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Comments: comments on draft Forest Plan

attn: Mr. Zach Peterson, Forest Planner

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My name is Charles Ray. I live in McCall, Idaho. Thanks for this opportunity to comment on the draft Nez Perce/ Clearwater Forest Plan.

I have read the parts of the draft Forest Plan that deal with the topics in which I am interested.

I am a graduate forester and former timber faller. I have been a regular user of the Nez Perce/ Clearwater National Forest for over 30 years. I camp, hike, boat, and observe wildlife in the Forest. I take my grandchildren there. Until a couple of years ago, I regularly fished for steelhead in the Salmon River, and I occasionally fished for them in the South Fork of the Clearwater. Now that wild steelhead are nearing extirpation, I cannot in good conscience continue fishing for them. I hope that someday management actions will change, allowing the runs to recover and me to resume fishing. Strong protection for steelhead habitat in the new forest plan would be a good start to restoring wild steelhead.

Following are my comments on the draft Forest Plan and my recommendations for improving the final Plan.

1) Citizen-Science Alternative - I am disappointed that the Citizen-Science Alternative as proposed by Friends of the Clearwater and others was not considered. I suggest suspending this planning process, analyzing the Citizen Science alternative, and issuing a supplemental draft plan EIS that includes the Citizen-Plan as an alternative.

2) Management areas - I opposed the consolidation of the Nez Perce and Clearwater National Forests. The land area is too large, and the biology, geology, hydrology, microclimates, and topography are simply too diverse for one Forest Supervisor or management team to get their arms around. Additionally, the habit of professional resource personnel and line officers to frequently move from one assignment to another makes it hard for anyone to develop a "sense of place". Continuity of management is rare. Dividing the Forest into as many management areas as possible makes it easier for managers to formulate and execute site specific prescriptions. The current plans for the Nez Perce and Clearwater utilize over 40 management areas. The draft plan combines all these into 3. I oppose the combining of management areas. It is not consistent with, nor does it foster, good management. I suggest retaining the current number of management areas as a minimum.

3) Quantifiable standards - My comments here are related to my comments in 2) above. Because the Nez Perce and Clearwater Forests have been consolidated into a spatially huge, incredibly diverse area, managers need every tool possible in order to evaluate current conditions, set management goals and objectives, and evaluate the results of actions taken to achieve those goals. Two essential tools are measurement of pre and post-treatment conditions and quantifiable standards. The draft plan largely eliminates hard numerical standards. This opens the door to arbitrary, subjective evaluation of the results of management actions. It leaves managers and the public with no numerical means by which to evaluate current conditions and management actions. Forest science is built on a foundation of measuring existing conditions, proscribing and executing quantifiable actions, and measuring the results. I suggest making quantifiable standards an integral part of every element the new

plan, instead of weakening or abandoning hard standards.

4) Actions to protect wild steelhead and other fish species - I suggest retaining the current 300 foot buffer along wild steelhead streams. Prohibit logging, mining, road building, and other land and vegetation disturbing activities within the buffer. I suggest prohibiting land or vegetation disturbing activities on steep slopes (defined numerically) or on fragile soils (defined by soil type, vegetative cover, aspect, and slope) along streams that are wild steelhead or salmon habitat. The new plan must contain quantifiable standards for fish habitat such as sedimentation, cobble embeddedness, substrate composition, macroinvertebrate abundance, and riparian vegetation. I suggest that the quantitative definitions of high quality habitat included in the draft plan's appendices be incorporated in the final plan as quantifiable requirements.

5) Old growth forest - The draft plan allows logging in old growth forests. In order to protect old-growth dependent wildlife species such as pine martin, fisher, pileated woodpecker, and Northern goshawk, I suggest the final plan prohibit logging, road building, and mining in old growth areas. There are simply too few old growth areas remaining undisturbed, and the areas that remain are too spatially fragmented.

6) Wild and scenic rivers - The draft plan incorrectly (likely illegally) makes Wild and Scenic suitability recommendations. At one time, there were 120 rivers and streams deemed eligible for W & S protection. Somehow, that list got trimmed to 89 rivers. I suggest revising the eligibility list to include all the original 120 and protecting them from any action that would jeopardize their suitability for designation as a Wild or Scenic River.

7) Timber harvest level - I suggest that the final plan retain all current management areas (see - 2) above). For each management area, I suggest establishment of permanent continuous forest inventory (CFI) plots. I suggest that harvest volume be determined by mean annual increment over time within that area as determined by the CFI plots. I suggest the following areas within each management unit be excluded from the determination of mean annual increment - wilderness areas, roadless areas, old growth areas, the 300 foot buffer along salmon, steelhead, cutthroat trout, bull trout streams, and areas of steep slopes or fragile soils (see - 4) above).

Collaborative Process - While not exactly an element of the draft plan, I want to take this opportunity to comment on this topic.

All National Forests belong equally to each citizen of the United States. Each citizen is entitled to an equal voice in how any National Forest is managed. National Forest resource specialists and line officers are have a public trust obligation to manage the forest to equally benefit each citizen owner of the forest.

The so-called collaborative management process subverts the principle of equal ownership and denies most citizen an equal voice in management decisions. The collaborative process gives greater deference to the wishes of an arbitrarily selected group, usually heavily weighted towards the extractive industries, often from a relatively small geographic area. The management recommendations of collaborators are often based on their desire for economic gain and are often inconsistent with science-based management. The collaborative process is counter to the principles of fairness, equal opportunity, and basis in science that should govern decisions about management of public resources. In my opinion, this whole idea should be scrapped. It should be no part, even implicitly, of a forest plan.

Thanks, again, for the opportunity to comment. I look forward to a final plan that's better than any of the alternatives in the draft.

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