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Comments: Supervisor Probert -

Please accept my attached comments on the DEIS and draft forest plan related to recommended wilderness.

I was disappointed to perceive a bias towards motorized recreation in the analysis and plan and this is an unacceptable approach. In addition, there seems to be a lack of understanding by the team about wilderness given that recreation is identified as the priority for assessing the effects of the alternatives. Last, and most important, many components of the DEIS and draft plan are inconsistent with national Forest Service direction for planning and management of recommended wilderness in FSH 1909.12, Chapter 70. This is risky for the forest in that it can easily lead to unnecessary litigation. If I can find these inconsistencies so can others and you can do better.

ATTACHMENT BELOW

April 16, 2020

To: Nez Perce/Clearwater Forest Plan Revision Team

The following are my comments on the DEIS and Draft Revised Forest Plan related to Recommended Wilderness. While the documents are extensive, detailed, and generally well written I believe they fail to provide an adequate and balanced evaluation and are inconsistent with Forest Service direction provided in FSH 1909.12, Chapter 70 as shown in the following examples:

DEIS Chapter 2, page 2-14 -Alternative Y: [ldquo]Historic snowmobiling areas in the Great Burn are removed from consideration as recommended wilderness resulting in a boundary change...[rdquo]

While this is a reasonable approach the resulting boundary change is not the best practice. A boundary between motorized and non-motorized use must be placed in a location that makes it both possible and feasible for visitors to comply. With these boundary locations there are no such geographic break or feature between the proposed snowmobile areas and the recommended wilderness that would inform the public that they are nearing a closed area. It will be highly unlikely that snowmobilers will be kept out of the recommended wilderness and in the case of the snowmobile area south of Hoodoo Pass, the trespass will likely occur on the Lolo National Forest where illegal snowmobiling already occurs on that side of the Stateline. Those activities will only increase if snowmobiling is legal on the Clearwater National Forest side. I see that the forest consulted with snowmobilers but since this decision clearly affects management of lands within the Lolo National Forest, has there been any coordination between the forests about how to better address this issue?

Detailed guidance on how to establish boundaries that support management of wilderness and other adjacent areas is found in FSH 1909.12 Chapter 70, 73 [ndash] Analysis. Please coordinate with the Lolo National Forest and adjust the proposed boundaries to better conform to this direction and make it more likely that motorized travel restrictions can be successfully implemented. I support the Great Burn boundary described for Alternative Z and the management direction found in Alternative Y.

DEIS Chapter 2, page 2-14 - Alternative Z: [ldquo]These areas are managed to allow many uses within them, including uses that would likely not be allowable if designated wilderness by congress in the future. This includes winter motorized over-snow use and mechanized travel.[rdquo] This is not consistent with direction found in FSH 1909.12, Chapter 70, 72.1 [ndash] Evaluation of Wilderness Characteristics which reads: [ldquo]Consider

the opportunity to engage in primitive-type or unconfined recreation activities that lead to a visitor's ability to feel a part of nature. Examples of primitive-type recreation activities include observing wildlife, hiking, backpacking, horseback riding, fishing, hunting, floating, kayaking, cross-country skiing, camping, and enjoying nature.

In addition, FSH 1909.12, Chapter 70, 74.1 [ndash] Management of Recommended Areas requires that: [ldquo]When developing plan components for recommended wilderness areas, the Responsible Official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.

Snowmobiling is not mentioned as an example of a primitive type recreation activity in this direction and it should not be allowed in recommended wilderness because motorized and mechanized recreation activities are inconsistent with the requirement to [ldquo]protect and maintain both the social and ecological characteristics of the area that make it eligible for wilderness designation[rdquo]. Please remove this inconsistency with Forest Service direction.

DEIS Chapter 3, 3.2.1.1, page 101 - Effects from forest plan components associated with recommended wilderness areas: [ldquo]Within these areas, all action alternatives would have the same level of ability to achieve desired vegetation conditions within recommended wilderness areas through the use of vegetation treatments. All have forest plan direction that allow restoration activities to occur as long as the ecological and social characteristics that provide the basis for wilderness recommendation are maintained and protected. Anticipated vegetation treatment activities would largely be associated with the restoration of high elevation ecosystems, and whitebark pine forest communities in particular. There may be other treatments occurring to achieve restoration objectives outlined in the plan components. The most likely treatment would be prescribed burning (planned ignition), in some cases followed by limited planting of conifer seedlings. Objectives would include restoration of desired forest structure and compositions, and to restore desired landscape patterns.[rdquo]

