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April 20, 2020

Nez Perce – Clearwater National Forest
Attn: Zach Peterson, Forest Planner
903 3rd Street
Kamiah, Idaho 83536
CC: Nez Perce-Clearwater NFs Forest Plan Revision #44089

RE: Comments to Draft Revised Forest Plan and Draft Environmental Impact Statement of the Nez Perce-Clearwater National Forest.

Dear Forest Planner, Zach Peterson,

Please accept the following comments from Trout Unlimited (TU) regarding the Nez Perce-Clearwater National Forest Draft Revised Forest Plan and Draft Environmental Impact Statement (collectively referred to as the draft plan and DEIS).

Trout Unlimited is the nation's oldest and largest non-profit coldwater conservation organization with over 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU staff and volunteers have worked toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges. Additionally, we recognize the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes that the actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

In Idaho, TU plays a critical role in watershed conservation, restoration, and rehabilitation on public lands, particularly our forests. Nine chapters with 2,500 members statewide actively participate in projects with the National Forest, local communities, and private landowners in order to maintain the larger forest landscape that is so vital to the social and economic well-being of communities in Idaho. Trout Unlimited's Idaho chapters have long-term relationships with the National Forest system and partnerships with stakeholders to develop mutually beneficial solutions to land management problems.

The Nez Perce-Clearwater National Forest (NPC) is host to a large portion of occupied habitat for spring/summer Chinook, fall Chinook, steelhead, westslope cutthroat trout, bull trout and other native aquatic species. With spring/summer/fall chinook being listed as threatened under the Endangered Species Act in 1992, steelhead in 1997 and bull trout in 1998 the NPCNF plays a critical role in the perpetuation of these species not only in Idaho but the Columbia River Basin and the Pacific Northwest.

Because these fish are only found in specific and limited places, protection of their watersheds and habitats are especially important. The listed anadromous species have adapted to this region over eons; they are a part of Idaho's culture, social, economic and angling heritage.

Trout Unlimited has worked on salmonid species issues consistently over many years, and we are excited to take advantage of this opportunity in the planning process to ensure even better protections for these fish.

We request that the NPCNF include additional plan components that recognize spring/summer/fall chinook and steelhead values to ecology, landscapes, sportsmen and women, and cultural heritage and ensure these species expand its range and establishes more robust populations under this new forest plan.

Major Recommendations

Trout Unlimited has reviewed the draft plan and draft environmental impact statement. We are largely supportive of the plan as written and commend the Planning Team for their work to date. Trout Unlimited applauds the Planning Team and their diligence through the history of plan development. Trout Unlimited appreciates the Planning Teams attention, balancing the four identified issues (Recommended Wilderness and Wild and Scenic Rivers, Recreation and Access Management, Forest Vegetation and Timber) with their incorporation into the four action alternatives.

Below we have provided additions and recommended changes that we believe will make for an improved final plan that will maintain and restore watershed health, water quality, terrestrial and aquatic habitat, and native species while providing many additional ecosystem services to forest users and surrounding communities.

We support NPCNF and their dedication as identified in the draft environmental impact statement to ecologically, socially, and economically sustainability while being sensitive to Idaho's rural prosperity, in concert with restoring, establishing and maintaining functioning ecosystems.

Trout Unlimited is committed to partnering with NPCNF to achieve these goals over the life of the plan, with an emphasis on one additional goal: restoration of wild native migratory salmonids to their historic range.

Our major recommendations based upon the effects of the alternatives as listed are focused on these areas as follows:

Forest wide components to provide for integrated social, economic, and ecological sustainability, and ecosystem integrity and diversity, while providing for ecosystem services and multiple uses. Components must be within Forest Service authority and consistent with the inherent capability of the plan area (36 CFR 219.7 and CFR 219.8–219.10).

- Include objectives in the final plan that will restore native and migratory anadromous salmonids to their historic range and reconnect isolated populations occurring in headwater streams.
- Include objectives in the final plan to improve water quality, stream habitat, and aquatic connectivity, as well as standards to protect high-value riparian habitat and free-flowing rivers and streams.
- Include intermittent streams and ephemeral channels in the final plan's definition of riparian management zones to protect native species and water quality.

