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Comments: I object to the Nez Perce-Clearwater Forest Draft Final Plan's (Plan) designation of only 108,276 acres (out of 151,874 acres) as the Hoodoo Recommended Wilderness Area (RWA). By opening 43,598 acres to snowmobiling and mountain biking, the Plan will cause irreparable harm to the health of a vital landscape. Collaborative efforts have worked to conserve this area as an intact unit for nearly four decades, and legislators from Idaho and Montana have introduced 16 bills in support of its Wilderness designation since 1984. The Hoodoo RWA is the largest RWA managed by the US Forest Service in the Lower 48 and, when coupled with the buffering public land that surrounds it, it has provided a resilient refuge of core habitat.

While the 43,598 acres at risk might seem a mere fraction of what remains, the allowance of mechanized use would have outsized consequences for a variety of vulnerable species. Wolverines depend on wildlands with deep snowpack and minimal human disturbance, and they were proposed for listing on the Endangered Species Act (ESA) just one day after the Plan was unveiled. The Plan would degrade the quality of denning habitat that will be critical for wolverine protection into the next century, and it would allow the very winter recreation encroachments that have (in part) led to their ESA listing. Grizzly bears (an ESA-threatened species) and mountain goats (a Species of Concern on adjacent land in Montana), would similarly suffer from the intensification of use in vital (sub)alpine refugia. Canada lynx and fisher (both Species of Concern on adjacent land in Montana) could also have their present and/or future habitats limited by the Plan's proposed contraction. Countless other species would also be harmed by the wheeled and heavy-motored machines, including fragile alpine plants and lichens. The remote quality of the human experience would be damaged too: Bikes in the summer would advance the spread of invasive species, cause safety concerns for foot travelers, and create erosion/compaction on the trails themselves. And with snowmachines allowed in the winter, the season's quiet would be destroyed, far beyond the boundaries proposed.

I first visited the Hoodoo RWA as a college freshman, on a volunteer trip with the Great Burn Study Group (now Great Burn Conservation Alliance; GBCA). We monitored wilderness character and invasive species, just as those before me had, since the GBCA started in 1971. Many who followed me have done the same. That work helped me feel part of something larger and more lasting than I had ever known. I want that gift to keep giving, for generation on generation to come. Spanning two states and two national forests, the roughly 252,000 acres of this area has been recognized for its high Wilderness value for decades. To keep that hope alive, the area needs to stay whole. Cut by cut, each act of diminishment will advance its death, and that is a debt our future can't afford.

I urge you to maintain full protection for all 151,874 acres of the Hoodoo RWA. Thank you.