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Organization:

Title:

Comments: To the decision makers of the National Forest

Re: The forest plan revisions for the Clearwater Nez Perce National Forest

At nearly 4 million acres, the Clearwater Nez Perce National Forest is both physically huge and administratively significant. This unique area is the largest intact ecosystem in the continental US. It contains 1.5 million acres of roadless areas and four nationally recognized wild and scenic rivers: Salmon, Selway, Lochsa and Clearwater. These facts mean that administration of this area is a tremendous responsibility with far reaching impacts on the land, water, plants, animals and people. The forest service has the power to shape this area for many decades to come. That is why the forest service has the obligation to consider and use current scientific research data to make the best-informed management decisions.

As visitors to this pristine country for over 45 years, my family has a reverent respect for this spectacular area. We strive to enter and leave with no trace of our presence. I urge decision makers to consider outlining plans to maximum protection of delicate plants, declining, threatened or endangered species and maintaining the health of the forests and waterways. This must be the governing philosophy of all decisions without pressure to ensure funding by engaging in funding provided by scheduling prescribed burns or with blind adherence to historic range of variability data to make decisions.

The current individual plans for each of the forests actually provide far better protections for water quality, fish and wildlife habitat than do any of the draft plans. The draft plans do a disservice to the wildlands, watersheds and wildlife of the Clearwater Nez Perce Forests. They also do a disservice to the citizens of this country by proposing a plan short on accountability and long on logging.

The Forest Service has indicated in their initial proposed action that they want to increase logging on these forests from current annual levels of 40 [ndash] 50 million board feet to 150 million board feet. In order to achieve these unsustainable levels, the new forest plan would do away with measurable and enforceable standards for water quality and sediment levels, old growth and wildlife habitat, riparian areas and fish habitat. The forest draft plan greatly reduces protective streamside buffers and would allow logging in riparian areas currently prohibited. This would be disastrous for declining populations of B Run Steelhead, salmon, bull trout and west slope cutthroat trout.

Logging in old growth forests would also gravely endanger critically imperiled Canada Lynx, endangered Idaho Wolverine and sensitive species such as fisher, pine martens, piliated woodpeckers and goshawks. The draft plan has few quantitative standards and would result in massive forest manipulation that is scientifically suspect. In fact, by Forest Service admission, some of the areas set for logging in the alternatives require access through current roadless areas, thus degrading even more land than what has already been done in the front country.

A paltry 20% of the 1.5 million acres of roadless wildlands on the forests are recommended for wilderness, and the rest is threatened with development, including increased off-road vehicle abuse. Special places like the Kelly Creek Roadless Area could receive some protection, but possibly end up fragmented by snowmobiles. Portions of the spectacular Meadow Creek Roadless Area could be subjected to off-road vehicle abuse. The Weitas Creek Roadless Area, the heart of Wild Clearwater Country, might not receive any protection, and be susceptible to development. Mechanized vehicle traffic would gravely impact sensitive populations of bighorn sheep, mountain goats, wolves and bears especially during the winter months when they are most susceptible to disturbances. Vehicle traffic damages habitat, harasses wildlife, causes erosion, results in leaks of oil and gas and increases greenhouse gases.

Some areas in the Weitas Creek region contain cultural and historical features such as the trail used by the Nez Perce and Chief Joseph in 1877 in route to Canada escaping from the US military. There are also many trails that were used by the Lewis and Clark Expedition in this region. These must be protected.

The diversity of this area, from low elevation habitat with coastal disjunct species in wet cedar forests to wind swept ridges with mountain hemlock on undulating peaks, is unique. This broad spectrum requires a broad vision for the future prioritizing protection and free of pressure from economic interests.

In conclusion, the Forest Service must focus on the following:

1. Reduce the negative effects of resource development to fish, wildlife, water quality, cultural and historical sites in the new forest plan.
2. Restrict mechanized vehicles from the proposed areas to protect fish, wildlife, habitat, and riparian areas.
3. Classify the Great Burn Area as wilderness to protect declining populations of mountain goats, lynx and wolverine and maintain the grizzly migration corridor.
4. Classify the Mallard-Larkin Area as wilderness to protect sensitive species and habitat.
5. Classify East and West Meadow Creek as wilderness. This area contains the greatest diversity of declining populations of wild salmon, B Run steelhead, trout and char in the Rocky Mountains. In addition, this vital fish habitat, with 200,000 acres of watershed, flows in to the Wild and Scenic Selway River.
6. Establish strict reforestation guidelines so that tree seedlings will be replanted at a significant level for every board foot of lumber removed. This is to ensure sustainability of the forest and maintain CO2 uptake.
7. Guarantee protected status for the wild and scenic rivers [ndash] the Salmon, Selway, Lochsa and Clearwater.
8. Propose the following rivers be added to the Wild and Scenic Rivers list: The Little North Fork, Kelly Creek, Weitas Creek, Cayuse Creek, Fish Creek, Hungry Creek, East and West Meadow Creek and Johns Creek

Thank you for the opportunity to share my opinions and concerns. I look forward to reading the final plan with hope that the Forest Service acts in an environmentally responsible and ethical manner.

Alida Bockino
March 11, 2020