- Incorporate in the final plan components for RMZs as proposed in the Draft Forest Plan. The plan components for RMZs are critically important, particularly in watersheds inhabited or used by candidate, threatened and endangered fish.
- Recommend identifying any watershed that is not meeting desired conditions as a priority watershed, unlike the current proposal, identifying only three drainages.

Recommendations to Congress, if any, for lands recommended for inclusion in the National Wilderness Preservation System and/or rivers suitable for inclusion in the National Wild and Scenic Rivers System (36 CFR 219.7(2.v) and (vi)).

- Include in the final plan recommendations and management direction for recommended wilderness areas. The recommended wilderness areas fulfill multiple valuable goals for protecting important fish and wildlife habitat, landscape connectivity across a broad swath of the forest, and play a key role in providing a diverse and rich mix of recreational opportunities on this unique national forest
- Incorporate directives in the final plan that make recommended wilderness areas unavailable for any use that may reduce a recommended area's wilderness designation potential.
- In the final plan eliminate non-conforming uses that are incompatible with protecting the area's wilderness attributes and potential.
- In the final plan manage recommended wilderness areas in a primitive or semi-primitive non-motorized recreation opportunity spectrum ("ROS").
- All 89 rivers determined to be suitable for inclusion in the Wild and Scenic Rivers System should be included in the final plan.
- Include in the final plan all eligible rivers classified as suitable under the Wild and Scenic Rivers Act with plan components to protect their suitability status and their ORVs.

Identification of watersheds that are a priority for maintenance or restoration (36 CFR 219.7 (c.3), (e.3) and (f)).

- Accept into the final plan the Conservation Watershed Network. Development and inclusion of the Network provides a pattern of protection across the landscape where the habitat of migratory salmonids receives special attention and treatment.
- Include in the final plan components that the Conservation Watershed Network include both a list and a map that make distinctions of which watersheds are meeting desired conditions and which are not.
- The final plan should limit management activities within riparian management zones to only those that maintain or restore connectivity, function, composition and structure by including a standard to that effect. There should also be an objective specific to acres of riparian habitat restored.

Identify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered (36 CFR 219.3).

- Estimated sediment yields in watersheds with lands identified as suitable for timber production would be most useful. Projected sediment yields across alternatives should then be compared to existing and desired aquatic conditions

- Include in the final plan estimated sediment yields to the extent of the existing road network across lands identified as suitable for timber production, relative to the road network that would be required to achieve projected increases in annual timber sale quantities.

Trout Unlimited did not find any of the alternatives, as they stood preferable. The NPCNF's "all or nothing" approach in alternative approach fails to recognize the collaboration that has occurred among interested parties, communities and organizations in the development of the draft Forest Plan. In the following narrative you'll find recommendations and portions of each alternative, specific to Trout Unlimited's mission to conserve, protect and restore coldwater fisheries and their watersheds.

Protections for Native and Migratory Salmonids

Trout Unlimited believes the best management approach to recovering spring/summer Chinook, fall Chinook and steelhead populations is a forest-wide approach to restoring riparian and stream habitat while working collaboratively with the Nez Perce Tribe, Idaho Fish and Game and groups like TU to focus work in priority areas on the forest while being responsive to change.

Climate change may affect water quantity by changing seasonal river flows as well as increased fire intensity and severity. Some areas may experience reduced flows, increased flows, or a change in flow timing. Shifts in the timing and magnitude of snowmelt runoff may increase winter flows and increase the risk of summer drought. Increased winter temperatures and reduced snowpack could cause peak flows to increase and result in diminished runoff earlier in the season than under current conditions. Increased fire activity may result in increased sediment input into streams, as well as reduced shade.

