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Organization:

Title:

Comments: Revised Land Management Plan for the Nez Perce-Clearwater National Forests

Concerns are listed below,1-12-2020

FW-OBJ-CR-01. Evaluate 15 cultural resource sites per year for their eligibility to the National Register of Historic Places.

FW-OBJ-CR-02. Nominate one cultural resource site every three years to the National Historic Register.

Comment: 15 cultural evaluations a year will be a finance burden on the agencies budget as well as a burden on existing staff to perform the evaluations. Where only one cultural site every three years will be nominated, the number of evaluations is not efficient use of time & money. Suggest evaluate 5 or less cultural resource sites per year.

FW-OBJ-REC-02. Reduce deferred maintenance of trails by five percent, every five years.

Comment: Summary of Key Findings from the GOA 13-618 report in 2013.

*The Forest Service trail system faces a \$314 million backlog in trail maintenance and an additional \$210 million backlog in annual maintenance, capital improvements, and operations. Combined, the Forest Service trail maintenance backlog exceeds a half-billion dollars.

*Only one-quarter of the agency's 158,000 miles of trails meets agency standards for maintenance and nearly two-thirds receive no maintenance at all. At 5% reduction in deferred maintenance over a five year time frame you are looking at 100 years to catch up. Suggest increasing to 10-15% every five years.

FW-OBJ-INF-01. Decommission or place into intermittent stored service 30 miles of Forest Service system roads. Priorities shall include roads causing resource damage in priority watersheds or where roads chronically fail. Priorities shall also include obliterating previously decommissioned roads that utilized earlier methods, such as only removing culverts and abandoning road templates on mid-slope roads. Every 5 years.

Comment: Decommissioning roads increases sediment in to streams, often for several years before vegetation stabilizes the land. To go back and disturb already decommissioned roads should not be done. Suggest deleting "Priorities shall also include obliterating previously decommissioned roads that utilized earlier methods, such as only removing culverts and abandoning road templates on mid-slope roads."

Table 17. Management action suitability in recreation opportunity spectrum classes by alternative.

Table 28. Management action suitability on wilderness by alternative.

Table 30. Management action suitability on designated wild and scenic rivers by alternative.

Table 31. Management action suitability on National Historic Landmark trail by alternative.

Table 33. Management action suitability in recommended wilderness by alternative.

Table 34. Management action suitability on suitable wild and scenic rivers by alternative.

Table 35. Management action suitability in Idaho Roadless Areas by alternative.

Comment: All these tables do not have non-motorized travel listed as a Managed Action. While non-motorized travel is listed throughout the draft plan it is not listed in any of these tables. I do not know if this was omitted intentionally or if it is supposed to be understood that non-motorized travel is approved anywhere all the time. If non-motorized travel is not specifically listed, if it came to a lawsuit in the future all non-motorized users could find they are omitted from using the Nez Perce Clearwater National Forest. Suggest that Non-motorized Travel be listed as a separate line in all these tables for clarification with designated use listed in all tables.

Table 19. Suitability of Lands in Alternative W

Table 20. Suitability of Uses in Alternative X.

Table 21. Suitability of Uses in Alternative Y.

Table 22. Suitability of Uses in Alternative Z.

Comment: In the "Recreation Access" column on all these tables there is no Non-Motorized Recreation listed. I do not know if this was omitted intentionally or if it is supposed to be understood that non-motorized recreation is approved anywhere all the time. If non-motorized recreation is not specifically listed, if it came to a lawsuit in the future all non-motorized users could find they are omitted from using the Nez Perce Clearwater National Forest. Suggest that a new sub column under Recreation Access column add Non-motorized Recreation with all uses designated in the above tables.

Table 32. Recommended Wilderness acres by alternative.

Comment: In this table is "No Action" column the same as "Alternative X"? Suggest that this be better clarified by changing the column heading to X or clarifying in the footnote that X is the No Action Alternative.

Thank you for the opportunity to comment.