The text in this section (and shown above) is inconsistent with direction found in FSH 1909.12, Chapter 70, 74.1 [ndash] Management of Recommended Areas. That direction allows the Forest Supervisor [ldquo]discretion to implement a range of management options[rdquo] but it also requires that [ldquo]All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.[rdquo] This direction also allows the plan to [ldquo]include one or more plan components for a recommended wilderness area that: 1. Enhance the ecological and social characteristics that provide the basis for wilderness designations[ldquo] The DEIS further supports this direction in Chapter 3.6.2, page 4, by stating [ldquo]National direction requires that areas recommended for wilderness avoid uses and management activities that might reduce their future potential to become designated wilderness.[rdquo]

Vegetative treatments and restoration activities are manipulations of the natural conditions and negatively affect the natural processes that influence the existing ecosystem. These management activities are the opposite of what would maintain, protect, or enhance the social or ecological characteristics that are the basis for recommending these lands for wilderness designation and must not be allowed in recommended wilderness. Once the manipulations occur the ecosystem is managed and not governed by natural processes which diminishes the wilderness characteristics. Please delete this provision for management of all areas recommended for wilderness.

[ldquo]Future wilderness designation of recommended wilderness areas could be anticipated. Designation as wilderness would likely result in reduced flexibility and options for vegetation management to achieve desired conditions. Use of prescribed fire is typically restricted within designated wilderness areas, and the ability to use unplanned ignitions (wildfire) as a tool would be limited within some of the recommended wilderness

areas.[rdquo]

Ya think? Yes, designation of these areas by Congress as Wilderness will definitely result in reduced options for vegetative management to achieve desired conditions. That is because the desired condition for designated Wilderness is a natural environment controlled by natural processes and not management. This text sure seems to indicate a desire by the forest to hurry up and manipulate the existing conditions and degrade the wilderness characteristics to meet desired conditions unrelated to a wilderness recommendation before it is too late. Again, this seems absolutely inconsistent with Forest Service direction to [ldquo]protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.[rdquo] Please delete this provision.

DEIS Chapter 3.2, page 2 - Measurement Indicators: The text reads: [ldquo]The indicators were developed based on the issue statements developed from the scoping comments and comments made to the draft wilderness evaluation to show how elements are affected by recommended wilderness management area allocation:

1. Changes in wheeled motorized opportunities compared with the existing condition
2. Changes in motorized over-snow vehicle opportunities compared with the existing condition
3. Changes in trail miles that allow mechanized transport compared with the existing condition
4. Changes in amount of commercial use of permanent structures
5. Acres of underrepresented ecological groups of the National Wilderness Preservation System[rdquo]

With no further description it would seem like most of the indicators were developed primarily to satisfy the concerns of motorized recreationists and commercial users. But, as you know, areas recommended for wilderness are about far more than that. What about the negative affects to all the other elements and values of wilderness and the identified wilderness characteristics?

Elsewhere in Chapter 3 the values that recommended wilderness provides for; [ldquo]species diversity, protection of threatened and endangered species, protection of watersheds, scientific research and other ecological processes, and social values[rdquo] are identified yet there is no discussion of the effects to those values in the subsequent analysis. Please revise the Measurement Indicators to be more inclusive of all wilderness values and add a more thorough discussion of the gain or loss of these wilderness values for each alternative.

Chapter 3.6.2, pages 5-13 - Effects that Vary by Action Alternative: Each alternative includes the following statement, [ldquo]Displacement of wheeled motorized vehicles on the Nez Perce-Clearwater could occur if a site-specific decision is completed that prohibits these uses in recommended wilderness. Should these closures occur, use might become concentrated in areas that remain suitable for motorized wheeled transport causing some users to have negative experiences and/or go elsewhere to an off-forest location or to other lands open to motorized use.[rdquo] This statement further supports a suspicion of bias towards motorized recreationists as evidenced by the choice of Management Indicators.

Is it not just as important and relevant to discuss the negative effects that allowing motorized and mechanized recreation will have on hikers and equestrians, especially the effects to solitude and safety and the potential resulting displacement? In addition, how can the Forest Supervisor possibly make a decision on which alternative to select if the effects of that alternative on the very values that are used to rate the roadless area are not identified and disclosed? Please improve this analysis.

