

Data Submitted (UTC 11): 4/26/2020 7:00:00 AM

First name: Chris

Last name: Ryan

Organization:

Title:

Comments: Dear Zach,

These comments are intended to replace the comments I sent electronically - 44089-3190-525.

I'm sorry to do this - I neglected to include all of the comments/edits from my partners. The trouble with comments by committee.

Thanks for taking care to ensure the proper comment letter is considered.

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To: Nez Perce/Clearwater Forest Plan Revision Team

Congratulations on completing the monumental task of updating and revising the plan that will dictate management of these two amazing forests for the foreseeable future. Thank you for the opportunity to comment.

These comments will focus mostly on the treatment of Recommended Wilderness and specifically on the Hoodoo Roadless Area (Great Burn).

General Comments:

In the Need for Change, there is no mention of the very recent travel plan decision for the Clearwater National Forest. This document went through many years of cooperative work between the forest and public. The decision was litigated, and Forest Supervisor Probert's decision was upheld by the court. Though the travel plan decisions are much more site specific than those made in a forest plan, it still seems that a lengthy analysis, resulting in a successful decision, should at least be taken into account.

Appendix E, the Wilderness Evaluation, seems to do an adequate job of evaluating the roadless areas for a variety of values, including manageability. However, Chapter 3 has literally no assessment of the effects of the various values or wilderness characteristics by alternative. How can the Forest Supervisor possibly make a solid decision on which alternative to select if she doesn't know the effects of that alternative on the very values that are used to rate the roadless area?

The measurement indicators that are used to complete the effects analysis in Chapter 3 are woefully inadequate. In fact, they demonstrate only the potential negative effects that wilderness recommendation could have on motorized and mechanized recreation. What about the negative affects to wilderness values and wilderness character if an area is not recommended or if certain management actions or uses are allowed?

The opening paragraph in Chapter 3 defines the values that recommended wilderness provides for; "species diversity, protection of threatened and endangered species, protection of watersheds, scientific research and other ecological processes, and social values", yet there is no discussion of losses of any of those values in the ensuing analysis. You must include a more thorough discussion of loss of the aforementioned wilderness values with each alternative.

Comments on Alternatives in Chapter 3

Each alternative includes the following statement, "Displacement of wheeled motorized vehicles on the Nez Perce-Clearwater could occur if a site-specific decision is completed that prohibits these uses in recommended wilderness. Should these closures occur, use might become concentrated in areas that remain suitable for motorized wheeled transport causing some users to have negative experiences and/or go elsewhere to an off-forest location or to other lands open to motorized use." Again, the potential negative effects are only discussed for motorized recreationists. If you are going to discuss this potential effect, you also need to include the negative effects that allowing motorized and mechanized recreation will have on hikers and equestrians, especially effects to solitude and safety and the potential resulting displacement.

Under the discussion on Fire and Fuels management, the document states that "Fuel treatments such as timber cutting, sale, and removal may occur to the extent permitted in the Idaho Roadless Rule or to preserve and improve wilderness character." Please explain exactly how those types of fuel treatments can preserve and improve wilderness character.

In the discussion on Recreation and Access, again, the only effects that are described are potential gains and losses to motorized and mechanized recreation. There is no discussion of which alternatives provide the greatest opportunities for solitude, quiet, self-reliance, primitive and unconfined recreation. These are real values that many people crave. You must not ignore them. Even in the discussion of Alternative X, there is absolutely no mention of the losses of traditional "wilderness" values or the potential displacement of visitors seeking a more primitive experience.

In the discussion of Wildlife and Fish Management, why is there no discussion of the gain and losses by alternative? Clearly, the alternatives that have the greater amount of recommended wilderness will have the greatest gains for wildlife habitat and connectivity. It would seem that this would be especially true for species deemed sensitive, threatened and/or endangered.

Standards (Standard in italics, suggested changes in regular font)

MA2-STD-RWILD-01. Summer recreation opportunities are consistent with the recreation opportunity spectrum classification of primitive or semi-primitive non[shy] motorized. This standard must include non-mechanized recreation as well as non[shy] motorized.

MA2-STD-RWILD-04[middot]. There must be no road construction in Recommended Wilderness, including temporary roads. Since no timber harvest is allowed, there is no need for road construction.

MA2-STD-RWILD-12. There must be no over-snow vehicle use in Recommended Wilderness.

MA2-STD-RWILD-16. There must be no landing of aircraft allowed in Recommended Wilderness, except for emergencies, including fire or justified administrative activities.

