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Comments: Please see the attached comments from the Montana Wildlife Federation.

ATTACHMENT BELOW

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April 20, 2020

Nez Perce-Clearwater National Forests
Attn: Zach Peterson, Forest planner
903 Third Street Kamiah, Idaho 83536

RE: DEIS comments on Revised Nez Perce Clearwater National Forest Plan Revision -Submitted on April 20th, 2020 electronically at https://cara.ecosystem-management.org/Public/ CommentInput?project=44089 and by email to zacharyapeterson@fs.fed.us

Dear Mr. Peterson and the Nez Perce-Clearwater National Forest Planning Team,
On behalf of the Montana Wildlife Federation, thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) on the revised Forest Plan for the Nez PerceClearwater Forests. Please accept and consider our comments below in the development of the final forest plan.

I. Background

The Montana Wildlife Federation (MWF) is the oldest wildlife conservation organization in Montana. Since 1936, MWF has been at the table to protect Montana[rsquo]s fish and wildlife, lands and waters, and hunting and fishing heritage. MWF has over 7,000 members and supporters, and 18 affiliate organizations. The Montana Wildlife Federation seeks to maintain a balance between development and wildlife habitat and health.

Public lands encompassed by the Nez Perce-Clearwater National Forests provide high quality fish and wildlife habitat and support a variety of recreational opportunities for hunters, anglers, hikers, bikers, motorized and non-motorized users, and wildlife enthusiasts. Though this forest is located in Idaho, Montanans have enjoyed the lands and waters affected by this forest plan for countless years. Many of our members across western Montana travel to Idaho to experience the opportunities found on the Nez Perce- Clearwater National Forests. Additionally, wildlife moves freely between our states and land management in Idaho will ultimately influence land management in Montana.
Our comments will primarily regard the following subjects:
1. Maintaining habitat connectivity and secure wildlife habitat. 2. Implications of proposed recreation on MA2 regions. 3. Managing Recommended Wilderness Areas and Roadless Areas as recommended wilderness.

II. Wildlife

General
The Montana Wildlife Federation is primarily concerned with the potential for increased motorized use in Management Area 2 (MA2) and Management Area 3 (MA3) in addition to the apparent reliance on mechanical harvest to achieve ecosystem objectives in MA3 on lands adjacent to the Montana/Idaho stateline. The following desired conditions demonstrate how timber harvest is being prioritized over natural ecological processes for reaching desired conditions.

FW-DC-TBR-06. Loss of timber volume due to wildfire is minimal on lands suitable for timber production.

MA3-DC-FOR-12. Although natural ecological processes and disturbances are still present, timber harvest has a dominant role in affecting the composition, structure, and pattern of vegetation.

The Draft Environmental Impact Statement (DEIS) lacks a thorough examination of the effects that this proposal will have on wildlife habitat suitability and habitat connectivity. Additionally these desired conditions contradict the following desired conditions found in the draft forest plan.

FW-DC-WLMU-05. Natural processes contribute to the mosaic of habitats needed by ungulates.

FW-DC-TE-06. The arrangement of vegetation patches ranges widely in size, shape, and structure to provide connectivity for wildlife. Patches are juxtaposed across the landscape, forming a landscape pattern consistent with the natural range of variation. These patterns vary by potential vegetation type, slope, aspect, and topographic position. Wide-ranging species are able to move freely across and between habitats, allowing for dispersal, migration genetic interaction, and species recruitment.

While the areas along the Montana/Idaho stateline are mostly MA2 regions, there are some key areas that fall within the MA3 category that are important to Montanans (including the Lochsa and Selway Rivers). The emphasis on mechanical harvest within these regions could inhibit wildlife dispersal and habitat connectivity within these locations.

Management of MA2 regions must also be managed with at-risk species in mind. Wolverines, mountain goat, and lynx all experience negative impacts when subjected to increased road densities. These wildlife do not adhere to political boundaries and may crossover into Montana on occasion. Additionally, both wolverines and lynx are listed as potential species of concern in Montana.

