

Data Submitted (UTC 11): 4/20/2020 5:53:01 PM

First name: Phil

Last name: Knight

Organization:

Title:

Comments: Hello and thank you for this opportunity to comment on the Nez Perce Clearwater Forest Plan Revision.

I've spent quite a bit of time on the Nez Perce Clearwater, and this landscape is very important to me and my family and friends. We most appreciate the wildlife, pristine rivers, old growth forests, roadless areas and wilderness that are found there. The Nez Perce Clearwater is globally significant for its wild, undeveloped land and biodiversity. It should be treated as such.

In order to maintain and sustain the biodiversity of the Nez Perce Clearwater there are steps you can take and elements you need to include in the forest plan. I expect to see a document that will provide for the long term health of the forests, wildlife, rivers and people of this special place.

I've hiked the trails, camped in remote meadows in Cove and Mallard roadless areas, backpacked into pristine lakes, swum in the gin-clear rivers, heard elk bugling, watched a black bear climb a tree, rafted the Salmon and kayaked the Middle Fork, sat around the campfire with my friends, harvested edible mushrooms, stared at the stars in the clear night sky, enjoyed the silence and looked across vast roadless old growth forests here in the Big Wild.

I've also seen roads being punched into some of the wildest, most diverse forests in the lower 48. It was like watching priceless art being slashed with a switchblade. I've seen the sap oozing from fresh cut stumps five feet across, and watched the log trucks charging off with stolen loads of old growth forest.

Here's what I want to see in the forest plan.

Number one would be to analyze and include the Citizen Science alternative developed and submitted by the Friends of the Clearwater in 2014. This alternative, which received over 10,000 comments in support, was ignored by the Forest Service, yet the Nez Perce Clearwater developed an alternative based on local demands for tons more logging - up to 200 million board, an unimaginable amount of logging that would leave the forest a wastelands of stumps and slumping roads. Friends of the Clearwater know this forest better than almost anyone and have shown themselves to be dedicated to the long-term health of the forest rather than trying to make money from developing it.

Poor showing on standards

The draft plan, unfortunately, has few quantitative standards. It needs standards for fishery habitat potential percentages based on cobble embeddedness (sediment), minimum percentages of old-growth drainage-wide, and elk habitat effectiveness calculations. The vague standards of "ecological conditions capable of supporting self-sustaining populations of native species," or to not "retard attainment of desired conditions" without more information, or to use "best management practices," just don't cut it.

Current forest plans have quantifiable standards for fish habitat, such as 300-foot buffer zones around streams and maximum allowed cobble embeddedness (percentages of rocks/pebbles not smothered in silt). The draft plan, however, effectively reduces riparian buffers to 150 feet, and doesn't contain measurable standards to protect stream substrate. This could negatively affect macro-invertebrate communities and already imperiled fish populations like steelhead. If salmon are every to return here, where they belong, stringent standards for fish habitat could help.

Less logging please!

Current forest plans project timber harvest levels between 50-60 million board feet annually combined for these two forests. In the agency's "natural processes dominate over anthropogenic influences" revision alternative (Alt Z), the one that is supposed to be the most environmentally friendly and ecologically driven, the Forest Service (FS) proposes to increase logging levels to 60-80 million board feet annually. Just how does this amount of logging qualify as natural processes? Logging is by far the most heavy-handed activity on national forests and must be scaled way back to avoid more of the devastation and impoverishment that has afflicted so much of our national forests.

Climate change (yes it is real) and carbon sequestration

The Nez Perce Clearwater could play a significant role in climate change mitigation through carbon sequestration. Leaving old forests alone allows the carbon to stay in the trees and other vegetation and soils whereas logging contributes significantly to releasing carbon and thus to anthropogenic climate change. It's infuriating that the Nez Perce Clearwater claims we are in a "natural warming cycle." In denying that human-caused carbon emissions are warming our climate the Nez Perce Clearwater is complicit in creating a grim future of heat and drought and wildfire.