MA2-STD-RWILD-17. There must be no rebuilding of structures in Recommended Wilderness, except trail bridges, puncheon, turnpike, etc.

Comments specific to Hoodoo Roadless Area (Great Burn)

We won't spend our time re-iterating what you already know about the qualities of the Great Burn. Suffice it to say, it is one of the largest and wildest, unprotected roadless areas in National Forests in the lower 48. Certainly, your assessment of the Wilderness qualities, in Appendix E, support that notion.

With this in mind, it's not only disappointing but actually quite amazing to see how the Great Burn is treated in

your alternatives Y and Z. Below is a discussion of each alternative as it relates to the Great Burn.

Alternative W-We support The Great Burn boundaries and the management strategy in this alternative.

Alternative X-We do not support the treatment of the Great Burn in this alternative.

Alternative Y-This is the most egregious alternative of the 4 when it comes to the Great Burn. An absolute basic tenet of recreation and wilderness management, when prohibiting an action, is to make it as easy as possible for the user to comply with the restriction. To do that, there needs to be a very obvious geographic break or feature on the ground that will be easily recognized as a boundary not to be violated. There is no such geographic break or feature between the proposed snowmobile areas and the recommended wilderness that would inform the public that they are nearing a closed area. Therefore, in this alternative, it will be impossible to keep snowmobilers out of the recommended Wilderness and in the case of the snowmobile area south of Hoodoo Pass, the trespass will likely occur on the Lalo National Forest. Currently, there is illegal snowmobiling occurring on the Lolo side of the Stateline. That will only increase if snowmobiling is legal on the Clearwater side. This also paints the Lolo into a corner when they revise their forest plan. It could be considered pre-decisional for the Lalo because there is no way they can successfully keep snowmobilers out of a recommended wilderness on their side of the state-line if the Clearwater allows it on their side. The same problem exists with the proposed snowmobile area on the southern end of the Great Burn. Again, there is no geographic break or feature on the ground informing the public of the closed area, thus making it difficult for them to comply with the closure.

Please review the decision that was made for Mt. Jefferson on the Beaverhead-Deerlodge National Forest for a justification as to why your proposed snowmobile areas are a bad idea. Mt. Jefferson has a long and sad history of the USFS dropping the ball on a formal wilderness recommendation. Between the first forest plan and the revision, a small but vocal group of snowmobilers began riding from Idaho to the flanks of Mt. Jefferson. Because it was considered "established" use, the decision was made to continue to allow that use but the main peak of Mt. Jefferson would remain recommended wilderness and closed to snowmobiling. There was what was referred to as a "rolling break" that would distinguish the recommended wilderness on the ground, much like the geographic feature that would delineate the recommended wilderness in the Great Burn. The snowmobilers promised that they would honor the closure and the forest included direction to monitor the area for illegal trespass and, if it occurred, the decision would be revisited. Monitoring did occur and, as feared, illegal trespass began right away and has only increased over time. The forest has not revisited the decision and Mt. Jefferson will never be considered for wilderness designation.

We cannot let this same thing happen to the Great Burn. There are a small handful of snowmobilers who currently illegally trespass into the Great Burn in the two areas that are proposed to be open in Alternative Y. Please think about the values that you identified in your wilderness evaluation. How will those values be affected if the entire Great Burn is overrun with snowmobiles? The agency has rarely demonstrated an ability to successfully enforce motorized closures in winter recreation areas. You will not successfully keep snowmobiles out of the recommended wilderness.

Alternative Z- This alternative better aligns with geographic features and would be a little easier to administer than the boundaries in Alternative W. The problem with this alternative is that it allows motorized and mechanized recreation within the recommended wilderness. It's very misleading to say this is the alternative preferred by a coalition of conservation groups. Though they proposed these boundaries, they certainly are not supportive of allowing non[shy] conforming uses. We will just refer to your very recent travel plan ROD for an explanation of why non-conforming uses should not be allowed in recommended wilderness.

In conclusion, we support the Great Burn boundary in Alternative Z and the management direction in Alternative W.

We trust that you will correct the omissions and language that make your document biased in favor of motorized recreation. The future of the Great Burn and other critically important roadless areas are in your hands. Again, thank you for the opportunity to comment.

Sincerely,

Kathy McAllister, Deputy Regional Forester, retired

Deb Gale, Bitterroot National Forest Wilderness Manager, retired

Chris Ryan, Regional Wilderness Program Manager, retired