

Data Submitted (UTC 11): 2/24/2020 4:23:51 PM

First name: Bruce

Last name: Smith

Organization:

Title:

Comments: I have recently reviewed the released Nez Perce-Clearwater Forest Plan Revision Draft Environmental Impact Statement and Draft Revised Forest Plan. None of the alternatives presented reflect the management I would like to see implemented for the Hoodoo Roadless Area. Please accept these comments into the formal record.

I'm a career wildlife ecologist and science writer. I spent 2 years living in the Selway-Bitterroot Wilderness just south of the Great Burn while conducting my graduate research on mountain goats. I continued to advocate for wildlife and wildland conservation for 45 years, particularly species sensitive to human activities and disturbance by motorized equipment, species we think of as wilderness species. The Great Burn contains a variety of such species: struggling mountain goat populations, hoary marmots, and transitory if not resident wolverines, lynx and grizzly bear. My recent book, *Life on the Rocks: A Portrait of the Mountain Goat*, discusses the necessity of wildland conservation for the community of species that reside there. The Great Burn Roadless Area occupies a pivotal geographic location for connectivity of wildlands and there residents to the north and south. Its solitude is a feature that enables sensitive species to call the area home. Compromising its habitat effectiveness would be a mistake.

Unfortunately, this is one wildland area of Montana that I've not yet visited. However, 45 years of experience just to the south in the Selway-Bitterroot and to the northwest in the Scotchman Peak WSA help me to understand the values of this wildland tract along the Montana-Idaho border. I plan to visit the area this summer to enjoy its spectacular scenery, wildlife, and solitude. Yet my past experiences in the S-B and other Montana wildlands, as well as reading and discussions with others about the Great Burn, allow me to "imagine" the Great Burn landscape. After all, just imagining that such a place exists offers Americans value in itself and hope that they may one day set foot in such a remarkable natural area. There are more of us every year, and more pressure on the remaining wildlands left in America. Relegating such precious wildlands -- part of our collective natural heritage -- to a diminishing number of places is akin to relegating happiness to heaven (as Aldo Leopold remarked about dwindling grizzly bear populations in the Lower 48), you may never get there.

The Great Burn Roadless Area has been recommended for wilderness designation for 50 years by the USFS. Several failed legislative efforts, including a pocket veto by Ronald Regan, are what has kept it from joining America's national system of designated wilderness lands. It's time the Great Burn and the American public got their due. The entire area that is roadless should be recommended as wilderness.

I disagree with this. Wildlife species, among them mountain goats, lynx, and wolverine that can be particularly sensitive to motorized recreation, are best served by abandoning this proposal. Granted there may be no site-specific, prescient research to conclude how these and other wilderness characteristics may be affected by allowing snowmobiling, but the USFS should err on the side of caution. Either that or exhaustively review the peer-reviewed research from similar situations to evaluate potential impacts.

I don't have adequate familiarity with this to comment.

I just reiterate that the Great Burn's highest values are its wilderness character, including plant and animal communities, and non-motorized recreation.

As a 30-year federal land management employee, including time with the USFS, I appreciate the challenging work required to conduct land management planning and environmental reviews. Passing on to future generations our natural heritage is a most sacred trust of those employed in land management agencies. I am continually grateful that those who came before me saw fit to do that for me.