Mountain Goats
Currently, mountain goats are considered a Species of Greatest Conservation Need Tier 2 in the Idaho State Wildlife Action Plan. This species requires [ldquo]escape terrain[rdquo] that consists of rugged, intact, backcountry areas with little to no human disturbance. Winter habitat for mountain goats is especially critical and must be taken into account when proposing winter recreation within a backcountry setting (IDFG Mountain Goat Management Plan 2019).

The Blacklead herd is one example of why mountain goats need to be actively managed as a priority species. This herd has experienced significant declines that could ultimately lead to complete loss of the population. There is significant evidence to suggest that illegal over-snow recreation has been the primary cause of population decline within this herd. For these reasons, it is imperative that the Hoodoo Roadless Area, and the entirety of the Great Burn, be managed as recommended wilderness.

Climate change also has a direct impact on mountain goat populations (IDFG Mountain Goat Management Plan 2019). Increasing temperatures in the spring and summer negatively affect over-winter survival and juvenile growth through changes to quality and availability of forage (Pettorelli et al. 2007). Climate change must be considered in potential management approaches, as a long term stressor on mountain goat populations and the habitat they use.

Bighorn Sheep

Bighorn Sheep are another species that need to be prioritized within the forest planning process. This species has suffered extreme population declines since westward expansion with the most prominent cause attributed to competition and disease from domestic sheep in addition to habitat loss due to noxious weeds (IDFG Bighorn Sheep Management Plan 2010). This loss has occurred across the west, including both Montana and Idaho. The following are two forest plan provisions that directly address disease transfer from domestic sheep to bighorn sheep:

FW-STD-WL-02. In order to prevent disease transmission between wild and domestic sheep, domestic sheep or goat grazing shall not be authorized in or within 16 miles of bighorn sheep occupied core herd home ranges.

FW-GDL-WL-05. New authorizations and permit reauthorizations for domestic goat packing should include provisions to prevent disease transmission between domestic goats and bighorn sheep.

MWF strongly supports the standard to not authorize domestic sheep grazing within 16 miles of bighorn sheep occupied core herd home ranges. This standard provides strong guidelines for wildlife managers to prevent further declines in bighorn sheep populations due to disease. As other organizations have pointed out, however, FW-GDL-WL-05 does not specify whether packing goats will be allowed within the 16 mile buffer provided in FW-STD-WL-02. We recommend that the 16 mile buffer include ALL domestic sheep, including packing goats.

Elk

Elk are an iconic species of both Idaho and Montana that draw hunters from around the world and provide immeasurable economic value to both of our states. This species requires a balance of early seral forage in addition to hiding cover and security in order to thrive and maintain stable populations. In order to create a mosaic of early seral forage and security, the draft forest plan contains the following desired conditions:

FW-DC-WLMU-05. Natural processes contribute to the mosaic of habitats needed by ungulates.

FW-DC-WLMU-03. At the forest scale, habitat for wild ungulates provides conditions to meet life history requirements year-round. Vegetation in these habitats are primarily composed of native plants.

FW-DC-ELK-01. Habitat conditions maintain or improve elk habitat use and provide nutritional resources sufficient to support productive elk populations. The amount and distribution of early seral nutritional resources are consistent with the desired conditions in the Forestlands and Meadows, Grasslands, and Shrublands sections. Elk habitat quality is not degraded by invasive species.

FW-DC-TE-06. The arrangement of vegetation patches ranges widely in size, shape, and structure to provide connectivity for wildlife. Patches are juxtaposed across the landscape, forming a landscape pattern consistent with the natural range of variation. These patterns vary by potential vegetation type, slope, aspect, and topographic position. Wide-ranging species are able to move freely across and between habitats, allowing for dispersal, migration genetic interaction, and species recruitment.

FW-DC-WL-03. The arrangement of vegetation patches ranges widely in size, shape, and structure to provide

connectivity for wildlife. Patches are juxtaposed across the landscape, forming a landscape pattern consistent with natural range of variation. These patterns vary by habitat type group, slope, aspect, and topographic position. Species are able to move freely across and between habitats, allowing for dispersal, migration genetic interaction, and species recruitment.

