

Nez Perce Clearwater Draft Forest Plan Comments  
April 19, 2020  
Submitted by Shelley Dumas  
735 WN 2nd. Grangeville, Idaho. 83530  
Ph. 208-983-2821

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-plantation 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 in tact 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?"