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First name: Hunter

Last name: Johnstone

Organization: Backcountry Hunters and Anglers

Title: Idaho Regional Representative

Comments: Please see attachments.

I am very honored to provide my personal and professional comments with regard to the NezPerce-Clearwater NF Revision EIS. I've been fortunate enough to spend an inordinate amount of time all across the NP-C NF, and thus have experienced some amazing places and true wilderness experience even outside of designated Wilderness areas. The content of this letter is my take on some aspects of the future management of the NezPerce-Clearwater National Forest. I've also included some questions about what management can or cannot be done in certain places, such as prior to or even after, a Wilderness designation.

To give a very basic summary, my understanding of the NezPerce-Clearwater Revision Plan EIS is that there are 4 primary "action alternatives" (w, x, y, and z) that the Forest Planning Team has developed, based on prior public comment over the last 7 or so years. Some of these action alternatives make more sense than others. None of the 4 are absolutely perfect, and I think it's important for us to understand the details within, motivations behind, and implications of, each alternative. To avoid confusion, there is also a "no action" alternative in addition to the primary 4 action alternatives. For clarification, there is nothing that says the USFS has to adopt any one of these alternatives. They could use 1, a combination, or none of them. It's our privilege and responsibility to give the most honest, pragmatic, passionate, and informed public input that we can, and encourage others to do the same.

You'll see that I'm a big fan of "Alternative W" because I believe it represents the best balance of Wilderness, timber harvest/production and economy, habitat, clean air and water, and more. W is not perfect though, and I would not give a binary "yes or no" for that alternative. Instead, I'm providing nuanced feedback and recommending more in-depth management ideas.

Again, please see the attachments I have provided for more information.

#### ATTACHMENT BELOW

Mr. Zach Peterson  
Forest Planner, Nez Perce-Clearwater National Forests  
United States Forest Service  
903 3rd St Kamiah, ID 83536

Dear Mr. Peterson,

I am very honored to provide my personal and professional comments with regard to the NezPerce-Clearwater NF Revision EIS. I've been fortunate enough to spend an inordinate amount of time all across the NP-C NF, and thus have experienced some amazing places and true wilderness experience even outside of designated Wilderness areas. The content of this letter is my take on some aspects of the future management of the NezPerce-Clearwater National Forest. I've also included some questions about what management can or cannot be done in certain places, such as prior to or even after, a Wilderness designation.

I hope this finds you well, and I hope that if you are able to find the time in your busy schedule that you can answer some of the questions I've posed.

Thank you for your hard work and for taking the time to read through what I've provided!

Sincerely,

Hunter Johnstone  
Wildlife Research Crew Leader

## Introduction

When it comes to management of public lands such as those overseen by the USFS, BLM, and USFWS, we're lucky to live in a time and place where we get to provide our opinions and advice as Public Land Owners, hunters, wildlife professionals, and human beings, so we absolutely should take advantage of that!

To give a very basic summary, my understanding of the NezPerce-Clearwater Revision Plan EIS is that there are 4 primary "action alternatives" (w, x, y, and z) that the Forest Planning Team has developed, based on prior public comment over the last 7 or so years. Some of these action alternatives make more sense than others. None of the 4 are absolutely perfect, and I think it's important for us to understand the details within, motivations behind, and implications of, each alternative. To avoid confusion, there is also a "no action" alternative in addition to the primary 4 action alternatives. For clarification, there is nothing that says the USFS has to adopt any one of these alternatives. They could use 1, a combination, or none of them. It's our privilege and responsibility to give the most honest, pragmatic, passionate, and informed public input that we can, and encourage others to do the same.

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Breaking down the "Action Alternatives":

"No Action" Alternative:

1) No additional timber harvest opportunity:

- a) No increased rate of return to "ideal" vegetation community/class
- i) Poor outlook for native wildlife (i.e. elk) that need mosaic of age classes
- ii) Does not improve/return fire regime
- b) No economic boost for local communities
- i) Loggers
- ii) Mills
- iii) Community at large

2) No additional protections or Wilderness designations:

- a) Does not strengthen protections for wildlife and wild places unique to the Clearwater Region
- b) Does not guarantee Wilderness experience for future generations
- c) Certain areas are very fit for Wilderness designation and should be protected as such

3) High level of new Wild and Scenic River designations:

- a) Protections, but may limit management possibilities (i.e. stream bank stabilization, prescribed fire, etc.)

