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Organization: The Lands Council

Title:

Comments: Please see the attached file.

#### ATTACHMENT BELOW

April 19, 2020

Dear Nez Perce/Clearwater National Forest,

The Lands Council would like to provide comments on the draft EIS for the Nez Perce/Clearwater National Forests Revised Forest Plan. We hope that our input will provide a useful addition to help the Revised Forest Plan achieve its objectives. We have several main topics that we wish to address.

#### Climate Change

The DEIS acknowledges that climate change is occurring, although does not incorporate a thorough discussion of climate models, the Climate Tool Box, or other accepted research on impacts for the Inland Northwest. The assumption of using the two warmest and driest years in the last 700 may not reflect more dramatic changes coming to the Forest. The changes to streamflow are likely to be significant, as well as changes to vegetation and wildlife. Three adaptation and mitigation measures should be analyzed, which we discuss below:

1. Beaver are known to raise water tables, and increase late summer flows. How many beaver exist on the Nez Perce Clearwater and how much habitat is available to expansion of beaver populations? In addition, beaver dam analogs are being used throughout the country to raise water tables, trap sediment, increase wetland area and improve aquatic and riparian habitat. What is the potential for placing low cost beaver dam analogs on the Forest and greatly improving the hydrology of many small and large watersheds?

2. Carbon sequestration will become increasingly important as a way to mitigate climate change. How is the proposed harvest activity going to impact carbon levels on the forest. Modelling this should be done for each action alternative. Harvested trees can store carbon for varying amounts of time, depending on the final product [ndash] from over a century in some buildings to a few weeks in paper products. Old growth forest should be protected for its carbon stores, as well as critical habitat for many species.

3. The role of fire on the forest should be analyzed in terms of carbon sequestration or loss of carbon. The past century of fire suppression has likely stored more carbon than natural fire cycles had done. But this has favored shade tolerant species, such as fir, that are more susceptible to root and insect disease. The action alternatives should analyze this issue and incorporate it into the desire to create a more climate resilient forest.

4. Prescribed burning has an impact on carbon stores, yet can be used to reduce above historic fuel loads and protect larger trees. Impacts on carbon from prescribed burning should be analyzed.

5. Natural and prescribed fires have the potential to create biochar, which sequesters carbon for decades or longer. In contrast burning slash piles creates no or little biochar, instead sending valuable soil carbon into the atmosphere. Under each vegetation management alternative, we would like to see an analysis of how much material in slash piles could be turned into biochar, by top burning, or in biochar kilns. This biochar would provide an important nutrient and soil moisture additive. We are happy to provide more information about this important issue.

## Recommended Wilderness

The Lands Council supports the following area for recommended Wilderness:

Great Burn [ndash] We support protecting the entire area as Wilderness with no proposed snowmobile areas. According to the Activity Participation chart, snowmobile usage is on 2.6% of the overall participation in activities. Impacts to mountain goats and other species by snowmobile usage does not justify allowing usage in the Great Burn. This area has been recommended for Wilderness for decades and there is no reason to not include it in the revised plan

Mallard Larkins [ndash] This area has also been previously recommended for Wilderness and should continue to be designated recommended Wilderness in the revised plan. This area is important for numerous rare species and also provides outstanding primitive recreation opportunities.

East and West Meadow Creek [ndash] This major watershed flows into the Selway River and has a great diversity of salmon, steelhead and trout. This 200,000 acre watershed is critical fish habitat and should be protected as recommended Wilderness.

We note that 4 to 13 roadless areas were recommended for Wilderness under Alternatives W, Y and Z. We would like to see all 13 of these areas recommended for Wilderness. It is not clear why Alternative W leaves out Pot Mountain and West Meadow Creek, while Alternative Z Leaves out Bighorn Weitas, Moose Mountain, and North Lochsa Slope?

We are supportive for inclusion of all eligible rivers for being recommended to the Wild and Scenic designation.

## Desired Condition for Forest Management

We support local mills and rural economies. It seems very possible to increase the timber volume to these communities from current levels. This should be done in a way that also helps the Forest reach a Desired Future Condition that accounts for the natural range of variation, past harvest practices, and a warming climate. To analyze the potential we ask that the following be used to determine when and where to conduct vegetative management.

- ? Conduct a Spatially Explicit Landscape Evaluation (such as Churchill and Hessburg)
- ? Focus on previously managed stands with existing road systems
- ? No entry into roadless areas or old growth stands

The Forest says there are nearly a million acres that are likely far from historic conditions and could benefit from timber sale projects. If a proper landscape evaluation is done we could expect that the timber volume available to local communities could increase over current levels.

Thank you for the opportunity to comment,

Mike Petersen, Executive Director