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Zach Peterson
Forest Planner
Nez Perce-Clearwater National Forests Supervisor's Office
903 3rd Street
Kamiah, Idaho 83536

Subject: Revised Forest Plan and DEIS Comments

Dear Mr. Peterson:

My comments come from the perspective of my faculty appointment in land-based economic development and land stewardship that I deliver through various engagement and education initiatives in north-central Idaho. I have been a member of the Clearwater Basin Collaborative since 2013, and my comments are informed by this engagement. I also serve on the North Central Idaho Resource Advisory Committee (RAC). I have had recurrent professional and personal familiarity with the Nez Perce-Clearwater (NPCLR) since 1978.

I believe the most important element of the revised Forest Plan is the projected annual average timber harvest that is outlined in the alternatives. Active management in the "front country" (MA3) is a priority because it is that part of the NPCLR that you can exert the most management influence on to achieve DFCs and a more resilient forest landscape that can achieve multiple ecological and economic objectives.

Given that importance, I support an alternative that will lead to the most rapid progress feasible to attainment of vegetation DFCs, including exceedance of the SYL in some years, provided that the harvest trajectory is not such that would destabilize the forest products industry and the communities that are dependent on it.

This intent is most closely captured by the timber quantity approach outlined in Alternative X; however, when this Alternative was presented by NPCL staff at a CBC Forest Plan meeting in Grangeville earlier this year, there seemed to be great uncertainty about what the SYL actually was, and it was stated that Alternative X was intended to have exceedance of SYL for 20 straight years, after which it would fall by half. If true, this would contradict the pledge in the Forest Plan revision documents that all the Alternatives were socially, economically, and ecologically sustainable. Obviously, the cut trajectory that was presented to the CBC would not be economically or socially sustainable as a drop from the indicated level (261mmbf) to suddenly half that after 20 years, would devastate the economy and local communities.

Therefore, I would urge the forest plan team to model an accelerated harvest to achieve DFCs in MA 3 as soon a practicable with the constraint that harvest trajectories that included years of exceedance of the SYL (whatever that is calculated to be) be done so that there is not a rapid drop off in harvest such that it would cause economic disruption to the industry and local communities. I would think forest economists could model this.

My recommendation for this level of harvest assumes that it can be met while abiding by all standards and guidelines and other processes and monitoring that prevent long-term deterioration of water quality, destabilizing stream flows, habitat for sensitive and T&E species, and other side-boards for good, science-based and ecologically informed, landscape management.

Such an approach would most rapidly alter vegetation conditions in MA 3 to address fuels and severe wildfire, insect and disease mortality, quality elk forage, greater vegetation heterogeneity and resultant biodiversity benefits, create greater recreation opportunity, and create a more resilient forest landscape to climate change and associated disturbance. These are pressing needs facing forested landscapes across Idaho and the western US, and such an approach would position the NP-CLR as a leader in addressing them, as well as a learning opportunity for all if adequate monitoring is in place.

Given the state of the forest conditions and the disturbance-driven nature of the forest ecosystems on the forest, you have a win-win situation where rapidly moving toward restoration goals in MA3 will also create great economic opportunity for local rural communities through increased jobs from new investment needed to harvest and process timber harvests that could be more than double what they are currently. New investment is the major engine of economic prosperity and jobs, and an accelerated restoration schedule would encourage this.

I would also suggest (although I did not find where this was covered in the DEIS) that alternative silvicultural approaches and research findings be consulted for creating stand through landscape scale heterogeneity of vegetation structure where feasible, and soliciting input from forest ecologists, wildlife biologists, and conservation biologists in the layout and treatment prescriptions for harvests, not just silviculturists.

Using alternative silvicultural approaches is especially important with the move to larger size regeneration units of 375 ac (which I support). The public will not abide 375 acre clearcuts if done conventionally. A conventional approach to forestry on the federal lands applied at this scale would run a very high risk of being shut down by a new wave of litigation and charges of violating the public trust that resulted in the National Forests being shut down in the early 1990s. If the Forest Service violates the public trust again by relying on their foresters over what the public, and other scientists, wants, it could take much longer than 30 years for the Forest Service to recover.

