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Comments: Comments - Nez Perce-Clearwater National Forests draft Forest Plan

Zach Peterson, Forest Planner

Nez Perce-Clearwater National Forest

Supervisors Office

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Re: Nez Perce-Clearwater National Forests draft Forest Plan

Dear Mr. Peterson:

I appreciate your considering my comments on behalf of the Upper Columbia River Group of Sierra Club. I have visited the Nez Perce-Clearwater National Forests (NP-CNF) frequently over the past twenty years, and many of the 1500 members of our group regularly visit these Idaho and national treasures.

The NP-CNF is a benefit to the northwest and our planet with its abundant wildlife, fisheries, forests, and unmanaged roadless areas. The opportunities it offers for recreation, hiking, camping, river travel, hunting and fishing brings thousands of people annually and helps build appreciation and respect for the natural world, something critical these days for Earth's sustainability.

However, we have serious concerns about the direction the US Forest Service (USFS) is taking with the draft plan. We think this proposal is wanting with regard to the very things that make the NP-CNF so valuable to the nation and its citizens.

THE CITIZEN-SCIENCE ALTERNATIVE

When the alternatives for the revised forest plan were being developed by the USFS, the Friends of the Clearwater (FOC) submitted an alternative which used the best available science to advocate for measurable, quantifiable standards to be included. The USFS received of ten thousand comments in support of that alternative. Yet the USFS did not analyze this alternative in the draft plan EIS.

The current plans for the forests have measurable quantitative standards. The draft plan as few of them. Instead the Agency seeks to achieve the desired condition of "ecological conditions capable of supporting self sustaining populations of native species." This offers no guarantees other than the Forest Service tried their best. There is no adequate measurement for outcomes. That is unacceptable, since a standard is to maintain the desired condition or to "not retard attainment of desired conditions.

CLIMATE CHANGE CONSIDERATIONS, LOGGING, AND OLD-GROWTH PROTECTION

Trees capture and sequester carbon, and Pacific Northwest forests can sequester more carbon than other forests in the West. Instead of recognizing human-caused climate change, the Forest Service simplistically notes in the draft plan that we are in a naturally warming period. The agency avoids discussing how its management actions might contribute to global emissions by increasing logging or how it might mitigate for it by preserving more of the forests.

In this regard, the Forest Service in one alternative proposes to increase logging levels to 60-80 million board feet annually or by one-third from the 50-60 million board feet annually in the combined level for the two forests. The other alternatives in the draft plan inconceivably propose logging over 200 million board feet annually.

Current forest plans have specific management areas for old-growth protection and some areas where logging is prohibited. The revision would allow logging in old-growth, prohibiting it only if the Forest Service concludes that logging would not "likely modify the characteristics" of old-growth for more than ten years. Again there is little if any way that such a description holds the Forest Service accountable. There are a multitude of species found on the Clearwater that are old-growth dependent, e.g. fisher, pileated woodpeckers, goshawks.

ROADLESS AREAS

Roadless areas are crucial for many rare species. Roads are one of the most damaging disruptors of wild places and the habitat they provide. The logging proposed in the draft plan and the roads required for such logging will damage for decades the wildlands provided by these forests and quite likely, if natural resource extraction continues to be the Forest Service's highest value, the damage will be permanent. There should be an alternative in the draft plan for recommending a majority, if not all, of the 1.5 million roadless acres as wilderness.

GRIZZLY BEAR RECOVERY

While the current forest plans for both forests note the potential for grizzly bear return to the Clearwater Basin and some grizzly bear observations were confirmed last summer, the new draft forest plan barely mentions grizzly bears, and it doesn't discuss essential migration corridors and habitat security necessary for their recovery. The Fish and Wildlife Service (FWS) recently sent the forest supervisor a letter stating that the agency must consult with the FWS when projects may potentially impact grizzlies. The Forest Service is seriously negligent in the matter of grizzly bear recovery.

STEELHEAD RECOVERY

The draft plans' reduction of riparian buffers from 300 feet to 150 feet and the absence of measurable standards to protect stream substrate could negatively already imperiled fish populations and some macro-invertebrate communities.

IN CONCLUSION

While one may acknowledge the many constraints the Forest Service faces these days from reduced budgets and local/regional appeals, the Forest Service's bias toward resource extraction and subsequent movement toward discretionary judgment rather than quantifiable and enforceable standards is a betrayal of the Forest Service's charter and the nation's heretofore highest standards provided by NEPA. The ecological losses we are facing due to climate change are great enough without the Forest Service contributing to those losses by failing to protect the very resources that can help us mitigate them.

Thank you for your consideration of these comments and for acknowledging your receipt of them. I have also

attached them.

Sincerely,

W. Thomas Soeldner, Forest Chair

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