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First name: Dan

Last name: Tracey

Organization: Backcountry Hunters & Anglers

Title: MT Chapter Missoula Valley Board Member

Comments: Dear Ms. Martin:

The Montana Chapter of Backcountry Hunters & Anglers has a particular interest in the Nez Perce-Clearwater National Forest (NPCNF) and its release of the Final Environmental Impact Statement, Draft Record of Decision, and Draft Final Revised Forest Plan. While there are numerous aspects we appreciate with the Plan, we'd like to formally register our concerns and objection.

Our chapter/organization weighed in during plan scoping in 2019/2020, and therefore have established standing.

Our full objection letter is attached.

Thank you for your consideration,

-Dan Tracey, Missoula Valley Board Member

The Montana Chapter of Backcountry Hunters & Anglers

January 12, 2024

The Montana Chapter of Backcountry Hunters & Anglers

PO Box 9257

Missoula, MT 59807

Regional Forester Leanne Martin (Reviewing Officer)

USDA Forest Service Northern (R1) Regional Office

Attn: Nez Perce-Clearwater Forest Plan Objection

26 Fort Missoula Road

Missoula, MT 59804

sm.fs.fpr_npclw@usda.gov

Re: Nez Perce-Clearwater National Forests Plan Revision

Dear Ms. Martin:

The Montana Chapter of Backcountry Hunters & Anglers has a particular interest in the Nez Perce-Clearwater National Forest (NPCNF) and its release of the Final Environmental Impact Statement, Draft Record of Decision, and Draft Final Revised Forest Plan. While there are numerous aspects we appreciate with the Plan, we'd like to formally register our concerns and objection.

We weighed in during plan scoping in 2019/2020 and are disappointed that many of our comments related to habitat protections, wild lands, and quiet recreation appear to have been overruled. Of particular concern is the removal of protections of some 32,000 acres of recommended Wilderness in the Great Burn area, and the increase in both off-trail and on-trail motorized and mechanized use.

Many of our Chapter's sportsmen and women use and cherish the resources of the Great Burn region, as well as streams found within the NPCNF such as the North and South Fork of the Clearwater and Kelly Creek. Both the Idaho and Montana portions of this contiguous state-line landscape currently offer incredible ecological values, exceptional backcountry opportunities, and potential Wilderness designation in addition to vital habitat for mountain goats and other species. On the Idaho side, the Hoodoo Recommended Wilderness [ndash] and its nearly 152,000 acres in the heart of the Great Burn Proposed Wilderness [ndash] combines with Montana's backcountry to form one of the largest and wildest roadless areas in the lower 48. We'd like to keep it that way.

Management of these lands is shared between the NPCNF and the Lolo National Forest (LNF). Much of the Montana side of the Great Burn has been recommended for Wilderness designation by the LNF since the 1982 Lolo Forest Plan. Yet this draft decision fails to adequately protect this wild landscape on the Idaho side and will likely make protections more difficult to achieve on the adjacent LNF lands in Montana. This concerns us, especially considering that the entire landscape is not only deserving of Wilderness designations, but would be Wilderness today if it weren't for a 1988 presidential veto. We do not want to see the opportunity to designate this special area as Wilderness squandered. A unilateral decision by the NPCNF that removes areas as suitable for Wilderness will likely impact what occurs on the adjacent LNF. Therefore, we recommended and continue to recommend maintaining these deserving lands with suitable for Wilderness designations to protect wildlife, ecological and watershed values, and the increasingly scarce non-motorized integrity of the landscape that serves our members and others with quiet recreation opportunities, specifically backcountry hunting and angling.

Additionally, this area offers vital habitat for, among other species, the vulnerable mountain goat, a species cherished by hunters and non-hunters alike. Our native mountain goat populations are hurting in both Idaho and Montana, and hunting permits and opportunities have reflected that. It's worth noting that the current LNF's planning process is proposing to appropriately treat mountain goats as a species of special conservation concern, whereas the NPCNF just across the border has kept them off that list, despite population level decreases there too. Worse, the proposed plan will undoubtedly harm mountain goats and their habitat by removing protections and opening more areas - roughly 40,000 acres - to motorized use, including oversnow activity in winter, which has been shown to have a direct, negative impact on mountain goats. We ask that motorized use is not expanded in this area.

Montana BHA does applaud the inclusion of 11 rivers recommended to the Wild and Scenic Rivers System, amounting to more than 230 miles of protected waterways including Kelly Creek, an outstanding wild Westslope cutthroat fishery relatively close to our Montana membership. That said, we are disappointed that 77 rivers were determined to be 'not suitable' including the South and North Forks of the Clearwater River. We ask that the NPCNF continue to pursue protections for the South and North Forks of the Clearwater River specifically.

We ask that the Nez Perce-Clearwater National Forest manage the Great Burn in a way that protects the entire wild backcountry of the Hoodoo Roadless Area, ensures that mountain goat populations won't continue to decline, and further takes into account two actions that happened after the NPCNF released their plans, and therefore weren't appropriately considered: the November 29, 2023 ESA listing of the wolverine and the administration's December 19, 2023 commitment to protect old growth forests on National Forest lands.

We appreciate the opportunity to formally register our concerns and objection, and we thank you for your careful considerations.

Sincerely,

Dan Tracey, Missoula Valley Board Member

The Montana Chapter of Backcountry Hunters & Angler