Please learn from the mistakes of the Forest Service over the clearcutting controversies in the 1960s and 70s, and the spotted owl period of the 90s. Silvicultural systems must be supported by the public and other scientists, not just foresters.

There is a growing scientific literature of silvicultural critique promoting ecologically oriented (and unorthodox) alternatives to forest vegetation management including works by Puettmann, Franklin, Hessburg, and Churchill that I urge your project planners and ID teams to consult, in addition to

concepts like the “Target Stand” approach promulgated by some of your own staff on the NPCLR. I will provide a few sample citations of this literature below.

I also support in principle, but would depend on a case-by-case analysis of each project, of some limited harvest in MA2 as well as the use of prescribed fire (37,500 acres), as tools to approach DFCs in this part of the forest.

I will not take any formal stand on additional Wilderness or Wild and Scenic River proposals. I will say that given the rapid changes on our landscape that will likely be accelerated by climate change, as well as advances in our understanding of ecological systems since the Wilderness Act was passed in 1964, it concerns me that Wilderness designation would “tie the hands” of managers, and may create national sacrifice areas rather than ecological preserves. However, I do support alternative management for wildlands from what we have in the “roaded front,” but am concerned about areas where all management is statutorily precluded that may need some limited level of management in the future to protect threatened ecological values.

I believe a major roadblock to the CBC being able to craft a position regarding Wilderness and Wild and Scenic in the Forest Plan revision, was the same reason that stymied our work on a legislative proposal, and that is the need of county, forest products, and economic/community development interests for assurance of a long-term, predictable supply of forest products that would provide the security for new investment. With no assurance that the NP-CLR can deliver this type of long-term supply security, and the inability to craft an adequate legislative solution to the problem, makes agreeing to permanent protections under the Wilderness and Wild and Scenic Acts problematic for some for multiple reasons.

The NPCLR is uniquely situated to provide outstanding backcountry and front-country recreation, high water quality and cold-water fish habitat, abundant wildlife and biodiversity, scenic beauty, and a greatly expanded timber program from an accelerated ecological restoration effort that will benefit local communities through increase investment and resultant economic prosperity. This is a forest where you really can have it all.

Adopting a Forest Plan that captures this unique opportunity for the next 30 years would make the NPCLR a national leader on what can be accomplished by an inspired forest management effort that truly ties economic, ecologic, and social prosperity. I urge you to adopt such a plan.

Finally, I want to personally thank the NPCLR staff and leadership for all the hard work on this plan revision, the staff excellence and diligence, your obvious concern and intention to do the right thing for the land and the local communities that depend on it, and all the time and effort you have devoted to the CBC. Much appreciated!

Sincerely,

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Land Based Economic Development and Land Stewardship

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Sample references on alternative silviculture approaches:

Churchill, Derek J. et al. 2013. Restoring forest resilience: From reference spatial patterns to silvicultural prescriptions and monitoring. Forest Ecology and Management 291: 442-457

Franklin, Jerry F., K. Norman Johnson, and Debora L. Johnson. 2018. Ecological Forest Management. Waveland Press.

Grahm, Russell T. and Theresa B. Jain. 2005. Application of free selection in mixed forests of the inland northwestern United States. Forest Ecology and Management. 209: 131-145.

Hessburg, Paul F. et al. 2015. Restoring fire-prone Inland Pacific landscapes: seven core principles. Landscape Ecology 30: 1805-1835.

Larson, Andrew J. and Derek Churchill. 2012. Tree spatial patterns in fire-frequent forests of western North America, including mechanisms of pattern formation and implications for designing fuel reduction and restoration treatments. Forest Ecology and Management. 267: 74-92.

Puettmann, Klaus J., K. David Coates, and Christian Messier. 2009. A Critique of Silviculture: Managing for Complexity. Island Press