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Comments: Forest Supervisor Probert:

I've spent a good 10 years roaming about the Nez Perce and Clearwater National Forests enjoying its beauty and mystery, physically challenging myself in the backcountry, and for a time fighting for better protections for one of the wildest places in the Lower 48. I no longer represent an organization, but I still hold a deep connection to this place, to all things wild. With 29 roadless areas (some bordering wonderful Wilderness), over 2,000 river and tributary miles, and most if not all native species intact (or attempting to make their way back), the Clearwater Basin is too great a place to succumb to the levels of development proposed in any of these forest plan alternatives. I've been hearing and reading this term "adaptive management" being thrown around as a great tool for the Forest Service. Some kind of tool that cuts out any meaningful public participation to fast track deforestation and development.

The Nez Perce and Clearwater National Forest should be an inland harbor for threatened and endangered fish species including the wild Clearwater B-run steelhead, salmon, bull trout and Westslope cutthroat trout. How will relaxing buffer regulations including PAC-FISH and IN-FISH help these species? How will allowing more sediment loading into streams impact these species? With our fish in the emergency room year after year, consider how your proposed increase in board feet will further reduce fish numbers. Is that a legacy you'd like to leave for another 15-30 years?

Last year, I was overjoyed that grizzlies passed through the Kelly Creek Roadless Area, over Highway 12, and into the Selway-Bitterroot Wilderness. As a trained wildlife biologist yourself Supervisor Probert, I hope that you'll take that knowledge and amend and choose a final alternative that includes protecting habitat for Grizzly Bear. This may mean that you'll have to reconsider the promises you've made to the motorized crowd. This may mean proposed timber sale locations should remain as intact habitat rather than increasing the board feed across the forest. Because Grizzly has been so overlooked in this plan, you may want to choose an alternative that favors Grizzly Bear, not ATV, ORV, UTVs and whatever else people are riding in roadless areas these days. You are probably well aware that you are on shaky legal ground just by way of Grizzlies coming onto the Nez Perce and Clearwater National Forests.

I would also encourage you to take a hard look at how increased mountain biking activities in roadless areas may impact threatened and endangered species, such as Grizzly Bear. I am not particularly worried about the safety of the rider as much as I am the continued existence of Grizzly Bear. Once Grizzly and human find each other, and that interaction generally doesn't go well, that bear seems to be as good as dead. Keep that from happening. Close all roadless areas to motorized and mechanized wreck-reational pursuits.

A few years ago I attended a really interesting talk about cryptobiotic species in the Clearwater Basin. Cryptobiotic species outwardly appear similar to other species, but they are evolutionary divergent on the inside. I hope the Forest Service has considered the impacts of development on these cryptobiotic species that we may know every little about. I would hate to see these small creatures disappear because of oversight in a long term management plan.

Also, I've attended a few meetings during the forest planning process, and not once has the Forest Service analyzed Friends of the Clearwater's Citizen Conservation Biology Alternative. If the Forest Service is willing to entertain Idaho County's ridiculous plan that omits any new Wilderness or wild and scenic rivers, than the Forest Service should also spend equal time analyzing FOC's Citizen Conservation Biology Alternative.

At one point in time, the Clearwater and the Nez Perce were managed as two separate forests. These two forests are so biologically distinct enough from each other that it may be scientifically unsound to manage both the same under a vague management plan. It may be a big ask, but shouldn't the Forest Service adopt a plan that recognizes and sets unique quantitative standards for different parts of the forest? Maybe including 12 management types instead of reducing it down to three management types in some alternatives may help alleviate this troubling proposal in the plan.

As many have stated over the years, please designate WEITAS AS WILDERNESS! If folks are so worried about elk populations, then protect the best winter habitat for elk in the Clearwater Basin. WEITAS AS WILDERNESS! Protect cultural resources. WEITAS AS WILDERNESS! Protect historical corridors used by the Nimiipuu and Lewis and Clark. WEITAS AS WILDERNESS! Some much documentation points to ATV damage. Stop this and protect WEITAS AS WILDERNESS! Grizzly Bear would thrive in a WEITAS turned into WILDERNESS! I think you get the point.

So many other roadless areas deserve Wilderness designation as well including the little known Siawash Roadless Area, the Eldorado Creek Roadless Area, and the 27 others in between. Have you actually thoroughly evaluated the roadless characteristics of these places while creating your forest plan? If not, would this place you on legal shaky ground?

I always used to say that the Clearwater is a wet and wild place. So wet and wild that all river and tributary miles should be considered for protection under the Wild and Scenic Rivers Act. It's a powerful law that protects some of the most pristine rivers in the U.S. Development usually never bodes well for rivers and its inhabitants. The North Fork of the Clearwater is a prime example of a river that needs wild and scenic status. All of the tributaries flowing into the North Fork of the Clearwater needs wild and scenic designations. Think long term here. Clean water will be the fight of another lifetime, protect what we have now for the future.

Finally, all of your alternatives stand on shaky ground legally. It might be prudent for the Forest Service is pull the forest plan all together and consider either creating or adopting an alternative that includes measurable and enforceable standards that protect the unique characteristics of the Nez Perce and Clearwater National Forests rather than ruining such a wonderful place.

Let's keep it wild!

Ashley Lipscomb