

September 29, 2023

Andrew Skowlund, District Ranger  
North Fork Ranger District  
12740 Highway 12  
Orofino, Idaho 83544

Cheryl Probert, Forest Supervisor/Responsible Official  
Nez Perce-Clearwater National Forest  
1008 Highway 64  
Kamiah, ID 83536

**Re: Clearwater National Forest Travel Planning Draft SEIS**

Dear Andrew and Cheryl,

The draft Supplemental Environmental Impact Statement (SEIS) for the Clearwater National Forest Travel Plan was developed by the Clearwater National Forest to address several lawsuits stemming from the 2011 Travel Plan Final EIS and Record of Decision. This document addresses the issues remanded by the judge in *Friends of the Clearwater v U.S. Forest Service* (filed 2021) and proposes to designate Fish Lake Trail as open for seasonal motorized use.

The 1987 Clearwater Forest Plan set Elk Habitat Effectiveness (EHE) standards at 100% for Management Areas (MA) A3 (semi primitive recreation), B2 (recommended wilderness), C1 (elk summer range), C6 (fishery/water quality). These EHE values are intended to average across the MA. When the Forest Plan was written these MAs were believed to be meeting the 100% standard for elk summer habitat potential based on Legee's methodology (1984). When the Clearwater National Forest updated its EHE methodology with Servheen et. al. (1997), the EHE was reduced in some MAs because of the change in methodology rather than an actual change in current habitat condition. The EHE methodology using Servheen, takes into account roads (e.g 250 Road) and motorized trails that were not originally considered and is broadly accepted as an improved metric for evaluation. These roads are often legacy roads that allow minimal access to large tracts of land, not unlike the Magruder Road in the Selway Bitterroot Wilderness area. Amending the EHE standard in these MAs to "at least 90%", removes the language inconsistency between the Forest Plan and the Travel Plan and aligns both documents with best available science and practice. Additionally, much of these MAs are currently part of the 2008 Idaho Roadless Rule and have additional protections that the 1987 Forest plan could not have foreseen.

The CBC fully supports the proposed project-specific amendment to the 1987 Forest Plan regarding EHE standards in MAs A3, B2, C1, and C6 where 100% EHE is unachievable. These Plan modifications will reduce the Forest's risk to continued litigation on this matter and supports its multiple use mandate.

Of note, there is a concern that reducing the EHE in these MAs to 90% because we're not meeting our current objectives could have Forestwide implications where other objectives are not being met. While we do recognize and agree that in this case the 100% EHE is not achievable based on current best available science, simply lowering standards so we can meet our objectives is not something we want to see become common practice.

The last item this SEIS addresses is the motorized use of Fish Lake Trail. The Fish Lake Trail is special to the Clearwater Basin Collaborative (CBC) as it is one of first collaborative accomplishments of the CBC by recreation, mining, forest industry, wildlife, and conservation interests all agreeing to mitigations allowing motorized access. While there are many high mountain lakes in the North Fork of the Clearwater River, the motorized Fish Lake Trail offers an opportunity for many to experience a high mountain lake that may otherwise be inaccessible. The CBC continues to unanimously support the Fish Lake Trail being open to seasonal motorized access.

Thank you for your consideration of these comments.

Sincerely,



Tera R. King, Co-Chair  
Clearwater Basin Collaborative



Eric Crawford, Co-Chair  
Clearwater Basin Collaborative

#### **Clearwater Basin Collaborative Member Organizations:**

Associated Logging Contractors  
Clearwater County Board of Commissioners  
Community Member At-Large  
Empire Lumber  
Framing Our Community  
Idaho Conservation League  
Idaho County Board of Commissioners  
Idaho Department of Lands  
Idaho Fish and Game

Idaho Forest Group  
Idaho Parks and Recreation  
Idaho Recreation Council  
Idaho Wildlife Federation  
Mining Interests  
Public Land Access Year-round  
Rocky Mountain Elk Foundation  
Trout Unlimited  
University of Idaho Extension