Given that there are good spatial predictions of forecast changes in stream temperature via NorWeST models, <https://www.fs.fed.us/rm/boise/AWAE/projects/NorWeST.html>, and changes in precipitation regime and seasonal stream flow via the Columbia Basin Climate Change Scenarios Project, <http://www.tandfonline.com/doi/full/10.1080/07055900.2013.819555> and http://warm.atmos.washington.edu/2860/products/primary_data/, those products should be incorporated as a means to refine where critical habitat actions are among or within migratory anadromous fish distribution. The NorWeST model describes the pattern of mean August stream temperatures (1993-2011) within the Clearwater basin – this is a useful application of the NorWeST data (and a method that should be expanded to other populations) that can be furthered by also using the forecast mean August stream temperatures (2040) to describe those locations where stream temperatures will likely be suitable for chinook or steelhead in the future. Not only would that information be useful for highlighting the locations where habitat actions are likely to have lasting benefit for the species within populations (e.g., within the Clearwater basin), but also for prioritizing populations based on where climate-secure habitats are located.

Finally, it is imperative that efforts to recover spring/summer Chinook, fall Chinook and steelhead throughout their historic range and that projects are implemented to reduce risks to migratory salmonids from increasing water temperatures due in part of climate change and catastrophic wildfire in the long-term.

Please incorporate the following plan components in the final plan to benefit native and migratory salmonids:

- Support strong protective stream buffers along all perennial rivers and streams as found and recommended in the Northwest Forest Plan (USDS, 1994) with PACFISH and INFISH Biological Opinions.

- Incorporate language in the final Forest Plan that maintains the 1998 PACFISH and INFISH Biological Opinions required all streams within the range of Endangered Species Act -listed steelhead be considered “PRIORITY” watersheds.
- Maintain standardization that defines the delineation of riparian management zones and minimum widths.
- Guidelines for mineral development to limit mining impacts to native and migratory salmonids, including from suction dredge mining activities.
- Decommission or eliminate redundant or unnecessary roads in priority watersheds identified as critical habitat for native salmonids or where impacts to water quality and aquatic habitat are occurring, especially where such roads overlap with native and migratory salmonids.
- Monitor flow and temperature regimes in critical habitats and future planned restoration zones.
- Work in conjunction with other resource concerns (grazing permittees, water right holders, forestry project leads, etc.) to prioritize and develop mutually beneficial projects, such as pairing upland restoration projects with improvements to streams and habitat.
- Create educational experiences around native and migratory salmonids, their natural history and importance.

Forest-wide Plan Component Discussion and Recommendations

Aquatic Ecosystems

Water and Aquatic Resources

Trout Unlimited appreciates NPCNF’s recognition of the value of water resources originating from watersheds managed by the Forest Service. As noted in the draft plan, Appendix 6 (page A6-3) one of the original purposes of the establishment of our National Forest System was to protect water resources. Areas with water are also areas of high biological diversity and contribute to overall ecosystem sustainability. It is essential that management direction in the forest plan emphasize the protection and restoration of watersheds, riparian areas, and aquatic systems to ensure that the NPCNF continues to provide cold, clean water and associated values throughout the duration of the plan.

We support the desired conditions for Water and Aquatic Resources (FW-DC-WTR) and commend the planning team for inclusion of excellent language in this section. We are especially supportive of desired conditions that call for resilience to respond and adjust to disturbances, including climate change (DC-01), spatial connectivity managed water sheds move in concert with or towards those in reference watersheds (DC-02), aquatic habitats contribute to ecological conditions capable of supporting self-sustaining populations of natives species etc (DC-03), Water quality, including groundwater, meets or exceeds applicable state water quality (DC-05). We believe all these desired conditions should be included in the final plan.

We are supportive of Alternative X increased objectives for watershed restoration – we believe this should be one of the highest priorities for the NPCNF over the life of this plan. As noted in the DEIS the NPCNF has “riparian stream habitats ranging to highly disturbed with varying degrees of impaired function”. Additionally, the NPCNF “supports a significant percentage of remaining spawning and rearing habitats accessible to anadromous fish in the Snake River basin”. (pg 3.2.2.2-9) These factors must guide and dictate watershed restoration efforts.

