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To the Nez Perce Clearwater Forest Plan Team

I live in Hamilton, Montana and frequent the forests for which you have created this planning document. I submitted scoping comments for this plan and feel that my concerns were not addressed in the final document. I must object to this proposed Nez Perce-Clearwater Forest Plan Revision (Revision).

Issues of Concern:

Issue: The Revision does not fully analyze direct, indirect, and cumulative effects of the the Revision on the recovery of grizzly bears in violation of the Endangered Species Act (ESA).

The Revision does not address and curb road densities that will affect the secure core and core habitat necessary for ease of natural recovery in the Bitterroot Ecosystem (BE) and to create islands of occupation allowing bears to move from recovery areas and other occupied areas to the BE. Occupation of the BE is essential to the recovery of grizzly bears. The Revision also allows for three times the commercial logging that has recently been allowed on the forest. This will bring countless roads and road prisms on the landscape, fragmenting habitat and reducing core habitat and denning habitat. Motorized trail densities also affect grizzly bears and should be curtailed.

Remedy: Create a measurable road and motorized trail density standard that creates restrictions similar to those found in Amendment 19 to the 1987 Flathead Forest Plan.

Issue: The Revision does not fully analyze direct, indirect, and cumulative effects of the the Revision on the recovery of wolverine in violation of the Endangered Species Act (ESA).

The Revision does not address and curb road densities that will maternal and primary habitat for wolverine and to create islands of occupation allowing wolverine to move from intact areas of habitat to others as climate change affects winter conditions. Wolverine especially female wolverine are affected by roads even when they are not highly travelled this includes roads set aside for administrative use. The Revision allows for three times the commercial logging that has recently been allowed on the forest. This will bring countless roads and road prisms on the landscape, fragmenting habitat and reducing maternal and primary habitat. It will also reduce mobility between islands of intact and snowy habitat. The revision also allows motorized travel in the Great Burn, an excellent area of habitat for wolverine. This will affect the recovery of wolverine.

Remedy: Reduce logging and create road and motorized trail density standards on the forest to protect wolverine. Keep motorized travel out of the Great Burn and continue to manage the entire Great Burn area as Wilderness.

Issue: The Revision fails to analyze and disclose the effects of using guidelines instead of standards in this plan on sensitive species, endangered and proposed species, as well as many species important to the public like mountain goats whose population has decreased by 70%. There is little incentive for the Nez Perce-Clearwater Forest (NPCF) to follow these guidelines because they do not include measurable and enforceable criteria. They are also filled with loopholes to allow them to fragment habitat, build roads, and deplete old growth forests. Basically, the public will be unable to hold the NPCF accountable to its mission to preserve habitat and protect biodiversity.

Remedy: Change all guidelines to standards that include specific, measurable criteria, so that the public can hold the NPCF accountable.

Issue: The Revision fails to analyze and disclose the direct, indirect, and cumulative effects of reducing the Hoodoo Recommended Wilderness.

Opening the 40,000 acres of the Hoodoo Recommended Wilderness to motorized recreation will affect listed species, proposed listed species and soon to be endangered species like mountain goats. Idaho's 2017 state wildlife action plan recognizes mountain goats as a Species of Greatest Conservation Need, priority Tier 3. The Revision will also open Recommended Wilderness on the Montana side to motorized poaching with little recourse or access for enforcement. Goats do best where they will not encounter conflicts with human activities. This specific area is special and should be preserved as Wilderness in its entirety.

Remedy: Keep the Hoodoo Recommended Wilderness intact and recommended for inclusion in the National Wilderness Preservation System.

Issue: The Revision did not analyze an alternative that recommends all 1.5 million acres of roadless areas on the forest for inclusion in the National Wilderness Preservation System.

In my scoping comments, I asked that you analyze an alternative that recommends all 1.5 million acres of roadless acres for Wilderness designation. This alternative was not proposed or analyzed. In fact, 80% of the roadless areas are left without Wilderness protections. Preserving intact forest in the roadless areas will promote biodiversity, grizzly habitat, wolverine habitat, lynx habitat, and protect many more sensitive plant and animal species like mountain goats. It will also protect endangered white bark pine and preserve old growth and mature forests. Not analyzing this alternative is inhumane and does not follow National direction to preserve biodiversity and old growth and mature forests. The Great Burn is a very popular area and provides invaluable intact habitat, it should be protected in its entirety.

