Data Submitted (UTC 11): 4/20/2020 7:00:00 AM First name: Bonnie Last name: Rice Organization: Title: Comments: Sierra Club comments on NPCNF Draft Plan/DEIS

Mr. Peterson,

Please accept the attached comments from the Sierra Club on the NPCNF Draft Plan and DEIS.

If you have any problems with the file or questions, please don't hesitate to contact me.

Thank you,

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ATTACHMENT BELOW

Submitted Electronically To: sm.fs.fpr_npclw@usda.gov April 20, 2020 Nez Perce-Clearwater National Forest Forest Plan Revision Team Attn: Zach Peterson, Forest Planner 903 3rd Street Kamiah, ID 83536 Re: Draft Revised Forest Plan and Draft Environmental Impact Statement for the Nez Perce-Clearwater National Forest Dear Mr. Peterson, The Sierra Club submits the comments below on the Draft Revised Forest Plan (Draft Plan) and Draft Environmental Impact Statement (DEIS) for the Nez Perce-Clearwater National Forest (NPCNF) on behalf of more than 5,000 active members in Idaho and Montana as well as over 3.7 million members and supporters nationwide who care deeply about the management of our national forests. Sierra Club staff and volunteers have participated in the forest plan revision process since its inception, attending public meetings and submitting written comments. We appreciate the considerable work that has gone into the Draft Plan and DEIS, and the current opportunity to offer the following comments. As noted in the Draft Plan, the NPCNF is characterized by [Idquo][Rugged mountain ranges, pristine rivers and streams, and extensive forested landscapes [that]combine to create diverse ecosystems that provide spectacular recreational opportunities; substantial fish and wildlife habitat: and forest, minerals, and range products. [rdguo] (Draft Plan, page 8) Our members and supporters in Idaho and Montana as well as across the country treasure the NPCNF for these attributes, for its unique ecological and wildlife values and for the special recreational opportunities it provides. The NPCNF has an important role to play in helping to address the biodiversity and climate crises. A growing consensus of scientists around the world is calling for drastic action to address these interrelated threats, centered on protection of public lands and waters. A draft plan1 released earlier this year by the U.N. Convention on Biological Diversity outlines a path for combating the biodiversity crisis that many scientists say is the start of Earth[rsquo]s sixth mass extinction. The plan centers on protection of 30 percent of all land and sea. In the United States, with only 12 percent of our country[rsquo]s lands currently protected2 reaching that goal means we need to work as quickly as possible to ensure our public lands are protected to the greatest extent. 1 https://www.cbd.int/doc/c/efb0/1f84/a892b98d2982a829962b6371/wg2020-02-03-en.pdf2 https://www.americanprogress.org/issues/green/reports/2019/08/06/473242/much-natureamericakeep/Unfortunately, extraction of fossil fuels on our public lands and forests in the United States are contributing to the climate crisis[mdash]despite their immense value to work as carbon sinks that can reduce climate pollution significantly. We must prioritize using our public lands to store carbon instead. Studies have shown that smart land conservation and management practices could offset 21% of US greenhouse gas emissions.3 Public lands, including the NPCNF, present tremendous preservation opportunities and we must act now to permanently protect them. 3 https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6235523/l. Recommended Wilderness a. Allowance of Non-conforming Uses in Recommended Wilderness Areas The Sierra Club is deeply disturbed by, and opposes, the Forest Service[rsquo]s proposal to allow any non-conforming uses in any of the alternatives, but particularly by what is proposed in Alternative Z. Under that alternative, everything seems to be allowed: winter motorized use, mechanized use, aircraft landings for recreational use, etc. This makes recommended wilderness meaningless. All of these uses virtually certainly will preclude an area from ever being designated by Congress as Wilderness. In addition to resource damage, adverse impacts on wildlife including threatened species, and impacts on members of the public desiring a true wilderness experience, once these uses are allowed there becomes an entrenched user base which will almost certainly lobby against designation of an area as Wilderness in the future, since such designation would preclude those uses. The Wilderness Act is clear in its prohibition on motorized and mechanized uses in designated Wilderness, and the Forest Service must honor its responsibility to manage recommended wilderness to maintain an area[rsquo]s wilderness characteristics in order for it to be considered for future designation by Congress. Proposing that these non-conforming uses be allowed in recommended wilderness is especially disturbing given the proliferation of new motorized and mechanized technologies, including but not limited to quickly changing models of snowmobiles, and recent introduction of snow bikes and e-bikes. These motorized and mechanized vehicles are increasingly allowing people to go farther and faster into remote areas in all seasons, potentially causing severe impacts to wildlife particularly during the winter when species[rsquo] energetic reserves are most challenged. The 2012 Planning Rule requires the Forest Service to protect and maintain the wilderness suitability and character of recommended wilderness areas. Likewise, Forest Service planning directives make recommended wilderness areas unavailable for any use that may reduce a recommended area[rsquo]s wilderness designation potential. The 2012 Planning Rule requires the Forest Service to include plan components that provide for [ldguo]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] (36 CFR 219.10(b)(1)(iv)). The preamble to the final rule also states, regarding this provision, [Idquo]The Department believes the requirement in the final rule meets the Agency[rsquo]s intent to ensure that the types and levels of use allowed would maintain wilderness character and would not preclude future designation as wilderness[rdguo] (77 Fed. Reg. 21224). Further, the Forest Service Manual states, [Idquo]Any area recommended for wilderness or wilderness study designation is not available for any use or activity that may reduce the wilderness potential of an area[rdquo] (FSM 1923.03(3)). The Forest Service Handbook notes, [Idquo][w]hen developing plan components for recommended wilderness areas, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation[rdquo] (FSH 1909.12, sec. 74.1).

These directives make it abundantly clear that what is proposed in Alternative Z regarding non-conforming uses in recommended wilderness does not fulfill the requirements of the 2012 Planning Rule or Forest Service direction. Courts have ruled that both such recreational uses can reduce both an area[rsquo]s [ldquo]ecological and social [wilderness] characteristics[rdquo] and its [Idquo]wilderness potential.[rdquo] As the Ninth Circuit Court of Appeals stated in Russell Country Sportsmen v. U.S. Forest Service, 668 F.3d 1037, 1043 (9th Cir. 2011), the Forest Service maintains the wilderness potential of Wilderness Study Areas [Idquo]when it either preserves against decline or enhances the wilderness protection of the area. Preserving motorized recreational uses, by contrast, does nothing to maintain the area's potential for wilderness designation.[rdquo] Closer to home in Montana, the Ninth Circuit Court of Appeals held that the Forest Service illegally failed to maintain the wilderness character of Wilderness Study Areas by ignoring the impact of increased motorized and mechanized recreational use on opportunities for solitude (Montana Wilderness Association v. McAllister, 666 F.3d 549 (9th Cir. 2011). The NPCNF itself has recently addressed the issue of non-conforming uses in recommended wilderness in its 2016 Record of Decision (ROD) for the Clearwater National Forest Travel Planning for Recommended Wilderness Areas. Numerous conclusions made by the Forest Service in this ROD illustrate that allowing nonconforming uses within recommended wilderness areas are in conflict with the Forest Service[rsquo]s mandate to protect and maintain the wilderness suitability of recommended wilderness areas, as enumerated below: [Idguo][Continuing to allow unregulated motorized recreation in RWAs (recommended wilderness areas) would negatively impact naturalness, primitive character, opportunities for solitude[hellip]. As motorized use continues to grow, such impacts would become more pronounced and the wilderness character of the areas[hellip] when they were recommended for designation, would not be maintained[hellip]. Impacts of such uses to wildlife (particularly wolverine) and trail resources would also be expected to increase. Because these areas are large and remote, the Forest Service does not have the ability to effectively regulate the amount of use if they remained open[hellip][rdquo] (ROD, pages 9-10) [Idquo][Allowing motorized use in RWAs generally would not maintain wilderness qualities nor would it protect wilderness character. I believe that if I decided to allow motorized use in the RWAs it could preclude future wilderness designation or predetermine decisions that could be made in a wilderness bill.[rdquo] (ROD, page 11) [Idquo][Eliminating motorized and bicycle travel in RWAs[hellip]will best protect wilderness attributes in RWAs.[rdquo] (ROD, page 11) [Idquo][Motorized and mechanized vehicles continue to increase in capability and popularity and given this trend, increased pressure on areas recommended for Wilderness seems inevitable unless those uses are restricted. I think that allowing motorized and mechanized use of vehicles in RWAs will reduce the future Wilderness potential of these areas.[rdquo](ROD, page 17) The Draft Plan accurately captures the Forest Service[rsquo]s responsibility in the management of recommended wilderness: [Idquo][The Forest Service preserves the opportunity for recommended wilderness areas to be included in the National Wilderness Preservation System by protecting and maintaining the ecological and social characteristics that provide the basis for their suitability for wilderness designation.[rdquo] (Draft Plan, page 103) The Draft Plan also identifies several Desired Conditions for recommended wilderness areas, including: 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-03. Recommended wilderness areas facilitate the connectivity and movement of wildlife species across the Nez Perce [ndash] Clearwater by remaining large areas with little human activity. 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. Additionally, the DEIS states: [Idquo][National direction requires that areas recommended for wilderness avoid uses and management activities that might reduce their future potential to become designated wilderness.[rdquo] (DEIS, page 3.6.2-4) Despite all of the agency[rsquo]s own directives, prior court rulings, and Desired Conditions in the Draft Plan, however, the Forest Service then presents to the public alternatives that directly conflict with these mandates and goals. Alternative Y slices off a substantial portion of the Hoodoo/Great Burn roadless area to allow unrestricted over-snow vehicle use, thus adversely impacting critical mountain goat winter habitat and wolverine denning habitat. This dramatically decreases the potential for recommended wilderness to provide for connectivity and movement of wildlife species across the Forest by retaining large areas with little human activity. In allowing motorized and mechanized recreation and recreational aircraft landings, Alternative Z flies in the face of the Forest Service[rsquo]s responsibility to protect and maintain the ecological and social characteristics that