[ldquo]Alternative W[rdquo]:

1) Increased timber output (from 50-60 million board feet to 221-241 mmbf annual):

- a) Support economic prosperity
- b) Career and education opportunity
- c) Supply for forest products
- d) Increased rate of return (30 years to minimally) to meet desired vegetation conditions
- i) Improve habitat for wildlife
- ii) Improve hunting
- iii) Restore fire regime and/or protections from catastrophic fires
- e) Protect watersheds from excess erosion (through smart logging & fire management)

2) High level of new designated Wilderness Areas:

- a) Provides Wilderness experience in areas that are still roadless
- b) Does not take away motorized travel routes [ndash] still keeps many existing routes and access areas open
- c) Bolsters existing landscape protections

3) Motorized and mechanized tools:

a) As proposed, Alt. W would permit public and administrative use of motorized/mechanized tools (i.e. chainsaws) within new Wilderness Areas

i) This is conflicting because it would satisfy some existing traditional uses (guides and outfitters in areas like Kelly Creek use chainsaws for firewood and trail clearing), but it[rsquo]s absolutely certain that motorized tools would take away from any true

Wilderness experience. I can personally attest that when I[rsquo]ve spent time in many of these backcountry areas, it[rsquo]s very disappointing and disheartening to hear the moan of a chainsaw in the distance.

ii) I would suggest a resolution for such tool use with the following in mind:

(1) Public use should be restricted to only within certain areas and/or certain

timeframes. I[rsquo]m firmly against using motorized (gas or electric) tools at all in Wilderness Areas, but I do understand that some outfitters might be up in arms about having to do things the hard way again.

(2) Administrative use could or should be restricted to habitat or fire management only, which is still conflicting if these areas are operated as Wilderness. Is it possible or conceivable that the areas could be designated, but urgent management could take place over the next (certain) timeframe before we turn everything over to nature?

b) Aircraft landing (both administrative and public) should be restricted to emergency- only. These areas (unlike the SBWA and FCWA) are very accessible and should not need a bunch of [ldquo]grandfathered-in[rdquo] airstrips.

[ldquo]Alternative X[rdquo]:

1) Departure form Maximum Sustained Yield Limit timber harvest (20 years):

- a) Likely dangerous
  - i) Could simply be [ldquo]too much[rdquo] harvest, and change things to quickly for certain species (not all species like mosaics or new growth)
  - ii) Serious sudden implications for water quality
  - iii) Very unappealing to those [ldquo]on the fence[rdquo] about timber industry and forest management
- b) Certainly unsustainable [ndash] might create economic issues with a boom followed by lag/bust

2) No additional Designated Wilderness Areas:

- a) Does not strengthen protections for wildlife and wild places unique to the Clearwater Region

- b) Does not guarantee Wilderness experience for future generations
  - c) Certain areas are very fit for Wilderness designation and should be protected as such
- 3) Very clearly only caters to a limited group of stakeholders

[ldquo]Alternative Y[rdquo]:

- 1) 50-year timeframe to return to desired vegetation conditions:
  - a) Much slower improvement of habitat
  - b) Slower return rate to proper fire regime
  - c) Increased timber harvest is still better than the [ldquo]do nothing[rdquo] alternative
- 2) Excludes some very eligible and appropriate DWA
  - a) Meadow Creek [ndash] Upper North Fork
  - b) Portions of Hoodoo
  - c) Bighorn-Weitas
- 3) Cross-country OSV use in [ldquo]great burn[rdquo] area:
  - a) The areas proposed within the Great Burn as [ldquo]backcountry snowmobile[rdquo] designation are some of the most underrepresented habitat types and pristine areas of the NP-C National Forest. These areas are also closely tied with struggling mountain goat populations and important wolverine habitat. Allowing cross-country snowmobile use in these areas where illegal OSV use is already creating problems for both species is unacceptable.
  - b) OSV use also takes away from [ldquo]backcountry[rdquo] and [ldquo]wilderness[rdquo] experiences of quiet and solitude, which are very limited resources in this day and age.
  - c) OSV use would likely disqualify what are some of the most [ldquo]scenic[rdquo], rugged, and truly [ldquo]wild[rdquo] parts (Rhodes Peak, Williams Peak, Continental Divide, etc.) of the Hoodoo area, from any Wilderness designation.
  - d) I absolutely do not support any expansion of OSV travel in the Hoodoo area.

[ldquo]Alternative Z[rdquo]:

- 1) No increase timber harvest
  - a) Does not consider economic benefit of timber industry
  - b) Does not consider ecological importance of the disturbance from harvest
- 2) Very slow return to desired vegetation conditions a)
- 3) 2 DWA[rsquo]s that simply don[rsquo]t make sense
  - a) Pot Mountain
    - i) Great opportunity for mountain bikes and dirt bikes
    - ii) Practical and accessible (Rd 250) for timber harvest
      - (1) Note that Idaho Roadless Area applies, meaning different timber harvest methods would be necessary
    - iii) Semi-isolated from other proposed Wilderness
    - iv) Useful and ideal as manageable habitat
  - b) West Meadow Creek
    - i) Already accessible and experiences occasional logging
      - (1) Road infrastructure exists (though one route is washed out from Meadow Creek upward)
    - ii) Provides excellent access for campers and hunters near current and proposed Wilderness
    - iii) Great opportunity to provide accessible recreation, manage habitat & provide timber products

## Proposed/Eligible Designated Wilderness Areas:

IDFG, RMEF, and USFS have teamed up to accomplish habitat improvement projects across the Clearwater Region, including prescribed fire, aspen regeneration, and more. These actions are vital habitat improvements and restoration for the Lolo Zone elk herd, mule deer across the NF, and many other species. It's my understanding that some of these actions would be limited to non-Wilderness areas. There are many areas that could benefit from these actions, and Wilderness designation could limit the ability to accomplish these habitat improvements. Because hands-off approaches are not always ideal due to our human legacy on the landscape, it should be discussed whether exceptions can be made to allow initial habitat improvement projects to happen, even in proposed Wilderness before turning the management over to strictly natural forces.

