

Data Submitted (UTC 11): 4/20/2020 7:37:07 PM

First name: LuVerne

Last name: Grussing

Organization:

Title:

Comments: Thank you for the opportunity to comment on the Nez Perce/Clearwater NF Plan Revision. All of my comments are in regards to the Wild and Scenic Rivers sections of the plan.

The eligibility studies that were done as part of this planning process appear to be comprehensive and thorough. However, rejecting all of the previous planning documents on eligibility, and the public input thereon does not give a whole lot of confidence that this round of planning and input will be given any real consideration in the final project. Perhaps the best we can hope for is that all streams will remain in the same limbo that the streams in the 1987 eligibility study have found themselves for the last 33 years, i.e., Eligible and thus given legal protection under the Wild and Scenic Rivers Act.

Which leads to my next and most substantive comment. I do not believe that combining eligibility studies and suitability studies in an overall forest planning document complies with the requirements of the Wild and Scenic Rivers Act or the any National Forest Planning Acts or regulations. The Wild and Scenic Rivers Act specifically lays out the requirements for eligibility and suitability, along with the requirement to make recommendations to Congress on the specifics of designating rivers and river segments found suitable. I don't believe the suitability study in Appendix F of this document meets the requirements of the Act, and since it is strategically hidden in one of a long list of appendices, it seems to be a good way to shield the process from the public eye.

I really don't care to comment on specific rivers or segments, since I believe the entire process should be conducted on its own, but I do specifically want to mention Lolo Creek. It is incomprehensible to me that the plan found a short segment of the Creek on NF land to be Eligible, and recognized the BLM study of the adjoining lower segment of the creek (which was found to be both Eligible and Suitable) yet determined the segment on FS administered land to be not Suitable. So much for managing "systems".

I sincerely hope that the Forest Service will pull the suitability study out of the Forest Plan Revision, and conduct a stand alone study for Wild and Scenic River suitability that complies with the requirements of the Wild and Scenic Rivers Act.