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Title:

Comments: Dear Cheryl Probert, Zach Peterson, and the planning committee,

Thank you for the opportunity for public comment on the Nez-Perce-Clearwater Forest Plan Revision DEIS.

The Great Burn:

The Great Burn area of Idaho and Montana contained within the Nez-Perce-Clearwater and Lolo National Forests provides exceptional ecological value as a roadless headwaters region. It is an important place where my family and I regularly go to find solitude and to enjoy primitive backcountry experiences like fishing, hunting, camping, and backcountry skiing.

The alpine areas of the Great Burn along the MT-ID state line offer refuge to sensitive wildlife species such as mountain goats and wolverines, while long stretches of pristine mountain creeks offer important habitat for native trout species. Much of the area has been recommended for Wilderness designation by the Lolo National Forest since the 1982 Lolo Forest Plan and several streams, such as Kelly Creek and the South Fork of the Clearwater are suitable for Wild and Scenic River designation.

Maintaining Wilderness Character:

It is essential that the contiguous unroaded portions of the Great Burn area of Idaho and Montana be recommended as Wilderness in this and future forest planning processes to help ensure congressional designation. Increasing snowmobile, OHV, and mountain bike use in the Great Burn may jeopardize the wilderness character of this unique area. I encourage you to consider affording the Idaho side of the Great Burn the same recommended wilderness status as currently exists on the Montana side. This includes restricting summer and winter motorized use, as well as mechanized use by mountain bikes.

The proposed snowmobile areas south of Hoodoo Pass and in the Toboggan Hill/Blacklead Mountain/Goat Lake area are of particular concern. Wolverine need deep snow for denning, and they traverse mountain ridgelines. Their winter habitat areas likely overlap with these proposed snowmobile areas. It is imperative that alpine obligate species receive increased protections as the rise in global temperatures due to anthropogenic climate change reduces the length of seasonal snowpack persistence in the Rocky Mountains.

If snowmobiles are allowed along the state line south of Hoodoo pass in this forest plan, it increases the likelihood that the Lolo National Forest will follow suit in their revision process and allow motorized access on the Montana side. This will reduce the area's potential for future Wilderness designation and so should be avoided. The increase in snowmobile traffic over the past decade has already posed enforcement challenges to Forest Service resources, and so it is logical to restrict snowmobile use to areas that do not contain significant wilderness characteristics so that enforcement is less of an issue.

Logging:

I am concerned that all the proposed alternatives in the DEIS increase logging from the current forest plan. The World Wildlife Fund and the US Fish and Wildlife Service have indicated that areas within the forest, such as the Clearwater basin, harbor some of the best remaining habitat for large carnivores in the Northern Rockies. I am concerned about the detrimental impact of increased logging to both grizzly bears and wolves, as well as to bull trout, steelhead, salmon, wolverines, Canada lynx, and fisher. As one of the last remaining large, undeveloped

areas in the lower 48, I encourage you and the planning committee to not increase the amount of timber output on the forest.

Instead of increasing timber output, I would encourage you and the planning committee to include provisions that seek to address climate change. These should include guidelines for sustainable timber harvesting that reduce greenhouse gas emissions. Our national forests are important carbon sinks that retain higher economic and ecological value as intact stands in the long term than they do as lumber product in the short term. They should be valued as such.

#### Management Areas:

Reducing the number of management areas from 26 on the Nez Perce forest and 17 on the Clearwater forest to 3 for the combined forests promotes logging over other values. I implore you and the committee to retain a higher number of management areas with specific management plans for each area as exists in the current plan. I am concerned that old growth stands outside of designated Wilderness and Wild and Scenic corridors will be logged if management areas are reduced in the manner that you propose. If increasing economic opportunity is a priority for this revision process, I encourage you to promote sustainable economic activities like tourism instead of logging.

#### Standards:

Standards in the current forest plan that offer quantifiable thresholds for water quality, old growth, soils, riparian areas, and wildlife habitat should be included in the new plan. These standards and guidelines allow forest supervisors and the public to monitor how projects on the forest are impacting the environment. Without specific standards limiting sedimentation in waterways, for example, timber projects are not encouraged to use best practices for environmental protection.

I would encourage you to include enforceable standards that protect native fish habitat and maintain clean water and habitat connectivity. Likewise, standards that currently protect old growth forest and wildlife habitat should be maintained in the current plan. Species like fisher, pileated woodpeckers, and goshawks, which are all found in the Clearwater, are old-growth dependent.

Any project on the forest that may affect the recovery of federally listed species such as grizzly bears should be constrained by standards that are informed by US Fish and Wildlife recommendations. Moreover, the plan should include future desired conditions and guidelines for forest management that delineate migration corridors and habitat security areas for these species.

Recovering steelhead need specific river substrate conditions and I encourage you to maintain the 300-ft riparian buffer zone standard around streams to promote fish population recovery and persistence.

Thank you for your consideration of my comments.