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Comments: Sunday, April 19, 2020

Nez Perce-Clearwater National Forests

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Subject: Protect Idaho's Wild Rivers, Wilderness, and Wildlife -- Nez Perce-Clearwater NFs Forest Plan Revision #44089

To USFS Chief Christiansen and Nez Perce-Clearwater NF 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. I fully support the Citizen Conservation Biology Alternative submitted by Friends of the Clearwater and request that it be fully analyzed as its own Alternative.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

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 purpose of conservation: The greatest good to the greatest number of people for the longest time."

-- Gifford Pinchot

The majority of streams on the Forest are designated critical habitat for one or more Endangered Species Act-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.

"As we peer into society's future, we--you and I, and our government--must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow."

-- Dwight D. Eisenhower

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 no more than 37 rivers and streams would retain critical protections. This is unacceptable and a threat to some of our nation's most cherished waterways.

"Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish--indeed, all the living creatures of prairie and woodland and seashore--from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement."

-- Theodore Roosevelt

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 data and analysis and provide valid reasons for finding any stream to be unsuitable for designation under the Wild and Scenic Rivers Act.
- * Administer existing Wildernesses as per the Wilderness Act, both the spirit and intent.
- * Protect all roadless areas so they maintain the characteristics necessary to be designated as wilderness by Congress in the future. All roadless areas should be recommended for wilderness or protected by administrative non-motorized and non-mechanized backcountry designations. The FS should also limit mechanized access to provide secure areas for sensitive wildlife (wolverine, grizzly bear and even elk), and reduce erosion to streams, compaction of fragile soils, and the spread of invasive weeds.
- * Address climate change by reducing carbon emissions and promoting climate stability by emphasizing carbon storage in trees, down wood, and soils in the forest and reducing the use of motorized vehicles and fossil fuels.
- * Exclude roadless areas, existing and potential Wild and Scenic river corridors and proposed and existing Research National Areas from the suitable timber base and make them off limits to logging.
- * Protect Water, Soil and Aquatic Resources by maintaining and/or restoring the elements which characterize good native fish habitat and high water quality by including enforceable standards that protect clean and cold water and complex, connected and comprehensive habitats. Existing wetland and stream buffers and other protection measures, known as PACFISH and INFISH, must be maintained and improved. Meaningful and enforceable standards to protect soils, as required by law, must be included.
- * Allow fire to perform its necessary ecosystem rejuvenating function and also allow insects and disease to play their ecological functions. This is especially true within Wilderness, roadless areas and other natural areas.
- * Curtail clearcutting and other silvicultural prescriptions that leave large openings, which cause edge effects that fragment the landscape. These openings adversely affect habitats for numerous species.

* Emphasize landscape connectivity by providing wildlife linkage corridors so that animals can move unimpeded across the landscape, facilitating migration and genetic interchange.

* Reduce the miles of roads to improve wildlife security and watershed integrity, while also providing good paying restoration jobs.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA