



January 26, 2024
Objection Reviewing Officer
USDA Forest Service Northern Region
26 Fort Missoula Road
Missoula, MT 59804

Idaho Wildlife Federation
Objector

v.

Cheryl Probert, Forest Supervisor, Nez Perce Clearwater National Forest
Responsible Official

Objection to the 2023 Land Management Plan, Final Environmental Impact Statement (FEIS) for the Nez Perce Clearwater National Forest

Objector's Contact Information:

Idaho Wildlife Federation, Lead Objector.

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Objector's Notice, Statement of Reasons and Suggested Remedies

Objector's Notice, Statement of Reasons

Pursuant to 36 CFR 218 Subpart B and §218.5(a), the Idaho Wildlife Federation (IWF) objects to the 2023 land management plan, final environmental impact statement (FEIS) proposed by the Nez Perce Clearwater National Forest Supervisor Cheryl Probert. In this objection we intend to state our objections to the plan and provide remedies we feel would strengthen the forest plan moving forward and participate in any objection resolution discussions moving forward.

IWF is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations with 45,000 affiliate members and individual supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

Connection between prior specific comments

Idaho Wildlife Federation has been engaged in discussions and deliberation on this forest plan for years. IWF submitted comments and recommendations to the Forest Service on April 20, 2020 for the Draft Environmental Impact Statement on the Revised Nez Perce Clearwater National Forests Forest Plan.

While IWF supports much of the revised Land Management Plan FEIS and Draft Record of Decision, we object to several components of the draft ROD. Below we list our concerns and objections while offering suggestions that we feel would help to resolve these issues.

Wilderness

We appreciate the Forest Service including three areas on the forest as recommended wilderness, but object to the reduction to the Hoodoo Recommended Wilderness Area(RWA), primarily due to concerns for the declining mountain goat population in the area. The Mallard-Larkins and Hoodoo RWA's are occupied by two endemic mountain goat populations in the Black Snow Population Management Unit (PMU), which includes Idaho Department of Fish & Game (IDFG) Game Management Units (GMUs) 7, 9, 10, 10A, and 12. Currently, only three tags are available for harvest of mountain goats in these GMUs, none of which are available in the former subunit 10-3 which is partially contained within the Hoodoo RWA which as recently as 2017 had two tags available. While surveys in the Mallard-Larkins suggest that population is stable, the Hoodoo herd is declining. IDFG cites¹ snowmobiles, snow bikes, habitat loss, and climate

¹ Idaho Department of Fish and Game. 2019. Idaho Mountain Goat Management Plan 2019-2024. Boise, Idaho.

change as threats to mountain goat persistence. In particular, IDFG identifies the need to “Collaborate with Idaho Panhandle and Nez Perce-Clearwater national forests and BLM to minimize potential impact of motorized and non-motorized recreation on mountain goats” to increase mountain goat populations in the Black Snow PMU. We feel reducing the southern area of the Hoodoo RWA and allowing motorized over snow travel into areas where it was previously illegal to do so will further hurt this important population. *We recommend that the Forest move the southern border of the Hoodoo RWA back to the original boundary in the 1987 Clearwater Forest Plan and continue the current management scheme that prohibits motorized over snow travel in this area.*

Wildlife

IWF supports much of the language in the forest plan under the Multiple Uses Wildlife heading, but objects to the omission of motorized security language for elk and other wildlife combined with moderate or high nutritional quality forage for elk.

MA2-DC-WLMU-02- We believe this desired condition should be edited to say, Areas at least 5,000 acres in size exist *with an emphasis placed on areas of moderate or high nutrition quality forage for elk* without motorized access open to the public to maintain habitat use by elk.

Having 5,000 acres without motorized access open to the public to maintain habitat use by elk is important, but if within those 5,000 acres we do not have moderate or high nutritional quality forage, it will not achieve the desired effect of more and healthier wildlife in that area.

MA3-DC-WLMU-01- IWF suggests language that identifies a **percentage** of the moderate or high-quality nutritional forage that should occur greater than 0.5 miles from open motorized routes. The way it is currently written would allow for 1 acre of this high-quality forage to exist further than 0.5 miles from a motorized route and the desired condition would be met.