Conservation Watershed Network

We ask that clarification be made in the final Forest Plan on the designation of “priority” watersheds and their roll or inclusion in the Conservation Watershed Network. In the 1998 PACFISH and INFISH Biological Opinions required “all streams within the range of Endangered Species Act – listed steelhead trout be considered a KEY or PRIORITY watershed”. Throughout the DEIS the term “priority watersheds” is used but it is unclear and confusing to say the least if this term is being used in concert with that found in the PIOB.

While the description of the Conservation Watershed Network clearly indicates a focus on native salmonid fish, it is not clear which of the subwatersheds included in the Network are meeting desired conditions and which subwatersheds are not meeting desired conditions. Furthermore, it is unclear whether subwatersheds included in the network that do not meet desired conditions influenced the identification of the priority watersheds. Table 6 on page 3.2.2.2-39 distinguishes between No Action and Action alternatives drawing comparison only to HUC12 watersheds in the Selway Basin, with no other basins listed.

Also, it is our preference that objectives (CWN -01 and 02) be focused on *decommissioning roads and motorized routes* rather than simply maintaining roads. The change to these objectives is significant in several ways that should result in greater ecological benefits and help achieve desired conditions over the life of the plan. First, it distinguishes “decommissioning” from simply maintaining or improving roads (those could be a separate objective). Second, it focuses on roads and should include unauthorized roads and motorized trails which are the primary cause of ecological degradation.

We also would like to express our support for management approaches aimed to work with partners to develop projects and priorities for watershed protection, remedying impacts of water diversions, considering opportunities to secure instream flows, and developing watershed specific plans for road system management. These plan components along with Alternative X’s objectives will move the forest toward healthier watersheds, streams, and aquatic systems and we ask that any plan components we have highlighted are retained in the final plan.

Riparian Management Zones

We support the draft forest plan components for Riparian Management Zones and ask that they be included in the final plan. We are especially supportive of the following plan components and have provided some of our rationale.

Delineation of riparian management zones based on site conditions. The Categories rightfully include intermittent and seasonal (ephemeral) streams in the delineation of riparian management zones (RMZs) and should be included in the final plan. Protecting the riparian areas of lower order streams is essential to protecting downstream water quality and supported by best available science. Consider the following:

“The importance of biogeochemical transformations, in terms of preventing pollutants from reaching adjacent waters, diminishes as one goes from ephemeral and first- and second-order streams to larger, higher-order streams. A greater portion of the flow passes through riparian areas along low-order streams before reaching the channel network, making their riparian areas more instrumental in removing pollutants from runoff. In contrast, most of the flow in high-order streams comes from low-order stream channels, and only a small portion of the flow in high-order streams actually crosses the riparian areas associated with the high-order stream segment. This suggests that if water-quality protection is a primary objective, priority should be given to restoration of functional riparian areas along ephemeral and first- and second-order streams over larger, higher-order streams (similar to the conclusion reached by Brinson (1993) for wetlands used for water-quality protection).” -National

Research Council. 2002. *Riparian Areas: Functions and Strategies for Management*. Washington, DC: The National Academies Press.

FW-DC-RMZ-01. Riparian Management Zones reflect a natural composition of native flora and fauna and a distribution of physical, chemical, and biological conditions as compared to reference conditions. The species composition and structural diversity of native plant communities in riparian management zones provide adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, and channel migration. Nutrients, large woody debris, and fine particulate organic matter are supplied in amounts and distributions sufficient to sustain physical complexity and stability.

FW-DC-RMZ-02. Riparian Management Zones feature key riparian processes and conditions that function consistent with local disturbance regimes, including slope stability and associated vegetative root strength, wood delivery to streams and within the riparian management zones, input of leaf and organic matter to aquatic and terrestrial systems, solar shading, microclimate, and water quality.

FW-OBJ-RMZ-01. Improve 300 to 700 acres of riparian habitat. Improvements can be actions such as road obliteration, riparian planting, reconnecting floodplains by removing road prisms or berms, etc. Every 5 years.