This mosaic landscape must be preserved for the benefit of Idaho[rsquo]s elk population as well as Montana[rsquo]s. In order to maintain potential migratory pathways, this species needs the ability to move from early seral forage to security cover and between winter and summer range freely and without significant disturbance. Proposed motorized/mechanical development within MA2 regions proposed within Alternatives X, Y, and Z are especially troubling. The increased motorized and mechanical access within these proposals would significantly diminish elk habitat while potentially inhibiting migratory pathways (Naylor, Wisdom, & Anthony 2009). MWF, therefore, strongly supports the following provisions within the draft forest plan that concern recreation and elk.

FW-DC-ELK-02. Elk populations are distributed throughout the planning area in suitable habitats. Motorized access does not preclude use of high or moderate quality nutritional resources.

MA2-DC-ELK-02. Areas at least 5000 acres in size exist without motorized access open to the public to maintain habitat use by elk. Areas of high and moderate nutrition potential remain unfragmented by new motorized trails.

MA3-DC-ELK-01. At least 15 percent of the landscape at the Hydrologic Unit Code 12 scale is composed of high-quality nutritional resources located at distances from open motorized access that promotes habitat use by elk. Open motorized access does not preclude elk use of newly created nutritional resources at the HUC 12 scale.

MA3-OBJ-ELK-01. In order to create a landscape that produces between 10 to 15 percent high nutritional resources for elk away from open motorized access, 20 percent of the treatments to restore the natural range of variation for early seral habitats in Management Area 3 will be targeted to produce high-quality nutritional resources and be located farther than half a mile from open motorized access. These treatments should be accomplished with methods designed to result in high nutritional response.

MA2-GDL-ELK-01. To maximize elk habitat, use and avoid fragmenting large areas of elk habitat that is currently not accessible by motorized access. New motorized trails open to the public should not be authorized unless adjacent areas of 5000 acres or larger can be maintained without motorized access. The location of new motorized trails should avoid areas of high or moderate nutrition potential when possible.

MA3-GDL-ELK-01. When conducting management activities that adversely affect elk habitat use, projects should be designed to maintain or improve predicted percent body fat of cow elk. Factors that maintain or improve predicted percent body fat include one or more of the following: the amount of high-quality nutritional resources usable by elk, increased distances from open motorized routes during spring through fall, improve habitat use on slopes less than 40%, or improved vegetation interspersion. These should be applied at the HUC 12 scale.

These plan elements should be implemented wherever possible to concentrate motorized/ mechanical recreation in appropriate areas in addition to being expanded to cover winter recreation. This would mitigate the impacts on, not only elk, but also mountain goats, bighorn sheep, and grizzly bears (see next section).

Grizzly Bears

As the population of grizzly bears increases and these bears disperse further from their established range, wildlife managers need to expect, and take into account, the needs of this species. There is a significant body of evidence indicating human disturbance affects the spatial distribution, and survival, of this species (Schwartz, Haroldson, & White 2010).

Although the Nez Perce-Clearwater National Forest does not currently support a resident population of grizzly bears, the Forests provide essential habitat needed for full Recovery of the species in the lower 48 states. The Forests not only include the majority of potential grizzly bear habitat in the Bitterroot Ecosystem, they also provide connectivity habitat between the North Continental Divide, the Cabinet-Yaak and, to a lesser degree, the Yellowstone Ecosystems. Since reoccupation of the Bitterroot Ecosystem by grizzly bears is dependent upon grizzlies naturally reestablishing themselves, it is imperative that the Forests maintain suitable habitat connectivity across the more intensively managed portions of the Forests.

