

Zach Angstead
2206 2nd Ave North
Great Falls, MT 59401
centralmtcaves@gmail.com
406-899-9955

Regional Forester Martin,

Please accept these objections on the Nez Perce Forest Plan Revision. I participated in 2020 by commenting on the DEIS, and wish to raise several concerns about the FEIS and Draft Record of Decision. I am commenting on my own behalf and not on behalf of an organization or group. I understand that the process of Forest Plan Revision is time-consuming and exhausting, but it is vitally important for directing the management of the forest for decades. That means we need to get it right. Thank you for the work done so far, but let's finish by ensuring the Final ROD and Forest Plan are the final products that the forest deserves.

I have run in the Great Burn, and it is an incredible landscape that should be protected.

The released FEIS did prohibit non-conforming uses in recommended Wilderness which was one of my requests on the DEIS. Thank you for that.

Objection1: Wildlife standards are lacking.

The wildlife standards incorporated into the released final EIS are inadequate and disappointing. As you well know, the standards written into Forest Plans guide the management of species and their habitat for the next 20-30 years. These standards are important given the threatened status assigned to Wolverine, Grizzly Bear, and Lynx. Although not listed as threatened, Mountain Goat populations in the Plan Area are at a precarious point where steps need to be taken to ensure they continue to exist on the landscape,

It is critical that the FEIS incorporate standards for wildlife that will ensure their continued existence on the landscape. Standards should incorporate the best available science. For example, winter disturbance of Mountain Goat Populations by motorized recreation has shown a negative impact on fecundity. The recent listing of the Wolverine (*Gulo gulo*) should also create the impetus to create standards for protecting both maternal denning habitat and general occupancy habitat.

The lack of standards addressing the continued existence of these species is disappointing. The Forest Service must rectify this before signing the Record of Decision.

Objection 2: The entirety of the Hoodoo Roadless Areas (151K Acres) should be recommended for Wilderness Designation.

The 2 areas that dropped from 1987 should be included in the Final Plan. The Wilderness Evaluation and Recommendation acknowledges outstanding opportunities for solitude exist

within the 1987 recommended Wilderness. When the Forest recommends wilderness designation, it is bound to protect the Wilderness Character of that area until it is passed by Congress. Professionally, I work within the legislative process and understand that these things take time. The Forest Service should have been protecting the wilderness Character of the Entire Hoodoo Roadless Area on the NPNF.

The evaluation states, "However, snowmobiling and summer motorized use occurs either within the recommended area or adjacent to it." The fact that the Forest Service allowed Snowmobile trespass and mechanized recreation to gain a foothold within the recommended wilderness is not an excuse to alter their previous recommendation now. It is a sign that the Forest failed to protect the wilderness character that existed. It seems like the Forest is attempting to use the Forest Plan revision process to legitimize uses that undermine wilderness character. The Forest must include the entire Hoodoo Roadless area within the Forest and close the area to nonconforming uses.

This is obvious in the fact that nearly every recent Forest Plan revision finds that non-conforming uses within recommended wilderness are not suitable. This is because they recognize these uses have degraded wilderness character.

Thank you to the Forest Plan revision team for taking the time to read the submitted objections and for their dedication to providing a multi-use ethos on the land while recognizing that multi-use does not mean all uses on any given portion of land. I look forward to discussing my objections with the regional forester at the objection resolution meeting.

A handwritten signature in black ink, reading "Zach J. Angel". The signature is written in a cursive, flowing style with a large initial "Z" and a long, sweeping underline.