.

Nez Perce Clearwater Forest

903 3rd Street

Kamiah, ID 83536

Re: Comments on DEIS Nez Perce Clearwater Forest Plan Revision

Submitted to https://cara.ecosystem-management.org/Public/CommentInput?project=44089

And e-mailed to sm.fs.fpr_npclw@usda.gov

Attn: Zach Peterson, Forest Planner

Thank you for the opportunity to comment on the future of the Nez Perce and Clearwater Forests. Together they encompass 4 million acres, much of it is Wilderness quality and provides essential wildlife corridors. It includes Wild and Scenic Rivers and other waterways that should be considered for this delegation. It is a key route for grizzly bears as they wander from the Cabinet Yak area to the Selway Bitterroot. For the human population, the bear, wolverine, fisher, lynx, salmon and many other species, this is a key area that needs to be treated as a precious place and highly regarded for its intrinsic value.

I am a resident of Hamilton on the edge of the Bitterroot mountains. I have spent many days wandering in both the Nez Perce and Clearwater Forests. I have great admiration for their beautiful wild places, wildlife, and rivers. I hope that you will follow Aldo Leopold's advice as you assess the plan components. "Examine each question in terms of what is ethically and esthetically right as well as what is economically expedient. A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

This is a trying time not only because of the current Covid 19 pandemic, but also due to looming climate change. The Covid 19 pandemic has been on the front burner of concern for so many people, it seems inhumane of the Forest to deny an extension for comment when folks are trying to stay healthy and keep food on the table. Covid 19 is an intense concern, but we will probably find our way through it. Climate change is a long-term concern that we might rectify if we do not take great strides to change our behaviors immediately.

Issue: Best Available Science

I am concerned about the emphasis on geospatial modelling over on the ground survey work. On the ground survey work is so much more reliable. And without current data, the modelling becomes garbage in/garbage out. Please consider a quote by Bob Lee at University of Washington. He said that science "gives us rules that protect us from the all-too-human tendency to fool ourselves, either individually or collectively."

Please do not allow this forest plan to be riddled with the current administration's disregard for solid science. As Oliver Milman reported in The Guardian (Oct 3, 2019), a group of ex-government officials describe weekly violations of norms meant to safeguard objective research. According to Christine Todd Whitman, former administrator of the Environmental Protection Agency (EPA), "Politics is driving decisions and has been for some time."

Do not let politics muddy your decisions. This plan must be based in the best available science. Modelling can be a part of the analysis, but it is worthless without on the ground field surveys and studies. One can get caught up in computer analysis, but often geospatial modelling always contains a degree of error. The Bitterroot/Lolo National Forest VMap data (Ahl and Brown 2017) found that accuracy for size class was only 62% when they compared it to ground survey data points. This is especially concerning since every alternative in the new plan increases timber production. Decisions made on timber suitability are couched in age class data and please remember that you are expected by the 2012 planning rule to only allow for a sustainable timber harvest. How can you assume your timber targets on all alternatives which are more than current targets are sustainable with out of date data that has been put into a computer model?

Remedy: Only use the best available science which includes on the ground surveys to make decisions and create quantifiable standards concerning the future of the forest.

Issue: Public Input

I attended the public open house in Hamilton last February. I was disappointed by the format. Instead of allowing the public to speak and ask questions of the forest personnel in a public forum. The open house separates the public and does not allow them to benefit from the experience and knowledge of other members of the public. The open house was carefully orchestrated to ensure that only the Forest Service voice was heard. This leaves the public feeling disenfranchised and disempowered. At one point the supervisor spoke and said how important it was for them to get public input, that it was our forest, but when I raised my hand to ask a question, I was told we did not have time and that there would be plenty of time for them to answer questions personally. So, you want to hear from the public but not in front of anyone else? To find the truth, we must hear from all sides to make sound, thoughtful judgements. The open house does not allow for the dissemination of ideas other than those of the Forest Service. This format does not allow for solid and constructive discourse to inform decisions and public opinion.

On the website, the supervisor claims they spent 20 months working with and hearing public comment. Then why didn't the Forest Service analyze the Friends of the Clearwater's Citizen Conservation Biology Alternative. Certainly, this would be a way for the public to be heard. This alternative had support from over 10,000 comments during scoping. It seems the public spoke loud and clear and this needs to be analyzed and

considered. Not analyzing a well thought and well researched alternative with the support of 10,000 folks is essentially ignoring the public in this process. This alternative included quantifiable, measurable standards that would protect forest ecosystems for years to come. What is the point of seeking public comment if you do not take it seriously? Public comment needs to be more than just a hoop to jump through and check off on the list. The law demands that this alternative be analyzed. The National Environmental Policy Act NEPA requires the Forest Service to, "include reasonable alternatives not within the jurisdiction of the lead agency." 40 CFR section 1502.14(c).