There is recent evidence that grizzly bears are starting the process of naturally reoccupying the Bitterroot Ecosystem and, provided that they do not come in conflict with humans along the way, it is only a matter of time that bears will reoccupy the Bitterroot Mountains. To promote Recovery, Recommended Wilderness Areas and other MA2 regions need to be managed in a manner that reduces barriers, minimizes conflict and facilitates movement of bears across the landscape with the expectation that grizzlies will once again establish themselves in Clearwater and Salmon River country

III. Timber Harvest and Vegetation Management

General
Forests throughout the west have experienced over a century of extractive uses coupled with countless interruptions to natural ecological processes. The Nez Perce-Clearwater Forest, along with adjacent lands in Montana, has been no exception and has been subject to fire suppression, invasive weed encroachment, and unsustainable timber harvest. Many of the plan elements listed in the draft forest plan, along with a large portion of the DEIS, are focused on the need to return to a Natural Range of Variation (NRV). MWF agrees that returning to the NRV is both practical and desirable and can benefit forests in Idaho as well as those in Montana.

The proposed management activities driving the return to the NRV need a strong balance of natural ecological processes and active mechanical management. Where feasible, MWF recommends using less intensive forest management practices and prescribed fire over implementing management prescriptions that maximizes wood fiber production. From a wildlife habitat perspective, the size, shape, spatial and temporal distribution of harvest units is as important as the specific stand treatments prescribed. MWF requests that the Forests plan vegetation treatments with these elements in mind and that the Forests commit to effectively monitoring the impacts of all of these activities on a variety of species across the Nez PerceClearwater Forests over time.

Proper planning, treating vegetation in a way that mimics natural processes, effective monitoring and adaptive management will produce results that are more aligned with the following forest plan elements:
FW-DC-TE-06. The arrangement of vegetation patches ranges widely in size, shape, and structure to provide connectivity for wildlife. Patches are juxtaposed across the landscape, forming a landscape pattern consistent with the natural range of variation. These patterns vary by potential vegetation type, slope, aspect, and topographic position. Wide-ranging species are able to move freely across and between habitats, allowing for dispersal, migration genetic interaction, and species recruitment.

FW-DC-WLMU-05. Natural processes contribute to the mosaic of habitats needed by ungulates.
The levels of timber harvests as suggested in Alternatives W and X would potentially compromise the ability of wildlife populations to respond in addition to degrading secure wildlife habitat and habitat connectivity.

Additionally, plan element FW-STD-TBR-05 (see below) needs to be modified to exclude clearcutting except where absolutely necessary. Clearcutting at the levels listed below rarely mimic natural disturbance and could seriously damage wildlife security habitat. Additionally, the final sentence needs to be modified to REQUIRE the forest to consider existing newly created openings on National Forest System, adjacent private, and other agency lands. Wildlife and plant communities are tied to the ecosystem as a whole and not to one specific region. It is expected that national forests in Montana will communicate and coordinate with national forests in Idaho and vice versa.

FW-STD-TBR-05. When determined necessary to help achieve desired ecological conditions for the plan area, the maximum opening size created by clearcutting, seedtree cutting, shelterwood cutting, or other cuts designed to regenerate an even-aged stand of timber in a single harvest operation shall be 375 acres. These desired conditions include those associated with forest patterns, patch sizes, and forest resilience both in the short- and long-term and the guidelines that help achieve these desired conditions (see Forestlands section for details). This standard applies forestwide to new harvest proposals on National Forest System lands only and need not consider existing recently created openings on National Forest System, adjacent private, or other agency lands. Additional guidance is available in FSH 1909.12 64.21.

Old Growth
MWF supports the Forests in their goal to maintain or increase levels of old growth forest. Old growth forests provide critical winter habitat for both elk and moose by reducing snow depth as well as providing unique habitat conditions for species that are dependent on old growth habitat conditions for at least some portion of their life history requirements. Old growth forests have declined in both Montana and Idaho over the past century and require special management to ensure we do not lose even more. The following plan elements address increasing or maintaining old growth forest but need some modification/clarification:

MA3-STD-FOR-01. Within ponderosa pine, western larch, western white pine, Pacific yew, western redcedar, western hemlock, and whitebark pine old growth stands, vegetation management activities shall not be authorized if the activities would likely modify the characteristics of the stand to the extent that the stand would no longer meet the definition of old growth ten years post activity. See glossary for old growth definition.

MA2 and MA3-DC-FOR-10. Amounts of ponderosa pine, western larch, western white pine, and whitebark pine old growth are maintained or increased from existing amounts. Amounts of western redcedar, Pacific yew, and western hemlock old growth are maintained through time.