Chapter 3.6.2, page 11: Alternative Z: [ldquo]These areas would be managed in a primitive or semi-primitive non-motorized, with motorized travel prohibited, excluding recreational and administrative use of aircraft and unmanned aerial systems. The winter recreation opportunity spectrum for these areas would be primarily semi-primitive motorized and would allow for motorized over-snow vehicle use. Bicycles and other forms of

mechanized transportation would also be allowed year-round.[rdquo] The allowance for motorized over snow vehicle use and bicycles is inconsistent with Forest Service direction in FSH 7109.12 74.1 [ndash] Management of Recommended Areas which states: [ldquo]All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.[rdquo]

Also, [ldquo]Within the Hoodoo recommended wilderness area the Fish Lake trail would remain open to motorized travel.[rdquo] Management of designated Wilderness does not allow the use of motorized equipment, motor vehicles, or any form of mechanical transport. To allow these types of use in recommended wilderness is not only inconsistent with Forest Service national direction for recommended wilderness but foolish as, once the use is established, it becomes significantly more challenging to stop should the area be designated, especially these days with limited staff and budgets. Please reference the Record of Decision for the recent forest travel plan ROD for an explanation of why non-conforming uses should not be allowed in recommended wilderness and revise this provision accordingly.

Chapter 3.6.2, page 15 [ndash] Effects to Resource from Other Resources:

Fire and Fuels Management - The document states that [ldquo]Fuel treatments such as timber cutting, sale, and removal may occur to the extent permitted in the Idaho Roadless Rule or to preserve and improve wilderness character.[rdquo] Really? There is no way that a management activity such as timber cutting, sale and removal will preserve and improve wilderness character! This provision demonstrates a total lack of understanding of the concept of wilderness, as described in law and Forest Service policy, and the definition of wilderness character, which is documented in numerous agency publications. Please educate yourselves and delete this provision. It is correctly stated in the next section: Vegetative Management as [ldquo]These lands are not suitable for timber production; timber harvest is not allowed.[rdquo]

Recreation and Access [ndash] The only effects that are described are potential gains and losses to motorized and mechanized recreation. There is no discussion of which alternatives provide the greatest opportunities for solitude, quiet, self-reliance, primitive and unconfined recreation, values which are inherent to wilderness, and which were required to be identified in FSH 1909.12, Chapter 70, 72.1 [ndash] Evaluation of Wilderness Characteristics Please assess and describe the losses or the potential displacement.

Wildlife and Fish Management - There no discussion of the gain and losses by alternative. It has been clearly demonstrated by research and documented in Forest Service publications that the alternatives that have the greater amount of recommended wilderness will have the greatest gains for wildlife habitat and connectivity. Please revise this section to reflect current scientific understanding.

Draft Revised Forest Plan, Chapter 5, 5.6, Management Area 2, Recommended Areas, pages 103-104

Please make the following changes to be consistent with national Forest Service direction to manage recommended wilderness areas to [ldquo]protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation[rdquo] (FSH 1909.12 Chapter 70).

Standards:

MA2-STD-RWILD-01. Summer recreation opportunities are consistent with the recreation opportunity spectrum classification of primitive or semi-primitive non-motorized.

Please add [ldquo]and non-mechanized recreation[rdquo] to include bicycles.

MA2-STD-RWILD-02. Alternative Z: Winter recreation opportunities are consistent with the recreation opportunity spectrum classification of primitive, semi-primitive non-motorized, or semi-primitive motorized. Please delete [ldquo]or semi-primitive motorized.[rdquo]

Guidelines, Table 33:

Please change the table to read NO in all categories for alternatives with these Guidelines:

MA2-SUIT-RWILD-02. Timber Harvest

MA2-SUIT-RWILD-04. Temporary Road Construction

MA2-SUIT-RWILD-11. Replacement of existing buildings and structures (unless explicitly needed to protect resources or administer the area)

MA2-SUIT-RWILD-12. Over-snow vehicle use

MA2-SUIT-RWILD-14. Mechanized travel (e.g., bicycles, game carts)

MA2-SUIT-RWILD-16. Recreational aircraft landing, including unmanned aircraft systems

MA2-SUIT-RWILD-17. Building replacement

Draft Revised Forest Plan, Appendix 4, Management Approaches and Possible Actions - Recommended Areas, page 75:

FW-MSA-RWILD-01. A Minimum Requirements Analysis (e.g. Minimum Requirements Decision Guide) should be considered for all instances authorizing uses that may not protect and maintain the social and ecological characteristics that provide the basis for a future wilderness designation.

Please change this provision to require that some type of Minimum Requirements Analysis will be done [ldquo] for all [proposed] instances authorizing uses that may not protect and maintain the social and ecological characteristics that provide the basis for a future wilderness designation. To do anything less is inconsistent with direction found in FSH 1909.12, 74.1 - Management of Recommended Areas to [ldquo]protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.[rdquo]

Sincerely,

Tom Carlson

retired Forest Service Wilderness Manager and Training Specialist