

Data Submitted (UTC 11): 2/23/2020 7:37:39 PM

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Organization:

Title:

Comments: I attended the open house hosted by the Perce-Clearwater National Forest in Hamilton, Montana on February 22, 2020. I found the materials and personnel involved in that open house to be exceptionally well-organized and informative. I very much appreciated the materials provided and the assistance from P-C personnel as I went through the resource stations.

I am an experienced outdoorsman, with over 60 years of active participation in the woods in both Wilderness and non-Wilderness settings. My experience includes both summer and winter activities and both motorized and non-motorized activities. I submit that the breadth of my experiences recreating on public lands qualifies me to make substantive comments on the proposed PCNF Plan Revision. For the past 15 years, I have been actively involved with Forest Service planning processes in the Bitterroot, Beaverhead-Deerlodge, Salmon-Challis, and Perce-Clearwater National Forests.

I support Alternative X proposed in the PCNF DEIS for the Plan Revision for the following reasons.

1. Alternative X minimizes the amount of land recommended for wilderness status (RWAs). Given that visitation rates are very low in Wilderness areas and that 20% of the PCNF is already Wilderness, there is no recreational demand for additional Wilderness in the Forest. The Agency purports to make decisions that provide the greatest good for the greatest number of people. RWAs recommended in the other Alternatives would exclude 95% of the recreating public from those areas: Hardly consistent with the "greatest good" mandate.

2. Alternative X maximizes the economic benefits derived from the PCNF from both recreation and vegetation management. An exhaustive report by the US Bureau of Economic Analysis documents the economic values of Outdoor Recreation. This study shows that Outdoor Recreation created \$412 billion in the national economy in 2016 and is growing rapidly. Virtually all of this value is created by various forms of motorized recreation. In Montana, Outdoor Recreation is the second largest economic driver for the state, and most of that comes from motorized recreation. Virtually none of these economic benefits accrue from Wilderness or Wilderness-like areas. Similarly, Wilderness or other restrictive land designations prohibit vegetative management activities such as timber harvest, fuel management, or forest restoration. These activities create jobs and contribute to national, state, and regional economies.

3. Alternative X maximizes the opportunity to create a more stable and fire-resistant ecosystem. Timber harvest and Restoration projects provide the means to reduce the susceptibility of our Forests to harmful intense wildfires. These wildfires are increasing rapidly in frequency and size and are the single most harmful and destructive disturbances to the environment, the ecosystem, and wildlife habitat that can happen. Alternative X maximizes the number of acres that are suitable for timber harvest and forest restoration and thus maximizes the ability of the PCNF to stabilize and enhance the ecosystem.

4. Alternative X more appropriately accounts for "social" issues. Unfortunately, poorly-defined social considerations have come to include ideological preferences in land management activities. There is no quantitative metric to measure ideological preferences and whether or not ideological preferences are rewarded or denied has no quantitative or material consequence to those who profess to hold those ideological preferences. This has led to the "squeaky wheel" syndrome wherein those who screech the loudest (or are more likely to file lawsuits) are rewarded at the expense of the majority of visitors who lack the financial resources to resist. The most obvious example of the squeaky wheel syndrome is in the Great Burn area of the PCNF. Here wealthy environmental groups claim that they are conflicted by the use of snowmobiles in the Great Burn. But these groups can't get to the Great Burn (without the use of a snowmobile) to actually experience any conflict, so the alleged conflict is entirely philosophical. Most of the Alternatives offered in the DEIS designate the Great Burn as an RWA and reward the ideological screeching of wealthy environmental groups at the expense of snowmobilers and snowmobile-assisted backcountry skiers. I believe this is inappropriate and one of the reasons I prefer Alternative X.