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Title: ReWilding Advocate

Comments: Dear Forest Planner,

WildEarth Guardians respectfully submits these attached comments on the draft revised Nez Perce-Clearwater Forest Plan (draft plan) and Draft Environmental Impact Statement (DEIS). These comments supplement those we provided jointly with several organizations and individuals detailing our concerns with the draft plan and DEIS, and urging for specific changes necessary to ensure compliance with the 2012 National Forest Management Act Planning Rule.

ATTACHMENT BELOW

April 20, 2020

Zach Peterson,  
Forest Planner,  
Nez Perce-Clearwater National Forests

Submitted electronically: <http://bit.ly/NezClearFPRComments>

Re: Supplemental comments for the draft revised Nez Perce-Clearwater Forest Plan and DEIS

Dear Mr. Peterson,

WildEarth Guardians respectfully submits these comments on the draft revised Nez Perce-Clearwater Forest Plan (draft plan) and Draft Environmental Impact Statement (DEIS). These comments supplement those we provided jointly with several organizations and individuals detailing our concerns with the draft plan and DEIS, and urging for specific changes necessary to ensure compliance with the 2012 National Forest Management Act Planning Rule.

WildEarth Guardians (Guardians) is a nonprofit conservation organization whose mission is to protect and restore wildlife, wild places, wild rivers, and the health of the American West. Guardians has offices in six states, including Idaho, and has more than 278,000 members and supporting activists across the United States and the world. Guardians has an organizational interest in ensuring the Forest Service complies with all environmental laws during the Forest Plan revision process. Guardians has a demonstrated history of advocating for an ecologically and economically sustainable transportation system on the Nez Perce-Clearwater National Forest, and protecting at-risk species. Guardians has a history of engaging in forest's travel management planning process, and participating in project-level NEPA processes that potentially affect a range of species including grizzly bear, Canada lynx, wolverine, mountain goat, gray wolves, bull trout, salmon and more.

#### I. Land Ownership and Uses

A. The Land Ownership and Land Uses section of the Draft Revised Forest Plan neglects to address climate change.

Scientists believe climate change will affect future forest conditions by altering forest processes and biodiversity.

The Draft Revised Forest Plan's Land Ownership and Land Uses section does not specifically address disturbances from climate change that can be expected over the life of the plan. To redress this flaw, the section's Desired Conditions (FW-DC-LND) must include a statement that calls for a land ownership pattern, rights-of-way, and conservation easements that are resilient to disturbances on and to the Nez Perce-Clearwater National Forest. The section's Guidelines (FW-GDL-LND) must include a statement that the Forest Service will not consider lands for acquisition or conveyance that decrease the Forest's resiliency to disturbance caused by future climate change.

B. The prohibition on new utility corridors and communication facilities in cases where the use of existing corridors/facilities is feasible should be a strict rule rather than a guideline.

There is no rational reason for exceptions to a prohibition on siting new utility corridor and communication facilities outside of designated communication sites or utility corridors in cases where it is feasible to accommodate expanded use of existing facilities or corridors. The guideline FW-GDL-LND-01 should therefore be re-categorized as a Forest Plan Standard.

C. The Land Ownership and Land Uses section of the draft plan fails to prioritize the public interest in addressing potential land ownership adjustments.

Guideline FW-GDL-LND-02 should include the factors the Forest Service must consider when determining whether a land exchange proposal would well serve the public interest. See 43 U.S.C. [sect] 1716(a).

Management Strategy and Approach FW-MSA-LND-01 should state that protecting resources such as wildlife habitat should take precedence over improving management efficiency when the Forest Service adjusts the Forest's land ownership pattern. This would match the manner in which FW-MSA-LND-03 lists different types of boundary line management in order of importance.

The Nez Perce-Clearwater National Forest should maintain a land ownership adjustment plan that is included in the Forest Plan as a Land Ownership Standard (FW-STD-LND). This would ensure that ownership adjustment proposals either comply with the adjustment plan or require an amendment to the Forest Plan prior to any decision to proceed with an exchange or other acquisition or conveyance. An ownership adjustment plan that specifies non-Federal lands for possible acquisition and National Forest lands as suitable for exchange will add analytic rigor and accountability to the Forest Plan's Land Ownership section. This would also prevent post hoc public interest rationalizations for proposed exchanges and purchases and foster public confidence in such proposals.

The Forest Plan should include a Land Ownership Standard requiring that National Environmental Policy Act (NEPA) analyses for land exchange proposals include quantitative assessments of the costs of surveying and maintaining boundary lines and corners for proposed actions and their no action alternatives. NEPA analyses of land exchange proposals often identify reduced costs of surveying and maintaining property boundaries as a purpose or need for the trades but then frequently neglect to identify dollar value estimates of the cost savings the proposals would offer, raising questions of whether the stated purposes and needs are being used to justify proposals with hidden agendas.

## II. Guardians Online Petition

During the Forest Service comment period that began December 20, 2019 Guardians alerted its members and supporters about the draft plan and DEIS, and the need to submit comments. Certainly many of those we reached chose to submit individual comments through the agency's CARA online comment portal. Once the COVID-19 and coronavirus pandemic forced people to become caregivers and home-schoolers, and change

their lives to ensure their safety and the safety of others, Guardians joined with other organizations to urge the Forest Service to suspend all comment deadlines. The agency did not halt the draft plan and DEIS comment deadline, and Guardians provided an easier way for people to engage in the forest planning process by generating an online petition, provided below. Guardians collected 11,862 signatures, which we include in the attached spreadsheet. We urge the Forest Service to consider these signatures as separate individual comments given the pandemic and people's limited ability to provide their own letters.

#### A. Petition Language

Dear Nez Perce - Clearwater Forest Supervisor Cheryl Probert,

By signing this petition, I urge that the Forest Service adopt a Revised Forest Plan that ensures the sustainability of ecological integrity on the Nez Perce-Clearwater National Forest, and provides for a diversity of plant and animal communities by adopting the following directions:

Include clear standards that protect riparian areas and habitat for at-risk species.

Establish standards and guidelines that ensure habitat connectivity for grizzly bear, lynx, wolverine and other wildlife that need large landscapes to roam.

Designate all Inventoried Roadless Areas as Recommended Wilderness, and establish standards that will protect these wild places from non-conforming uses. At the very least, the agency should designate all Inventoried Roadless Areas as non-motorized.

Include standards for motorized use that minimize conflicts between recreational uses; minimize damage to soil, watershed, vegetation, and other forest resources; and minimize harassment of wildlife and significant disruption of wildlife habitats.

Include an objective that directs removing all unnecessary roads over the life of the forest plan, with at least 5% restored to nature each year.

Sincerely,  
(See attachment for list of signers).

#### Conclusion

The number of people signing the petition shows wide-spread support for increased protection of fish and wildlife habitat, for reducing the agency's over-burdened road system, and for managing Inventoried Roadless Areas as recommended wilderness absent non-conforming uses. The Forest Service must not dismiss this support simply because it comes in the form of a petition signature, and we urge the agency to include an alternative in the Final EIS that fully analyzes our proposed directions, and adopt them in the final forest plan.

Cordially, Adam Rissien  
ReWilding Advocate  
WildEarth Guardians  
PO Box 7516  
Missoula, MT 59807

Attachment: Spreadsheet listing petition signatures.