provided the basis for the areas[rsquo] suitability for wilderness designation in the first place. The NPCNF[rsquo]s proposal to allow non-conforming uses in recommended wilderness is even more earegious. considering that there is no analysis in the DEIS of the ecological and social (or other) impacts of motorized and mechanized travel in areas recommended for wilderness. At the least, if the Forest Service is going to propose allowing such uses, the agency is required by the National Environmental Policy Act (NEPA) to fully analyze the impacts of these types of recreation, including new technologies such as snow bikes and ebikes, and to make that analysis available to the public during this forest plan revision process so that the public can make informed comments on forest management (42 USC [sect] 4332[copy] (iii).) As stated above, motorized and mechanized uses are non-conforming uses in recommended wilderness. These uses detract from an area[rsquo]s wilderness quality, ecological function and wildlife habitat value; as such, they are incompatible with Wilderness designation. The Forest Service acknowledges this in Table 4, the Overview of Alternatives, in denoting [Idquo]nonconforming uses[rdquo] and noting that Alternatives W and Y allow [ldquo][no non-conforming that would likely preclude designation[rdquo] i.e. winter motorized, mechanized travel (DEIS, page 2-19) and that [ldquo][There would be a five-year objective for removing those uses that are inconsistent with wilderness designation[rdquo] when discussing Alternatives W and Z. (DEIS, page 3.6.2-10) The point of recommended wilderness, as enshrined in agency directives and the 2012 Planning Rule, and as backed by court rulings, is that recommended wilderness facilitates large landscape connectivity for wildlife, preserves important wildlife habitat, provides opportunities for solitude and primitive and unconfined recreation untrammeled by man, and maintains the area[rsquo]s wilderness characteristics so that it can be included in the National Wilderness Preservation System in the future. The Forest Service needs to step up and unequivocally say that non-conforming uses are not allowed in recommended wilderness, and to clearly and consistently denote the higher level of protection that recommended wilderness provides in the forest plan revision documents. b. Improper Conflation of the Protections of Recommended Wilderness and the Idaho Roadless Rule We are very concerned about how the Draft Plan/DEIS conflates the protections provided by recommended wilderness with the lesser protections provided by the Idaho Roadless Rule (IRR), and that the Forest Service seemingly considers them to be basically equal in protection. As one example in the section on grizzly bears: [Idquo][The plan does not propose any connectivity areas because the Nez PerceClearwater is already a contiguous block of land containing many acres of lands well preserved by management area direction, such as the Idaho Roadless Rule, designated wilderness, and recommended wilderness.[rdquo] (DEIS, page 3.2.3.3-86) The Forest Service also claims that: [Idquo][The extent to which recommended wilderness improves connectivity for grizzly bears over Idaho Roadless Rule management depends upon the roadless rule theme but, in general, it is only a slight improvement from an already well-connected condition.[rdquo] While the DEIS and Draft Plan have three alternatives with varying amounts and locations of recommended wilderness, the Forest Service proposal for management of those areas departs dramatically from recognized requirements to manage recommended wilderness to preserve the ability of Congress to enact such designation. The proposal reflects a conflation of the IRR management standards for inventoried roadless areas that are not recommended wilderness with recommended wilderness management. Indeed, the IRR Final Environmental Impact Statement (FEIS) recognizes this distinction: [Idquo][Recommended wilderness areas are managed to maintain wilderness character and values until such time as Congress acts upon the Agency recommendation or a different Agency recommendation is made. Roacless areas that are recommended for wilderness have management prescriptions that protect the widerness character of the area[hellip][rdquo] (IRR FEIS, Chapter 3-351) The IRR FEIS goes on to describe that timber cutting and road construction are [ldquo]unlikely to happen[rdquo] as current recommended wilderness did not allow such activities (Chapter 3351). It does not analyze the impact of allowing such actions in recommended wilderness as a result. Therefore, no prior NEPA analysis of the impact of use of IRR management conditions in recommended wilderness has been done. The Wilderness Act defines wilderness character as having the opportunity for solitude and primitive recreation, naturalness, a state untrammeled by humans, and ecological functions as a primary outcome. The proposed permitting of temporary road construction, timber harvest per the IRR standards, mechanized transport and, in alternative Z, unrestricted oversnow vehicle use violates all of those qualities. Elk alter feeding times and increase travel time relative to feeding time when in the presence of mountain biking.4 Wisdom et al found that mountain biking evoked similar responses to ATV riding, increasing flight distance substantially.5 Herrero and Herrero reported a higher number

of bear-mountain biker encounters versus hikers in Banff National Park, Canada.6 Road cuts for temporary roads produce gaps in vegetation, piles of soil and rock and differing understory indicating their presence for many years following their repair. Timber harvest leaves stumps and slash at a minimum that is clear and obvious evidence of human activity that also persist for decades. Primitive recreationists have conflicts with both mountain biking and snowmobile activity that interfere with naturalness and solitude. 4 Naylor, L. M., Wisdom, M. J., & amp; Anthony, R. G. (2009). Behavioral responses of North American elk to recreational activity. The Journal of Wildlife Management, 73(3), 328-338. doi:10.2193/2008-102.5 Wisdom, M. J., Preisler, H. K., Naylor, L. M., Anthony, R. G., Johnson, B. K., & amp; Rowland, M. M. (2018). Elk responses to trail-based recreation on public forests. Forest Ecology and Management, 411, 223-233. doi:10.1016/j.foreco.2018.01.032.6 Herrero, Jake & amp; Herrero, Stephen (2000). Management Options for the Moraine Lake High Trail: Grizzly Bears and Cyclists. BIOS Environmental Research Ltd. September 2000. In regard to motorized access, the IRR does not address motorized use or access, though the planning documents contain contradictory statements in regard to this issue. 7 The fact that the Forest Service views protections of recommended wilderness and the IRR in this and other regards as virtually the same is a significant issue. As noted above, the Forest Service itself concludes that motorized and mechanized use impact an area[rsquo]s wilderness quality and ecological value. Additionally, the Forest Service must give more weight in its planning and decision processes to acknowledge the widespread proliferation of motorized and mechanized technology that is allowing people to travel much further and faster into the backcountry. Demands for access by ever-more powerful snowmobiles, snowbikes, ebikes, utility task vehicles, ATVs, mountain bikes and other machines continues to grow rapidly every year. 7 As noted in the DEIS: [ldquo][[hellip] the rule does not speak to motorized use or access[rdquo] (DEIS page 2-9), but just a few pages later in the DEIS, the Forest Service asserts that the Idaho Roadless Rule does speak to this issue: [Idquo][The northern portion of the Nez Perce-Clearwater provides the ecological conditions to provide connectivity because it has low road densities and management areas, such as Idaho Roadless Rule areas that restrict motorized development.[rdquo] (DEIS [age 3.2.3.3-90) (emphasis added) The DEIS recognizes that typically, management of recommended wilderness is like that of designated wilderness: [ldquo][Recommended wilderness is managed to prevent degradation of wilderness character. Management for recommended wilderness is very similar to management for designated wilderness. (DEIS, page 3.2.3.2-14) [Idquo]Plan direction for designated and recommended wilderness emphasizes a management system through natural processes. This direction should maintain or increase non-forested vegetation and early seral habitats. (DEIS, page 3.2.3.2-70) And as noted above, the plan components recognize the values recommended wilderness areas should maintain with Desired Conditions (MA2-DC-RWILD-01 through 04). However the only standards or guidelines relating to non-conforming uses in the plan are as follows: MA2-STD-RWILD-01. Summer recreation opportunities are consistent with the recreation opportunity spectrum classification of primitive or semi-primitive non-motorized. MA2-STD-RWILD-02. Alternative W and Y: Winter recreation opportunities are consistent with the recreation opportunity spectrum classification of primitive or semi-primitive non-motorized. Alternative Z: Winter recreation opportunities are consistent with the recreation opportunity spectrum classification of primitive, semi-primitive non-motorized, or semiprimitive motorized. Reliance on the IRR to guide management in recommended wilderness is misplaced. The management direction in the IRR does not adequately protect wilderness values critical to designation as wilderness. c. Lack of Adequate Plan Components The Sierra Club supports Desired Conditions MA2-DC-RWILD-01 through MA2-DCRWILD-04. We are unclear regarding the term [ldquo]suitability[rdquo] in Table 33. Does this mean that these management actions are not allowed if noted as [ldquo]no[rdquo] in the Table? Are these management actions enforceable if not accompanied by standards? If not, we request that the Forest Service specifically add standards for these management actions. d. Inadequate Range of Alternatives In prior comments, the Sierra Club specifically requested inclusion of an alternative which analyzed recommendation of all Idaho Roadless Areas for wilderness designation. We are extremely disappointed that the Forest Service chose not to pursue analysis of such an alternative. However, the Forest Service did choose to include an alternative that recommended zero areas for wilderness designation (Alternative X). The most-inclusive alternative for wilderness designation, Alternative W, would protect only just over half (58%) of roadless lands evaluated for wilderness designation. In our view, since the Forest Service put forward an alternative that recommended zero wilderness, but did not put forward an alternative that analyzed anything even close to recommending all Idaho Roadless Areas for wilderness, the range of alternatives

