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Title:

Comments: Dear Planning Team:

Thank you for the opportunity to respond to the Nez Perce-Clearwater National Forest Framework for Alternative Development as well as on the 2014 Proposed Action.

My interest and concerns focus primarily on the Hoodoo Roadless Area (Great Burn). The wilderness qualities of the Great Burn/Hoodoo IRA have been recognized by the USFS since RARE I and the area has been administratively recommended for Wilderness in both the Clearwater and Lolo National Forests since the mid-1980s. The Proposed Great Burn Wilderness has been included in 16 Wilderness bills introduced to Congress by Idaho and Montana legislators since at least 1984. The Great Burn was most recently proposed for designation in 1996. The Clearwater Basin Collaborative (CBC), spurred on by Idaho's Congressional delegation, is laying the groundwork for a new legislative attempt in Congress. In 2013, the CBC agreed to support a Great Burn Wilderness. It is only a matter of time before the Great Burn will be permanently designated unless a USFS decision jeopardizes future support.

The Great Burn meets a significant need for wilderness type recreation in an area with very little designated wilderness (Northern Idaho and Eastern Washington). Much of the recreation use is from Spokane, Washington because there are so few quality non-motorized recreation opportunities nearby. It is an area enjoyed by many families seeking a quality wilderness experience close to home. The Great Burn is [hiker friendly], a quality not easily found in wild areas in Northern Idaho and NE Washington.

In addition to quality recreation opportunities, the Great Burn is at a pivotal crossroads for wildlife connectivity; between the Selkirks and Cabinets to the North and the Selway Bitterroot and Frank Church to the South. The Great Burn has an important but declining mountain goat population, and provides important winter range for both mountain goats and wolverine. Grizzly bears have been known to inhabit the area, there are healthy stands of white bark pine and several world class native trout streams.

Switching gears, I want to comment on the 2014 Proposed Action because I have grave concerns that I shared in 2014 but fear they may have lost and could be pertinent as you consider alternatives.

The 2014 Proposed Action established [special management areas] (SMAs) within the Great Burn. There is a very small number of [elite] snowmobilers who have been snowmobiling in the Great Burn. To eliminate recommended wilderness status to benefit a very few snowmobilers is absolutely wrong. Especially considering the many benefits that the Great Burn provides for wildlife, fisheries, water quality and recreation.

I oppose the SMAs for the following reasons:

[Special Management Areas] (SMAs) that create intrusions into a recommended wilderness are simply a bad idea. It is incredibly difficult to manage to preserve and protect the qualities of wilderness character in areas recommended for wilderness when surrounding long, narrow areas that allow motorized recreation. These SMAs will pose problems with fire, wildlife and recreation management.

he proposed SMA boundaries will be impossible to manage. The Hoodoo and Surveyor SMAs are on an open, meadowy ridge. Though a ridegeline may be considered a recognizable feature, if there is an adjacent attraction in a closed area, incursions into the closed area will occur. In this situation, there are numerous lake basins to the north of the ridge line in an area closed to motorized recreation on the Lolo National Forest. It is known that

snowmobilers covet the snowy bowls that occur in lake basins in the winter. For years there has been a law enforcement issue with incursions from the Clearwater side on to the Lolo. With SMA 1 & 3, this will continue, and likely increase, creating a significant law enforcement issue for the Lolo NF. The Beaverhead Deerlodge NF agreed to leave an area open to snowmobilers in the Mt. Jefferson roadless area in the 2009 forest plan. The Record of Decision stated that monitoring would occur and if there were incursions into the closed area, the forest would re-evaluate the decision. According to a letter dated January 15, 2013 and signed by Forest Supervisor David Myers, [ldquo]Despite clear boundary marking, intentional trespass is common, as evidenced by tracks, and direct observations of riders entering the closure in close proximity to signs.[rdquo] The forest is now in a situation of having to re-evaluate the decision to allow snowmobiling on Mt. Jefferson. The establishment of the SMAs would be a huge work load for the Lolo and a huge mistake for the Clearwater and devastating to the potential for wilderness designation.

The noise impacts from snowmobiles will have a significant negative impact on skiers and snowshoers in the recommended wilderness, resulting in potential visitor conflicts. Visitors tend to have expectations based on the agency management scheme for an area. When people visit areas that are recommended for wilderness by an agency, they expect to have a wilderness type of experience. The noise from snowmobiles will ruin their wilderness experience. The fact that there are few skiers or snowshoers only exacerbates the problem, because people expect to find solitude and quiet.

The establishment of the SMAs will eliminate the possibility of the area ever being considered for wilderness designation. The Idaho and Montana delegation will not consider proposing an area for designation as wilderness if it is fraught with controversy and cannot be managed as wilderness. The three SMAs that you have proposed will make the area un-manageable. This is of grave concern, considering that the Great Burn has been included in 16 past wilderness bills.

The Nez Perce Clearwater National Forest has many other reasonable options for snowmobilers and mountain bikers outside of the Great Burn. No trails in the Great Burn have been constructed for mountain bikers and the trail standards for mountain bikes are significantly different from the standards for the trails in the Great Burn. To convert trails to mountain bike standards would be expensive and not justified considering the very small number of mountain bikers that would ever use the area.

Any decision the NP/Clw makes regarding the Great Burn will have a significant affect on the Lolo portion of the Great Burn. Please consider this when developing your alternatives. Please develop alternatives that are implementable and that will not create management nightmares for the Lolo and will not jeopardize the Lolo[rsquo]s opportunity to consider the Great Burn for recommended Wilderness in their forest plan revision.

Thank you for your consideration.

Sincerely,
Chris Ryan