

Nez Perce Clearwater Draft Forest Plan Comments
April 19, 2020 *Ditto Jan. 26. 2024*
Submitted by Shelley Dumas

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Through employment, volunteering, recreating and spousal affiliation, I have had a close affiliation with the USFS for over 50 years. That connective tissue runs deep and has resulted in my advocacy of the agency's mission as the preeminent caretaker of OUR Public Lands — a concept that is truly, uniquely "American". Unfortunately, I have become less enamored of current USFS policies and actions.

"Restoration" has become the new buzzword for justifying extreme and questionable practices. Increased timber cutting to alleviate fire fuels in the name of forest health would be laudable if it wasn't so laughable. Climate Change isn't adequately addressed as the culprit of widespread dry conditions which has led to catastrophic fires. The most important defense for reducing greenhouse gases that contribute to climate change is vegetation, namely TREES . . . and yet wholesale deforestation through rather indiscriminate logging is the driving force in the Forest Plan.

Since a new Forest Plan could potentially be the go-to document for the next 30 years, it needs to be done right. Either take the NPCL team back to the table for major revisions or scrap it entirely and keep the old one which, at least, adhered to a better ecosystem approach with high standards.

LOGGING. I am not/have never been opposed to logging. Timber is certainly an important commodity (especially during this pandemic when tp is considered a highly valuable survival item!). Every timber sale should be designed with a land conscience and the best scientific data available. Gauging by the number of logging trucks I pass every day and the massive stockpiles at the mill(s), I would surmise the current harvest levels are adequate and should not exceed 80mmbf. Contemplating anything over 100mmbf would seem irresponsible considering how the forests and timber personnel would be over-stressed by that burden. The suggestion of a 450% increase (Alt X) in timber production is ludicrous. Although timber is "renewable", there is a limit as to what abuses forests can endure. The idea of sustainability goes way beyond the notion of natural regeneration or poking a seedling in the ground when survival rates are immediately compromised by soil disturbance, erosion, weather, weeds. MAN-ipulation is not a substitute for natural processes, so great care must be applied to any timber sale.

Identified pockets of old-growth forests and ancient trees must be protected for scientific purposes/comparisons and aesthetic enjoyment. There should be no consideration of logging in these areas for any reason; these oldies-but-goodies provide perfect homes for uncommon, isolated plant and animal species.

ROADLESS AREAS. All 1.5 million acres of roadless areas within the NPCL Forest must be protected as undeveloped, pure gems of wildness and natural diversity. Keeping these landscapes intact must be the USFS' highest calling because once they're gone, they're gone forever.

WATER. This is probably the most critical resource of all. Every river and stream should be equally protected and valued as contributors to healthy watersheds (with specific fisheries, plant communities, associated wildlife). Why-on-earth would any earnest forest steward recommend that the stream-side buffer be reduced? **MAINTAIN** (or extend) the 300 ft. stream side defense zone.

RECREATION/TRAILS The USFS has squandered a wealth of system trails. So many of the NPCL trails have fallen into disrepair which makes them difficult to find or use. This creates a convenient "out" for the USFS: Fewer useable trails means fewer trail-based recreationists which translates to meager trail-maintenance budgets because the user-numbers don't justify the expense. However, since walking/hiking accounts for nearly 45% of forest recreation activities (the highest), why isn't more effort put into trail maintenance? The NPCL has definitely shirked this responsibility and historic precedence.

WILDLIFE Logging totally ignores, disrupts, displaces wildlife species. Every felled tree and uprooted bush eliminates a nest, hiding place, shade and food source. There needs to be more emphasis on maintaining/retaining the needs of non-game species.

An uncompromised wildlife corridor must be maintained from North Idaho to and through the wilderness zones of the Selway-Bitterroot and Frank Church-RONR wildernesses. Currently the Roadless Areas from the Upper North Fork/Mallard Larkins through the Cove-Mallard provide that. There should absolutely be NO snowmobiling allowed in the areas adjacent to Hoodoo Pass and the Toboggan Hill-Blacklead-Williams Peak area. Snowmobiles will and do have a negative impact on wildlife during a time of great vulnerability. **NO SNOWMOBILES in the Great Burn.**

Regarding any kind of motorized "backcountry" use, it doesn't take an expert to observe that the majority of motor-heads are the greatest land/resource abusers; garbage, wildlife harrying, mud-bogging, facilities damage, trail damage etc. This problem is exacerbated by the fact there is virtually no law enforcement presence on the NPCL Forest.

I can't quite agree with the Forest Plan Executive Summary that states "Elk habitat quality is not degraded by invasive species". How is that measurable? It is very difficult to have high quality wildlife forage as a by-product of logging when a host of invasive weeds are waiting in the wings to colonize a disturbed site.

I have never seen a Fisher or a Wolverine in the wild. Is the USFS managing wildlife habitat and remote wild areas so that I might have that opportunity?

MISC.

—Grazing allotments that have not been used for five consecutive years should be vacated . . . permanently.

—Since the forest has no oil or gas deposits, there should be no speculative, exploratory permits. Any other mineral explorations permits should be well-vetted and monitored. There needs to be permanent stream-protection measures in place for suction dredge mining.

