

Data Submitted (UTC 11): 11/3/2014 12:00:00 AM

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Comments: Proposed Action Comments

See Attached.

I would appreciate it if you would acknowledge successful receipt of these comments.

Thanks,

Bill Moore

November 2, 2014

Forest Plan Revision Comments

Nez-Perce-Clearwater National Forest

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Initially I would like to express my appreciation for the way you have done the collaborative outreach for the planning process. As I participated in this outreach, I was impressed with both the Nez Perce – Clearwater National Forest's willingness to listen to and react to input from outside folks and the spirit of working together mutually that the meetings fostered.

Throughout the meetings, my focus has been on Wilderness Fire Suppression and the need to engage many in service disciplines as well as the public at large with a reexamination of how much fire can be allowed to continue to burn in Wilderness without altering the many values Wilderness supplies beyond the point of enjoyment by the public who uses it. Additionally the many ecosystem values that Wilderness provides are on the cusp of being damaged beyond redemption for the next generation or so and possibly forever. In short, put fire suppression back in Wilderness in areas that are targeted through the collaborative process as being either too vital to loose or that are serving as habitat buffers around large burns and are already burned enough in a "natural" mosaic.

I acknowledge that in the final collaborative meeting I was told that my concerns should not be dealt with in the Nez Perce - Clearwater Forest Plan Revision but might be dealt with in Wilderness Planning at some future date. I urge you to reconsider this position as I feel that this is the perfect venue for discussion and I am concerned that we are at a point that it may already be too late to preserve the Wilderness Values we cherish for the immediate future generations. I strongly feel that this is the perfect chance for the Nez Perce – Clearwater National Forest to take a leadership position in this reexamination. I see nothing wrong with a grass roots Forest Plan that might have positive national fire policy implications.

Accordingly I would like to offer my comments specific to the Proposed Action for Forest Plan Revision on the

Nez Perce - Clearwater National Forest dated July 2014. My comments are specifically directed at Wilderness and Future Wilderness.

(Pg. 13) It is important to remember the cultural heritage values of the Forest Service itself as well as the many Caucasian folks who helped shape the land. There are many locations in the Wilderness where such sites need to be preserved and in some cases their stories documented.

(Pg. 15 FW-DC-TE-01) Structural diversity has been lost in many drainages as too much fire has created monoscapes of burned areas. Changing climate conditions have and will continue to contribute to this phenomenon. Selective fire suppression is about the only way I can see to stop this trend.

(Pg. 16 FW-GDL-TE-01) Scenic integrity values are being overshadowed by the constant sight of large fire scars. Many have burned multiple times and the impacts on SIO's will be decades long rather than 3-5 years.

(Pg. 28 FW-OBJ-FOR-04&06) Within Wilderness, the only tool managers have to treat vegetation is natural wildfire. In most fire seasons in the Wilderness this alone treats far more acreage than is desired. And the trend is continuing.

(Pg. 33 FW-DC-FIRE-04) Natural fuels (fire mosaic) is a good desired condition for Wilderness, however the large burns that dominate many Wilderness landscapes is not. In 1910 it was O.K. to burn 3+ million acres in a day but in today's situation Wilderness is finite and much smaller. The same scenario would wipe out both the Selway Bitterroot and the Frank Church wildernesses. While such an occurrence would not happen today, it is happening in Wilderness every decade or so, and we cannot sustain that rate and end up with Wilderness as intended.

(Pg. 33 FW-OBJ-FIRE-02) Within Wilderness nature herself treats far more acres than this objective. In many cases that results in as good of fuel treatment as if it was done mechanically under close supervision. That is good but can't be coupled with the vast acreages that are moonscape burns and maintain a quality Wilderness.

(Pg. 43 FW-DC-AIR-01) The large wildfires that are typical in Wilderness today have a huge detrimental effect on wild lands air quality, view shed, and recreation. About the only economic benefit is when a Wilderness Fire Use Team brings in a large "monitoring and point protection" show and those do have a very limited positive effect on the local economies. This type of income generation is not sustainable over the long term, however. A balance needs to be reintroduced.