Remedy:

1. Thoroughly analyze Friends of the Clearwater's Citizen Conservation Biology Alternative and give it the attention that it merits in this process.
2. Do an independent scientific review as recommended by The Committee of Scientists report 1999. The committee recommends "an independent scientific review of proposed conservation strategies before plans are published." (https://www.fs.fed.us/emc/nfma/includes/cosreport/Committee%20of%20Scientists%20Report.htm)

Issue: Forest Plan does not consider Climate Change a high priority or a driving factor now and in the future.

The Friends of the Clearwater's Citizen Conservation Biology Alternative emphasizes reducing carbon emissions and promotes climate stability. The Draft EIS of the forest plan does not seem to recognize the anthropogenic influence on global warming. The proposed plan says that we are in a "natural warming period." Thus the plan does not look into ways the forest and its personnel can reduce emissions. The Forest Service is tasked with protecting forests, they have a responsibility to look at practices on the forest and consider how forest operations can be altered to reduce emissions. A recent study showed that globally, "around two thirds of people consulted are considering high-end climate change or using high-end scenarios in their work all the time, or starting to." (see attachment 1 abstract) The Forest Service should be doing the same, especially in a forest plan that might span decades. It has been 23 years since the last plan. The study went on to show, "there is widespread support for avoiding delaying large-scale adaptation until we have more certainty." (ibid) Do not delay. Consider large scale adaptations as you modify this plan. Consider using many of the recommendations from the citizens' alternative.

Sadly, the plan does not rethink timber rotations in lieu of global warming predictions. Consider an analysis of current rotations and how changes in climate that will result in slower growth will affect them. With increasing global warming, current rotations will be way too short.

According to Law et al 2018 (attachment 2), logging is the top source of greenhouse gas emissions in Oregon. This has not been studied in Idaho, but one can expect similar results. The DEIS does not address this or even allude to addressing this. All alternatives

increase logging practices, the increased emissions and contribution to global warming must be addressed in your analysis.

The plan ignores the important role forests play in sequestering carbon. The Nez Perce and Clearwater Forests have large areas of untouched or barely touched forests. Intact forests sequester carbon and are the nations best chance to reduce global warming (see attachment 3). This Forest Plan must recognize the need to protect forests by not logging and allowing them to do what they do best: reduce global warming.

Remedy:

1. Analyze the carbon footprint of forest service operations and include ways to reduce carbon emissions in the EIS.
2. Analyze the effect of increased logging on carbon emissions and loss of carbon sequestration
3. Consider increasing timber rotation times due to global warming predictions.
4. Promote carbon sequestration through sustainable logging levels.

Issue: Increased logging volumes

The current timber harvest allowance on these forests is 50-60 million board feet annually. This was analyzed and considered to be viable and sustainable in the last plan. All of the proposed alternatives increase that by 1/3rd on the low end of the spectrum to FIVE times the current plan. What has changed? Certainly, a changing climate would call for a reduction of these volumes not an increase. How is five times the current allowable timber volume even a viable alternative for consideration?

Remedy: Fully analyze an alternative the does not increase volume or even better, one that reduces timber volume and increases timber rotations.

Issue: Plan does not create clear measurable standards.

The plan does not include standards that are clear and quantifiable, so future projects can be analyzed by the basic the tenets of this plan. The Forest Plan is a contract between the public and the forest. During the duration of the plan, supervisors, district rangers, and specialists will change, but the forest plan will continue. The standards must be clear and quantifiable so no one misinterprets the plan in the future and breaks the trust of the public by misinterpreting the plan. This also helps the public understand the goals of the plan. Vague standards can be construed in too many ways for them to be a solid, trust building, contract between the forest and the public.

I am concerned about the term “desired conditions.” This seems all to similar to the conditions-based planning approach used in the Tongass National Forest. Please note that this approach has been thrown out of court because it violates NEPA (see attachment 4). Conditions-based planning does not inform the public of the actual on the ground proposed work of the project. Instead it discusses desired conditions. Isn’t this the same approach only on a broad scale that will span decades to come? Without quantifiable, measurable standards, you are not informing the public of what your

intended outcomes are. This leaves the public unable to make meaningful public comment on this plan or any project to come.

The objectives in this plan are not quantifiable leaving the public out of the loop and leaving an agency with no accountability.

