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Comments: I'm writing in support of continuing the "recommended wilderness" status of as much of the Nez Perce-Clearwater National Forest as possible and of recognizing as many local streams as possible as suitable for inclusion as national Wild & Scenic Rivers. As a member of the Montana Wilderness Association, I'd like to see that habitat managed primarily for wildlife and am particularly concerned about one of the options proposed in the Forest Plan Revision that would open two sizable areas of currently recommended wilderness to snowmobile use. One of those areas, running right along the Idaho-Montana border, has considerable potential to impact the planning process for the adjacent Lolo National Forest when its next Forest Plan Revision is put together in a few years.

I'm not a forester or biologist and I expect that the National Forest Service employees who are working on this plan are well aware of the relevant scientific literature, so I'll restrict my comments to more general observations. In the past few weeks I've come across significantly different takes on the status of mountain goats within this region. My wife and I attended a talk by long-time goat researcher Bruce Smith at the University of Montana, where we learned that mountain goats are particularly sensitive to disturbance by helicopters and that little research has been done on the impacts of others kinds of disturbance. Alternatively, an editorial in the Missoulian a few weeks ago argued that mountain goat survival is better in regions where snowbiling is allowed and that snowmobiles wouldn't typically access winter habitat of the goats. That author also indicated that he'd seldom seen skiers in the areas in question, and usually only using tracks initially made by snowmobiles. I find the editorial author difficult to believe, though I imagine it would be possible, by choosing specific areas impacted by other factors, to find places where the statement about mountain goat survival and snowmobiles was correct. How you would untangle all the potential factors that went into that survival to identify snowmobile use as a positive impact would seem to be almost impossible as I'd think that any monitoring would be rather sporadic. Given that there is a significant population of goats in the strip of land above Heart Lake on the Idaho-Montana border, it makes much more sense to me to be conservative and deny snowmobile access to the region. By the editorial author's own admission, denying snowmobile access will likely severely limit the number of non-motorized winter users as well, leaving the region as natural as possible during a difficult time of year for mountain goats and other wildlife.

The other point I'd like to make is to urge planners to view this landscape in its larger context, as an important region of connectivity for grizzly bears and other wildlife who will be faced with numerous challenges resulting from climate change over the coming decades. I believe that maintaining large chunks of national forest lands in as natural a state as possible is the best way to maximize the odds that a wide variety of species will not only survive, but thrive in our warming world.

Thank you for considering my input.