Monday, 4/20/2020

To: Zach Peterson, Forest Planner for Nez Perce-Clearwater Forests

Covid 19 lock down has restricted access to the libraries to centrally locate all Forest documents and the free internet. I wasn’t able to turn in early comments through the Collaborative process (beginning in 2018), though I am making efforts to contrast ALL Alternatives developed by dedicated citizen volunteers from a variety of scoping settings. Equally important work from volunteer citizens is noted in the “Citizen Alternative,” deserving of full analysis too, since submitted before the deadline through science based research beginning in 2014. Unfortunately, accessing the Forest Service link for “fire management” was not helpful, since the site is under construction for new GovDelivery software. With staff confined to home and government offices closed, extending the comment period could have helped overcome some challenges, though the request was denied.

As an engaged global citizen who regularly visits the Clearwater- NP Forest, I recognize the DEIS is open for all comments until 4/20. We have rafted the Lochsa and North Fork Clearwater, hiked, picked berries and mushrooms, and camped out in our Clearwater- NP Forests.

The final revised Forest plan will guide management of the Clearwater- Nez Perce Forests for decades to come. It must reflect diverse natural Forest resources valued for the 21st century, including mechanized free wilderness habitats that use evidence based Forest planning tools to decrease carbon emissions. *More* Department of Agriculture strategies to combine the Nez Perce and Clearwater Forests can be applied, beyond the Roadless Rule guidelines. These National strategies are necessary to off set the ‘legalized takings’ and habitat damages to Forests resulting from Idaho’s Roadless Rule. **The biggest cumulative impact to identify in the DEIS is the Idaho Roadless Rule itself.** It has allowed Roadless areas inventoried from 2008, to lose out in two essential ways: ­­­­­­­­­­ wild characteristics to make land eligible for any new wilderness is being degraded, while at the same time, the total net acres of Roadless Areas are being lost every day. Reference: 8/2008, USDA Appendix C- Idaho Roadless Areas, volume 3: Clearwater and Nez Perce sections and compare RA of 2020.

Background: In 2/2006, Idaho’s Governor Kempthorne hired timber lobbyists to summarize all public comments on the Roadless petition. Nationally, over 265,000 people commented to reinstate the Original Roadless Rule that the Bush administration petitioned against, which included my comments too. By 9/2006, a Federal District judge reinstated the Clinton Roadless Rule to protect America’s National Forest from road building, logging, and year round motorized recreation. We see these same cumulative impacts from the Idaho Roadless Rule right now, so if there was ever a time to implement “adaptive management” to change our course, it’s now through the Final Revision.

Administrative points: The volunteer Collaborative scoping process casted a net for catching targeted local input, which skewed proposed alternatives. The Alternatives were predetermined to promote extraction of timber and natural resources by a variety of means, like reducing the existing management uses from 43 to only three, even while combining two entire Forest jurisdictions. Diverse Forest management uses (like backcountry MU, or primitive MU) seem to be nullified to allow for mainly economic development, shortsighted. I question the measurable long term benefits for communities. Idaho’s schools and rural communities may not see financial gains continue despite massive resource extractions, as profits slip away somehow. One can only squeeze the Golden Egg from the Goose for so long until we meet the point of no return. Other Department of Agriculture Strategic goals must yet be incorporated, to rebalance the final plan.

In reviewing the Collaborative scoping process, I understand a system of “drivers” or mandated words were used to populate proposals; “wildfire, insect and disease, and climate change”. If the process is to be based on a level playing field, the hopper can also be primed to include “drivers” like “predator, water quality measurements, or wild steelhead habitat.” Contrast the ‘Citizen Alternative’ that was developed thru field science. Now is the time to combine scoping efforts, using all citizen efforts and alternatives. I believe we still can build the best final Revision Plan, if decision makers remain objective.

Administratively, the actual Memorandum of Understanding, document **15-MU-11015600-009**, implemented between the U.S. Forest Service and the State of Idaho, allows for modifications to the Idaho Roadless Rule, subject to limitations and requirements. Since we are involved in planning revisions, I suggest adding allowable mitigations to the Idaho Roadless Rule. See Section F, #2 on page 3, stressing NEPA documentation is to be used for all actions within Idaho Roadless Areas. The MOU coordinates National objectives with the State, not allowing local politics to override prudent coordination of values. Using all available tools, we must stop using the Idaho Roadless rule to destroy Roadless area characteristics into the next Forest Plan.

