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Title:

Comments: RE: Nez Perce-Clearwater Forest Plan revision / Recommend Wilderness for entirety of the Great Burn/ Ban on motorized winter use of any portion of the Great Burn/ Recommend finding of suitability for Wild and Scenic River Status for Kelly Creek and its forks and Cayuse Creek.

To whom it may concern:

I've lived in Montana for 40 years and have been fortunate to be a Bitterrooter for 39 of them. My hikes, rambles and boating and floating experiences over the years have taken me into the NPCW NF on many occasions. The Bitterroot Divide is at the head of every major West side canyon. As pointed out by Bud Moore in the Lochsa Story, the Bitterroots are an integral part of the Clearwater drainage with passes connecting it to most of the major drainages. I know that from the ground truth by hiking most and skiing some of them. One of our children's first hikes as toddlers was in the Bear Creek Pass area at the head of Lost Horse Creek which drops into the Selway. The first backpacking trip proposed by our son, as opposed to being dragged along by his Dad, was to "hike home" from Elk Summit to Hamilton. My daughter and I have hiked the Bear Creek Pass traverse, between Big Creek and Bear Creek with its views of Lochsa country. On practically all of the walk-up and ski-up peaks in the Bitterroot you look west to the Clearwater drainage when you top out. Back in my kayak days I spent more time than I like to admit swimming the Lochsa in high water, usually at Grim Reaper. I've skied numerous days at Lolo Pass. Over the years our family has taken many week long floats down the wild and scenic Salmon. We've driven and camped along the Fish Creek Road between HW 12 and I 90. We've made countless trips over Look Out Pass and Lolo Pass. Our daughter and her family's favorite campsite is Wilderness Gateway on the Lochsa. Whether standing atop Saddle Mountain (just W of Lost Trail Pass) or on top of Lolo Peak the view looking north and west make it obvious that the Lolo, the Bitterroot and the Nez Perce Clearwater National Forests are one ecological unit. The heart of the northern part of that ecosystem is the Great Burn, its lifeblood is the creeks and rivers of the Clearwater that drain it.

That brings me to the point of this letter. The Great Burn in it's entirety, all 151,874 acres in the Nez Perce Clearwater National Forest should be recommended for wilderness in the final forest plan. This is one the largest remaining roadless areas in the lower 48. It has outstanding wilderness characteristics. It provides critical wildlife habitat for many species including threatened and endangered ones such as wolverines, lynx and the grizzly bear. It also provides critical connectivity between NW Montana and the Selway Bitterroot Wilderness area. This is acutely important for grizzly bear recovery.

As widely reported last summer, a three year old male grizzly from the small Cabinet-Yaak grizzly population wandered down the northern Continental Divide undoubtedly through the Great Burn to the Selway-Bitterroot and continued south well past Lolo Pass. After spending the summer there it returned to den-up back in the mountains of the Cabinet-Yaak. The reason this bear's journey received so much attention was due to the possibility it showed of connecting populations and the necessity of preserving the conditions that made the journey possible. We now know for certain grizzlies are starting to use this area. Unfortunately one of the first instances this became apparent was in 2010 when a grizzly was shot over bait in the Great Burn while in the headwaters of Kelly Creek.

The fact that grizzlies are now using the only existing route to connect discrete populations and population-vacant bear habitat underscores the importance of recommending the entire ID portion of the Great Burn as wilderness in the final forest plan. Cutting down available habitat will undoubtedly jeopardize the recovery of this endangered species. Note that the court fight over the delisting of the Yellowstone Grizzly was at its core a fight for connectivity of grizzly populations. The prevailing arguments on connectivity and its importance in securing genetic diversity in order to preserve the species were woven through Judge Christianson's decision not to delist. Factually, a critical part of his decision was that the six grizzly ecosystems were geographically isolated from one another with no evidence of interbreeding. The judge criticized the government's attempt to delist the bears as a "balkanization" of these discrete populations. It stands to reason that increasing the odds of connecting any of these populations by expanding, or continuing to protect

habitat, stands to benefit all of them. Conversely, shrinking the size of the recommended Great Burn wilderness area shrinks the odds of connectivity happening which imperils grizzly bear recovery and is contrary to the goals of the Endangered Species Act.

Additionally, shrinking the size of the Great Burn to allow for snowmobiling imperils not only the grizzly and the other species mentioned above, it also endangers a native mountain goat population that is already at risk due to steep population decline. Research has established that snowmobiling and other forms of motorized winter use, have an adverse effects on mountain goats. Besides being morally wrong, it is poor management to allow a motorized recreational use to destroy any animal population. It is particularly perverse to destroy such an iconic part of the Great Burn wilderness as the native mountain goat. Further, any motorized use is wholly inconsistent with the wilderness characteristics with which the Great Burn is so richly endowed. For these reasons the final plan, or any interim plan, should not open any of the Great Burn to any winter motorized access or use.

The final forest plan should also address the rivers flowing from and near the Great Burn which, in addition to being vibrant fisheries themselves, contribute to the health of the Lochsa. They have achieved iconic status nationwide, at least among fly fisherman, as legendary, blue ribbon cut throat fisheries that are scenically outstanding. Accordingly it is critical that the final plan recognize that Kelly Creek, including its three forks (north, south and middle) are suitable for Wild and Scenic River Status and be recommend as such. The same holds for Cayuse Creek. As a major tributary of Kelly Creek it also has the characteristics of a wild and scenic river and should be found suitable and recommend as such.

In revising a forest plan there are many responsibilities but the guide star should be the responsibility to future generations for there is no more wilderness like the Great Burn in the lower 48. In weighing your decision I hope the reflection of Elers Koch concerning the Clearwater county will be remembered. *

As Elers wrote: "Only a few years ago the great Clearwater wilderness stretched from the Bitterroot to Kooskia; from the Cedar Creek mines to the Salmon River and beyond. No road and no permanent human habitation marred its primitive nature. There it lay-the last frontier- an appeal to the mind of the few adventurous souls who might wish to penetrate its fastness's and plunge for weeks beyond human communication. "

In the next paragraph he describes the enormous changes in the land wrought by "progress". The message I would leave with you is in his justly famous final paragraph where he asks the question:

"Is it possible this all was a ghastly mistake....."

Elers Koch understood there's no undoing for future generations when the natural wilderness is undone. While written in regret, by writing it at all he left a legacy of wisdom for future decisions like the one before you.

Thank you for consideration of my comments.

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*Elers Koch was the one of the first Forest Supervisors in Montana arriving in the early 1900's before the Big Burn. In 1935 he published his initial impression of the Clearwater country and his regrets and second thoughts on the path of its development in an article titled "The Passing of the Lolo Trail "in the Journal of Forestry. It's fitting that his memoir "Fourth Years a Forester" was republished last fall.