We support this restoration objective, but suggest that given the importance of riparian ecosystems, a higher end target be included in the final plan. We suggest the following:

- *Improve 700 acres of riparian habitat of nonfunctioning and functioning-at-risk riparian areas annually, every 5 years.*

The value of healthy and functioning riparian areas is widely recognized, riparian areas and wetland ecosystems regulate and support water cycling and infiltration, recharge aquifers, reduce flood damage, protect water quality, provide for water temperature regulation, provide wildlife connectivity, and are some of the most important and biodiverse habitats on the forest and critical to providing supporting and provisioning ecosystem services to downstream communities .

Finally, we support the inclusion of a guideline to limit adverse impacts from mining in riparian management zones. The following guideline from the Flathead National Forest's Final Plan should be included in the NPCNF final plan to help meet desired conditions for water quality and riparian habitat:

- *To protect water quality and migratory and native fish habitat, wildlife and other riparian-associated resources, mineral operations should not be authorized in riparian management zones. If the riparian management zone cannot be avoided, the authorization should include measures to maintain, protect, and rehabilitate fish and wildlife habitat that may be affected by the operations.*

Recommended Areas

Trout Unlimited supports the highest protections and designations under the management decisions of the NPCNF, the Wilderness Act and the Wild and Scenic Rivers Act (WSRA) while retaining flexibility for active management and improvements of ORV's, especially native and migratory salmonids.

Recommended Wilderness

Trout Unlimited supports the desired conditions for recommended wilderness that contribute to clean water, wildlife habitat enhancement, primitive recreation opportunities, and cultural ecosystem services. We support the inclusion of standards MA -STD-RWILD-01 and MA2-STD-RWILD_01, Alternative W and Y in the final forest plan that ensure the wild character of these places is maintained and management

achieves desired conditions, including prohibitions on roads and motorized recreation, commercial timber harvest, new energy developments or leases, and the sale extraction of common variety minerals.

We do not support the inclusion of any standards that will/may deviate from “the management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation”³⁶ CFR 219.10(b)(1)(iv). Any alternative in the NPCNF planning effort that allows continued or new motorized or mechanized use or provides a course of opportunity to open recommended wilderness to motorized or mechanized use, will be in conflict with 2012 Forest Planning Rule.

Active fish and wildlife management in recommended wilderness areas faces several challenges due to management under the Wildland Recreation theme, including limited access and restrictions on equipment use. Trout Unlimited supports MA2-SUIT-RWILD-21, which states, Administrative uses (e.g., research, monitoring, aircraft landing including unmanned aircraft) related to management responsibilities, including by other federal and state agencies in coordination with the Nez Perce-Clearwater.

Our recommendations for RWA in the final forest plan are as follow:

- Trout Unlimited supports RWA’s that fulfill multiple valuable goals for protection of important fish and wildlife habitat, landscape connectivity across a broad swath of the forest, and play a key role in providing a diverse and rich mix of recreational opportunities on this unique national forest.
- Implementation of management direction that maintains the wilderness characteristics of the recommended areas that preserve opportunities for inclusion in the National Wilderness Preservation System.
- We strongly support the portion of the Mallard-Larkins Roadless Area delineated in Alternative Z (79,011 acres) for wilderness. The area spans a portion of both the Idaho Panhandle and Nez Perce-Clearwater National Forests, sharing a 33-mile boundary, creating a continuous area of solitude and primitive recreation encompassing approximately 255,700 acres. The Idaho Panhandle National Forest has already recommended the Mallard-Larkins are for wilderness. NPCNF’s inclusion of this recommendation to the final plan would complement the Idaho Panhandle NF actions.
- We strongly support the portion of the plan that recognizes the Hoodoo or Great Burn recommended wilderness in inclusion to the NPCNF’s final plan. This recommendation, like the Mallard-Larkins the Hoodoo compliments action of the Lolo NF and their identity of 98,100 acres of recommended wilderness creating a continuous 249,000 acres of recommended wilderness.
- We support the portion of the plan that recognizes Meadow Creek-Upper North Fork as recommended wilderness in inclusion of the final plan. Meadow Creek-Upper North Fork adds ecosystem connectivity to the Mallard-Larkins and Hoodoo recommendations.
- We support the portion of the plan that recognizes East Meadow Creek as recommended wilderness in inclusion of the final plan. East Meadow Creek creates a valuable connection between currently designated Selway-Bitterroot and Frank Church River of No Return Wilderness. The inclusion of East Meadow Creek in the final plan would preserve the ORV’s as well as the critical habitat that it supports native and migratory salmonids.

