



February 20, 2024  
Objection Reviewing Officer  
USDA Forest Service Northern Region  
26 Fort Missoula Road  
Missoula, MT 59804

**Request to be considered as an Interested Person in the Objection Process for the 2023  
Land Management Plan, Final Environmental Impact Statement (FEIS) for the Nez Perce  
Clearwater National Forest**

**Interested Person Contact Information:**

Trout Unlimited  
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**Statement of reasons to be considered an Interested Person**

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.

Our staff and grassroots members have invested time and funding for habitat improvements on the Nez Perce-Clearwater National Forest. Trout Unlimited has been an active partner in the Clearwater Basin Collaborative since its inception. We have a vested interest in conservation outcomes on this forest. Additionally, our members recreate on forest and have a passion for maintaining quality fish habitat now and in the future.

While TU has more than a passing interest in habitat restoration and forest management decisions, we also see the value in setting the stage for future forest health with forest planning. We have been actively engaged in forest planning since it was initiated and most recently submitted substantive comments for the Draft Revised Forest Plan and Draft Environmental Impact Statement of the Nez Perce-Clearwater National Forest in April 2020.

Trout Unlimited supports much of the revised Land Management Plan FEIS and Draft Record of Decision, however, we do have object to some components of the draft ROD. Below we list our concerns and objections which we are interested in.

## **Wilderness**

Trout Unlimited supports Recommended Wilderness areas 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 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).

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. We are interested and support the objections made by the Montana Wildlife Federation.

Trout Unlimited still supports proposals in the draft plan that recognizes Meadow Creek-Upper North Fork as recommended wilderness for inclusion of the final plan. Meadow Creek-Upper North Fork adds ecosystem connectivity to the Mallard-Larkins and Hoodoo recommendations.

## **Wild and Scenic Rivers**

In our draft comments on the Forest Plan DEIS dated April 2020, Trout Unlimited stated that it “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.”

Through feasibility studies between the DEIS and FEIS, the forest has eliminated numerous segments as suitable for further study. The forest is now only classifying 10 river segments as suitable and one segment as eligible for inclusion. While TU agrees with the 11 segments carried forward for inclusion, we feel strongly that the forest missed the mark on its evaluation of numerous segments previously designated as suitable.

We are interested in the objections submitted regarding Wild and Scenic Rivers submitted by American Rivers. We are neutral on their objections, but have an interest into how this issue is resolved.

## **Species of Conservation Concern**

Trout Unlimited supports objections from the Nez Perce Tribe and the Idaho Wildlife Federation regarding 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,



Michael Gibson  
Idaho Policy Advisor  
Trout Unlimited