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Comments: The whole Hoodoo Roadless area, proposed Great Burn Wilderness, should be fully protected and managed for future wilderness. Under this plan the proposed wilderness is far too small to protect the species within it. Our snowpack is no longer guaranteed to be deep enough to protect species like recently-listed wolverines if snowmobiles are allowed in the northern part of the Great Burn. Research shows off-road motorized recreation affects female wolverines, and that female wolverines are denning in the Hoodoo roadless area on the Clearwater side. Snowmobiles will likely disturb them. Since wolverines were listed just after this plan was released, this area should be reconsidered and revised. Also the Lolo NF and Clearwater Nez Perce NF are being inconsistent in their management to protect goats. Recommending managing the northern part of the Hoodoo roadless area for wilderness would rectify this. I have commented on recommending this area for wilderness management in the original scoping and many times in the past.

I have backpacked in that area (most recently just this last summer, when the Fish Lake trail closure finally made Fish Lake a peaceful place that was finally starting to heal) and this is a delicate and fragile area. Wildlife like grizzly bears need large protected spaces and to connect Northern Continental Divide and Greater Yellowstone populations of the bear, connections essential to diversifying the gene pool of this threatened species. Goat Lake should be included in the wilderness proposal to protect the mountain goats in that area. Also, the Stateline trail should not be opened to ebikes, and seems far too erodible even for mountain bikes. Parts of that trail have been worked on by conservation groups recently, but trail maintenance has been very limited in recent years. The trail is very steep and eroded in places already. Bikes will increase erosion and ebikes will certainly bring crowds that the fragile subalpine areas that the trail goes through cannot sustain.

Only 17% of the roadless areas are proposed for wilderness protection. Areas like Weitas Creek and Hungry Creek are home to wolves (we saw track and scat there) and other wildlife. Rapid River and Elk Mountain need to be added to wilderness areas next to them. I support the addition of Meadow Creek, but more of Meadow Creek should be protected. These are all areas dear to my heart and important to wildlife and sustainability of our planet.

The plan does not include standards by which forest and wildlife sustainability can be measured. This is completely unscientific and contrary to nearly every other business or institution, in which metrics are needed to assess productivity, success or viability. The valuable fisheries in watersheds need to be protected with measurable streamside buffer, no-harvest zones. Minimum old-growth was 10% in the old plan and should be at least that, but certainly an assessable number, in this one. Not having measurable standards implies that the Forest Service is not going to try to meet goals, and seems designed to prevent any challenges to the results of forest and wildlife management.

The proposed forest plan is in direct contradiction to several Biden Administration directives that are essential to stemming the climate change emergency and the extinction crisis. For example, the 30x30 directive (conserve at least 30 percent of U.S. lands and freshwater and 30 percent of U.S. ocean areas by 2030) would require protecting 100% of the remaining roadless lands from logging and other human incursions. Yet, the Nez Perce-Clearwater plan proposes conserving only 17% of these lands in the Forest. Additionally, the proposed plan elimination of forest-wide, old-growth standards will allow the wholesale harvest of the most abundant old growth stands and is incompatible with the recently proposed Biden Administration policy to conserve and restore old-growth forests across the National Forest system.

The forest should be managed with the knowledge that the nation has very little land as wild and natural as this forest. Its value is in the rich mature forests, wildlife, clean streams, sustainable recreation, and fisheries rather than board feet.