required by the National Environmental Policy Act is inadequate. We request that the Forest Service issue a revised DEIS that includes such an alternative. The rationale that the Forest Service provides in the DEIS as to why it did not include such an alternative is inadequate. Recommending wilderness protection for substantially all roadless areas is consistent with both the purpose of forest planning and the agency[rsquo]s multiple-use mandate. Wilderness protection would help to achieve the 2012 Planning Rule[rsquo]s fundamental requirement to maintain or restore the ecological integrity or ecosystems and watersheds (36 CFR 219.8(a)(1)). Further, the Multiple-Use SustainedYield Act specifically states that [Idquo][t]he establishment and maintenance of areas of wilderness are consistent with [multiple use and sustained yield][rdquo] (16 USC 529). Additionally, recent forest plan revision processes on other forests did include an alternative that analyzed recommendation of all or nearly all inventoried roadless areas for wilderness designation; specifically, the Flathead National Forest and the Custer Gallatin National Forests did exactly that in the past 2-3 years. We are particularly concerned about this omission given the fact that grizzly bears are attempting to return to the NPCNF, and in order to do so, and to reestablish populations and to achieve connectivity between populations between the north (Northern Continental Divide, Cabinet-Yaak) and the south (Yellowstone), the strongest possible protection of roadless areas [ndash] recommended wilderness with no non-conforming uses ---in the NPCNF is critical. e. Recommended Wilderness Areas As outlined above, the Sierra Club views the range of alternatives presented in the DEIS as inadequate, and we request a revised DEIS that analyzes an alternative that recommends all or nearly all Idaho Roadless Areas for wilderness designation. At the present time in lieu of such an alternative/analysis, we support the recommended wilderness areas in Alternative Z (again, prohibiting non-conforming uses) with important additions. Bighorn Weitas, North Lochsa Slope and Lochsa Face should be recommended for wilderness as well, due to their importance for wildlife connectivity. Without these additions, we are concerned that Alternative Z leads species into the checkerboard/US 12 potential population sink. Those lands are heavily roaded, heavily harvested for timber and/or burned and may not be viable connectivity for species that require cover. RackliffGedney should also be recommended for wilderness, given its large size and location between the North Lochsa Face and West/East Meadow Creek roadless areas, which would provide geographic connectivity to the Salmon Challis National Forest to the west of the Selway-Bitterroot Wilderness. f. Improper Bias In Measurement Indicators We are also very concerned about the strong bias shown in choosing measurement indicators for recommending areas for wilderness designation. The first three indicators listed deal with changes in motorized or mechanized transport compared with existing conditions, illustrating what we believe is a clear bias in regard to allowing motorized and mechanized recreation as the primary consideration in recommending areas for wilderness designation. Indeed, only the last measurement indicator listed, #5, says anything at all in regard to ecological or wilderness characteristics as being important, and that only in relation to an area[rsquo]s characteristics being underrepresented in the National Wilderness Preservation System. We strongly believe that using this measure as the only indicator of wilderness benefits used in the evaluation process is inadequate and inappropriate. This calls into question the entire wilderness evaluation for the NPCNF. A new and unbiased set of measurement indicators should be developed and a new wilderness evaluation should be done using those indicators, and we request that the Forest Service undertake these steps before moving any farther in the forest plan revision process. II. Wild and Scenic Rivers We are concerned that, similarly as with recommended wilderness, the Forest Service has presented an alternative that determines no rivers or streams are suitable for Wild and Scenic River designation (Alternative X), but does not present an alternative with suitability determinations for all or nearly all 89 rivers that were found eligible. We request a revised DEIS that includes an alternative with suitability determinations for all or nearly all 89 eligible rivers and streams. This is particularly warranted as there is little to no rationale presented in the suitability study for the Forest Service[rsquo]s determinations that dozens of eligible rivers on the NPCNF are unsuitable for Wild and Scenic River designation. We request that the Forest Service immediately make available to the public any and all rationale used to determine rivers and streams unsuitable. In lieu of such an alternative at this point in time, we support suitability determinations for all the rivers in Alternative Z, as they are well-deserving of Wild and Scenic River designation. Additionally, we urge the Forest Service to declare additional deserving rivers as suitable, as outlined below. . North and South Forks of the Clearwater River It is difficult to understand why the Forest Service did not include outstanding rivers including the North and South Forks of the Clearwater as suitable in all action alternatives. These rivers have the highest number of outstandingly remarkable values (ORV) in the evaluation. The planning

