

January 23, 2024

To: Regional Forester (Reviewing Officer), Northern (R1) Regional Office

From: Gerry Snyder, 2200 Londondery Circle, Manhattan, KS 66503, gerrysn@gmail.com

Please include the following comments into your records for the Nez Perce-Clearwater National Forest Forest Plan Revision #44089.

**Introduction:**

In opening, I found this draft plan to be a very complex, confusing and overly lengthy document. It didn't clearly identify recommended actions for specific areas on the National Forest. The document contains numerous general and vague management goals/objectives but it did not give a clear and future path for the Nez Perce -Clearwater National Forest.

Below is a list of some of my concerns within the draft followed by my personal recommendations that reflect many local and national public interests.

**Objections, issues and problems with the draft plan:**

- One major omission is the lack of a preferred option and listed alternative. This had been standard operating procedures for the USDA in the past and deviates to a compilation of loose management goals, standards and objectives.
- The newer format of the forest plan is far too complex and confusing. It resembles an alphabet soup mixture of goals, standards, guidelines, etc.. To try to comprehend how these work, it is a puzzle connecting one set of numbers to another. For just a couple examples... *"For other plan components related to invasive plant and aquatic species see FW-GDL-FIRE-02, FW-DC-GS-01, FW-DC-GS-02, FW-DC-GS-03, FW-DC-GS-04, FW-DC-GS-05, FW-GL-WTR-01, FW-STD-WTR-05, FW-DC-WLMU-06, MA1-OBJ-WLMU-01, and FW-DC-ED-01."* and Table 23 (page 84). The document is a giant listing of codes so as to confuse any normal public person to understand how these come together to make a planning document. It's just too technical and overwhelming for a public planning document.
- I can not find any justification why sensitive wild lands are proposed to be taken out of the Idaho Roadless Rule land areas. These lands currently meet the definition as designated Wilderness lands. It is unclear why some are proposed to be protected and others not. Why? What criteria did you use? Why protect only a small percentage of your current roadless lands and open the rest to potential development?
- I particularly find it disheartening that many unique roadless areas are omitted for Wilderness protection. I specifically speak up for the Bighorn-Weitas-Cayuse Creek area, also Pot Mtn, Lochsa Face, and really most of the Idaho Roadless Rule lands.

These areas make the Clearwater country a really special part of the US because of its wild and scenic character. The Weitas and Cayuse creek drainages are one of the very few low elevation roadless areas in the Pacific Northwest.

- Objection to any motorized access into the Idaho Roadless Rule lands. These lands need to be protected fully for their wild and scenic character. Off road vehicle use has been documented to destroy single track trails and impact the wild character of the land. It also seriously impacts many animal species that use these primitive and wild habitats as their home.
- Forest lands and habitat type groups. This is a fairly new management concept for me. It kind of makes some sense for habitat type conditions like “Moderately Cool Moist to Wet.” It is my understanding that it is the soils and under/over story vegetation that defines habitat diversity. Slope and aspect dictate moisture conditions and to some regard plant species, but  
When you allow a 207 acre opening, this will change your “habitat type” conditions that you are setting as a reference.
- Cutting of old growth. There is a national directive to maintain the remaining old growth forests in our nation. The Clearwater and Nez Perce forest are no exception. The proposing of cutting Grand Fir and other non-desirable trees goes against this policy. Also, any attempt to do maintenance within old growth habitat is detrimental to the forest.
- Management 2 area activity information is too vague. By declaring a large part of the National Forest as Management 2, it allows disturbance to current roadless and sensitive lands. Within the plan it indicates timber suitability in Table 25 (page 87) at around 1,240,000 acres, but doesn’t specifically identify these future tree harvest lands in question. Many of these areas have been historically harvested and may not be mature enough to include as part of your proposed “timber suitable” database.
- I am disturbed by the Category 4 listing of 197,821 acres in Table 25 (page 87). It states *“4. Lands not suited for timber production because timber production is not compatible with the desired conditions and objectives established by the plan. Harvest may occur in some areas for other resource objectives per plan component descriptions.”* This is a blatant loophole to cut trees in sensitive areas. As shown on the Timber Suitability map that these Category 4 lands encompass mostly riparian and current roadless areas. This is a direct threat to the integrity of these lands and should do a better job of protecting these lands from development and exploitation.
- The proposed plan does not provide adequate protection for threatened and endangered species such as the grizzly and wolverine. Habitat integrity and protection of sensitive lands from man-made intrusion such as roads and motorized trails is not properly addressed for their survival.

- This is a comment related to the forest supervisor's "Letter to Planning Participants." I am baffled on how she came up with the assumption of providing 4000 jobs and \$163 million income from a planning document that doesn't identify these types of economics. These seem to be random numbers and here-say. I am also troubled that this was in the supervisor letter which gives suspicion to promote this plan to politicians and timber industry audiences.

### **Recommendations:**

- Recompile this draft document by adding a complete "executive summary" in layman's terms so that the public can actually understand what is being proposed. The overuse of codes with cross-referencing is far too complex and confusing to understand what is being proposed on a forest-wide basis.
- All current roadless areas should remain roadless with most areas designated as "Wilderness." The Idaho Roadless Rule lands should be protected as such under any proposed plan.
- Immediately add all adjacent roadless lands to the Selway-Bitterroot and Frank Church Wilderness area. This includes Elk Summit, East and West Meadow Creek. It makes perfect ecological sense to expand current Wilderness boundaries to include lands adjacent to them.
- Keep all motorized vehicles out of the Idaho Roadless Rule lands. This very intrusion into these primitive lands changes the natural and wildness of the lands. It protects these areas from human impacts
- Increase the distance of buffer strips along riparian areas to enhance fisheries and water quality. The proposed 150 and 100 foot zone is inadequate protection and needs to at least double in size (300 feet). These buffer zones play an important role as filters and shade protection to rivers and creeks.
- Limit any future clearcutting, shelterwood and all timber projects to 40 acres or less. No category exclusions. The latest trend for timber projects up to 207 acres is unacceptable and irresponsible in the health of an ecosystem. There is no sound research to support any larger openings within a forest drainage.
- No cutting of any old growth on the Nez Perce - Clearwater National Forest. First of all, the National Forest is hard pressed to contain a significant percentage of the overall forest as old growth forest. Much of these older trees have been harvested over the past several decades. The other factor of replacing a Grand Fir old growth forest with another type of tree is ludicrous since growing conditions in the region take over a century to mature.

**Conclusion:**

It has been since 1987 that a forest plan has been insured. I would have expected a better, more comprehensive document to have been compiled over these years. As mentioned in several comments above, this proposed draft is far too complicated in its delivery and doesn't show a clear path forward to the public. As far as I can surmise, this proposed draft also lacks the forethought and vision to overall protect its resources and maintain the integrity of Nez Perce - Clearwater National Forest.

Please completely revise this draft document.

Best Regards, *Gerry Snyder*