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Comments: Dear Mr. Peterson,

The proposed revisions to the Nez Perce-Clearwater National Forest Plan unfortunately includes what would be significant steps backwards from the currently in place 1987 plan in affording the 1460 streams and rivers in the region the protection they need and deserve given their invaluable assets for recreation and their ability to drive a long term sustainable economy for the entire region. These watersheds are designated critical habitat for ESA-listed Steelhead, Chinook Salmon, and resident Bull Trout because they provide spawning, rearing and migration corridors for these fish. The loss or further degradation of these watersheds would put these struggling species at further risk at a time when the anadromous fish are already teetering on the brink of extinction.

One of my biggest concerns is that the proposed plan lacks quantifiable standards. The current plan has specific, measurable, science-based goals for recovery and management. Data-driven and research-based standards are essential for healthy rivers as well as land management. The new plan is largely devoid of these.

Additionally I am somewhat at a loss as to why the Forest Service (FS) has chosen at this time to move forward with a "suitability study" of the 89 free flowing rivers previously designated eligible for management under the Wild and Scenic Rivers Act (WSMA). The WSMA does not authorize the FS to conduct a suitability study unless directed by Congress to do so. Why is this happening now?

I would urge you to forgo the W&S Suitability Study (WSES) until the proper resources, time and team can conduct a comprehensive analysis of each Eligible W&S River.

All 89 rivers previously identified as eligible for W&S designation should remain eligible, and be protected for their Outstandingly Remarkable Values (ORVs) and free-flowing status.

If the FS decides it must complete the WSES in the Forest Plan Revision, it "should clearly demonstrate the reasons for or against recommending an individual river or river segment to Congress", per your FS Handbook, 83.3. The current study is NOT sufficient.

Thank You for the opportunity to comment.

John Wells Ketchum, ID