team identified no less than seven ORVs for the North Fork, including recreation, scenery, cultural resources, cultural importance to the Nez Perce Tribe, fish, wildlife and botany. Additionally, as noted in the DEIS, [Idquo][Those rivers that provide the most connectivity for grizzly bears are the North Fork Clearwater River[hellip].[rdquo] (DEIS page 3.2.3.3-87) As noted in the suitability study, the North Fork of the Clearwater is threatened by dam development: [Idquo][The presence of a dam on the river and the number of potential dam sites previously identified suggest potential for future dam building.[rdquo] (DEIS, page F-44) [ldquo][Additionally, the history of damming on the river and the number of potential dam sites remaining on the river suggest legislation may be needed to prevent future dam building.[rdguo] (DEIS, page F-45) (italics added) and: [Idquo][Numerous potential dam locations have been identified in the past for the North Fork Clearwater River and its tributaries.[rdquo] (DEIS, page F-45) Given the high number of ORVs, the potential for dam building, the importance of the North Fork to grizzly bear connectivity, and that the Forest Service itself notes that [Idquo]This is one of the major rivers on the national forest and is itself a basin. Its overall health contributes to and defines basin integrity[rdquo] (DEIS, page F-45) there is no question that the North Fork Clearwater River should be given the highest level of protection possible and recommended as suitable for Wild and Scenic River designation. It is particularly troubling that the Forest Service gives no rationale in its suitability study for the North Fork being deemed unsuitable in two of the three action alternatives. South Fork Clearwater River Likewise, the Forest Service should classify the South Fork of the Clearwater as suitable. The South Fork also has a very high number of ORVs: Recreation, scenic, cultural, Nez Perce cultural, fish, and wildlife (DEIS, page F-218). The Forest Service notes that, similar to the North Fork, [Idguo]The South Fork Clearwater River is one of the major rivers on the Nez Perce-Clearwater National Forests. It is a major river in the Clearwater Basin.[rdguo] (DEIS, page F-224) The South Fork is threatened by potential dams as well: [Idquo][Water resource development is possible on the South Fork Clearwater River. Potential dam sites on the South Fork Clearwater River have been mapped.[rdquo] (DEIS, page F-224) As with the North Fork, no rationale was provided for declaring this river unsuitable in three of the four action alternatives. The Forest Service attempts to make the argument that state Comprehensive Water Management Plans are sufficient to protect these rivers from dams or impoundments, hydropower projects, and water diversion works. However, this rings hollow as these plans can be changed at any time by a simple majority vote of the Idaho Water Resources Board and either house of the state legislature. Additionally, Congress has the authority to approve federal water projects and the Federal Energy Regulatory Commission retains authority to issue licenses to non-federal agencies; therefore, a nonfederal entity could bypass the state and apply for a license to construct a dam on federal lands. Only Wild and Scenic River designation will permanently protect these rivers from dams or other destructive projects, and the Forest Service should issue suitability determinations for the North and South Forks of the Clearwater River. Cayuse Creek Cayuse Creek is declared suitable in Appendix F but is not included in Table 26 or 27 for Alternative Z as suitable for Wild and Scenic River designation. This discrepancy should be corrected and Cayuse Creek consistently declared suitable in all planning documents for its outstanding fisheries and recreation values and as an integral part of the North Fork Clearwater system. III. Wildlife Connectivity The 2012 National Forest Planning Regulations contain specific planning obligations for the National Forest units to fulfill. In particular, the new regulations have substituted two provisions [sect]219.8 and [sect]219.9 for the 1982 regulations[rsquo] [Idquo]maintain viable populations of forest vertebrates[rdquo] standard. These new sections seek to meet the mandate of NFMA that forest plans [ldquo]provide for the diversity of plant and animal communities[hellip][rdquo] 16 USC [sect]1604(g)(3)(B). In relevant part [sect]219.8 states: (a) Ecological Sustainability. (1) Ecosystem Integrity. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure function, composition, and connectivity, taking into account: (ii) Contributions of the plan area to ecological conditions within the broader landscape influenced by the plan area. (iii) Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area. In parallel language [sect]219.9 Diversity of plant and animal communities, in relevant part, states: (a) Ecosystem plan components. (1) Ecosystem Integrity. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore their structure, function, composition, and connectivity. It is clear from the language of these regulations

that connectivity planning is central to the forest plan revision process. Indeed, it is so central that [Idquo]plan components, including standards or guidelines[rdguo] addressing connectivity must be included in the forest plan. The DEIS does recognize the important ecological role of connectivity and the 2012 Planning Rule[rsquo]s requirements: [Idquo][The 2012 Planning Rule requires that the plan must include components, such as standards or guidelines, to maintain or restore connectivity. As it pertains to wildlife, connectivity is defined as [Idquo]the ecological conditions that exist at several spatial and temporal scales that provide landscape linkages that permit the daily and seasonal movements of animals within home ranges, the dispersal, and genetic interchange between populations, and the long distance range shifts of species, such as in response to climate change[rdquo] (36 CFR 219.19). Habitat connectivity is widely recognized as a crucial component for maintaining biodiversity and managing for sustainable populations of native species (Cushman & amp; Landguth, 2012; Haber & Nelson, 2015; Hansen, 2009; McClure, Hansen, & Inman, 2016; McIntyre & Ellis, 2011; Parks, McKelvey, & amp; Schwartz, 2012; Wade, McKelvey, & amp; Schwartz, 2015) (Western Governors Association, 2008).[rdquo] (DEIS 3.2.3.1-4) However, it misstates the 2012 Planning Rule language that specifically requires that plan components [Idquo]including standards or guidelines[rdquo] are included to maintain or restore connectivity (36 CFR 219.8(a) and 219.9(a)(1)). Therefore, objectives and desired future conditions may be plan components related to connectivity but they do not satisfy the 2012 Planning Rule requirement for standards or guidelines conserving connectivity. As a result, clear standards and guidelines that provide definite guidance to subsequent projects and permits on the NPCNF are required as part of the final forest plan. The Draft Plan only includes a single goal in regard to connectivity and a single mature forest guideline. This is insufficient for a plan required to address a variety of threatened, proposed and conservation concern species. There must be an overall plan for connectivity included and explained in the DEIS and Draft Plan in order to meet the transparency requirements of the 2012 Planning Rule [sect]219.4. In addition, in the case of Endangered Species Act listed species such as lynx, grizzly or bull trout. Section 7 of the ESA imposes a duty to conserve those listed species and to act to achieve survival and recovery of the species (Sierra Club v. Glickman, 156 F3d 606 (5th Cir 1998)). Connectivity is an essential element of both survival and recovery of ESA listed species and specific, appropriate standards or guidelines that are clear and affirmative boundaries that guide subsequent project development are needed to achieve the duty imposed by Section 7 of the ESA. Thus, connectivity plans for each of those species must be explained and supported by the best available science (36 CFR [sect]219.3 and [sect]219.4). Such an explanation is not present in the current DEIS or Draft Plan. The confusing and obscure combination of the Northern Rockies Lynx Management direction and any carryforward of the Grizzly Bear Forest Plan Amendment must be explained in the context of the NPCNF Forest Plan and specific, local standards dealing with local issues such as the US 12 corridor, the Bitterroot Divide checkerboard land and an alternative including the Pot Mountain. Bighorn-Weitas, North Lochsa Slope, and Lochsa Face connectivity region must be developed. Suggested connectivity standards include limits on re-entry for a ten-year period, provision for cover maintenance both pre- and post-fire, wildlife crossing zones on US 12 and road/open motorized trail density in the connectivity areas as well as grizzly bear conflict reduction measures specific to that species to encourage connectivity and re-colonization of the Bitterroot Recovery Zone. IV. Climate Change and Carbon Sequestration The Sierra Club strongly agrees that climate change will have a variety of impacts on the NPCNF over the life of this forest plan and beyond. We emphasize that these impacts will be significant. As noted in the DEIS, climate change impacts may include an increase in annual temperature, changes in forest composition, habitat degradation for a variety of rare species, and decreases in the Forest[rsquo]s capacity to sequester carbon, among other impacts (DEIS 3.2.1.3 pages-3-5). Considering these many challenges, we urge the Forest Service to take a precautionary approach and protect remaining intact wildlands, rivers and wildlife linkages to the greatest extent possible in order to partially mitigate these impacts. The specific plan components in the DEIS that address climate change focus on building resilience, increasing resistance to change, and managing the landscape to better respond to climate change. (DEIS, page G-3) While we agree that these goals and components are critical for the health of the ecosystems within the NPCNF, we question how the plan alternatives will achieve these management goals. Alternative Z allows motorized and mechanized recreation in recommended wilderness areas, placing even more stress on wildlife and potentially decreasing the ability of species to adapt to climate change. All the alternatives other than the no action alternative allow an increase in the annual projected timber sale quantity (PTSQ) from 55 million board feet to 220-241 MMBF, 241-261 MMBF, 120-140 MMBF, and 60-80 MMBF for alternatives W, X,