MA2 and MA3-GDL-FOR-03. To prevent fragmentation of existing ponderosa pine, western larch, western white pine, Pacific yew, western redcedar, western hemlock, and whitebark pine old growth patches, permanent road construction should be avoided in these old growth types unless a site specific analysis determines the route through old growth to be the optimum location and no other alternative location is feasible.

MA2 and MA3-DC-FOR-10. Amounts of ponderosa pine, western larch, western white pine, and whitebark pine old growth are maintained or increased from existing amounts. Amounts of western red cedar, Pacific yew, and western hemlock old growth are maintained through time.

Plan element MA2 and MA3-GDL-FOR-03 states that [ldquo]permanent road construction should be avoided in these old growth types unless a site specific analysis determines the route through old growth to be the optimum location and no other alternative location is feasible.[rdquo] While this guideline does show the caution this forest is exercising in regards to development in old growth, MWF strongly holds that permanent road construction should not be allowed. Roads are well known vectors for noxious weeds spread and can be detrimental to wildlife (Naylor, Wisdom, & Anthony 2010). We believe this element should be edited to require all roads be

temporary with complete obliteration and reclamation completed within a specified amount of time.

Additionally, element MA3-STD-FOR-01 states that [ldquo]activities shall not be authorized if the activities would likely modify the characteristics of the stand to the extent that the stand would no longer meet the definition of old growth ten years post activity.[rdquo] Given the length of time to establish old growth forest, it is highly unlikely old growth status can be attained again within 10 years after loss of such status. This element should be modified to not allow any projects that could result in loss of old growth status.

MWF recognizes that large wildfires have the potential to eliminate significant acreages of old growth habitat. When treating vegetation adjacent or near existing old growth stands, the Forests should prescribe treatments that recruit future old growth habitat to compensate for old age forests that will eventually be lost to insects, disease, fire or normal plant succession. In addition, the Forests should prescribe vegetation treatments adjacent to old growth habitat that create conditions that minimize the risk of losing the stands to wildfires and/or improve conditions that improve the probability of effectively suppressing wildfires when they eventually occur.

III. Hoodoo Roadless Area and other Recommended Wilderness

Wilderness and Recommended Wilderness Areas (RWA) within the Nez Perce-Clearwater National Forest are highly valued by recreationists around the nation. These areas provide ample opportunity to experience remote, backcountry settings while also providing secure habitat for many different wildlife species. Montanans have enjoyed Idaho[rsquo]s wilderness and RWAs for as long as these areas have existed and our members frequently venture across the stateline to experience the pristine waters and lands of Idaho. Whether it is fishing, hunting, or just enjoying the scenery, there is no doubt these lands are held in high regard by Montanans.

The alternatives listed in the DEIS range across a wide gamut of options with regards to RWAs and management actions within these areas. The 2012 forest planning rule states that:
[ldquo]The plan must provide for [hellip] protection of Congressionally designated wilderness areas as well as management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation.[rdquo]

It is the position of the MWF that:
1. All 151,874 acres of the Hoodoo Roadless Area are managed as recommended wilderness due to not only the outstanding wilderness character of this region, but also because of this areas importance as linkage habitats for species that have large home ranges and disperse over large areas such as grizzly bears and wolverines.
2. Non-conforming uses should not be allowed within any RWA so as not to preclude any RWA from congressional wilderness designation (with the exception of administrative use of chainsaws by the USFS and partners). Non-conforming uses should include all forms of mechanized travel, over snow travel, and use of e bikes.
3. The DEIS needs to be modified to accurately assess the economic benefits of nonmotorized/non-mechanical to local economies.
4. All 90,855 acres of the Mallard-Larkins Roadless area as recommended wilderness.

The previous statements are consistent with the following plan elements:

MA2-DC-RWILD-01. Recommended wilderness areas maintain their existing wilderness characteristics to preserve opportunities for inclusion in the National Wilderness Preservation System.

