

Data Submitted (UTC 11): 4/10/2020 6:39:57 PM

First name: Joshua

Last name: Dubansky

Organization:

Title:

Comments: Protect Idaho's Wild Rivers

Dear Supervisor Probert,

Dear Supervisor Probert,

As a citizen who cares deeply about our nation's rivers, I am writing to urge the Nez Perce-Clearwater National Forest to protect the clean water, free-flow, and outstanding values of its Wild and Scenic eligible streams in its revised forest plan.

With four designated wilderness areas and five Wild and Scenic designated rivers, the Nez Perce-Clearwater National Forest is home to some of our nation's most ecologically intact public lands and waters.

Tributaries to the Clearwater, Lochsa, Salmon, Selway and Snake rivers feed the forests that support local timber industries, while simultaneously providing world-class recreation opportunities and jobs for local river guides and outfitters. Stewarded for thousands of years by indigenous peoples, these rivers and streams are steeped in rich cultural history and are home to a number of cultural sites, including one of three places indicated in Nimi'ipuu oral history as a place-of-origin for the Nez Perce Tribe.

The majority of streams on the Forest are designated critical habitat for one or more ESA-listed fish species, and many of them are projected to provide cold water refugia for westslope cutthroat trout and bull trout as the climate warms. The lands adjacent to these waterways also support healthy populations of elk, moose, rare carnivores such as Canada lynx and fisher, and over a half-dozen endemic snail species.

These waters are truly the lifeblood of the Nez Perce-Clearwater National Forest, as well as countless communities and ecosystems downstream. They deserve and need to be protected.

After recognizing 89 rivers and streams to be eligible for designation under the Wild and Scenic Rivers Act, the Forest's 2018 Wild and Scenic Rivers Suitability Report dramatically reduced protections by finding only 42% of those to be "suitable" for continued protections. Within the four alternatives identified in the draft environmental impact statement for the revised Nez Perce-Clearwater Forest Plan, as few as zero and as many as only 37 rivers and streams would retain critical protections. This is unacceptable and a threat to some of our nation's most cherished waterways.

As the Forest finalizes its new forest plan, determining the long-term fate of its lands, waters, wildlife and the rural communities that depend on those resources for their cultural and economic survival, I implore it to:

- Provide and select a new forest plan alternative that finds all 89 Wild and Scenic eligible streams to be suitable for designation;
- Retain protections for all 89 Wild and Scenic eligible 89 streams regardless of whether they are found "suitable" for designation;
- Show its work and provide valid reasons for finding any stream to be unsuitable for designation under the Wild and Scenic Rivers Act

Thank you for taking my comments into consideration.

Sincerely,

Joshua Dubansky
10368 Bexhill Pl
Truckee, CA
96161
dubansky@gmail.com