Management areas - really? Just 3?

The new Forest Plan (combining 2 national forests) has only 3 management areas, compared to 26 for the original Nez Perce plan. This is far too coarse of a filter to allow for different goals, different land and forest types, wildlife zones, recreation considerations, water quality protection, etc. etc. 2 of the 3 proposed management areas allow lots of logging. This is not going to work - we need a more detailed approach to management of a diverse forest.

Old Growth - irreplaceable

Current forest plans have specific management areas for old-growth protection, as well as other areas where logging is prohibited. The revision would allow logging in old-growth, and prohibit it only if the FS concludes that logging would not "likely modify the characteristics" of old-growth for more than 10 years.

One management area needed is old growth forest. How can we know if the Forest Service is targeting old growth for logging if it is not even mapped and identified? Forest Plans should inform and equip citizens to comment on and track the management of their national forests, not hide the Forest Service's actions.

Species like fisher, pileated woodpeckers, and goshawks, which are all found in the Clearwater, are old-growth dependent. Old Growth is also very effective at carbon sequestration.

Grizzlies - coming back in spite of everything

Grizzly bears are a threatened species in the lower 48. The Forest Service has a responsibility to assist with their recovery, which includes re-occupying former habitat like the Clearwater Basin. Central Idaho is a designated grizzly bear recovery zone.

There have been several confirmed grizzly bear observations in the Clearwater this past year - they are coming back, on their own, despite lots of resistance from people. The Fish & Wildlife Service (FWS) recently sent the Nez Perce-Clearwater Forest Supervisor a letter stating that the agency must consult with the FWS when projects may potentially impact grizzlies. Unfortunately, the new draft forest plan barely mentions grizzly bears,

much less discusses essential migration corridors and the habitat security necessary for recovery. This is gross negligence on the part of the Forest Service.

Grizzly bears have a place in Central Idaho, and you must find a way to help them return. Protecting old growth, roadless areas and corridors will go a long ways toward that goal.

All roadless areas should be Recommended Wilderness

The Custer Gallatin National Forest included in their draft forest plan Alternative D, which would set aside nearly every roadless area as Recommended Wilderness. The Nez Perce Clearwater should have a similar alternative. With 1.5 million acres of unprotected roadless areas on both forests combined, this is a big deal. Roadless areas provide crucial habitat for many rare species because they are undeveloped. The draft plan, however, would protect few of these irreplaceable wildlands from industrial logging alternatives and roading.

Most of these roadless areas are headwaters of some of our nation's most iconic wild rivers - the Lochsa, the Selway, the Main Salmon, and the Middle Fork. People plan months and years out and scramble for rare permits to raft and kayak and fish on these incredible rivers. River such as these are priceless and should be protected as if they were irreplaceable.

Failing to protect roadless areas would be an act of sabotage. I remember the Cove and Mallard timber sales - 140 miles of roads and 200 clearcuts proposed in world-class roadless forest full of elk, pristine waters, diverse forests, great grey owls, goshawks, even a few wolves. Without citizen resistance the Nez Perce forest would have completely trashed these amazing wildlands. What has happened to the Forest Service, that you must constantly push to destroy these remnant wilderness areas? Can't you see these places are like gold, more valuable every day?

There should be an alternative in the plan that recommends all 1.5-million acres for wilderness.

#### Wildlife

Few places in the lower 48 still have such a diversity of wildlife. This legacy of life belongs to all Americans and must be preserved. Bull trout, Chinook salmon, Westslope cutthroat trout, lynx, fisher, wolves, wolverines, black bear, mountain goats, pileated woodpeckers, and harlequin ducks all survive here, BECAUSE THERE ARE STILL SUFFICIENT WILDLANDS. Please don't blow it. Restoring these species once they are gone is much more difficult and expensive than maintaining them where they now live.

Thank you again for this opportunity to comment, and please include my comments in the official record for the Forest Plan.

Attachments: Cove and Mallard timber sale map, from about 1992.