Instead the Revision excludes these roadless areas from Wilderness recommendation: Weitas Creek (including Cayuse Creek), Selway-Bitterroot Wilderness additions around Elk Summit (previously recommended by the Forest Service), South Lochsa Face, Gedney Creek, Rapid River (an addition to Hells Canyon Wilderness), Pot Mountain, a critical area for mountain goats, among other species, Fish and Hungery Creeks, some of the best steelhead habitat in the region, Cove-Mallard (which would be additions to the Frank Church-River of No Return Wilderness), Upper North Fork, Gospel-Hump Wilderness additions and Moose Mountain (currently protected as a non-motorized backcountry area). Kelly Creek/Great Burn is has been cut in half and though Meadow Creek has been Recommended it still only recommends half of this intact roadless area and does not protect the Meadow Creek watershed.

Remedy: Recommend all 1.5 million acres of roadless terrain for inclusion in the National Wilderness Preservation System.

Issue: The Revision fails to analyze or disclose the direct, indirect and cumulative effects to reducing stream buffer zones.

Stream buffer zones to reduce ground disturbance in riparian habitat have been reduced by up to 66% in some areas. This will effect salmon, steelhead, bull trout, and cutthroat trout. It will also effect the flammability of riparian areas by opening up the canopy, drying out the area, and removing wind breaks, making riparian zones more susceptible to fire.

Remedy: Create standards with measurable criteria that follow the streamside protections found in INFISH. No ground disturbing activities should be permitted in the area 300 feet on either side of fish bearing streams.

Issue: The Revision does not fully analyze or disclose the direct, indirect, and cumulative effects to old growth and mature forests and the species that depend on them.

Old growth is very important to the public. Many of the comments concerning this Revision discussed old growth and mature forests that will soon be old growth. Old growth cannot be replaces in our lifetime, or the lifetime of our children. The Revision's lack of measurable standards and enforceable criteria is a slight to the public who

own these forests and care about old growth and mature stands and the wildlife that depend on them. The Revision will allow for damaging commercial logging in old growth and mature forests and leaves the public with little recourse.

Remedy: Create standards with specific, measurable criteria to protect old growth and mature forests. Create a standard that limits cutting any tree over 16 inches dbh, and 6 inches dbh for lodgepole pines to protect mature and old growth forests across the NPCF.

Issue: The revision fails to analyze and disclose the direct, indirect, and cumulative effects of tripling logging levels on wildlife.

The Revision increases logging levels to three times what has been done in the past 30-40 years. This will seriously effect wildlife and increase the size and possibility of wildfire. Please consider the recent study out of Australia that questions landscape scale logging and burning and its effects on wildfires. Lindemeyer and Zylstra 2024:

Where disturbance is found to stimulate flammability, then key management actions should consider the long-term benefits of: (i) limiting disturbance-based management like logging or burning that creates young forests and triggers understorey development; (ii) protecting young forests from disturbances and assisting them to transition to an older, less-flammable state; and (iii) reinforcing the fire-inhibitory properties of older, less-flammable stands through methods for rapid fire detection and suppression (abstract).

Remedy: Reduce logging to half what was experienced on average between 2000-2010.

Issue: The Revision fails to analyze and disclose the direct, indirect, and cumulative effects to carbon stocks on the forest and carbon emissions from logging and management activities.

The Talberth Report (<https://www.friendsoftheclearwater.org/forestclimate/>) commissioned by Friends of the Clearwater analyzes the effects of the Revision on carbon stocks on the NPCF. This must be taken into consideration in the final decision of the Revision. Tripling logging will affect these stocks exponentially. The NPCF must become a part of the solution to global warming. Climate change can be mitigated with the reduction of fossil fuel use and the reduction in logging and prescribed burning.

Remedy: The Revision must greatly reduce not increase logging and logging emissions threefold.

Thank you for the opportunity to comment. I hope my comments make some difference. This Revision will boost climate change and the 6th mass extinction. It is a great departure from the duty of the Forest Service to preserve our natural resources.

Cited materials:

Lindenmayer D, Zylstra P. Identifying and managing disturbance-stimulated flammability in woody ecosystems. *Biol Rev Camb Philos Soc*. 2023 Dec 17. doi: 10.1111/brv.13041. Epub ahead of print. PMID: 38105616.