—There needs to be less emphasis and reliance on the advice and input from county commissioners who have no environmental or natural resource background. Any commissioner who touts the philosophy of “Log It, Graze It or Watch It Burn” should not have a place at the table. Economics (managing solely for profit) should never trump superlative ecosystem-based decisions and actions

—The citizen-science alternative needs to be revisited by the NPCL Forest Plan team.

—Every element of the Plan needs to have quantifying standards.

I do not want to see ANY alternative that sets a minimum (low) bar for resource management. There is no better “desired condition” than that which occurs naturally.

I do not discount or doubt the massive hours and effort it has taken to produce this Draft Forest Plan. At the end of the day, USFS employees need to ask: “Is this what is best for the resource, for our Public Land?”

Shelley K. Duma
Grangeville, Idaho

COMMENTS on the Nez Perce-
Clearwater National Forest
Plan/Draft Record of Decision

As a collective of varied personnel, the USFS can't seem to "see the Forest for the trees"... which makes the NP-CNF Plan a very sad document.

The public understands the agency must adhere to a planning template and certain legalities, but as a 12-year effort, The Plan fails the most rudimentary guidelines for sustaining the critical natural elements of our public lands. A large, outspoken segment of the public are forest advocates -- the environmentally "woke" -- the "tree huggers". Since the USFS has veered to the right, perhaps The Plan is meant to insure there are no trees left to hug. Rather than "Protecting the Land, Serving the People" the USFS has changed its tune to "Log It, Graze It or Watch It Burn". The GREEN part of the logo is about money - not trees.

A better name for The Plan might be Draft Wreck-ord of Incision as the NP-CNF main theme is CUTTING - LOTS of trees, vital wilderness acreage, sweet deals with industry and abusive recreationists

- When former/retired USFS employees are vocally critical of The Plan and agency -
Something is very wrong
- When staff members of environmental advocacy organizations have a keener understanding of USFS requirements, ecology and "forest health than the agency -
Something is very wrong
- When the concerned public can peruse The Plan and detect flaws, discrepancies and holes big enough for a logging truck -
Something is very wrong

I am resubmitting my NP-CNF Draft Forest Plan Comments (April 19, 2020) as they are still valid. I want that document added to the 2024 collection of public opinion -- in addition to the following addendum:

TREES/TIMBER

While the USFS views trees as a commodity, I see trees as a community — a vast, complicated, miraculous infrastructure of inter-connected, inter-dependent organisms. The drastic, troublesome increase of timber sale levels and locations means the indiscriminate felling of my trees for industrial profit while my tree-based experience is devalued. I am not, have never been, opposed to logging but the "proposed" site sizes and board foot numbers are EXCESSIVE. The Hungry Ridge and End-of-the-World projects are TOO BIG!!! The Plan is obviously NOT based on "the best available science". The cited literature is a litany of biased documents produced by the government/USFS. Recent, private, more sophisticated research/documentation/publications are nominally used.

Rather than respecting/acknowledging the superiority of natural landscape and processes, the USFS has convinced itself that MAN-ipulation is preferable. The USFS has skirted mandated environmental laws by ignoring or changing them. Note: the Hungry Ridge "old growth" obuondoggle.

The goal of President Biden's directive is to inventory and map all old-growth species and locations to protect those stands yet the NP-CNF plan intends to remove some.

The predictable skein of USFS subterfuge continues with the overuse of hackneyed "press release" phrases: "forest health", "forest restoration", "fire mitigation" — all buzzwords to camouflage poor MAN-agement. The new Plan is a way to remove and/or compromise the workable hard standards for water quality, fisheries, wildlife habitat, wilderness study areas, motorized vehicle use.

- Reducing stream buffer zones from 300' to 150'? NO!
- Cutting small diameter trees along stream? NO!

Massive logging and huge clear cuts are not helpful in dealing with the real and frightening aspects of

CLIMATE CHANGE! The Plan should be focused on Carbon Sequestration!!

With the combined Hungry Ridge/End-of-the-World sales amounting to 317 million board feet of trees/timber, that's 640,000 logging trucks of planet-saving trees going down the road for more houses and toilet paper.

WATER quality, quantity and sources will continue to be a hot topic ... and a critical element in the Climate Change Challenges. Reducing stream buffers, building more timber-access roads, and obliterating big sections of trees thereby creating more water evaporation and higher water temperatures will add to the dilemma. Newly logged (decimated!!!) areas will be an invitation for weed and insect infestations and vegetative desiccation with a great potential for dry fuels and fire. Add to that prescription fires and slash burning putting more hazardous smoke into the atmosphere ... so what is gained? This is science?

PROTECTING private properties and rural communities from possible wildfires? I'm not quite sure how/why that is a USFS mission. The potential for wildfire is not the same as a guarantee of a wildfire event. Regardless the beloved USFS fireshed models, fire is unpredictable

The Hoodoo/Great Burn Roadless Area needs to retain its acreage stature and potential for legitimate wilderness designation. Why does The Plan reduce the eligible acreage and purposely compromise/degrade its wild character while callously disregarding the Lolo NF's prohibition of snowmobiles across the state line. Reinstate all protections (NO snowmobiles, NO snowbikers, NO mountain biking) and the 32,000 acres of recommended Great Burn wilderness.

Shelley Dumas
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SPOKANE WA 990

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Leanne Martin
Regional Forester
Northern Region
26 Fort Missoula Rd.
Missoula
Montana 59804

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NDCNR
Forest Plan Comments
59804-730326

