

Data Submitted (UTC 11): 8/26/2014 12:00:00 AM

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Organization:

Title:

Comments: comments on proposed action document

Dear friends,

Thank you for this chance to submit comments on the proposed action document (although in the case of Wilderness, that would be proposed actions). Thanks too for arranging a wide range of public meetings on this topic. The one in Moscow was quite informative, although it would have helped a bit if USFS employees present would have had some sort of name tag.

The Management Area Direction portion of the proposed action is a key part of your work, and seems to follow--without saying so--the tentative conclusions already reached by the Clearwater Collaborative process. This is not all that bad, but some recognition of the origin of this part of the proposed action might have been useful.

The lands allocated to MA 3 seem to me, with few exceptions, to be those appropriately allocated to logging and other commercial uses, and the proposed timber harvest level (at least that based on current/likely staffing) is sustainable, if some sort of increase in watershed rehabilitation funding is really likely. The proposed action does differentiate between harvest levels with varying types of funding, a good idea. But it seems to be silent on just how external funding of watershed work will have an impact on timber harvest. Neither forest is now being overcut, so long as a decent level of funding for repair work is found.

The "standards" section for MA 2 is quite minimal and not especially useful. My understanding of the Idaho Roadless Rule is that except for areas quite near to towns or clusters of homes, the roadless resources will be left that way, and generally kept quite free from manipulation and modification. Maybe something like that could be said at pp. 79-80?

Suitability. The map and discussion of the subject of "suitability" for logging and commercial activity combine to produce a very optimistic notion of which places could be logged and managed for commercial uses without resorting to timber mining. A whole lot really high, steep, and dubious places now fall into the suitable category. Most are also within MA 2, and so appear to be free from any sort of threat from unwise development. But even so, "suitable" will at some point, by somebody, be deemed as needed and available. Including forested land at elevations above 5000 ft is one example of poor suitability decisions. Quite a few steep places, as well as places prone to mass failure, are also now in the suitable category. I think that some sort of revised look at suitability might be a good idea.

Winter special use areas within the proposed Great Burn Wilderness. Two very high places--both perfectly suited in every way to Wilderness designation--now appear in this document, for the first time. Both of these ideas are simply crazy. They would invite trespass, they will cause huge and unneeded harm to wildlife when animals are most vulnerable, and neither area could even be located on the ground. If these two areas survive in any way, their presence will poison the final forest plan with simply truly stupid and unwise. The idea of a Great Burn Wilderness has been around for many, many years, and enjoys wide public support. It's bad enough that Cayuse Creek is not being included in the Great Burn. Carving out two high elevation motorized playgrounds for a few very rich people is an awful idea. In fact, this is the single worst idea in the whole Proposed Action document. Lose it.

Meadow Creek. Meadow Creeks approximately 200,000 acres of roadless land contribute about 1/3 of the total flow of the Selway River. Luckily, the crazy Forest Service visions of the past--which included logging the steep

and wet banks of the west side of the valley--are now all gone. It would be hard, I think, to argue that the land allocations of the Proposed Action threaten either Meadow Creek or the Selway River.

But what is proposed is still illogical and does not in any way recognize the important role played by this great valley in the RARE II process and in the years since.

What you have followed is, in fact, a bizarre land scheme invented by the late Don Biddison, who believed, in his heart of hearts, that a place called "East Meadow Creek" need not actually include a big piece of East Meadow Creek. For no good reason, then or now, that portion of the east side of Meadow Creek lying NE of Mountain Meadows, and extending to the Elk Mtn/Running Creek Road, is actually called West Meadow Creek. But it's not. It's EAST of the creek (which is actually a river). This part of the East side of the creek looks JUST LIKE the rest of the East Meadow Creek Roadless Area. It is devoid of any type of commercial timber and is suited in every way--as is the valley of Running Creek, Bargamin Creek, etc, to Wilderness classification.

At some point, I am quite sure that the courts are going to require the Forest Service to explain, in plenty of detail, why:

--the west side of Meadow Creek is different from the east side, and why the east side (or most of it anyway) is suited to Wilderness classification and yet the west isn't

--how water quality in the Selway can be maintained by setting aside just HALF of its key tributary

--why (or how) the roadless land NE of Mountain Meadows can (a) be found on a map--good luck there-- and (b) how it differs from the roadless land lying right next to it

Why not explain all this right now? You sure are going to have to in the end. I have devoted a bit over 40 years to the cause of Meadow Creek and have hiked dozens of trail miles there. More than just about anybody else, I will greatly look forward to the official USFS explanation of these vagaries of the geography of Meadow Creek.

Thanks for considering these comments.

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