Y, and Z respectively. We believe that an increase in timber harvest will have a direct negative impact on ecosystem resilience, resistance, and ability to respond to climate change. Additionally, there is no analysis in the DEIS of the additional infrastructure that would be required to implement the increased timber harvest. The DEIS is therefore inadequate in its assessment of the climate impacts of the proposed increase in PTSQ. The additional infrastructure will further fragment the landscape and deteriorate waterways, detracting from ecosystem resilience. Moreover, we are concerned that climate change has been identified as having an impact on almost every aspect of forest management in the DEIS, yet increased carbon sequestration has not been prioritized as a Desired Condition for the NPCNF. The DEIS notes that [Idguo]All of the proposed management activities would initially directly reduce carbon stocks on the Nez Perce-Clearwater, though minimally.[rdquo] (DEIS, page 3.2.1.3-9) The justification for this course of action and lack of analysis is stated as: [ldquo]I[n a global atmospheric carbon dioxide context, even the maximum potential management levels described by the plan alternatives would have a negligible impact on national and global emissions and on forest carbon stocks, as described below. As in this case, when impacts on carbon emissions and carbon stocks are small, a quantitative analysis of carbon effects is not warranted and thus is not meaningful for a reasoned choice among plan alternatives. (USDA Forest Service, 2009)[rdquo] (DEIS, page 3.2.1.3-9). We take issue with this assessment. Comparing the NPCNF[rsquo]s CO2 emissions and potential to sequester carbon to global levels is inappropriate and delegitimizes the need for change. At a global scale, the CO2 emissions and carbon stock capacity will always seem insignificant under any management alternative or circumstance. However that does not mean that there is not an critical need to address both. To increase climate resiliency both globally and locally, all National Forests need to increase carbon sequestration and decrease carbon emissions at the individual forest level. If all 153 other National Forests chose to take the same course of action as the NPCNF is proposing, we would likely see a dramatic reduction in our carbon stocks and a national increase in CO2 emissions. A second justification by the Forest Service for not creating an alternative which increases carbon sequestration is: [ldquo][This initial effect would be mitigated or even reversed with time, reducing the potential for negative indirect and cumulative effects. These short-term losses and emissions are small relative to both the total carbon stocks on the Nez PerceClearwater and national and global emissions. Further, the proposed activities would generally maintain and improve forest health and supply wood for forest products, thus having positive indirect effects on carbon storage.[rdquo] (DEIS, page 3.2.1.3-9) With the immediacy of the climate crisis, we do not think that trading short-term losses for long-term benefits as described is acceptable. Dramatic reductions in both emissions and an increase in our carbon stocks is required to mitigate climate change impacts. As highlighted by the IPCC[rsquo]s Special Report on Global Warming of 1.5[deg]C, global greenhouse gas emissions must be cut approximately in half over the next decade to avoid catastrophic impacts from climate change. These targets require increasingly steep reductions in emissions over the coming decade. Yet this is precisely the time period during which there would be a decrease in the carbon storage capacity of the NPCNF and an increase in emissions. We also question that the proposed alternatives would result in increased carbon sequestration in the long term. A quantitative analysis of carbon stocks was not incorporated into the DEIS; therefore there is no way to develop a timeline or determine when or whether long-term gains would outweigh short-term losses. Additionally, these hypothetical long-term gains conflict with statements in the climate change portion of the DEIS: [Idguo][Carbon sequestration will be increasingly difficult if disturbances increase as expected. (DEI,S page 3.2.1.3-5) [Idquo]The combined impacts of increasing wildfire, insect outbreaks, and tree diseases are already causing widespread tree die-off and are virtually certain to cause additional forest mortality by the 2040s and long-term transformation of forest landscapes. Under higher emissions scenarios, extensive conversion of subalpine forests to other forest types is projected by the 2080s (Mote et al., 2014).[rdquo](DEIS, page 3.2.1.3-5) Finally, we guestion the assertion that carbon storage would be positively affected by an increase in the production of forest products. In logging operations, 28% of the carbon in felled trees is emitted from the burning of logging [ldquo]slash[rdquo] debris (branches from felled trees), and 53% of the remaining tree carbon is then lost almost immediately to the atmosphere through the milling and manufacturing process.8 This means that about twothirds of the carbon stored in the trees that are logged is emitted into the atmosphere. Logging not only removes the carbon stored in trees from forest ecosystems, but it also compacts and damages soils, removes vital nutrients that are stored in trees, and disturbs the carbon contained in soils.9 All of these impacts from logging combine to significantly reduce forest productivity (the rate at which trees and plants will grow),

which substantially reduces the capacity of our forest ecosystems to absorb, sequester, and store CO2 over time. The fuel required for felling, loading, and hauling of felled trees to the sawmill or biomass facility also add carbon to the atmosphere, yet those carbon emissions are not considered.10 8 Harmon, M.E., et al. 1996. Modeling carbon stores in OR and WA forest products: 1900-1992. Climatic Change 33: 21- 50. 9 Elliot, W.J., et al. 1996. The effects of forest management on erosion and soil productivity. Symposium on Soil Quality and Erosion Interaction. July 7, 1996, Keystone, CO; Helmisaari, H.S., et al. 2011. Logging residue removal after thinning in Nordic boreal forests: Long-term impact on tree growth. Forest Ecology and Management 261: 1919-27; Achat, D.L., et al. 2015. Forest soil carbon is threatened by intensive biomass harvesting. Scientific Reports 5: Article 15991. 10 The impacts of PM2.5 fine particulate matter from those same sources should also be considered in the analysis of air and soil pollution. We strongly believe that the Forest Service has not provided adequate assessment of carbon stocks or emissions to support its assertions that the alternatives would provide an increase in climate resilience, increase resistance to change, or manage the landscape to better respond to climate change. We also believe that the potential increase in timber harvest and associated infrastructure, and the allowance of mechanized and motorized recreation in recommended wilderness areas detracts from these management goals. The Forest Service should develop and implement management decisions that immediately reduce carbon emissions and increase carbon stocks including: Acknowledge the losses of carbon that are inevitable; Analyze the specific quantitative impact on snowpack and water availability from the levels of harvest projected; Explain the Forest Service[rsquo]s plan for preserving carbon storage on the forest itself and analyze the differences between alternatives in this regard; and Develop and analyze an alternative maximizing carbon storage on the forest as standing trees. V. Grizzly Bears The Sierra Club has worked to protect grizzly bears and their habitat, and to promote connectivity between grizzly bear populations, for several decades. Grizzly bear recovery is a primary interest of the Sierra Club and our members in the Northern Rockies and throughout the country. a. Importance of NPCNF to Grizzly Bear Recovery The NPCNF is extremely important for grizzly bear connectivity. Grizzly bears are beginning to show up after a very long absence, and the Forest Service must put strong habitat protections in place now, during this forest plan revision, to encourage their return and occupancy. Just last year, grizzly bear advocates held their breath for survival of a grizzly seen on a remote camera in the Kelly Creek drainage during black bear hunting season. This is very encouraging and the time is now for the NPCNF to enact critical protections. As the Forest Service notes. [Idquo][The Nez Perce-Clearwater serves a unique national role, providing vast, contiguous wildland areas, including the Selway-Bitterroot, Gospel-Hump, and Frank Church-River of No Return wilderness areas with regional linkages in the Hells Canyon Wilderness area and Idaho Roadless Rule areas, such as the Great Burn (Hoodoo) and Mallards-Larkin. Together, these areas comprise the largest complex of unroaded lands in the lower forty-eight states.[rdquo] (Draft Plan, page 10) and: [Idouo][The Selwav-Bitterroot Wilderness and the Frank Church-River of No Return Wilderness make up the core of the Bitterroot Ecosystem Recovery Area for the federally listed threatened grizzly bear. These two wildernesses make up the largest contiguous blocks of federal land remaining in the United States and the largest block of wilderness in the Rocky Mountains.[rdquo] (DEIS, page 3.2.3.3-76) Sadly, however, no grizzly bears currently occupy the vast wilderness areas of northcentral Idaho or the Bitterroot Ecosystem Recovery Area, nor have they for many decades despite some epic attempts by individual grizzly bears to cross over from the Montana side of the Bitterroot Divide. The NPCNF has a unique and important responsibility to recover grizzly bears and to ensure that both male and female grizzly bears recolonize the Bitterroot Recovery Zone. We are very concerned that the Forest Service[rsquo]s approach to grizzly bear recovery on the Forest is not proactive. The final plan must be robust and provide strong desired conditions, guidelines and standards to protect grizzly bears and their habitat. b. Connectivity The DEIS states that [ldquo][[hellip]only grizzly bears that reside within the recovery zones are crucial to achieving recovery goals. Inside the recovery zone, it is a priority to manage or conserve grizzly bear habitat while outside the recovery zones that level of emphasis is not necessary.[rdquo] However, the DEIS then goes on to note, [ldquo][...areas outside recovery zones can play a significant role in supporting movement of bears between recovery areas. Successful dispersal of bears is important to enable recolonization of vacant habitat; bolster small populations, such as in the Cabinet-Yaak Ecosystem; and provide genetic connectivity for the isolated population in the Greater Yellowstone Ecosystem.[rdquo] (DEIS, page 3.2.3.3-77) We strongly agree with the latter statement. Twenty-three percent of NPCNF acreage is inside the Bitterroot recovery zone, and 76% is outside. It should be a priority to conserve

