



Cheryl Probert, Forest Supervisor  
Nez Perce-Clearwater National Forests  
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RE: Draft Environmental Impact Statement on the Revised Nez Perce-Clearwater National Forests Forest Plan

Dear Supervisor Probert:

Thank you for the opportunity to provide comment on the Draft Environmental Impact Statement (DEIS) on the revised forest plan (Forest Plan) for the Nez Perce-Clearwater National Forests (Forests). Northern Idaho Whitetails Forever (NIWF) is committed to the preservation and perpetuation of a quality white-tailed deer herd in the Clearwater region and the rest of North Idaho. NIWF works closely with the Idaho Department of Fish and Game and other groups to institute flexible hunting seasons and regulations in response to habitat loss, predatory factors, and hunter over-harvest with the goal of maintaining superior herd genetics and populations for today and tomorrow's hunters. As the Forest Plan will dictate management of over 4 million acres of white-tailed deer habitat in the Clearwater Region for the next 20-30 years, we offer the following comments.

We agree the Forests should use a variety of tools to increase the pace and scale of vegetation management to return habitats to the Natural Range of Variation (NRV). Suppressed fire and timber harvest has led to a "mid-seral bulge" on the Forests that fails to provide quality forage or effective security habitat for white-tailed deer (IDFG White-Tailed Deer Management Plan 2020-2025). Wildfire, prescribed fire, and timber harvest can all be used to achieve NRV and increase amounts of early seral habitats for ungulate forage. However, unsustainable levels of these activities have the potential to impact water quality, reduce deer security habitat, and create boom-and-bust population cycles that are unfavorable for white-tailed deer hunters. Therefore, we do not support the unsustainable levels of harvest proposed in Alternatives W and X. Instead, Alternative Y proposes a substantial increase in harvest levels that would improve forage for white-tailed deer and contribute to local communities while still protecting watershed health.

NIWF was originally formed in 2018 in response to declining quality of white-tailed deer herds in the Dworshak Zone, which is Game Management Unit 10A. This area contains large swaths of agriculture and private timber land that are not managed for wildlife habitat, and IDFG has identified impacts to white-tailed deer, elk, and moose in this area. During a field trip with IDFG managers in 2018, NIWF documented a clearcut with no adjacent security cover on private timber land that extended for 9 miles. Under draft standard FW-STD-TBR-05, Forest Service managers would not have to take unsustainable practices like this into account when designing projects on adjoining Forest lands. While the Forests have no authority over activities outside their boundaries, managers should absolutely consider the impacts of management activities on neighboring lands when planning projects. In areas like the Dworshak Zone, managers should be strategic and include project design features that mitigate for neighboring impacts and will comply with the Forest Plan's desired conditions and goals for wildlife, including FW-DC-TE-06, FW-DC-WL-03, FW-GL-WLMU-01, FW-GDL-WL-01, and FW-DC-WLMU-03.

The Plan proposes a framework of “management areas” with different management goals and allowed activities. MA1 consists of areas with national designations, including Designated Wilderness Areas, Wild and Scenic Rivers, and National Historical Landmarks. MA2 includes “backcountry” areas, such as Idaho Roadless Areas, Recommended Wilderness Areas, and suitable Wild and Scenic Rivers. MA3 is considered “front country,” or what is locally referred to as the roaded front, where the majority of public access is located. The Plan emphasizes timber harvest as the tool of choice for managing vegetation in MA3, with active suppression of natural disturbance to protect the marketable timber base (FW-DC-TBR-06, MA3-DC-FOR-12). This approach has the potential to partition suitable habitat between management areas, as opposed to creating a well-connected landscape of habitat patches, as desired in FW-DC-TE-06. We encourage the Forests to actively manage habitat in MA2, including timber harvest as allowable under the Idaho Roadless Rule. This would create more congruous habitat for white-tailed deer across the Forests and could release some pressure in MA3, protecting watershed health, security habitat, and water quality. We understand this is less possible in MA1, where national designations restrict certain management activities.

The plan components in the Multiple Use Wildlife section mostly pertain to elk but will also benefit white-tailed deer herds. We believe these components do a good job of balancing the competing needs of creating more forage, providing cover and security, and limiting conflicts with motorized recreation. Both the short-term and long-term negative impacts of motorized recreation on wildlife are well documented, especially for big game species (Taylor and Knight 2003, Côté et al. 2013, St. Louis et al. 2013, Wisdom et al. 2018). These impacts are magnified during winter, when animals rely heavily on stored energy reserves to survive harsh winter conditions (Arlettaz et al. 2015, Larson et al. 2016). Though we understand and value the multiple use mandate of Forest Planning, multiple uses can often be incompatible on the same landscape and may require spatial differentiation (Wisdom et al. 2018). In addition to the existing plan components, we encourage the Forests to work with IDFG to identify critical areas of winter big game range and find them unsuitable for motorized recreation.

Some of our members enjoy the primitive backcountry experience of pursuing big game in wilderness areas. The lack of human intrusion in wilderness areas protects pristine headwaters habitat and provides connectivity for big game species, including white-tailed deer. The Forests

currently have two Recommended Wilderness Areas that were specified in the 1987 Forest Plan. The Mallard-Larkins and Hoodoo both contain mountain goat herds, an iconic species that is culturally and economically significant in Idaho. Idaho hunters may only harvest one mountain goat in a lifetime, and tags are extremely competitive. The Hoodoo mountain goat herd has seen substantial declines since the 1950s due to overharvest, habitat loss, and ongoing illegal motorized activity (IDFG Mountain Goat Management Plan 2019-2024). To preserve these mountain goat herds and hunting opportunity, we support continued status as Recommended Wilderness Areas for the Mallard-Larkins and Hoodoo. We do not support the boundary change under Alternative Y that would allow snowmobiles in the Hoodoo herd's critical winter range as this could exacerbate its decline.

Sportsmen contribute \$1.4 billion to Idaho's economy and support over 14,000 jobs across the state (Director's Report to the Commission, 2018). The thousands of white-tailed deer hunters who come to the Clearwater Region every year not only support outfitters and outdoor stores but benefit local economies by spending at hotels, restaurants, bars, and gas stations. The current economic sustainability analysis in the DEIS is incomplete and inaccurate because it fails to analyze the effects of each alternative on sporting opportunity and the resulting economic impact. In fact, the DEIS fails to analyze impacts to any industry other than the timber industry, resulting in a misleading picture for decision makers. In Tables 3 and 4 of Section 3.8.1, employment and labor income remain stagnant for Fish and Wildlife Recreation across all alternatives, including the no action alternative. This is despite the Plan's strong emphasis on improving conditions for valuable wildlife species, which would lead to more economic activity in the region.

Thank you again for the opportunity to comment on the draft Forest Plan. If you have any questions or responses, please direct them to Bill Samuels, NIWF secretary.

### Literature Cited

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