Remedy: Create quantifiable standards that the public and the agency can clearly understand, analyze, monitor, and attain.

Issue: Management area distinctions are too broad and too few.

Management areas should be as prevalent as the forest is diverse. Reducing the Nez Perce and Clearwater plans from 26 and 17 management areas respectively to 3 is ill advised. The forests are diverse. There are many areas that need protection of different sorts. Old growth areas should be protected for their old growth characteristics, there are areas that should be protected for elk winter range, and areas specific to wildlife corridors. It is not as cut and dried as you have categorized it in this plan. Of the three management areas, two include timber management and the other includes Wilderness and Wild and Scenic Rivers that preclude timber by law. It is important to enhance the integrity of the diversity of the forest not reduce it to two priorities. Diversity is the only chance that forest ecosystems have for survival in the face of an uncertain and changing future. Forest diversity should be recognized and protected by the management areas. The reduction of these forests into 3 management areas will do away with diversity and create timber plantations across the forest except in the minute areas where current laws preclude it.

Remedy: Create management areas that acknowledge the different types of forest characteristics necessary to a healthy ecosystem and retain those characteristics using management standards.

Issue: Old Growth Protections are non-existent.

As mentioned above, the dearth of management areas omits old growth and mature trees as an important part of the forest ecosystem demanding retention and protection. Old growth is important to many species including fisher, pileated woodpecker, marten, goshawks and our dwindling array of songbirds.

The management area specifications only limit old growth logging if it would not “likely modify the characteristics” of old growth stands for more than 10 years. Considering how long it takes to create an old growth stand, if the characteristics are modified in any way it will most certainly last longer than 10 years. Old growth has been developing for over one hundred years often more than two or three hundred years. It is irreplaceable and must be protected. Mature trees and areas that are moving towards old growth in the next 30-40 years should also be protected. Old growth is a process of aging and dying and over the years will be replaced with up and coming old growth stands. These are the natural processes of our forests and should not be meddled with.

Remedy:

1. Create a management area that identifies and protects old growth stands.
2. Create a management area that identifies and protects stands that are moving towards old growth.
3. Identify old growth and mature stands moving towards old growth status with on the ground surveys.
4. Create a standard to maintain at least 5% old growth in each watershed.
5. Educate the public about the importance of old growth.

Issue: Plan does not provide ample protections for riparian areas and fisheries endangering the recovery of Steelhead.

The plan does not guarantee the protection of fish habitat nor does it include quantifiable standards that will prevent the degradation of salmon and steelhead habitat. The current plan has quantifiable standards for riparian areas and fisheries. Things like maximum cobble embeddedness and 300-foot buffers that protect streams from logging. The new plan still claims there is a 300-foot buffer around riparian areas, but the fine print reveals that they allow mechanical thinning of trees greater than 7 inches DBH within 150 feet of streams. Mechanical thinning means the use of machinery that will degrade the soil near streams and deprive the riparian areas of downed logs and the habitat they provide.

The new plan does not provide quantifiable standards for soils in grazing allotments. These should be clear and monitored every five years. If the allotment fails to meet requirements for two cycles, the allotment should be retired.

Remedy:

1. Keep the 300-foot buffer around streams for mechanical thinning of any kind.
2. Create measurable standards to maintain high quality fisheries.
3. Create a standard that requires stream-specific, fishery-habitat percentages in every watershed.
4. Create strict soil requirements for grazing allotments and monitor every five years. Retire allotments that are unable to retain soil quality.
5. Keep grazing cattle from riparian areas by permanently retiring unused grazing permits.

Issue: No protections for recovery of grizzly bears

The grizzly populations in Montana remain in isolated recovery areas. Connectivity and genetic exchange is necessary for their survival into the future. The Nez Perce Clearwater Forest is a key corridor connecting bears from the Cabinet Yak to the Bitterroot Recovery Area. Creating this connectivity is vital to the re-establishment of a grizzly population in the Bitterroot. Confirmed sightings of grizzly bears have shown that they are attempting the journey to the Bitterroot, a key recovery area designated by US Fish and Wildlife.

The Plan does not establish key protections for the grizzly bear including food storage orders and a ban on bear baiting for black bear hunting. Food storage orders protect all wildlife from becoming human food habituated. Black bear baiting which includes human foods is counter-intuitive to the goal of preventing human food habituation in wild animals. Grizzly bears are especially vulnerable because they have a strong sense of smell and follow their noses. One bear last year travelled from the Yak to the Bitterroot and back and was photographed at a baiting station. This practice needs to end and fair chase returned to black bear hunting in Idaho.

