

Data Submitted (UTC 11): 4/16/2020 2:21:14 PM

First name: Kevin

Last name: Proescholdt

Organization:

Title:

Comments: Comments on Daft Plan for Nez Perce and Clearwater National Forests

2833 43rd Ave. S.

Minneapolis, MN. 55406

April 16, 2020

Forest Plan Revision

903 3rd Street

Kamiah, ID. 83536

Sent via email: sm.fs.fpr_npclw@usda.gov

Dear Forest Service Staff,

I am submitting the following comments on the draft plan revision for the Nez Perce and Clearwater National Forests. Please make them part of the record.

I fear that the Forest Service will once again demonstrate that it has no ability to protect wildlands, nor that the agency has much ability in stewarding designated Wilderness. It appears so far that the Forest Service also views the Nez Perce and Clearwater National Forests as only Idaho areas, with no regard for the national interests in protecting the wildlands on these National Forests, nor in recommending for wilderness designation the worthy areas on both Forests.

I fully support the Citizen's Alternative developed by Friends of the Clearwater, and strongly request that your agency include and fully analyze this alternative for the Final Plan, and select it as the agency's Preferred Alternative in the Final Plan. To do nothing less will confirm to the nation that the Forest Service is still a single-minded development agency focused on nothing more than getting the cut out.

There are two main areas on which I wish to comment more specifically:

Wilderness

In particular, I want the Forest Service to recommend the following areas for Wilderness designation:

* Weitas Creek (also known as Bighorn Weitas, including Cayuse Creek). This is a premier wild area of 260,000 acres, including low elevation wide-stream habitat that is unique and rich in wildlife. A boundary adjustment is needed to include the unmaintained 555 route beyond the Weitas Guard Station bridge.

* Selway-Bitterroot Wilderness Additions. As someone who has visited the Selway-Bitterroot Wilderness, I can personally attest to the need to add to this spectacular area with the following additions:

-- Meadow Creek. This is a premier addition of 215,000 acres, providing crucial steelhead habitat. The Forest Service unfortunately and erroneously split this addition into two pieces.

-- Rackliff-Gedney. This addition of about 90,000 acres protects excellent steelhead habitat. Much of this area was formerly protected as part of the old Selway Primitive Area, and should be protected again.

-- Lochsa Slope. This is a crucial addition of 75,000 acres, all of which were formerly protected. Again, this area should have its protection restored as Wilderness.

-- Sneakfoot Meadows. This addition of 23,000 acres would protect unique meadows, and deserves wilderness status.

-- North Fork Spruce. This addition of 36,000 acres contains Colt Killed Creek and would make a wonderful addition to the Selway-Bitterroot Wilderness.

-- Selway (Bear Creek) and Lolo. These are two additions of about 1,500 acres, mainly on Lolo and Bitterroot National Forests, but make logical additions to the Selway-Bitterroot Wilderness.

* Kelly Creek (also known as Hoodoo or Great Burn). This is a long-standing wilderness proposal of about 255,000 acres, and would protect a crucial fishery for cutthroat trout.

* Pot Mountain. This perhaps the wildest area, due at least in part to its shape. This wildland covers 51,000 acres.

* Fish and Hungry Creeks. This wildland of 118,000 acres contains the best wild steelhead stream in Idaho, and should be protected with wilderness designation.

* Upper North Fork. This 63,000-acre wildland includes Rawhide, perhaps the best bull trout habitat in all of Idaho. This area also includes parts of the Lolo and Idaho Panhandle National Forests.

* Frank Church-River of No Return Additions. I have visited the Frank Church-River of No Return Wilderness, and it is a spectacular area that needs to be rounded out with key additions. There are two Cove-Mallard areas of 63,000 acres that should be protected with wilderness designation. These were the site of infamous timber sales in 1990s that were largely stopped by citizen action.

* Gospel-Hump Additions. These additions total 55,000 acres, including Johns Creek, a crucial fish stream. It deserves wilderness designation.

* Hells Canyon Additions. These additions of about 79,000 acres include Rapid River and Salmon Face (#1). Rapid River is noted for its salmon and steelhead habitat, as well as excellent elk habitat. These additions overlap the Payette National Forest.

* Mallard-Larkins. This is a long-standing protection proposal of 260,000 acres that includes mountain hemlocks and mountain goats. It overlaps the Idaho Panhandle National Forest.

* O'hara Creek. (#9) This wildland of 33,000 acres includes great steelhead spawning grounds and deserves protection as Wilderness.

* Weir Creek. (#12) This wildland of 22,000 acres is mostly a wild, trail-less area that should be designated as Wilderness.

* Moose Mountain. (#14) This wildland consists of 22,000 acres and has very good elk habitat. It deserved wilderness protection.

* Pilot Knob. (#6) This wild area of 21,000 acres contains an important Nez Perce cultural site. It should be protected as Wilderness.

* Little Slate Creek. (#3) Little Slate Creek is an important salmon spawning area of about 12,000 acres. It, too, deserves Wilderness protection.

* North Little Slate. (#4) This is an important watershed of about 6,000 acres and should be further protected with wilderness status.

* North Fork Slate. (#5) North Fork Slate protects an important tributary stream in an area of 11,000 acres. It must be protected with wilderness designation.

* John Day. (#2) This important area of 10,000 acres overlooks the Salmon River and should be given wilderness designation.

* Eldorado. (#11) The Eldorado area of 7,000 acres contains a low gradient stream and deserves wilderness designation.

* Clear Creek. (#10) Clear Creek is an important stream. This area covers 9,000 acres northeast of Grangeville and deserves wilderness designation.

* Siwash. (#13) This area of 9,000 acres flanks the North Fork Clearwater. It should be given wilderness designation.

* Lick Creek. (#8) The Lick Creek area of 7,000 acres feeds the South Fork of the Clearwater and should be given wilderness designation.

* Dixie Summit. (#7) Dixie Summit is an important Research Natural Area (RNA) of 13,000 acres, and should also be given wilderness status.

Grizzlies, Wolves, and Wildlife

The Forest Service must also protect habitat for grizzlies so that this iconic species can recover in the Clearwater. The Forest Service must stand up to IDFG and prohibit the state from allowing bear-baiting on National Forest lands in Idaho, and to prohibit the wolf and wildlife slaughter that IDFG commits on National Forest lands. The federal government has ultimate control over wildlife on federal lands; there is U.S. Supreme Court precedent affirming this. For the spineless Forest Service to turn a blind eye to IDFG's anti-wilderness actions and wildlife slaughter is absolutely unconscionable.

In addition, I have the following more specific comments:

* Bear Management Units should be established in the Nez Perce and Clearwater National Forests.

* All potential grizzly denning habitat should be protected.

* All wildlife corridors should be protected so that grizzlies can move to and find necessary habitat and food.

* The Forest Service needs to assert its authority and prohibit bear baiting in grizzly habitat on the National Forests. All the roadless areas should be closed to motorized and mechanized use, including land adjacent to the Gospel Hump Wilderness.

* Food safety measures need to be established for front country campgrounds in grizzly habitat and backcountry travelers.

* Visitors need to be informed about grizzlies and their habitat at campgrounds in grizzly habitat.

Please support the Citizen's Alternative developed by Friends of the Clearwater, analyze it fully, and make it the Forest Service's Preferred Alternative in the Final Plan.

Sincerely,

Kevin Proescholdt