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19 April 2020

Zach Peterson, Forest Planner

Nez Perce-Clearwater National Forests Supervisors Office

903 3rd Street/ Kamiah, Idaho 83536

Dear Mr. Peterson,

I hope that you and the people of Idaho are safe in this time of pandemic. I am writing to submit my comments about the forest plan revision on the Nez Perce and Clearwater National Forests. The new draft forest plan raises alarming concerns in major areas, three of which I’ll touch on in this letter.

 **Quantifiable standards** – Measurable standards are good science. The draft plan has few quantifiable standards. Please fix this, such as preserving minimum percentages of old-growth drainage-wide and specifying that streams have fishery habitat potential percentages based on cobble embeddedness (sediment). General statement, such as using “best management practices” are not acceptable because they are not quantifiable.

 **Climate change mitigation** – Trees are essential for capturing and storing carbon dioxide. Pacific Northwest forests can sequester more carbon than other Western forests.1 The draft plan fails to recognize human-caused global warming which is a scientific fact. It is crucial that any forest plan discuss how its management actions might add to global emissions by substantially increasing logging. Rather, mitigating climate change by preserving more of the Nez Perce-Clearwater National Forests is basic in our duties as good stewards.

 **Recovering grizzly bears and steelhead and salmon** – Several grizzly bear observations in the Clearwater Basin were confirmed last summer. The Fish & Wildlife Service (FWS) recently sent the Nez Perce-Clearwater Forest Supervisor a letter requiring that the agency consult with the FWS when projects potentially impact grizzlies. The draft plan hardly mentions grizzlies, their essential migration corridors, or their habitat necessary for recovery.

Quantifiable fish habitat standards, as in the current forest plans, must be maintained, rather than reduced as the draft plan proposes. Macro-invertebrate communities in stream substrate are necessary for fish populations.

Thank you for your time in reading my comments. Stay safe and well.

Sincerely,



Barbara J. Andersen, Ph.D. (University of Idaho, Environmental Science, 2008)

1 Buotte et al. (2019). *Carbon sequestration and biodiversity co-benefits of preserving forests in the western USA*, Ecol Appl. 2019 Dec 4:e02039. Doi: 10.1002/eap.2039