Importantly, you have the power to provide FULL protection for 1.5 acres of inventoried Roadless habitat, please include recovery of dwindling indicator species like Grizzly and Wolverines. Subsequent Forest interventions from the Collaborative Alternatives further limit planning because other subordinate values become dependent on the primary driver of the Collaborative process, timber extraction. Without built in measurements, harm may not be detected to large mammal populations over time, resulting in extinctions. We must be the stewards, when facts are clear to prevent loss to species nearly endangered or extinct, including Steelhead and Salmon habitat. The Alternatives can not be voted on like a popularity contest, even when important content is deliberately omitted thru the scoping guidelines. Many have provided valuable input, plus there are administrative tools to yet apply within the process.

I learned that by using the 2012 Planning Rules omissions may be corrected:

Section 7 (a)(1) provide plans to protect both proposed and candidate species, not only endangered species.

Section 219.9 require plans to restore ecosystem integrity,

219.9 (a)ecosystem integrity,

219.9 (b) ecosystem diversity.

The planning Rule requires a monitoring program, 219.12,under ESA.

Alternatives (w,x,y,z) do not represent protection of species under the 2012 Planning Rule. Sadly the Lewiston Tribune reported that since 2011, approximately 100 wolves were shot by Wildlife Services from helicopters in the Clearwater Forest “Lolo zone”. Predictors of climate change, show drier soils and more frequent flooding that may slow regeneration of Forests. New Revisions must cut back on burning fossil fuels and worsening deforestation, as other National Forests have tried to do across the Country. Be aware of negative emission technologies to off set climate changes, such as bioenergy and carbon storage and direct air capture to lessen climate impacts. Trees can’t store Co2 to offset climate change when there’s not enough recovery time between harvests.

Additionally, decommissioned roads from previous damages remain back logged from essential restoration. It is simply irresponsible and unsustainable for Alternatives to recommend increasing logging levels to over 200 million board feet annually, without the context of climate science or quality assurance measures.

New motorized recreation and mechanization: Given the volume of open Forest roads, I don’t see a priority to damaging new habitat by allowing continued motorized uses in roadless areas. Eliminate *new* motorized access and chain saw uses newly proposed in all Roadless habitats moving forward, (see option z). Ask volunteers to help restore impacted areas from motorized impacts. Involve social groups, similar to the Idaho Recreation Council volunteers to participate in restoration projects, like rebuilding riparian buffers. With hundreds of existing roads, there’s certainty that motorized recreation won’t ever get ‘locked out’ of “our” forest. It is disturbing to find new areas listed near Black Lead Mountain and Hoodoo pass for snowmobile use. Reference current research conducted on the nearby Payette Forest:“The Wolverine in the Room” by Helen Santoro, High Country News March 2020 (vol. 52, page 10)~ “We assessed the potential for indirect habitat loss from differing levels and types of winter recreation. Motorized recreation occurred at higher intensity across a larger footprint than non-motorized recreation. Wolverines avoided areas of both motorized and non-motorized winter recreation with off-road recreation eliciting a stronger response than road based recreation. Female wolverines showed the strongest functional response to winter recreation. We speculate the potential for backcountry winter recreation to affect wolverines may increase under climate change, if reduced snow pack concentrates recreationalists and wolverines in areas with persistent snow pack.”

I discovered kayaking the Lochsa and North Fork of the Clearwater Rivers decades ago. By paddling along some roads and bridges, I came to observe the negative water quality in areas impacted from erosion and silting-in of prime Salmon spawning habitat. Any revised Forest policy needs to emphasize stream ecology, to correct damages and protect further habitat loss.

Wild and Scenic River suitability determinations: designations for suitability determinations are left up to Congress. All 89 River sections already determined suitable, must be left as established under the Wild and Scenic River Act and the 2012 Forest Planning Rules. It seems that by forming surrogate authorities like the Idaho State Rivers Program, Congressional authority for our U. S. free flowing rivers could be undermined, even when unintended. However, when real abuses were occurring from Megaload trucking, the Forest Service didn’t live up to its obligations to protect the Lochsa River corridor already designated as Wild and Scenic.

It is appropriate to recommend all 1.5 million acres of unprotected Roadless areas on both Forests, be eligible for full protection as Wilderness!

