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Organization:

Title:

Comments: I support the Great Burn (GB) remaining fully intact and moving it forward to a full wilderness status. If political-social pressure continues to obstruct this, then it must remain as a PWA, or in today's terms RWA, with the mandate to protect its wilderness qualities. Your plan to eviscerate the GB's expanse in order to accommodate mechanized travel is a monumental misstep. I will never support a reduction in the GB's acreage. I embrace this position for the following reasons.

The GB has a 53 year history of major support from a diverse group of people; the general public, politicians, businesses, non-governmental wildlife experts and forest ecologists, and a variety of past and current Forest Service personnel. But, I should not have to revisit what you should already know. The GB is an area fully deserving of wilderness status and entrusted to our forest service to diligently preserve its wild qualities. Political pressures is the only factor resisting this classification. Your proposal is a slap in the face to everyone who has worked in collaboration for over half a century to support the wilderness integrity of this amazing piece of wild lands.

The GB essentially runs north-south along the state line with open ridges overlooking a convoluted array of interlocking valleys providing excellent travel zones and the security of cover for the movement of wildlife, both transient and residents. This makes it a keystone wildlife corridor facilitating physical linkage between the GNP-Bob Marshall and Yellowstone ecosystems.

The importance of this wildlife corridor will become increasingly more pronounced because of climate change effects coupled with far-ranging habitat destruction. The globe is witnessing a staggering increase in species extinction. Currently, the extinction rate is about 1000 times the rates we normally observe in the fossil record. If this continues, it will reach a rate of 25% by 2050. This is about 1/3 of the way to the 70% rate signifying an episode of mass extinction. In order to counter this, the world must adopt the 30-30 plan. This plan preserves 30% of terrestrial and 30% of aquatic ecosystems by 2030 and increasing this to 50-50 by 2050. Allowing snowmobile traffic into large sections of land in the northern and southern ends of the GB, will not only jeopardize the integrity of this critical passage for transient animals, but the extreme noise level of snowmobiles and the speed at which they travel, will endanger the security, an essential quality of good habitat, for all resident wildlife, large or small.

Wilderness areas are wild, free of human impacts, and primitive. They are a place of profound solitude. They are shaped and governed intrinsically, only by the biophysical interactions and natural forces of their environment. We recognize their existence and set them aside to benefit their flora and fauna and to preserve their physical attributes and resources for the future. Humans with their needs, desires, and the physical impacts they bring are extrinsic factors. Such factors are foreign to and nonessential for the survival of this special place. However, without proper management and regulations, the impact of humans, even if it seems incidental or minor, can have profound effects. These effects are frequently detrimental to the wilderness integrity of the area. Reducing the acreage of the area is a crap shoot. You really cannot predictate the resulting effects. They maybe

singular or compounding. As intruders, humans are obligated to enter an area designated as wilderness, or as an RWA, on its terms. They must travel solely by primitive means showing deference to the silence, solitude, and lack of human impact it offers.

Snowmobile and mountain bike travel in the backcountry is a contentious issue and difficult to monitor. Because of the split and uncoordinated management and out-dated and contradictory travel plans, it is really difficult to ascertain the legality of their usage in the GB from 1988 to 2012 . After 2012 the usage has been illegal, at least on the Nez-Perce Clearwater side of the unit. If you are seeking solitude and silence, I do not believe that riding a snowmobile along open ridges trying to high line a slope, or traveling through meadows generating high levels of noise, which reverberates far beyond its physical location, while emitting about 20 pounds of carbon dioxide per gallon of gas is an acceptable means of primitive travel. This method of travel is totally antithetical to the concept of wilderness.

Less noisy and intrusive, mountain bikes are still a mechanized form of travel allowing for faster and deeper penetration into an area. Giving mountain bikes the green light to enter the GB will be quickly followed by the owners of electric bikes and the new low profile electric scooters demanding equal entry. When will this invasion stop? How will you regulate jet packs facilitating low level human flight in the near future?

Legal use of mechanized machines in the GB clearly violates the intent that humans travel only by primitive means in such an area. Additionally, there is no scientific-ecological merits supporting the idea of allowing legal travel by snowmobiles and mountain bikes in the GB. However, there are definitely more than a few scientific-ecological reasons to keep this travel illegal. Because of the lack of science support, this issue has been totally relegated to the vagaries of the political-social arena.

It seems evident that your conclusion to legalize access to these machines is grounded in a decision to respect and reward the historical ILLEGAL use of snowmobiles and mountain bikes. So, to avoid the wrath and difficulty you would face by LOGICALLY making a machine that does not belong in the area ILLEGAL, you ILLOGICALLY decide to simply cut the involved areas out of the GB . This desecrates the GB and will endanger the chances of it ever being classified as wilderness. Nevertheless, presto, the problem is resolved. Since these lands are no longer part of the GB, the snowmobilers and mountain bikers can legally access them.

After 53 years of dedicated support from thousands of people devoted to overcoming the political hurdles resisting its wilderness designation, the Great Burn gets its wings clipped in order to accommodate a small number of people demanding access on machines. Once again, human desires and needs take precedent.

I have been actively mountain biking and back country skiing for 55 years and I have occasionally hooked a tow from a snowmobiler or used their tracks to help me get to a place to ascend. I am not trying to lock these riders out of the Great Burn, only their machines. Nor, do I consider the GB my private area. I have no problem with them riding trails, roads, or none-roaded terrain, if legally open to mechanized travel, up to the GB's

boundaries and accessing this protected area on snowshoes, skis, or foot.

Thank you for giving me the opportunity to register my concerns.

Randy York (ex-forest service employee, retired physical and  
biological science and environmental studies teacher)

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