grizzly bears and their habitat outside of the recovery zone as well as inside, to enable bears to actually reach the recovery zone and re-establish a population through natural movements. Alternative Z includes many of the roadless areas that the Forest Service has deemed important for grizzly bear connectivity; however, other important areas were left out. Bighorn Weitas, North Lochsa Slope, Lochsa Face, and Rackliff-Gedney roadless areas should be recommended for wilderness designation in order to bolster potential for grizzly bear connectivity. Without these additions, grizzly bears entering the NPCNF from the north will likely be forced toward the checkerboard lands in the northeast part of the Forest in order to reach the Selway-Bitterroot Wilderness. Alternative Z also includes many rivers that the Forest Service determined important for connectivity; however, the North Fork of the Clearwater, as noted above, was identified by the Forest Service as important for grizzly bears but was inexplicably not included as suitable for Wild and Scenic Rivers designation. This should be revised in the final plan. c. Plan Components We are deeply concerned that the NPCNF has not included any plan components for grizzly bears in the Draft Plan. The Draft Plan notes, [Idguo][There currently are no speciesspecific plan components for grizzly bears within the proposed plan components and alternatives. While there are no species-specific plan components, nothing in the plan precludes the Nez Perce-Clearwater from contributing to the recovery of grizzly bears.[rdquo] (DEIS, page 3.2.3.3-81) It is incumbent upon the Forest Service to take a much more pro-active approach to grizzly bear recovery on the NPCNF. It is insufficient to say that [Isquo]nothing in the plan precludes[rsquo] the Forest from contributing to grizzly bear recovery. It is hard to imagine a less proactive statement from the Forest Service in this regard. Forest Service directives specify that the Forest Service has the responsibility to promote the recovery of threatened and endangered species, as noted in the DEIS: [Idquo][[hellip]the Forests are obligated under the Endangered Species Act (ESA) to aid in recovery of listed species.[rdquo] (DEIS, page 2-10) Ecosystem-wide plan components do not suffice in meeting the needs of grizzly bears and fostering their recovery on the NPCNF, particularly in regard to secure habitat, and exposure to human activity and human attractants. As noted in the DEIS, [Idquo][Paragraph b of Section 219.9 of the Planning Rule requires that the planning rule requires additional species-specific plan components be included in the plan to provide such ecological conditions in the plan area where ecological conditions are insufficient to provide for at-risk species. At-risk species are defined as [Idquo]a term used in land management planning and this Handbook (1909.9 zero code) to refer to, collectively, the federally recognized threatened, endangered, proposed, and candidate species and species of conservation concern within a plan area. Irdquol (DEIS, page 3.2.3.1-2) The Forest Service does seem to acknowledge that a somewhat more pro-active approach should be considered in regard to connectivity, noting that [Idguo][[hellip]because grizzly bears must disperse naturally into the Bitterroot Recovery Zone in order to become established, the way the plan provides for connectivity for grizzly bears is a key consideration for how the revised plan will contribute to the recovery of the grizzly bear.[rdquo] (DEIS, page 3.2.3.3-81) However, as noted above, no specific plan components were included in the Draft Plan to foster grizzly bear recovery or connectivity, and the Draft Plan does not include specific standards and guidelines related to connectivity. Grizzly bears[rsquo] ability to connect between populations is directly related to exposure to humans and human behavior. One example of this is food storage. However, despite the fact that it has been repeatedly shown how important implementation of food storage orders on national forests are in preventing conflicts between the recreating public and grizzly bears, the Forest Service states that: [ldquo][The plan does not have components for the management of food or attractants within the recovery zone. These activities are generally used to direct the public to store food or attractants away from bears. Food storage orders can be implemented by the Forest Supervisor outside of the Forest Plan in a special order if grizzly bears become established within the Bitterroot Ecosystem. Food storage is unnecessary at this time because the Bitterroot Ecosystem is currently unoccupied by grizzly bears.[rdquo] (DEIS, page 3.2.3.3-81) (italics added) This is a prime example of the Forest Service not being pro-active regarding grizzly bear recovery. Now -- not after grizzly bears start showing up in greater numbers on the NPCNF -- is the time to develop and implement food storage orders. At a meeting of the Interagency Grizzly Bear Committee[rsquo]s Bitterroot Subcommittee (of which the NPCNF Supervisor is a member) in Hamilton, MT last year, the chair of the subcommittee and other agency representatives noted the importance of [Idquo]getting out in front[rdquo] in regard to preparing the public for grizzly bears passing through and occupying lands in and around the Bitterroot recovery zone. This is particularly important, and logical, given that the life of a forest plan is usually 25-30 years; hopefully, more grizzly bears will be expanding their range into the NPCNF in the coming decades [ndash] and

the Forest Service should enact policies and procedures to encourage them to do so and to prepare the public now. A standard should be included in the final plan implementing a forest-wide food storage order on the NPCNF. In other recovery areas, Bear Management Units (BMU) have been designated and road density standards instituted. Now is the time to do so for the Bitterroot recovery zone as well, to prepare for the eventual return of grizzly bears and their occupancy on the Forest. We realize that this is not only up to the Forest Service as a member of the Bitterroot Subcommittee; and we urge the Forest Service to work with the other agency and Tribal partners on the Subcommittee toward creation of BMUs and road density standards. Also, we urge the Forest Service to work with partners to develop grizzly bear relocation sites in and around the Bitterroot recovery zone. It is nonsensical to trap and relocate grizzly bears away from the recovery zone when they are nearly there, as happened with the Stevensville [Idquo]golf course[rdquo] bear in the fall of 2018. We urge the Forest Service to include Desired Conditions and Objectives in the revised/final to: Pro-actively aid in recovering the grizzly bear, including working to foster establishment of populations in and around the Bitterroot recovery zone, and facilitation of genetic and demographic connectivity between grizzly bears in Idaho and Montana. Prevent conflicts between people and bears through pro-active measures including but not limited to food storage orders, public education and other means to keep attractants out of reach of bears and increase public awareness of proper behavior in grizzly country. Standards should be included in the final plan to: Implement a Forest-wide food storage order and install bearproof dumpsters at campgrounds and work centers. Establish grizzly bear relocation sites and Bear Management Units on the NPCNF within one year. Designate total and open motorized road densities and secure habitat percentages in BMUs to allow establishment of grizzly bears, especially breeding age females below 1 km/km2. Prohibit oversnow use in core habitat from March 15-June 15. Avoid disturbance in areas of predicted or actual denning habitat during spring emergence (March 15-May 1) Prohibit re-entry for vegetation management within 10 years in identified grizzly bear potential habitat or connectivity areas. Manage Recommended wilderness in suitable grizzly bear habitat to provide maximum reduction of human-grizzly bear conflict. Prohibit hunting of grizzly bears on NPCNF lands and a implement a National Forest penalty for mistaken identity shooting of a grizzly bear during black bear hunting season.d. Black Bear Baiting The bear baiting issue is relevant to grizzly bear recovery on the NPCNF and how the Forest Service manages habitat. In a misguided move, in 1992 the Forest Service gave authority to the states including Idaho on the issue of using bait in national forests by black bear hunters, and this issue is now being debated in court. Bear baiting is a serious issue in regard to grizzly bear connectivity. As noted above, the Forest Service is obligated to aid in recovery of listed species. Bear baiting on the NPCNF flies in the face of being able to meet that responsibility in regard to grizzly bears. In 2007, the first grizzly bear to be seen in over half a century on the NPCNF was killed over a bait station in the Kelly Creek drainage. It is extremely lucky that the grizzly bear captured on camera in the same drainage last year, also in the vicinity of a bait station, was not killed. The Forest must change its policy in regard to allowing states the sole decision-making authority for using bait during black bear hunting season on national forest lands, and prohibit that practice on lands under its authority. VI. Canada Lynx The DEIS refers to the following science to guide forest management for the benefit of lynx: [ldguo][A regular influx of this [ldquo]early stand initiation stage[rdquo] of forest succession created by processes such as fire or vegetation management can help to enhance snowshoe hare production. (DEIS, page3.2.3.3-8) [Idquo]Kosterman et al (2018) found that abundant and connected mature forests and intermediate amounts of small-diameter regenerating forests defined whether the female produced kittens or not. Small-diameter regenerating forests were described as [Idquo]smaller sized[rdquo] trees with an approximate diameter at breast height of 3.93 to 5.9 inches, intermediate canopy cover, and high horizontal cover. (DEIS, page 3.2.3.38) [Idquo]Reproductive success was highest for females with small-diameter regenerating forests between 12 to 20 percent and higher connectivity of mature forest. Reproductive success remained high when forests had small-diameter sized trees up to 20 percent and then declined slightly beyond 20 percent. Kosterman et al (2018) suggested that in addition to the connectivity of mature forest, the amount of small-diameter regenerating forests aids the reproductive success of female lynx. (DEIS, page 3.2.3.3-9) From this research, it is clear that within lynx analysis units and connectivity zones the NPC needs to monitor the percent of small-diameter regenerating forest resulting from fire and past/current/planned vegetation management with a buffer to account for continued wildfire additions to this age class. We request that a forest plan standard requiring no more than 20% of the NPC in small diameter tree condition at any time is required to meet the Endangered Species Act Section 7 duty to conserve listed species

