by motorized intrusions. Allowing any form of motorized recreation near mountain goat or wolverine habitat unnecessarily puts these species at risk. Please continue to prohibit winter snowmobiling in the Great Burn, and take steps to mitigate illegal motorized encroachment into the area.

The Great Burn is also increasingly welcoming pioneering grizzlies that boldly cross I-90 to reclaim the bears' lost range in Central Idaho. The fact that grizzly bears make it to the Great Burn against all odds underscores the area's high wildlife connectivity value for multiple species. Especially as wildlife adapt to a changing climate, these core habitat connections will be increasingly important. Please manage the Great Burn as a non-motorized and non-mechanized Recommended Wilderness, thereby reducing disturbance from noise, speed, and human recreation, and helping ensure the Great Burn is prepared to welcome back grizzly bears when they return.

**The Draft ROD is inconsistent with the 2017 Recommended Wilderness Travel Plan**

The NPCNF's 2017 Recommended Wilderness Travel Plan appropriately clarified wilderness management for the Great Burn region. 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, decisions on the NPCNF directly impact the Lolo NF, and vice versa. The NPCNF has failed to take a hard look at the management nightmare that would be created if motorized and mechanized use was suddenly permitted on one Forest but not the other, as is proposed in the Draft ROD.

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.

Tragically, the NPCNF turned a blind eye to illegal snow machine and mountain bike use in the Great Burn Recommended Wilderness for many years, displacing wildlife, and threatening non-motorized and non-mechanized uses in this landscape. We are appalled that the NPCNF is now legitimizing the reckless and immoral behavior of a few illegal riders, by allowing increased motorized and mechanized use in the Hoodoo IRA, shrinking the boundaries of the Great Burn Recommended Wilderness. This draft decision also endangers the wilderness character of the neighboring recommended wilderness managed by the Lolo NF, and creates a management nightmare.

### **The Draft ROD arbitrarily reduces the size of the Great Burn Recommended Wilderness**

As we raised in our previous comments, the NPCNF Wilderness Inventory and Evaluation arbitrarily assessed Inventoried Roadless Areas using criteria that have no grounding in the Forest Service's Ch 70 process. The Forest Service failed to take a hard look at the biodiversity, climate, water quality, and other benefits of wilderness, and the costs of expanding motorized and mechanized uses. The Great Burn previously scored higher than any other area in the nation according to the Wilderness Attribute Rating System. The Forest Service must correct its analytical failure in the NPCNF Forest Plan Draft ROD and appropriately quantify what is at stake in the range of alternatives considered in the DEIS.

### **Conclusion**

You are standing on the shoulders of generations of USFS leaders before you who have prioritized the management of the Hoodoo IRA/Great Burn Recommended Wilderness for wildlife, clean water, carbon storage, and solitude, qualities that are increasingly challenging to find elsewhere in our modern world. Please continue this longstanding tradition by correcting the errors highlighted in this letter, and revising your draft decision so that it protects the entirety of the Hoodoo Inventoried Roadless Area as Recommended Wilderness.

Thank you,

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