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Title:

Comments: Dear Forest Planners,

Thank you for the opportunity to comment on the Forest Plan Revision Draft Environmental Impact Statement (DEIS) for Nez Perce and Clearwater National Forests. I guided professionally in the Selway-Bitterroot Wilderness and on the Salmon River for many years and remain an avid hiker, photographer, naturalist and frequent user of these lands. First and foremost, I am disappointed that the Forest Service did not consider the Citizen-Science alternative submitted by Friends of the Clearwater. This proposal is driven by respectable science and has considerable popular support and should therefore be fully analyzed in the final EIS.

I am concerned by the draft EIS' proposals for recommended wilderness. Despite the Executive Summary's characterization of Alternative W as "have it most" and Alternative Z as "natural processes dominate", there appear to be arbitrary differences which undermine the stated logic of the alternatives. For example, Alternative W proposes recommending Bighorn-Weitas and Moose Mountain, but these are eliminated in Alternative Z; whereas Alternative Z recommends Pot Mountain, Meadow Creek-Upper North Fork and West Meadow Creek, which are absent in Alternative W. These capricious inclusions and exclusions make it difficult to compare and recommend one alternative over the other, especially when the reality is that all the areas mentioned in both alternatives are highly suitable for wilderness status and should be recommended.

It is also disappointing that no alternative recommends wilderness status for the Gospel Hump Adjacent to Wilderness, Gospel Hump Roadless, Lochsa Face or Rackliff-Gedney areas.

The addition of winter motorized and mechanized transport to Alternative Z also eliminates it from serious consideration as an alternative where "natural processes dominate." It is imperative for the region's future recreation and wildlife that snowmobiles NOT be allowed in potential wilderness, especially in the Hoodoo area.

It is also very disappointing that all alternatives besides No Action entirely eliminate "semi-primitive non-motorized" areas from the Palouse Ranger District. With growing populations of outdoor enthusiasts in Latah and Whitman Counties, the forest plan should be looking for ways to increase opportunities for non-motorized recreation on the Palouse Ranger District.

My experience guiding clients repeatedly showed me the value of the region's waterways and water quality: nowhere else in the country compares to the Clearwater drainage for beautiful waterways, pristine aquatic habitat and fishing, and these outstanding values were always noted by our customers. Forest plans should give top priority to preserving the region's waterways. It is therefore disappointing that no alternative in the draft plan offers Wild and Scenic status for more than 37 streams out of the 89 formerly found eligible, and takes away eligibility status from the other streams.

Finally, the Draft EIS proposals do not contain adequate quantitative standards for habitat and watershed quality. Any forest plan should emphasize objective benchmarks that can guide forest policy and facilitate accountability and public engagement across many years and changing administrative personnel.

Thank you kindly for considering my comments.

Sincerely,

Andrew J Frishman