- We appreciate the NPCNF's acknowledgement and thought process of the effects of urbanization and population growth on recommended wilderness use and that resource conditions are likely to be gradual and to extend well beyond the planning period. We disagree with the statement that "increased recreational use may negatively affect wilderness characteristics, particularly the opportunity for solitude and natural quality. Examples of potential impacts include increased opportunity for crowding, soil compaction or erosion, and threats to native plant species from the spread of noxious weeds from sources outside the area" this statement seems to be placed in the DEIS as an avoidance mechanism of recommendation/designation of wilderness.

Suitable Wild and Scenic

Trout Unlimited supports the NPCNF's identification of 89 of the 1,460 named rivers and streams found eligible under the Wild and Scenic Rivers System. We support actions that continue protections that maintain these rivers suitability status including their free-flowing condition, water quality and the river related outstanding remarkable values identified for each river.

Our recommendations for Suitable Wild and Scenic in the final forest plan are as follows:

- Trout Unlimited supports RWS as a key role in providing a diverse and rich mix of scenic, recreational and wild opportunities on these unique national forest rivers and streams and supports the protection and perpetuation of the eligible and suitable ORV's river and streams.
- Trout unlimited strongly supports the inclusion in the final plan of all suitable rivers named in the North Fork Clearwater watershed, each contributing to its integrity through a systems approach. The suitability of these river segments contributes significantly to the ecological viability of fluvial and adfluvial populations of bull trout and westslope cutthroat trout while providing critically important annual flushing flows as well as thermal regulation of the Snake River through releases at Dworshak Dam. These coldwater releases serve as a vital remedy to warming waters found in the Snake River hydrosystem due to reservoir formation above the associated Snake River dams, creating a vital link to critical habitat found on the NPCNF.
- Trout Unlimited supports the inclusion in the final plan of the Little North Fork Clearwater River. Inclusion into a final forest plan provides continuity for a watershed shared by the Panhandle National Forest and its suitability finding of the Little North Fork Clearwater River. Similar to the North Fork Clearwater, the Little North Fork Clearwater River contributes to the integrity through a systems approach. The suitability of this river segment contributes significantly to the ecological viability of fluvial and adfluvial populations of bull trout and westslope cutthroat trout and provides critically important annual flush flows as well as thermal regulation of the Snake River through releases at Dworshak Dam. These coldwater releases serve as a vital remedy to warming waters found in the Snake River hydrosystem due to reservoir formation above the associated Snake River dams, creating a vital link to critical habitat found on the NPCNF
- South Fork Clearwater River and named drainages due to their continued and future contributions to native and migratory salmonids. As model's predict (NorWest) drainages such as the South Fork Clearwater River will become significantly more important for its contributions to Snake River basin salmonid stocks.
- Salmon River and named drainages due to identified ORV's in addition to their continued and future contributions to native and migratory salmonids.

- These vital waterways are a critically important component of the forest providing important ecosystem services and social value and deserving of the interim protections afforded eligible rivers pending full designation within the National Wild and Scenic Rivers System.
- Many of these waterways are regionally renowned blue-ribbon cutthroat fisheries, are designated as critical habitat for bull trout and provide cold water refugia despite projected climate changes

Although Trout Unlimited supports the suitability of rivers identified in the Selway and Lochsa drainages, current land management (designated wilderness) in adjacent landscapes provide an existing level of protection not found in the previously named drainages.

