

Data Submitted (UTC 11): 7/23/2014 12:00:00 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Comments on upcoming public meetings on the revision of the Clearwater-Nez Perce National Forests forest plan.

July 23, 2014

Dear Ms. Peel and the rest of the FP revision IDT members,

I'd like to make myself available to you or anyone else on the IDT. I was the Nez Perce NF forest planner for 12 years. I participated in the development of the current 1987 forest plan constructed using the 1982 planning regulations.

I have the read the July 2014 Proposed Action for Forest Plan Revision Nez Perce-Clearwater National Forests. I noticed a few things that other members of the public may have discovered that you might want to clarify at the upcoming public meetings.

I understand the Plan must be revised to reflect changed conditions. My comments below relate to differences between the July 2014 Proposed Action for Forest Plan Revision Nez Perce-Clearwater National Forests and the current Plan. After 12 years of assuring proposed projects complied with the plan, I know what works and doesn't work. A strong forest plan is essential to guide line-officers as they propose projects to assure the proper functioning of all of the countless natural resources in the forest function properly at all times. Please forward these comments to the Forest Plan Revision IDT members.

I don't expect the 2 Plans to be the same. However, when the new Plan differs from the current Forest Plan it should be emphasized how and where it differs and the public should be given an explanation for the differences. This is especially important when key parts of the current Plan were not carried forward into the new, Revised Plan. I'll describe some below.

Forest Plan Standards

Based on my forest planning experience I will say without hesitation that the one of most important parts of any meaningful Forest Plan are the "must-achieve," measurable standards. The standards gave the line-officer something to shoot for during project design. Without standards there would be no sideboards or restraints on proposed projects to assure the project would not adversely affect other resources. Also, having measurable standards gave the forest monitoring team something concrete to measure and examine. If during monitoring it was discovered that a standard was being exceeded, corrective action was taken. This is why it's important to monitor ongoing projects as well as completed projects.

Unfortunately there are no standards for soil Quality and Productivity (compaction, organic content etc.), Aquatic Ecosystems (water temperature, turbidity etc.), air quality, cultural resources, or municipal watersheds.

Table 18. Maximum Opening Size that May be Cut in One Harvest Operation Conditions is inappropriate to display in a Forest Plan given national USFS direction on created openings.

Page 54 of the Proposed Action states:

FW-STD-TBR-04. Where clearcutting, seed tree cutting, shelterwood cutting, or other cuts designed to regenerate an even-aged or two-age stand of timber are used, an exception to the 40-acre maximum size for openings that may be cut in one harvest operation is as identified in Table 18.

Table 18. Maximum Opening Size that May be Cut in One Harvest Operation Conditions

Average Opening

Size (acres)

HRV Opening

Size (acres)

Maximum Opening

Size (acres)

Breakland Types

60

1,500

150

Upland Mesic Conifers (GF/C/DF/WP/WL)

60

800

80

FW-STD-TBR-05. The maximum size for openings to be cut in one harvest operation shall not apply to the size of openings harvested as a result of natural catastrophic conditions, such as fire, insect and disease attack, or windstorm.

FW-STD-TBR-06. These size limits can be exceeded on an individual timber sale basis after 60-days public notice and review by the regional forester.

The table indicates massive HRV openings will be allowed. Nowhere in the Proposed Action is the acronym HRV defined.

USFS national policy requires Responsible Officials to give the public a 60-day review opportunity prior to requesting Regional Forester approval to create an opening larger than 40 acres. Anticipating that this will be the case is inappropriate ... especially when the opening is can be 37.5 times as large as what is allowed without RF approval.

The Proposed Action doesn't indicate when approval for this deviation from national policy was given, nor does it cite this approval.

FW-STD-TBR-04, 05 and 06 should become a single standard that indicates national policy for created openings will be followed and Table 18 should be omitted.

Please make a copy of page 54 of the Proposed Action and hand it out to all meeting participants. Then, explain

the table, why created openings should exceed the national 40 acre limit, and hand out a copy of the Regional Forester's written approval to exceed the created opening limit.

The Proposed Action is contains weak (and sometimes non-existent) protections for water quality and aquatic habitat.

Reliable sources predict shortages of clean water will be so extreme in 2 generations that wars will be fought to acquire it. At the present time, clean water is the most important natural resource produced by national forests.

Everything that could or might be allowed to occur under the revised Plan must first be analyzed to determine if it will cause adverse effects to water quality and aquatic ecosystems. The final Proposed Action should state that if adverse effects are predicted to occur as a result of a proposed project, mitigation measures must be applied and if the mitigation is not predicted to significantly reduce the adverse effects the proposed project must be dropped.

Clean drinking water is precious. When the USFS knows streams leaving the forest enter municipal watersheds, no reduction in water quality must be allowed. Incredibly, there are no standards in the Proposed Action for municipal watershed water quality (turbidity and toxics?). Please explain this to the public at the upcoming meetings.

The health and proper functioning of aquatic ecosystems is very important to all people who visit the Clearwater/Nez Perce National Forests. Incredibly, there are no standards in the Proposed Action for aquatic ecosystems. Please explain this to the public at the upcoming meetings.

Without a doubt, adherence to the Forest Fishery/Water Quality Objectives by Prescription Watershed shown in Appendix A is the reason the aquatics resources on the Nez Perce National Forest are in such good condition.

Page III-4 of the current Forest Plan states:

"All management areas are stratified by fishery and water quality objectives. These objectives provide management direction in terms of the acceptable sediment budgets for each prescription watershed (see Appendix A)."

Sadly, Appendix A is not a part of the Proposed Action. Neither does the Proposed Action contain anything comparable to Appendix A. Once again, aquatic resources play second fiddle. Please describe Appendix A to the public at the upcoming meetings, and point out the section of the Proposed Action that provides comparable

aquatic resource protection.

Appendix A can be examined at:

<http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5400663.pdf>
http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5400663.pdf

Sincerely,

Dick Artley (retired forest planner, NEPA legal compliance reviewer, forest NEPA coordinator, and forest appeals/litigation coordinator --- Nez Perce National Forest, Idaho)

415 NE 2nd Street

Grangeville, Idaho 83530

208-983-0181

<<mailto:da99333@gmail.com>> da99333@gmail.com