I want to thank the Nez Perce-Clearwater National Forest for the opportunity to comment on their draft plan. If nothing else, this Covid-19 pandemic should make us more aware of our natural world and our place in it. But I fear it won’t. Our interference in our natural world has never produced a good outcome. For when we do, we change the character of the landscape, the climate of our planet, the amount of biodiversity on this planet, and the availability of disease in our air, water and wildlife. This is a nasty byproduct when these lands could actually provide us a sense of peace, a more stable climate, a greater biodiversity and a healthier environment. All of this is critical to our physical and mental health, as well as the health of our planet.

By that opening statement, it will be no surprise that I support the intent of Alternative Z of the Draft Environmental Impact Statement (DEIS) of the Revised Forest Plan. It says that Alternative Z was crafted to respond to request of the people as;

*“an alternative in which natural processes dominate over anthropogenic influence.”*

But I also want to give credence to the Friends of the Clearwater science-based plan. It is a shame their plan did not receive serious consideration to be an actual alternative in this report when nearly 10,000 comments supported that proposal during the scoping process. In today’s world, we must recognize the health of our planet and our role in it. We must recognize what small percentage of natural lands are left and how critical it is to allow them to breathe in order to allow natural processes to remain in control. The Nez Perce-Clearwater National Forest’s (NPCNF) is blessed to be 4 million acres strong with the largest wilderness complex outside of Alaska. This should be seen as a gift, not a source of income for exploitation. Not one to be taken advantage of. Even this approach, the “natural processes” approach is one which employs people. We must develop a plan that protects the roadless areas, maintains wildlife corridors and mitigates climate change.

**Change in Philosophy:**

But I’m afraid before that can happen, the U.S. Forest Service (USFS) must recognize a new policy, a new value that our forests have in our society. It is no longer correct to implement plans of the 19th and 20th century in the year 2020. It is a new time that requires new approaches. The application of current science would be nice. The recognition that our forests can fight climate change through sequestering carbon must take a more critical role in our thinking and planning. I have at my fingertips, volumes of science-based articles that highlight the importance of old-growth forests. But the USFS should have these at their ready. These forests are critical for our wildlife as they provide habitat that are species specific for some. They increase and/or maintain biodiversity. But they are also great sequesters of carbon. For these reasons, this places a previous unknown importance on our forests, a new aspect to the Multiple Use Act. This actually adds to the protection of our watersheds, protection of our forests, and protection of our wildlife, all within the scope and purpose of the USFS.

To think that man has a better understanding of nature than nature is arrogant and dangerous. This idea that a natural forest needs vegetative treatments to make it resilient is simply saying, it is a way to make the forest in man’s image. I strongly disagree with this philosophy.

**Wilderness:**

I’ve learned in my independent study of forest management over the years that the designation of wilderness fulfills several obvious goals of the Multiple Use Act. Wilderness protection protects wilderness, watersheds, wildlife, air and water quality and provides some forms of recreation and even grazing if done correctly. It is even cheaper to manage requiring fewer budget dollars. Yet it is one of the most difficult designations to incur. That designation basically sets up the premise that natural processes will dominate. I see no reason not to urge the maximum amount of wilderness possible. But the problem with Alternative Z is that it only recommends 475,000 acres of additional wilderness. This seems woefully inadequate compared to the 1.1 million acres of available roadless areas.

Therefore, there must be additions made to the list as suggested by Alternative Z. The following important additions need to be made: Bighorn Weitas, Rackcliff-Gedney, North Lochsa Slope and the Lochsa Face roadless areas. I definitely support the inclusion of The Hoodoo/Great Burn roadless area as wilderness. This area includes great winter habitat for wolverine and Canada lynx. All of these areas are critical in meeting the goal of wildlife corridor protection for grizzly bears and for the recolonization of the Bitterroot recovery area. There must be an attempt to rewild our Nation’s lands when possible and when doable. This is all part of that effort. The Forest must also develop and include much more proactive, specific guidelines and standards to encourage grizzly bear occupancy in the revised forest plan.

As part of wilderness management, I must strongly protest the USFS action to consider allowing motorized, mechanized and recreational aircraft to land in areas recommended for wilderness. This contradicts the Wilderness Act of 1964 and I urge you to abandon any such proposal. The DEIS doesn’t even detail the impacts of such a proposal. All this would do is to harm to the current status of designated lands so they would not or could not be considered as wilderness in the future.

In light of the science and policies in a world of declining biodiversity and a warming climate, we must think of the greater good. Our public lands can be a problem solver in addressing so many of the ills on our planet, but not if we don’t allow them to work for us in the positive. It is time to stop being selfish, extractive and exploitive of God’s creation. It is time to look out for a greater good. A growing consensus of scientists say that protecting 30% of our remaining lands and waters is critical in fighting the climate and extinction crises. I urge you to protect the Nez Perce-Clearwater National Forest’s irreplaceable wildlands, rivers and wildlife to the highest degree.

By the way, I urge you to consider science as a source of free-ranging alternatives. That is the new direction the Forest Service must seek.

Thank you for consideration of my comments.

Sincerely,

Clint Nagel