As noted in Table 28, page 106 of the Draft Forest Plan each of the rivers have been identified by specific outstanding recreation values to include, recreation, wild, or scenic values. Although we support a strong collaborative and cooperative work environment, we feel MA2-GL-SWSR-01 does not support the roll of Wild and Scenic Rivers Act and at times agencies, governments and private lands owners' actions degrade or counter future eligibility standards. We ask that all final plan components for recommended Wild and Scenic rivers maintain standards preserving each of the river segments ORV's.

Inventoried Roadless Areas (IRA)

Trout Unlimited supports managing roadless areas to provide a "myriad of other resource benefits, including undeveloped fisheries and wildlife habitat, biological diversity, and sources for high-quality water activities as intact ecosystems that provide a full range of ecosystem services." We request that all the current plan components are included in the final plan, with continuity with the Idaho Roadless Rule.

Trout Unlimited supports active restoration within and adjacent to IRAs to improve ecosystem function and benefit native species through habitat restoration but only when such work can be achieved consistent with the requirements of the Idaho Roadless Rule and forest plan components.

Monitoring

Monitoring is essential to determine the degree to which on-the-ground management activities and management direction in the plan are making progress toward desired conditions. The 2012 Planning Rule (36 CFR 219.12(a)(5)) requires that the plan monitoring program contain at least one monitoring question and associated indicator to address nine specific topics. Several monitoring topics - the status of select watershed conditions, status of select ecological conditions, status of focal species to assess how ecological conditions provide for the diversity of plant and animal communities, measurable changes on the plan area related to climate change, and progress toward meeting desired conditions – are of interest to TU and we would like to offer some brief comments and suggestions related to those.

Trout Unlimited believes that managing for watershed health and sustainable water resources should be a driving force in the future management of the NPCNF's, and we recognize improving conditions for impaired watersheds on the forest will require a long-term and forestwide emphasis on restoration. It is also important to protect those watersheds in properly functioning condition. In both instances, monitoring watershed health is essential to understanding how successful the NPCNF is in achieving desired conditions for watersheds.

Tracking acres treated for watershed restoration is an important component of monitoring. While it's not a perfect tool, we support using the indicator of watershed health as determined by USFS's WCC

Framework for measuring watershed improvement and suggest the NPCNF include a similar measure for stream health. We encourage miles of decommissioned roads be included as an indicator for watershed health as roads are often a cause of water impairment and other ecological degradation.

Concerning monitoring for at-risk aquatic species, the following are all excellent measures of habitat improvements and should reliably monitor changes on the forest for many at-risk aquatic species: number of roads decommissioned within the riparian management zone, and number of culverts removed or upgraded. We ask that they be considered in the final monitoring plan.

Effective monitoring is key to measuring the NPCNF's success in achieving desired conditions over the life of this forest plan and improving management strategies and on-the-ground treatments over time. We urge you to make this a forestwide priority over the life of the plan, and Trout Unlimited would like to partner with the NPCNF to help implement effective monitoring protocols where our interests align.

Summary

Trout Unlimited appreciates this important opportunity to participate in landscape planning for the Nez Perce – Clearwater National Forest. We believe the draft plan represents a positive step in developing a final management plan that will serve the Forest, local communities, and interested stakeholders in the coming decades. We ask that you carefully review the comments we have provided, many of which come from an analysis of management plans from neighboring National Forests in Colorado, New Mexico and Montana. We are confident that the consideration and inclusion of these suggestions will result in a stronger final management plan that addresses the identified *Needs for Change* and makes progress toward desired conditions for watershed health, fish and wildlife habitat, and the many other ecosystem services and values provided by the NPCNF.

Trout Unlimited applauds the NPCNF for its inclusion of partners in the planning process and the consideration of a wide variety of resource concerns and user groups in its analysis. We look forward to our continued participation in this process and other partnership opportunities this plan provides for. Please contact us if you have any questions about the comments we have provided, and thanks again for the opportunity to contribute.

Sincerely,



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