MA2-DC-RWILD-04: Recommended wilderness areas provide opportunities for solitude or a primitive and

unconfined type of recreation. Impacts from visitor use do not detract from the natural setting.

Allowing non-conforming uses with RWAs would directly contradict both plan elements MA2DC-RWILD-01 and MA2-DC-RWILD-04. The degradation caused by mechanical and motorized recreation would directly contribute to impacts on solitude, primitive settings, and could preclude RWAs from wilderness designation.
We also believe that Alternative Z is misleading in its description. This alternative is described as a proposal brought forward by wilderness advocacy groups yet it allows both mechanized travel and over-snow travel within the Hoodoo Roadless Area. This language should be removed to prevent non-conforming uses within a potential RWA. In addition, the Hoodoo Roadless Area should be managed to exclude timber harvest, and both permanent and temporary road construction.

RWAs and wilderness areas are vital for many species of wildlife as well. Mountain goats, wolverine, elk, and grizzly bears are all negatively affected by human disturbance and these areas offer a form of [ldquo]refugia[rdquo] from increased disturbance in other regions (see wildlife section).

Additionally, these areas support wildlife dispersal and habitat connectivity. The following plan element within the draft forest plan supports this:

MA2-DC-RWILD-03: Recommended wilderness areas facilitate the connectivity and movement of wildlife species across the Nez Perce-Clearwater by remaining large areas with little human activity.

We also believe that Alternative Z is misleading in its description. This alternative is described as a proposal brought forward by wilderness advocacy groups yet it allows both mechanized travel and over-snow travel within the Hoodoo Roadless Area. This language should be removed to prevent non-conforming uses within a potential RWA. In addition, the Hoodoo Roadless Area should be managed to exclude timber harvest, and both permanent and temporary road construction.

Finally, MWF believes that the definition of semi-primitive non-motorized recreation needs to be modified to state that e-bikes are considered motorized recreation. These bikes increase accessibility to backcountry regions which will cause further degradation of natural resources and wildlife habitat.

IV. Fisheries and Watershed Restoration

High quality fishing opportunities exist throughout the Nez Perce-Clearwater National Forest, which provide significant positive economic impacts to Idaho communities.

MWF supports the use of the Watershed Condition Framework (FW-MSA-WTR-09) and priority watershed identification. Specifically, MWF supports the highest levels of restoration outlines in the objectives in the revised plan (Pages 46-47) which includes:
- Completing all restoration work in 20 priority watersheds every 15 years (FW-OBJWTR-01X).
- Enhance or restore 400 miles of stream habitat (FW-OBJ-WTR-02W, FW-OBJWTR-02X)
- Improve soil and watershed conditions on 5,300 acres, including non-system road decommissioning (FW-OBJ-WTR-04X).

Appendix 4, Management Approaches and Possible Actions states that [ldquo]...identified essential restoration projects should be based on a consideration of the potential effects of climate change and the ability of restoration actions to minimize them. In particular, water availability, stream flows and stream temperature should be considered.[rdquo] MWF supports this consideration and suggests this strategy is adopted, especially for priority restoration projects dealing with fisheries habitat improvements and at-risk species that are projected to

decline due to the effects of climate change.

Within the objectives of the Conservation Watershed Network, MWF supports the highest level of stormproof roads for restoration, 20% of roads every 5 years (FW-OBJ-CWN-02W, FW-OBJCWN-02X).

Standard FW-STD-RMZ-01 for Riparian Management Zones needs to be clarified. As the standard currently reads, it is unknown if the standard could be abused to harvest timber within RMZs to meet other resource needs. Timber harvest within RMZs should only be permitted for projects that are aimed at specific restoration needs to enhance or restore riparian conditions.

