

Jeff Lonn  
Hamilton, MT  
January 29, 2024

Nez Perce Clearwater Forest  
903 3<sup>rd</sup> Street  
Kamiah, ID 83536  
Re: Comments on DEIS Nez Perce Clearwater Forest Plan Revision

I have previously submitted comments and attended a meeting in Hamilton on the Nez Perce-Clearwater Forest Plan Revision, and submit the following objection. I had previously raised all the issues below in my previous comments, which are included for reference at the end of this objection.

The revised plan is a big step backward from the 1987 plan. You have disregarded virtually all public comment except that submitted by those with ties to the timber and motorized recreation industries. As I said earlier, for the short-term economic gains mandated by our current politicians, you are selling out the American people who own these lands. Shame on you! These politicians will soon be gone, but your new forest plan will live on for many decades. Stand up to the politicians, please. Abandon this ill-conceived plan and start over.

I object the paltry 263,000 acres recommended for wilderness. This is roughly half of the area managed for recommended wilderness in the 1987 plan, and is only 17% of the roughly 1.5 million acres of roadless country available for this designation. In these times of endless human population increase, ever-increasing human pressure on the forest, and rapid climate change, the maximum amount of roadless area should be managed as recommended wilderness.

I object to the elimination of old growth standards and their replacement with unenforceable guidelines. Almost no real protection for old growth remains. That you will log old growth in order to save it is ridiculous. What a giveaway to the timber industry. Isn't this a violation of the Executive Order to protect and preserve mature and old growth forests?

I object to the weakening of protections for aquatic habitat. Stream buffers are reduced by 50% to 67% on the rest. Current standards that measure sediment are eliminated and replaced by vague guidelines. This will harm salmon, steelhead, Pacific lamprey, bull trout, and cutthroat trout.

I object to the lack of protections for wildlife. There are no longer any road density standards or motorized trail standards to protect elk habitat. These standards also protect grizzly, wolverine, lynx, fisher, and mountain goat habitat. There are no protection standards for grizzlies. The Bitterroot ecosystem provides important connectivity between the Yellowstone and NCD ecosystems, and grizzlies are beginning to show up here. The minimal wilderness recommendation does not protect enough grizzly, mountain goat, wolverine, lynx, fisher, or marten habitat.

I object to the increased logging the new plan proposes, 5 times the average of 20 years ago. You call it restoration, but that is never what it is. You purposely ignore the science that demonstrates logging's habitat destruction and significant greenhouse emissions. In 2024, and beyond, timber production is certainly not the best use of the forest.

I object to the opening of a large part of the Great Burn roadless area to snowmobile use. I have backpacked in the Great Burn many times. It's a spectacular place, and includes exceptional wildlife habitat. I would say that it's one of the wildest-feeling places I've ever been, and you are now opening it up to motorized use. The motorheads have the run of 99% of the US, and for them to claim they have no other similar areas open to abuse is pure B.S.

Below are my previous comments submitted 4-20-2020. They demonstrate the connection with the objections above, and stand as objections themselves because every single one of them was ignored.

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Submitted to <https://cara.ecosystem-management.org/Public/CommentInput?project=44089>

And e-mailed to [sm.fs.fpr\\_npclw@usda.gov](mailto:sm.fs.fpr_npclw@usda.gov)

Attn: Zach Peterson, Forest Planner

I live in Montana's Bitterroot Valley, and I know that Nez Perce and Clearwater Forests encompass some of the wildest remaining country in the northern Rockies. It is a precious place and should be preserved for future generations of humans and wildlife. Once these special places are lost to road building, logging, and motorized use, they are gone forever. Why not try to preserve as much of it as possible for future generations—of both humans and wildlife? In 100 years, people will be thankful that you had the foresight to do so. I went to the public open house held in Hamilton this winter, and I was appalled by the alternatives you offered. All propose to increase commercial logging, build more roads, and decrease the extent of potential wilderness over the current plan. It appears that, for the short term economic gains mandated by our current politicians, you are selling out the American people who own these lands. Shame on you! These politicians will soon be gone, but your new forest plan will live on for many decades. Stand up to the politicians, please.

