April 17, 2020

Mr. Zach Peterson

Nez-Perce Clearwater National Forest

RE: Nez Perce-Clearwater Forest Plan

Dear Mr. Peterson:

Thank you for the opportunity to comment on the updates to the Nez Perce-Clearwater Forest Plan. I value the work of the Forest Service in managing these public lands, waters and wildlife in an area that means very much to me personally.

I must add, however, that I was quite disappointed to see the Forest Service promoting “job creation” as one of the big goals of the new Forest Plan. It is my understanding that multiple use and sustained yield are supposed to be the goals of management of the forest. I am concerned that the promotion of job creation in the new Forest Plan shows a prioritization that is outside of the Forest Service’s directive. And, one that might sacrifice the other goals of multiple use and sustained yield for short term gain. This becomes especially concerning after noting the increased board-feet of timber harvest in many of the Draft Plan Alternatives.

Concerns surrounding the increased timber harvest relate also to new road construction that will impact previously roadless areas and the wildlife within and add sediment to the Clearwater drainage. Additionally, impacts on the wilderness character of the region are of utmost concern. It should also be noted that in some of the plan alternatives the timber harvest even exceeds what the Forest Service itself identifies as sustainable!

More specifically, there are some specific areas of concern that arise in the draft alternatives that should be addressed by the Forest Service before adopting the new Forest Plan:

**Wilderness**

-the Great Burn Recommended Wilderness should not be shrunk in size or have its boundaries altered from what was already recommended in the 1987 plan.

-in the Great Burn Recommended Wilderness and surrounding regions, the potential impacts of increased motorized and over-snow vehicles is extremely concerning in regard to their impacts on struggling elk populations, mountain goats, wolverines, and potentially ESA-listed grizzly bears, along with the destruction of the wilderness character of the land. Additionally, the precedent set by expanding their use is extremely concerning as it would be rewarding the currently illegal use of the area.

- Bighorn-Weitas Roadless Area contains critical elk winter range, wolverine habitat and spawning habitat for ESA-listed salmon, steelhead and bull trout. It should be recommended for wilderness designation.

**Salmon and Steelhead**

-Salmon and steelhead populations are near all-time lows. With unknown, but expectedly increasing impacts from climate change, the spawning and rearing habitat in the Nez Perce-Clearwater (the best in Idaho) will continue to be critical to the survival of the species. In particular, as the most important spawning tributary in the Forest, the Fish and Hungery Creek drainages should be protected from timber harvest and new road construction and considered for Wild & Scenic designation.

-In the Draft Alternatives, there is a lack of quantifiable objectives for stream buffers and sediment impacts. The buffer should be maintained at 300 feet and not reduced. Quantifiable objectives for sediment load should be maintained.

As a former fishing guide on the Clearwater River (2012-2019) who left his career because the fish populations could not sustain it, the importance of this National Forest, and healthy populations of the fish species it harbors to the local economies should not be understated. Short-term job creation from timber harvest should not sacrifice this fishery and the jobs associated with it. The drastic increase in timber harvest in the Draft Plan Alternatives will do just that.

**Wild & Scenic**

Kelly Creek and the North Fork Clearwater are, by their very nature, wild and scenic. They should be protected as such with a Wild & Scenic Designation.

**Old Growth**

Quantifiable standards for old growth from the 1987 plan should continue to be met: 5% per drainage and 10% forest wide.

**Big Game**

Elk in much of the Forest are below objective. Protection of migration corridors and winter range through roadless areas and non-motorized protections should be prioritized.

Over the last decade, I have lived near and visited National Forests around the country. The Nez Perce-Clearwater, above all others, stood out due to its wild country, wild rivers and wildlife, and its history. It is a special place unlike any other, and for that reason, I made it my home. I hope that the Forest Service will hold itself accountable as the steward of this resource and exercise caution in adopting a new Forest Plan that combines the best updates of the Draft Alternatives with the already successful priorities in the 1987 plan to prioritize this special place for multiple use and sustained yield over short-term gain.

Thank you, again, for the opportunity to comment and for being the most-important stewards of this one-of-a-kind landscape.

Sincerely,

Zack Williams

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