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Organization:

Title:

Comments: Forest Plan DEIS Public Comments

Attached are my comments on the Nez-Clr Forest Plan Revision -- Thx, Mike Oliver

Sent from Mail for Windows 10

ATTACHMENT BELOW

Dear Supervisor Probert: This letter is my comment on the Nez Perce [ndash] Clearwater Forest Plan Revision Draft Environmental Impact Statement (DEIS). Introductory personal information regarding me is contained within my February 11, 2018 comment letter on the Framework for Alternative Development. For the sake of brevity, I refer to that letter that is on file in the planning record. First, I want to thank you and your staff for holding public meetings in Montana. Many Montana residents use and enjoy the Nez Perce [ndash] Clearwater lands that interface the Lolo National Forest. Also, it was refreshing to see you personally attend the meetings. My primary interest and comments relate to the Great Burn Inventoried Roadless and surrounding other roadless areas. I will also address comments on the Mallard [ndash] Larkins area. Up front, I want to register my strong feelings that the Great Burn Roadless should be retained [ldquo]in-whole[rdquo] as recommended Wilderness. Any alternative that includes carving out exceptions or exclusions to this designation would be deemed unacceptable by me. Additionally, I am opposed to any decision that would provide exceptions for Wilderness non-compliant uses. These include, but are not limited to, motorized use of any kind (yearlong), mechanized use such as bicycles, game carts or non-emergency aircraft landings and the use of motorized equipment for administrative purposes. This area is one of the largest remaining roadless areas and stands very high on the list of areas with great Wilderness attributes. I want to restate that there are impacts when the administering agency allows non-conforming uses in any area recommended for inclusion in the National Wilderness Preservation System. When a federal agency forwards a recommendation to the U.S. Congress; if they have allowed or not enforced uses that do not conform to the agency proposal, they tacitly generate an opponent base that creates political issues that must be overcome by the Congressional Delegation. Additionally, there is a loss of general wilderness character as non-compliant uses proliferate. This area has great value to the people of Idaho and combined with the portion that lies within Montana provides exceptional backcountry experiences for people of all ages. Some of the trails are easy for families and/or elderly to venture out for a bit of solitude. As I hike in the Great Burn, I often encounter pack and saddle stock. I don[rsquo]t have to tell you, mountain bikes and livestock do not mix on trails. I want to address any alternative that would have seriously negative impacts on future decisions made by the Lolo National Forest when they pursue their Plan revision. Excluded lands that would in effect create a [ldquo]hole in the donut[rdquo] are unacceptable to me. Legislation that would propose a comprehensive Great Burn Wilderness will take the combined effort of both the Idaho and Montana Congressional Delegations. Any alternative that creates blocks of land within the proposed Wilderness where Wilderness non-compliant uses are allowed would make the legislative process painfully cumbersome if not impossible. Usually, these situations require access corridors via [ldquo]cherry stems.[rdquo] Also, these areas foster illegal recreational use in the backcountry. The cost of enforcement is much higher and may tend to be neglected. I want to call your attention to the Clearwater Division Travel Management Plan Record of Decision. You signed this decision on October 31, 2017. This is a current decision and could hardly be considered stale. I am perplexed that you are considering Plan Revision Alternatives that are dramatic departures from the decision you made in the Travel Management Plan. Specifically, I would expect you to exercise a great degree of

analysis to show a [ldquo]need for change.[rdquo] What ecological changes have taken place to show that there is now a need to allow motorized and mechanized use in areas that less than 3 years ago you specifically prohibited? It troubles me that you have cast your decision aside without due diligence. Specifically related to Wilderness, I did not see the application of rigorous analysis of the impacts of motorized and mechanized use on the Wilderness resource. I feel the level of analysis that is needed to clearly show the negative impact of all season motorized use and mechanized use is clearly lacking in your documentation. I believe you need to do extensive analysis to demonstrate how proposing these non-conforming uses is consistent with prudent management. I want to focus for a moment on the importance of the Great Burn Roadless Area to wildlife and the community of life. It is critical to remember that National Forest ecosystems are not only important to humans, but also to a multitude of plant and animal species. As stated earlier in this letter, The Great Burn is one of the largest segments of unroaded areas in the United States. It plays an essential role in providing connectivity between several ecosystems in the Northern Rocky Mountains. The Great Burn provides several levels of habitat protection for some of the most sensitive and threatened species. These include mountain goats and wolverine. For this reason, I oppose any motorized use (season long) in the Great Burn Roadless Area. Specifically, I believe over the snow motorized use will bring great harm to the southern edge (Black Lead) areas of the Great Burn. I want to encourage any portion of the Mallard [ndash] Larkins area on the Nez Perce [ndash] Clearwater National Forests to be included as recommended Wilderness. I want to reiterate: There must not be any mechanized and/or mechanize use year-long in the Great Burn. I am specifically asking that you consider both the Great Burn and Mallard [ndash] Larkins roadless areas as recommended Wilderness without exceptions.