### 1) Mallard-Larkins

- a) Much of this area is already a special management area
- b) This entire area is very rugged, remote, and undeveloped
- c) It just makes sense for this area (including the portions in the St. Joe NF) to be a designated Wilderness Area
- d) Proposed outline would not block any suitable timber production
- e) What is possible in terms of pre-designation management to get it on a track closer to [ldquo]ideal[rdquo] fire regime?

### 2) Meadow Creek [ndash] Upper North Fork

- a) This area is extremely undeveloped, and the W.A. would protect (at least encompass) the headwaters for the North Fork Clearwater River
- b) The calm and relatively flat flow of the NF Clearwater River would be unique to most Wilderness areas.
- c) Proposed outline would not block any suitable timber production
- d) What is possible in terms of pre-designation management to get it on a track closer to [ldquo]ideal[rdquo] fire regime?
- e) Extensive wet meadow complex is also [ldquo]unique[rdquo] and worth protecting.
- f) A person very quickly feels like they are in the Wilderness here, especially when wading across the freezing river with no wading shoes while it[rsquo]s pouring rain.

### 3) Hoodoo

- a) This is some of the most rugged non-protected terrain along the Idaho-Montana border
- b) Kelly creek area is a very well-visited drainage and destination fly-fishing area in Idaho
- c) Hunting guides and outfitters occupy some of the only meadows/flats along Kelly Creek
- i) Chainsaw use has [ldquo]disturbed the peace[rdquo] of the backcountry experience here for me
- ii) There[rsquo]s language in Alt. W that would recommend allowing such power tools even in the proposed newly designated W.A., but I think that is something that should be stopped.
- d) Fish Lake (Rd. 295 to Tr. 419) would remain accessible by motorized trail, which is probably a great choice due to popularity as a traditional-use ATV camping/fishing destination.
- e) This W.A. would encompass many of the Clearwater[rsquo]s highest peaks, and some of the most amazing alpine in Northern Idaho (and Montana).
- f) There[rsquo]s been big conflicts with snowmobile (OSV) use in the border area, and it[rsquo]s been proposed (by certain snowmobile communities out of Montana) to re-open this area to cross-country OSV use. This action would only serve to reward law-breakers who already ride there illegally. The biologists I know within IDFG would not recommend any cross-country OSV travel be legal here for the sake of Mountain Goats, Wolverines, and more wintering wildlife (the goats along the border have seen better numbers in the past). Additionally, allowing such OSV use would surely disqualify the area from Wilderness eligibility.

### 4) Moose Mountain

- a) This area has a unique and stunning composition of low, extensive meadows and rugged alpine.
- b) There are almost no trails in the area, and timber use would be zero. I see no compelling reasons this

wouldn't be Wilderness-quality.

5) Pot Mountain

- a) Great opportunity for mountain bikes and dirt bikes, but not heavily used.
- b) Practical and accessible (Rd 250) for timber harvest,
  - i) Note that Idaho Roadless Area applies, meaning different timber harvest methods would be necessary (i.e. helicopter is that even possible?)
- c) Semi-isolated from other proposed Wilderness
  - i) Useful and ideal as manageable habitat perhaps?

6) Bighorn-Weitas

- a) Extensive, rugged, undeveloped
- b) Nature is clearly the driving force of change here
- c) Fires have created some mosaics of habitat across this area
  - i) More prescribed fires may be a benefit
  - ii) Could we put habitat/fire projects in place to kick start return to desired conditions prior to designation?
- d) Examples of habitat project: regeneration of aspen stands along 4th of July creek trail

7) North Lochsa Slope

- a) Very mild, almost "rolling hills" terrain exists in very few designated wilderness areas in the rockies.
- b) Fire regime is fairly in-control of what happens here.
- c) It may make sense to limit the use of Boundary Peak Rd. 485 instead of leaving it open to motorized traffic (maybe limit to human-powered methods of travel?)

8) Sneakfoot Meadows

- a) Would "fortify" the border of the SBWA
- b) Could this present issues for fire management in the future?

9) North Fork Spruce [ndash] White Sand

- a) Would "fortify" the border of the SBWA
- b) Could this present issues for fire management in the future?
- c) This would protect Colt-Killed Creek, which is ecologically valuable and historically significant (Lewis and Clark)

10) East Meadow Creek

- a) This designation would make sense, and essentially allow Meadow Creek to be the border of the SBWA.

11) West Meadow Creek

- a) This designation does not make sense and would take away from potential timber production and motorized recreation that is currently available to all (not just playing favorites to ATV/dirt-bike users).

12) Rapid River

- a) This designation makes sense and would not take away any existing/future timber production, motorized recreation, or habitat management that I can think of.
- b) I'm not intimately familiar with this particular area as I've only visited the trailhead and spent time on the other side of the mountains, but it makes sense when looking at a map.