The positive benefits of Beavers in aquatic habitats are recognized within the desired conditions for aquatic systems (FW-DC-WTR-09), and the use of beaver dam analogs (BDA) and beaver reintroduction or supplementation into suitable habitats are mentioned within the possible action for aquatic systems (Appendix 4). MWF supports this recognition within the final plan and suggests that the following specific guidelines (identified by the Idaho Wildlife Federation), are adopted:
- [ldquo]To support aquatic habitat quality and resiliency, beaver complexes (including wetlands and riparian areas) should be enhanced or maintained unless their activities directly threaten roads/other human developments, and where such is the case, non-lethal techniques are explored first.[rdquo]
- [ldquo]To maintain ecological integrity and enhance climate resiliency, restoration of beavers to currently unoccupied but suitable habitat (either through translocation or natural recolonization) is facilitated in cooperation with national, state, and local partners.[rdquo]
- [ldquo]Where conflicts with beaver habitat and roads and other human development arise in a watershed, resolution will be addressed through management strategies such as pond levelers, beaver deceivers, fencing, and other non-lethal strategies, including livetrapping and relocation. Lethal removal will only be considered after non-lethal strategy options have been exhausted.[rdquo]
- [ldquo]In areas where beaver recolonization would result in conflict, Beaver Dam Analogs (BDAs) are installed to mimic the habitat manipulation activities of beavers.[rdquo]

Additionally, the use of beaver mimicry techniques or reintroduction to suitable habitat should be done in a way that does not create more favorable conditions for non-native fish species or result in increased competition between native and non-native fish species.

V. Wild and Scenic River Designations
The Wild and Scenic Rivers Act was created by Congress to preserve rivers with outstanding natural, cultural or recreational values. The Nez Perce-Clearwater National Forests Wild and Scenic River Suitability Report (Appendix F), outlines stream segments that have qualified for inclusion in the National Wild and Scenic Rivers System. Segments that qualify for inclusion based on having one or more Outstanding Remarkable Value (ORV) including scenic, recreational, geologic, fish, wildlife, historic, cultural or other similar river related values.

The suitability report found that eighty-nine river segments were eligible for inclusion in the National Wild and Scenic Rivers system. The alternatives range in designations from zero stream segments (Alternative X) to thirty-six segments (Alternative Z). MWF maintains that all 89 stream segments identified with one or more ORVs should continue to be managed as suitable and in a way that would not result in the loss of existing ORVs.

Streams in the Hoodoo Recommended Wilderness Area and other tributaries within the North Fork of the

Clearwater system provide high quality recreational opportunities, scenic values, and outstanding fisheries values. Fluvial bull trout, an ESA listed species, and westslope cutthroat trout, an identified sensitive species by the Forest Service, are found throughout this system. Climate change represents a long term threat to native fish species. Higher elevation streams will likely be the last remaining thermally suitable habitat for species like bull trout, which require some of the most intact and complex habitat to survive.
The North Fork of the Clearwater River, Kelly Creek, and Cayuse Creek are known nationally for their high quality fisheries and fishing opportunities. Many MWF members and other Montana citizens travel to these streams annually to angle and recreate, many of whom utilize the outstanding backcountry fishing opportunities. Due to these high quality recreation opportunities and fisheries habitat, MWF supports suitability of Wild and Scenic Rivers for the following streams/segments:

- Kelly Creek (26.2 miles), Consistent with Alternatives W,Y, and Z
- North Fork Kelly Creek (5.9 miles), Consistent with Alternatives W,Y, and Z
- Middle Fork Kelly Creek (4.9 miles), Consistent with Alternatives W,Y, and Z
- South Fork Kelly Creek (6.2 miles), Consistent with Alternatives W,Y, and Z
- Cayuse Creek (35.9 miles), Consistent with Alternatives W and Y
- North Fork Clearwater River (78.9 miles), Consistent with Alternative Y
- Little North Fork Clearwater River (4.3 miles), Consistent with Alternatives W,Y, and Z

VI. Conclusion
Given the varying management approaches and objectives within each of the alternatives, MWF cannot support any of the alternatives as currently written. MWF[rsquo]s comments have focused on suggestions for improvements or elements that should be added or included in the final forest plan. The Nez Perce-Clearwater National Forests are enjoyed by many Montanans, and we commend the Forest Plan Revision Team on working to include opportunities for Montana communities to participate in the Forest Plan revision process. Thank you for the opportunity to comment.
Sincerely,

Alec Underwood
Federal Conservation Campaigns Director
Montana Wildlife Federation