“Water is the most critical resource issue of our lifetime and our children’s lifetimes. The health of our waters is the principal measure of how we treat the land.” ~ Luna Leopold, River scientist and son of Aldo Leopold Our family has also participated in historical group hikes and camp outs, some detailing geography and natural history in the Roadless watersheds, (reference: North Fork, from Fred Rabe’s book). Two summers ago, we hiked along Kelly Creek and camped out with friends near Hanson Meadows. I learned more about the Bighorn- Weitas Roadless area, one of the most valued potential wilderness areas to recommend. Using River system concepts, protection of Cayuse Creek and Weitas Creek drainages are essential to maintain Roadless qualities for habitat connection in the Bighorn-Weitas Roadless Area. I suggest closing route 555 past the guard station bridge, for clear recommendations favoring Weitas Creek Roadless area. Also, it is important to fully review the Gospel Hump area for eligible wilderness, since the current Hungry Ridge timber sales can harm roadless characteristics and prized fish habitat in the area.

Alternative Z offers no relief to current allowed motorized access in Roadless areas, allowing chain saws and motor bikes to degrade roadless characteristics further. In essence the cumulative impacts from ongoing allowed mechanization negate benefits of planning for entire River systems, since watershed damage can be diffuse and extensive especially with mineral extraction at headwaters. Clearly there are many places to ride my mountain bike, without demanding new access to pristine environments. The single track ultimately brings in the ORV crowd, plus people haul in garbage to be forgotten that could never have been carried in on their backs. People get hurt or stuck, creating avenues for increasing activity that is not compatible in potential wilderness habitat. It is appropriate to recommend all 1.5 million acres of unprotected Roadless areas on both Forests, be eligible for full protection as Wilderness.

Roadless Areas adjacent to **quality fisheries**, like Moose Mountain Roadless Area adjacent to the North Fork on the East, need prioritization to *remain* Roadless to protect water quality and riparian habit. Referencing the book; “The Kelly Creek Chronicles,” author Colbert Cushing describes Kelly Creek from 1981. It describes intact stream ecosystems within the wider watershed context over time, adding for the need to include quantifiable measurements to assure standards for high water quality and improved species counts in all Revision plans. It is especially important to protect contiguity of habitat and lessen “fragmentation”. Prized old growth habit must continue to preserve minimum percentages of old –growth drainage wide. Poorly defined standards in finite old growth areas will allow logging to negatively­­­­­­­ impact habitat essential to rare old growth dependent species (goshawks, fisher). A study from the World Wildlife Fund concluded the Clearwater Country serves as the “most important core area in the Northern Rockies and Southern Canadian Rockies for large forest carnivores” (Paul Paquet and Reed Noss). During 2019, three grizzly bears were observed in the Nez Perce and Clearwater Forests! At the Lewiston hearing, plans that included biological corridors to encourage habitat recovery were most supported by participating citizens. Refer to 2018-2019 survey: “Keeping Grizzlies Wild, campground attractant survey”

Historic landmarks: Forest Plan Revisions allow updated provisions to preserve sensitive cultural Nez Perce sites. Previously, the Forest Service reviewed a proposal for the Lewis and Clark National Historic Monument and Preserve. Efforts in the Revised Forest Plan can share goals similar to the Monument proposal to reduce clear cuts on steep slopes, interspersed among historically treasured wildlands. The Nez Perce trail was significant for providing routes for trappers, miners, and explorers from the Plains to the Pacific. In Gene and Mollie Eastman’s book, Bitterroot Crossing II, a Nez Perce elder is quoted; ‘We took the old Lolo Trail up there, we went where the cannon could not go.” These places are National treasures, worthy of placing aside, even though current timber sales are taking place within these Historic Landmarks. Roadless Areas adjacent to **quality fisheries**, like Moose Mountain Roadless Area adjacent to the North Fork on the East, need prioritization to *remain* Roadless to protect water quality and riparian habits. Reference; “The Kelly Creek Chronicles,” author Colbert Cushing, who describes Kelly Creek from 1981. It is especially important to protect contiguity of habitat and lessen “fragmentation”or checkerboarding, as it lends itself to consolidation of land exchanges, reducing preferred management by the U.S. Forest Service. Alternatives (w,x,y, z) do not represent protection of species under the 2012 Planning Rule. Sadly the Lewiston Tribune reported that since 2011, approximately 100 wolves were shot by Wildlife Services from helicopters in the Clearwater Forest “Lolo zone”.

Thank- you for careful consideration of all alternatives and comments submitted.

Respectfully,

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