and/or the NFMA provision to provide for the diversity of animal communities and the 2012 Forest Planning Rule (36 CFR 219.9) directive to manage the landscape to maintain ecological conditions to support ESA-listed species. There is a forest-wide guideline in the draft plan directing the maintenance of mature forest and connected mature forest, however, the guideline[rsquo]s language is ambiguous and provides little direction as to how projects should be planned to comply. The applicable guideline reads as follows: FW-GDL-WL-01. In order to provide connectivity between watershed basins (HUC 10), corridors of mature and mid-seral forest with canopy closure greater than 40 percent should be retained and should connect to patches of mature and midseral forest in adjacent watershed basins. Considerations for location and width should include topography, elevation, and configuration of riparian areas. It is unclear if the connection is only between HUC 10 watershed basins or if connections between mature/mid-seral patches within watersheds are included. The guideline should clearly apply to all such connections. The last sentence implies that modification of the connections, especially those narrowing the width or extending the length of the connecting forest, are allowed. The guideline should be strengthened to allow no modification of those connections to provide a buffer for windthrow, wildfire or other processes other than vegetation management that might reduce the width or increase the length of these connections. Substantial uncertainty concerning the width or length suitable for the variety of wildlife requiring such cover requires caution, and these connections are likely limited on the landscape requiring preservation of any redundant connections as well. The DEIS estimates the amount of Lynx Analysis Unit (LAU) habitat that has been treated by regeneration harvest, but largely fails to estimate and disclose by LAU the regeneration that has begun in the relevant timeframe from wildfire. The main reference to habitat lost through wildfire is to discount the effect of past vegetation management (see DEIS page 3.2.3.3-16). Likewise, it acknowledges that selection cuts can provide the same beneficial habitat for lynx foraging, but does not identify the amount of selection cut in the same timeframe. Moreover, stand initiation following treatment is not immediate and is often spurred by replanting and other management and there is not an estimate of how treatments that occurred prior to 2000, but with stand initiation delayed, are contributing to habitat in optimal foraging condition. This leaves project planners with the impression that there is wide latitude to do regeneration harvest or selection cuts that may, in fact, be considerably narrower than this analysis suggests. About 0.23 percent, or about 3352.8 acres, of lynx habitat in lynx analysis units was treated by regeneration harvest on National Forest System lands of the Nez Perce-Clearwater since 2000 (FACTS data, accessed August 2019). Holbrook et al (2018) evaluated lynx resource use of silviculture treatments over a temporal gradient of 1 to 67 years after treatment. They found that, while lynx used treatments, lynx use was low until approximately 10 years of age for all forest treatment types, including thinning, selection cuts, and regeneration cuts. Furthermore, cumulative use in both winter and summer by lynx reached 50 percent at approximately 20 years after a thinning treatment. While it took about 20 years for lynx to begin using regeneration and selection cuts (Joseph D. Holbrook et al., 2018), it took approximately 34 to 40 years after a selection or regeneration cut for cumulative lynx use to reach 50 percent. Lynx use of regeneration cuts in the winter was best explained by time since treatment. In summer, the composition and abundance of forest structural stages surrounding a particular treatment also influenced lynx use that treatment (Joseph D. Holbrook et al., 2018). Lynx appeared to use regeneration and selection cuts similarly over time, suggesting that the difference in vegetation impact between these treatment methods makes little difference relative to potential impacts to lynx. (DEIS, page 3.2.3.3-9) The DEIS acknowledges the important role of wildfire in shaping lynx habitat availability, yet the Draft Plan fails to provide for a mechanism to account for those changes and develop vegetation management standards and guidelines sufficient to avoid exceeding the recommended 20% snowshoe hare early successional habitat of Kosterman et al(2018). The DEIS states: [ldquo][Overall, wildfire has clearly been the driver in creating substantial acreages on the Nez Perce-Clearwater in a condition where they do not yet provide winter snowshoe hare and lynx habitat.[rdquo] (DEIS, page 3.2.3.3-16) In accordance with the 2012 Planning Rule direction to use the best available science (36 CFR 219.3), and provide for habitat conditions to contribute to ESA-listed species such as Canada lynx, coupled with the ESA Section 7 duty to conserve and aim toward recovery and NEPA direction to analyze the affected environment, the DEIS must be revised to incorporate a specific analysis and disclosure of the amount of habitat conversion due to wildfire in LAU[rsquo]s and the anticipated effect of continued loss of such habitat to wildfire in the future. Moreover, to comply with those same authorities, the standards and guidelines of the final forest plan should account for such past losses and the likelihood that further conversion is likely from causes other than vegetation management,

and adjust vegetation management to provide a buffer for such change. In addition, an analysis of effects by alternative is required by NEPA. The Nez Perce Clearwater Forest Plan cannot simply rely on the Lynx Direction crafted in 2007 under the 2012 Planning Rule direction to use the best available science. The DEIS does refer to a number of more recent studies, most notably Kosterman et al (2018), that provide valuable information to guide management. Thus, the standards and guidelines to provide for habitat to support lynx survival and recovery can be considerably sharper than what the older Lynx Direction provides and, indeed, must be updated and strengthened in order to comply with the Planning Rule. VII. Wolverine The wolverine in the lower 48 states is extremely limited in number and threatened by climate change and other stressors, leading to its current status as a proposed threatened or endangered species. As noted in the DEIS, the northern Rockies portion of the North American wolverine distinct population segment is [Idguo]thought to be the largest subpopulation and the most genetically resilient of the current subpopulations in the United States.[rdquo] (DEIS, page 3.2.3.3-60) We urge the Forest Service to protect this important wolverine subpopulation and aid in ensuring its long-term viability by enacting the highest levels of protection for wolverine habitat on the NPCNF. Much of the higherelevation areas of the NPCNF are primary habitat for wolverine. (DEIS, page 3.2.3.3-60) a. Recreation Impacts One of the most effective ways to accomplish this habitat protection goal is through management of winter recreation in wolverine habitat. We are deeply disturbed that the Forest Service is proposing to allow additional winter recreation in wolverine habitat including in areas of natal and maternal denning [ndash] even allowing such uses in recommended wilderness under Alternative Z. The DEIS summarizes several studies on the impacts of winter recreation on wolverines, such as: [Idquo][Habitat associations of females were more complex; combinations of variables supporting food, predation risk, or human disturbance hypotheses were included in most supported models from both summer and winter in both study areas. Females were associated with alpine and avalanche environments where hoary marmot and Columbia ground squirrel prey are found in summer. Roaded and recently logged areas were negatively associated with female wolverines in summer. In the Columbia Mountains, where winter recreation was widespread, females were negatively associated with helicopter and backcountry skiing. Moose winter ranges within rugged landscapes were positively associated with females during winter. Our analysis suggests wolverines were negatively responding to human disturbance within occupied habitat. The population consequences of these functional habitat relationships will require additional focused research. Our spatially explicit models can be used to support conservation planning for resource extraction and tourism industries operating in landscapes occupied by wolverines.[rdquo] (DEIS, page 3.2.3.362) [Idguo][Heinemeyer et al (2017) studied the response of wolverines to winter recreation in Idaho, Wyoming, and Montana. In that study, wolverines avoided areas of both motorized and non-motorized winter recreation with off-road recreation, eliciting a stronger response than road-based recreation. Female wolverines exhibited stronger avoidance of off-road motorized winter recreation and experienced higher indirect habitat loss than male wolverines. Wolverines showed negative functional responses to the level of recreation exposure within the home range, with female wolverines showing the strongest functional response to motorized winter recreation. Hienemeyer et al (2017) suggested indirect habitat loss, particularly to females, could be of concern in areas with higher recreation levels. They speculated that the potential for backcountry winter recreation to affect wolverines may increase under climate change if reduced snow pack concentrates winter recreationists and wolverines in the remaining areas of persistent snow cover (K. S. Heinemeyer et al., 2017). These findings suggest that the amount of female wolverine denning habitat affected by the alternatives could have meaningful consequences to the conservation of the wolverine on the Nez Perce-Clearwater.[rdquo] (DEIS, page 3.2.3.3-71) [Idquo][Some scientists have expressed concern about the effects of human activities on female wolverines with young kits during the mid-February to mid-May time period because food resources are scarce for foraging females.[rdguo] (DEIS, page 3.2.3.3-62) As the Forest Service notes, [ldguo][Recent studies include evaluation of the effects of winter recreation on wolverines and preliminary results of multi-state efforts to survey for wolverines with camera traps. Data and information gaps exist, but the breadth and depth of the available scientific information are sufficient to assess potential effects of alternatives.[rdquo] (DEIS, page 3.2.3.3-57) (italics added) Given what we know [ndash] that some data gaps exist, but we have enough scientific information now to discern impacts [ndash] it is incumbent upon the Forest Service to employ a precautionary approach in regard to wolverine habitat and to protect important areas now. The most effective way in which to do that is to recommend important wolverine habitat for wilderness designation, and not to allow winter motorized recreation