Ten to twenty percent of Management Area 3 is in a condition that provides moderate or high-quality nutritional forage for elk. Areas with moderate or high-quality forage are distributed across the management area, with a **portion** of the moderate or high-quality nutritional forage occurring greater than 0.5 miles from open motorized routes.

MA2-OBJ-WLMU-01- We would like to see language around preference to treatments further than 0.5 miles from open motorized routes similar to those listed under **MA3-OBJ-WLMU-01**. This could be edited to say:

In Management Area 2, 10,000 to 15,000 acres are improved every five years through vegetative treatments and wildland fire to improve nutritional forage value for elk. ***Treatments are preferentially focused on areas more than one half mile from roads open motorized system routes.*** Natural ignitions are used to improve nutritional forage when and where appropriate to contribute to these acres.

Fisher

After going through the analysis for fisher we have some major concerns about what kind of potential impact we could see on the forest if the plan is implemented as written. The following is an excerpt from the analysis,

The fisher was petitioned for listing under the Endangered Species Act in 2013 and in 2016. The U.S. Fish and Wildlife Service published a 90-day finding that announced there was **substantial information that listing the Northern Rocky Mountain fisher may be warranted**. Based on the best scientific and commercial information available, the U.S. Fish and Wildlife Service found that the Northern Rocky Mountain fisher is **genetically different from other fisher populations and qualifies as a distinct population segment under the Endangered Species Act**. On October 5, 2017, the U.S. Fish and Wildlife Service published a 12-month finding which determined the Northern Rocky Mountain fisher is not in danger of extinction and does not need protection under the Endangered Species Act.

While the USFWS found they are not in danger of extinction, which we agree with, we are concerned that implementation of the forest plan could change their status and all management activities that occur in occupied, or modeled fisher habitat. According to the forests analysis, modeled habitat under the preferred alternative shows a 58% decline in preferred home ranges for fisher over the next 50 years.

Again from the analysis justification ,

1.....”The U. S. Fish and Wildlife Service estimated that the Minimum Critical Area needed to support a population of fishers was 2,500 square kilometers which equals **617,763 acres** and which is the area needed to support **50 breeding individuals needed to avoid inbreeding effects.**”

2.....”In a 50-year time horizon, the projected availability of habitat suitable to support preferred female fisher home ranges varies between 407,511 to 562,754 acres depending on the alternative, with the **Preferred Alternative projected to include 410,126 acres**. Assuming

female fishers require 49.3 square kilometers or 12,182 acres each, this amount would **support 34 female home ranges** with the spatial characteristics of preferred or high-quality female home ranges. Under all alternatives, the projected availability of habitat that has the spatial characteristics of preferred **female home ranges within the plan area is close to the critical habitat threshold (617,763 acres) thought necessary to ensure population viability.**”

This leaves us very concerned. Not only are we pushing the ragged edge for how much quality habitat for fisher is needed to simply avoid inbreeding and persist, much less thrive, if this modeling proves to be even a little bit too optimistic we fear this could trigger a potential listing and change the way our forest is managed, especially in MA3 where the vast majority of our timber projects occur. We feel this needs a closer look not only for the fisher themselves, but also for the people who depend on the forests for both their income and recreation activities.

Species of Conservation Concern

IWF objects to the omission of Endangered Species Act (ESA) listed steelhead and Spring and Summer run chinook salmon in the list of species of conservation concern. While we understand that chinook were extirpated from the Clearwater River basin due to poor fish ladder design on the Lewiston Dam, they were not extirpated from the Salmon River and tributaries to it like the Rapid River, which is within the Nez Perce Clearwater National Forest boundary. Along these same lines, steelhead were never extirpated from either the Clearwater or Salmon Rivers. We struggle to see the justification for not having either of these important, federally listed fish species who use the rivers within the boundaries of the Nez Perce Clearwater National Forest.

Respectfully submitted,



Brian Brooks
Executive Director, Idaho Wildlife Federation