(Pg. 43 FW-DC-CR-01&02) These paragraphs apply to Wilderness as well as non-wilderness areas. There are no true areas that are "Untrammeled". Specific sights need to be identified and protected from destruction by wildfire.

(Pg. 45 FW-DC-REC-02) These desired conditions are especially true in Wilderness. The opportunities were indeed incredible. However in today's conditions they are much less so and are likely to degrade further in the future without introducing planned wildfire suppression techniques.

(Pg. 51 FW-GDL-INF-14) Wilderness water quality is of primary importance as it typically is at the high country start of the water cycle process. While mechanical means to enhancing water quality issues are precluded in Wilderness, sediment and water runoff delivery issues are greatly degenerated when large wildfires are allowed to occur.

(Pg. 68 MA1-DC-02&03) Large drainage complete burns concentrate wildlife, especially the small critters, in areas where they are substantially overpopulated. In time these populations will most likely thin down to a more natural level. However should these "safety zones" be allowed to burn, due to the massive amounts of wildfire

already occurred there is no place for them to go if these zones are allowed to burn as well.

(Pg. 68 MA1-DC-WILD-02) Within Wilderness, all unsuppressed ignitions should be unplanned and naturally caused. That being said in today's fire seasons, air quality degradation is generally a season long condition rather than short term due to the size that many fires are allowed to become.

(Pg. 69 Table 23) I support the idea of increasing Wilderness area size where it makes good sense. However I do not support addition of any recommended Wilderness unless it is managed for wildfire suppression. I see no value in allowing unchecked wildfire until it is actually designated wilderness. In the case of Elk Summit and Sneakfoot Meadows specifically, that are already is a fairly good wildfire mosaic and is a "safety zone" for the animals displaced as I mentioned above.

(Pg. 72 MA1-GDL-RWILD-01) I am not sure what this statement implies however I believe that all normal activities can be carried out in Wilderness in a non-motorized fashion. However fire suppression cannot. To make any sort of management by fire suppression work fire managers have to be able to move quickly with all tools at their disposal to put the fire out as quickly as possible thereby minimizing the burn size. This is the one area where the end justifies the means.

(Pg. 83 Monitoring) As with any planned process, monitoring is essential. Should reasonable and collaborative suppression be introduced, the process should be reviewed to see if it is working. This is more than a new fire season plan, but rather a possible review at each forest plan revision. One has to stay the course for a decade or so to see if the desired future conditions are occurring.

(Pg. 115 to 118) Scenic integrity objectives are pretty hard to define however I would say that it is very easy to point out many areas listed on these pages where the primary scenic viewing would be fire scar observation.

(Pg. 136 Wilderness) Protection of historic wilderness structures is a key part of our heritage. While many of them will gradually disappear through the years, there is no need to hasten that process by allowing them to burn. They should be identified (again by the collaborative process) and not allowed to burn. And I am advocating for a review of Wilderness fire management direction as part of this plan not at some unknown date in the future. Too much has already burned not to be reviewing the consequences of unchecked wilderness fire.

(Page 139) I think it is good to point out the many less formal groups that have sprung up to help the Nez Perce - Clearwater national forest. These folks forge close ties with the Forest employees to the benefit of the land. And that's what it is all about. I personally participate in such efforts and take a great deal of pride in doing so.

In conclusion I am struck by the fact that with the exception of timber management and harvest goals, it is hard to find very many pages in the Nez Perce - Clearwater proposed action plan that do not in some way pertain to the values that Wilderness embodies. The overall natural balance of Wilderness is being heavily tilted by climate change and too much unchecked fire. I would urge you to reconsider your thoughts and do a thorough review of it in the environmental assessment for your Forest Plan. If that is not possible then I think such a collaborative review should be a part of the final plan with an early timeline for its completion and implementation.

Thank you very much for allowing me to be a part of your planning process.

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