US Fish and Wildlife Service recently sent notice to the Nez Perce Clearwater Forest requiring consultation on grizzly bears for all projects and planning. However, the revised forest plan draft mentions neither grizzly bears, probable movement corridors, nor habitat requirements for grizzly recovery. The plan should include monitoring and surveying for tracks, diggings, buried carcasses, denning areas, and other bear signs. There has been no comprehensive survey effort that would warrant exclusion of lands from likely occupancy and the formal consultation requirements as well as detailed analysis, standards and discussion within the DEIS. It seems an SEIS is necessary to rectify this.

Remedy:

1. Create food storage orders on the forest that are consistent with IGBC standards
2. Provide bear resistant food containers and receptacles at campgrounds, picnic areas, and other facilities.
3. Ban bear baiting of any kind in the forest.
4. Protect likely corridors connecting recovery areas from increased road densities due to industrial logging.
5. Reclaim roads in likely corridors connecting recovery areas to reduce road densities.
6. Consider road densities standards like amendment 19 in the former Flathead Forest Plan.
7. Prepare an SEIS to address grizzlies.

Issue: Poor protections for Recommended Wilderness Areas RWA

The plan allows unacceptable use in RWAs. Motorized and mechanized vehicles, and recreational aircraft landings in RWAs. This would degrade their Wilderness quality and preclude them from Wilderness designation. It is a slippery slope to allow such use and then take it away with Wilderness designation. Snowmobiles, snow motorbikes, snow bikes, mountain bikes, e-bikes and all other types of motorized or mechanized vehicles have not place in an area with the potential to be designated Wilderness.

The Great Burn has proven to be an important wild life conduit connecting the “Crown of the Continent” area with the Bitterroot Selway and the Frank Church Wilderness and on to the Greater Yellowstone region. The area also provides the quiet recreation that inspires hikers, hunters, backpackers and horse trail riders.

One alternative in the DEIS reduces the Great Burn Proposed Wilderness which would adversely affect mountain goats, fisher, wolverine and grizzly bear. The alternative also allows for mechanized use (which includes electric motorized bikes under current administration definitions) and winter snowmobile traffic. This would degrade Wilderness qualities and affect current users. Again, allowing a use and then taking it away with a Wilderness designation is public opinion suicide. There is an argument that over snow traffic does not damage the area. This argument does not take into consideration the effects on wildlife and the fact that snowmobiles can travel with little snow damaging soils. One need only look around as the snow melts in popular snowmobile areas.

Remedy:

1. Lobby congress to designate all RWAs as Wilderness
2. Manage them as Wilderness until it happens.

Issue: No strict protections for roadless areas

The amazing roadless areas in this forest are not adequately protected in this plan. Recommended Wilderness designations are scarce even when most of the roadless areas are Wilderness quality and deserve RWA designation. Roads temporary or permanent destroy areas permanently. Road prisms once created are forever on the landscape creating ghost roads that fragment habitat and deter natural processes and water flow.

Remedy:

1. No road building of any kind temporary or otherwise should be allowed in roadless areas.
2. All roadless areas should be recommended for Wilderness designation.
3. The Great Burn Proposed Wilderness should not be reduced in size.
4. No over snow or mechanized travel in the Great Burn.

Issue: Plan lacks necessary and timely Wilderness designations.

Remedy:

- The Great Burn Proposed Wilderness should not be reduced in size. The entire area should remain RWA
- The roadless areas adjacent to the Gospel-Hump Wilderness should be designated Wilderness
- The Weitas Creek Area should be designated Wilderness
- All roadless areas should be designated Wilderness to create permanent protection to these areas and preserve them as carbon sinks necessary for combating global warming.

Issue: Insufficient Wild and Scenic Rivers Protections.

All 89 rivers that were identified as eligible for Wild and Scenic Designation should remain eligible and be protected for their Outstandingly Remarkable Values and free-flowing status. The Forest is not authorized to do a Wild and Scenic Suitability Study unless authorized to do so by Congress. The Forest is going ahead with the process without proper authorization. Should a legal study be conducted, it must clearly demonstrate the reasons for and against recommending an individual river or river segment to Congress (FS Handbook 83.3). The current study does not fulfill this requirement.

Strangely enough the different plan alternatives allow for a range of rivers from 0-37 as considered suitable for inclusion. The study should conclude which rivers are suitable and recommend designations accordingly. Allowing for different options seems to defeat the purpose of a suitability study.

Remedy: All 89 rivers identified as eligible for Wild and Scenic designation should retain that status.

Thank you for considering my comments

Michele Dieterich

Hamilton, MT