as proposed in Alternative Z. Additionally, though the Forest Service states that [Idquo][hellip][non motorized and non-mechanized transport on the Nez Perce-Clearwater are not restricted but it is difficult to access for nonmotorized and nonmechanized winter recreation because much of the designated wilderness area on the Nez Perce-Clearwater is remote[rdguo] the Forest Service should consider whether restrictions are necessary for these types of recreation as well, to protect wolverines, particularly in natal and maternal denning habitat. The Forest Service notes that winter recreation is generally allowed in Idaho Roadless Rule areas, but then misleadingly states that it is not allowed in recommended wilderness and designated wilderness. (DEIS, page 3.2.3.3-63) The Forest Service is proposing to allow winter motorized recreation (and mechanized year-round) in recommended wilderness in Alternative Z. This alternative would leave sixty percent of modeled wolverine habitat as suitable for winter motorized recreation. (DEIS, page 3.2.3.3-73) The Sierra Club strongly opposes this proposal, particularly in light of the fact that winter motorized (and mechanized) vehicles allow people to increasingly go farther and faster into remote areas. Scientists have raised this point specifically in regard to threats to wolverines: [Idquo][[hellip]wolverines reacted negatively to higher levels of recreation use in winter, with stronger responses to dispersed use than to use on designated routes, indicating that wolverines may have a higher tolerance for more predictable patterns of winter recreation use. Wolverines reacted to both motorized and nonmotorized winter recreation. However, since motorized equipment allows humans to travel further and faster than nonmotorized means of transport, motorized winter recreation could affect larger proportions of wolverine habitat.[rdquo] (DEIS, page 3.2.3.3-62) (italics added) The Forest Service makes the argument that models showing winter motorized use, which were validated with on-the-ground information by user groups, [Idquo]suggest a much smaller footprint of winter recreation than that currently allowed in areas open to motorized winter recreation[rdquo] but then acknowledges that the models were developed for snowmobiles and backcountry skiing and did not predict winter motorized use with new technologies, i.e. snow bikes. Additionally, as the Forest Service notes, user demand and use is increasing: [ldquo][In areas open to motorized over-snow vehicle use, the amount of use has likely increased over the last few decades due to technical advances in motorized oversnow vehicles and human population growth. Backcountry skiing has also increased in popularity.[rdquo] (DEIS, page 3.2.3.3-63) Human population growth in the northern Rockies can only be expected to increase in the future and demand for access will certainly increase. New winter recreation technologies such as snow bikes are alarming in how they allow people to go places too remote until recently, as illustrated by a recent article, [Idguo]Snow shredding machines: Snowbikes add new spark to winter motorsports.[rdquo] In this article, users talk about the agility of snowbikes and how they can go places they [Idquo]would never get into with a snowmobile.[rdquo]Another user talks about how he has only seen 20% of the Crazy Mountain Range in southwest Montana on a snowmobile, but now plans to see the other 80% on a snowbike, because [ldguo]they can go where his snowmobile couldn[rsguo]t, and with less of a workout for him.[rdquo] (Bozeman Chronicle, Dec. 19, 2019) The Forest Service also acknowledges this in its statement that snow bikes have an easier time navigating through trees (DEIS, page 3.2.3.3-68) The Forest Service must take the threat of this new use seriously and not allow it to take hold; once such access is allowed, it will be difficult if not impossible to curtail it in order to protect wolverines and other wildlife. b. Connectivity The DEIS notes that [Idquo][[hellip]the most important areas for connectivity on the Nez PerceClearwater are along the Idaho-Montana border[rdguo] (DEIS, page 3.2.3.3-70) and that this area includes the Hoodoo, Meadow Creek Upper North Fork, and Rawhide roadless areas. Table 21 also notes that the North Fork Spruce-White Sand and Sneakfoot Meadows have high importance to connectivity of wolverines. We are glad to see that the Forest Service recognizes that [Idquo][[hellip]recommended wilderness provides the greatest amount of protection of connectivity areas[rdquo] for wolverine, but concerned that the Forest Service goes on to say that the IRR would offer similar protection for wolverines [Idguo]and keep these lands relatively free from human development, which is the primary cause of loss of connectivity.[rdguo] (DEIS, page 3.2.3.3-70). However, as explained above in numerous places, the IRR is silent on motorized and mechanized recreation, and therefore does not protect wolverines from a major threat identified in many scientific studies as outlined above, i.e. winter motorized recreation. As noted above, the Sierra Club opposes carving out any of the existing Hoodoo/Great Burn roadless area to allow winter motorized recreation. We are disappointed that the Forest Service is proposing such use given the area[rsquo]s importance for wolverines. We are especially concerned given the impacts of climate change on wolverine habitat, and that wolverines could increasingly need the habitat proposed for winter

recreation and therefore be displaced by winter recreation. As noted above in the Heinemeyer et al (2017) study, [Idquo][They speculated that the potential for backcountry winter recreation to affect wolverines may increase under climate change if reduced snow pack concentrates winter recreationists and wolverines in the remaining areas of persistent snow cover (K. S. Heinemeyer et al., 2017). These findings suggest that the amount of female wolverine denning habitat affected by the alternatives could have meaningful consequences to the conservation of the wolverine on the Nez Perce-Clearwater.[rdquo] (DEIS, page 3.2.3.3-71) We are also very concerned that the Forest Service did not recommend the Bighorn Weitas roadless area for wilderness designation in any alternative other than W, given its importance to wolverines, and considering its statements that, [ldguo][The Bighorn-Weitas area contains the second largest amount of modeled female wolverine denning habitat.[rdquo] (DEIS, page 3.2.3.3-71). [Idquo][[hellip]female denning habitat is thought to be much more limited.[rdquo] (DEIS, page 3.2.3.3-71). and in particular, [ldquo][More modeled female denning habitat in recommended wilderness would better conserve the wolverine because these areas would receive greater protection against development and human disturbances, such as winter recreation.[rdquo] (DEIS, page 3.2.3.3-71). The Bighorn Weitas roadless area should be protected through recommended wilderness that does not allow winter motorized use. In summary, we urge the Forest Service to first and foremost consider the impacts of climate change and human population growth and associated demand for increasing recreational access in the region, as two of the most serious stressors to consider in determining how to promote connectivity for wildlife and to protect the NPCNF[rsquo]s invaluable resources for decades to come. We urge you to reissue a new DEIS that includes alternatives with all Idaho Roadless Areas as recommended wilderness and all eligible Wild and Scenic Rivers as suitable. We are deeply disturbed by the Forest Service[rsquo]s proposal to allow many non-conforming uses in recommended wilderness and strongly oppose such proposal. We are also very concerned about the bias in the measurement indicators used in the wilderness evaluation toward motorized use and believe such bias undermines the entire evaluation and consequently request that the evaluation be redone. We urge the Forest Service to be much more pro-active in regard to grizzly bear recovery and to adopt our recommendations regarding specific plan components and protections for grizzly bears, Canada lynx, and wolverines, and to develop and implement clear, specific plan components to ensure connectivity for all wildlife. We look forward to continuing to work with the Forest Service throughout the plan revision process to ensure a strong final forest plan that truly protects the considerable resources of the NPCNF in the face of rapidly changing social and environmental conditions. Thank you for your consideration of our comments. Sincerely, Bonnie Rice, Senior Representative Our Wild America Campaign