Below are specific issues brought forward by the open house:

1. **You have obviously not used best available science to design your alternatives.** NEPA requires it. I am so tired of the propaganda that logging will prevent wildfires and improve forest “health” (a meaningless buzzword). Most recent science disputes these ideas, and you need to consider this recent science. And models are no substitute for field-based science to make decisions.
2. **You have eliminated quantifiable standards that protect the forest.** The old plan has them, and even with them it is hard to control detrimental effects. With ever more people and pressure on the forest, more stringent standards are needed, not more lax ones.
3. **Increasing timber harvest is obviously politically driven, and not science driven.** I was told by the acting Bitterroot NF Supervisor in 2018 that the Trump administration is mandating this increase. At the Hamilton meeting, models and junk science that could best be called propaganda were shown to justify the increases.
4. **The format of the Hamilton open house suppressed any real public input by separating the public and not allowing them to hear each other’s concerns.** I was told by the so-called moderator: “You have probably already attended a Friends of the Clearwater meeting and had public discussion there—that’s not the purpose of this open house”. Well, I hadn’t, and even if I had, NEPA requires that **you** consider public input. And why didn’t you analyze the Friends of the Clearwater’s Citizen Conservation Biology Alternative that had the support of 10,000 comments? The National Environmental Policy Act NEPA requires the Forest Service to, “include reasonable alternatives not within the jurisdiction of the lead agency.” 40 CFR section 1502.14(c). It appears to me that you broke the laws requiring consideration of public input.
5. **The Forest Plan disregards its effects on Climate Change.** The proposed plan says that we are in a “natural warming period”, and so does not consider its proposed alternatives effects on climate change. This is clearly another political statement not supported by best available science. There are recent studies showing that logging emits more CO<sub>2</sub> than any type of wildfire (and of course many other papers concluding that logging does not reduce wildfires anyway).
6. **You have eliminated measurable standards.** This creates a situation where “anything goes”; nothing is enforceable. “Desired conditions” is a term with little meaning; for example, desired by who? And this is a part of “conditions-based analysis” which has been ruled to be illegal in a recent Tongass NF case.
7. **You have eliminated almost all the management areas, in favor of a few general ones with few standards.** Surely the forest ecosystem is more complex than this! It looks like it was in the previous forest plan. What happened? By eliminating the details, you are essentially creating a plan that is no plan at all.
8. **You do not protect old growth.** Old growth is becoming more rare every year, and its importance as habitat for rare creature require that it be protected. It is also important to protect future old growth, that which will qualify in 30-40 years. In the Bitterroot NF, this future old growth is the favored logging target.

9. **Your plan does not provide ample protections for riparian areas and fisheries endangering the recovery of Steelhead and Bull Trout.** The plan does not guarantee the protection of fish habitat nor does it include quantifiable standards that will prevent the degradation of salmon and steelhead habitat. The current plan has quantifiable standards for riparian areas and fisheries. The new plan does not provide quantifiable standards for soils in grazing allotments. These should be clear and monitored every five years. Keep grazing cattle from riparian areas by permanently retiring unused grazing permits.
10. **Your plan has no plan for recovery of grizzly bears.** The grizzly populations in Montana remain in isolated recovery areas. Connectivity and genetic exchange is necessary for their survival into the future. The Nez Perce Clearwater Forest is a key corridor connecting bears from the Cabinet Yak to the Bitterroot Recovery Area. Confirmed sightings of grizzly bears in NP-C NF require that this be addressed.
11. **Your plan fails to protect RWA's wilderness qualities.** It allows motorized and mechanized travel, and aircraft landings in RWAs, not only degrading their wilderness qualities, but essentially precluding them for ever being designated as Wilderness. I am particularly concerned with the Great Burn, having backpacked there many times. It's a spectacular place, and includes exceptional wildlife habitat. I would say that it's one of the wildest-feeling places I've ever been. I, and the wildlife, would hate to see any type of motorized vehicle in there, including snowmobiles. The motorheads have the run of 99% of the US. Can't we just save a sliver of the country as untrammled?
12. **Your plan lacks real protections for roadless areas.** At the Hamilton meeting, I was told the Idaho Roadless Rule will protect them. We all know this is not true, and your plan creates additional loopholes in the name of "forest health", a meaningless term. No road building, temporary or permanent, should be allowed in roadless areas. All roadless areas should be recommended for wilderness.

Given the choice of alternatives you presented, I favor a "NO ACTION" alternative. Keep the current plan.

Sincerely,

Jeff Lonn

Hamilton, MT