

Data Submitted (UTC 11): 4/20/2020 6:27:25 AM

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Comments: Forest plan comment

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Thank you for trying but the plans you have presented are unacceptable. We need to do the right thing here.

The Nez Perce-Clearwater National Forests comprise a very unique and special place in America. At a time when species like wild salmon and steelhead are spiraling towards extinction in Idaho, we need to increase habitat protection measures, not minimize them. Please stop treating the forest as a commodity and just protect it.

The current forest plans for the Nez Perce and Clearwater National Forests have measurable, quantitative standards. For example, streams have fishery habitat potential percentages based on cobble embeddedness (sediment), the agency must preserve minimum percentages of old-growth drainage-wide, and in some areas of the forests there are elk habitat effectiveness calculations. The draft plan, unfortunately, has few quantitative standards. Instead, the agency seeks to achieve the desired condition of "ecological conditions capable of supporting self-sustaining populations of native species," a standard is to maintain the desired condition or to not "retard attainment of desired conditions" without more information, or to use "best management practices," which offers no guarantees other than the Forest Service tried their best.

#### LOGGING

Current forest plans project timber harvest levels between 50-60 million board feet annually combined for these two forests. In the agency's "natural processes dominate over anthropogenic influences" revision alternative (Alt Z), the one that is supposed to be the most environmentally friendly and ecologically driven, the Forest Service (FS) proposes to increase logging levels to 60-80 million board feet annually or by 1/3. Two other alternatives in the draft plan remarkably propose logging levels over 200 million board feet annually.

#### CLIMATE CHANGE MITIGATION

Greenhouse gas emissions are the leading cause of the earth's rapidly changing climate. The leading sources of emissions are from burning fossil fuels and deforestation, which includes logging. Trees, however, can capture and store carbon dioxide, thus reducing levels in the atmosphere-this is called carbon sequestration. Pacific Northwest forests can sequester more carbon than other forests in the West.[1] Instead of specifically recognizing human-caused global warming, the FS states rather simply in the draft plan that we are in a natural warming period. In failing to acknowledge anthropogenic causes, the agency avoids discussing how its' management actions might contribute to global emissions by substantially increasing logging (see above Logging) or how it could, instead, mitigate for it by preserving more of the Nez Perce-Clearwater National Forests.

#### TOO FEW MANAGEMENT AREAS

The current Nez Perce forest plan has 26 management areas. The Clearwater plan has 17 management areas. Each of these areas is managed for specific values. For example, the Nez Perce forest plan has a management area for timber, where the goal is timber production. The revised plan for both forests, however, has only three management areas in total. One management area includes federally designated Wilderness and Wild && Scenic Rivers, meaning the FS cannot legally log in the management area, even if it wanted to. The other two management areas (MA 2 and MA 3) allow lots of logging, both in the frontcountry and backcountry.

#### PROTECTING OLD-GROWTH

Current forest plans have specific management areas for old-growth protection, as well as other areas where logging is prohibited. The revision would allow logging in old-growth, and prohibit it only if the FS concludes that logging would not "likely modify the characteristics" of old-growth for more than 10 years. This is an incredibly squishy, qualitative conclusion that cannot hold the agency accountable. Species like fisher, pileated woodpeckers, and goshawks, which are all found in the Clearwater, are old-growth dependent.

## RECOVERING GRIZZLY BEARS

Current forest plans on both forests acknowledge the potential for grizzlies to return to the Clearwater Basin. Several grizzly bear observations in the Clearwater were in fact confirmed last summer. The Fish & Wildlife Service (FWS) recently sent the Nez Perce-Clearwater Forest Supervisor a letter stating that the agency must consult with the FWS when projects may potentially impact grizzlies. Unfortunately, the new draft forest plan barely mentions grizzly bears, much less discusses essential migration corridors and the habitat security necessary for recovery. This is gross negligence on the part of the Forest Service.

## RECOVERING STEELHEAD

Current forest plans have quantifiable standards for fish habitat, such as 300-foot buffer zones around streams and maximum allowed cobble embeddedness (percentages of rocks/pebbles not smothered in silt). The draft plan, however, effectively reduces riparian buffers to 150-feet, and doesn't contain measurable standards to protect stream substrate. This could negatively affect macro-invertebrate communities and already imperiled fish populations.

## RECOMMENDING ALL ROADLESS AREAS AS WILDERNESS

There are 1.5-million acres of unprotected roadless areas on both forests combined. They provide crucial habitat for rare species because they are undeveloped. The draft plan, however, would not protect much of these irreplaceable wildlands from the maniacal logging alternatives and the roads, ostensibly temporary, needed to log them. There should be an alternative in the plan that recommends all 1.5-million acres for wilderness.

## ANALYZING THE CITIZEN-SCIENCE ALTERNATIVE

When the FS was developing alternatives for the revised forest plan (2014), FOC submitted an alternative, which used the best available science to advocate for measurable, quantifiable standards to be included in the new plan. Indeed, the agency received over 10,000 comments in support of the alternative. Yet, the FS refused to analyze the citizen-science alternative in the (2020) draft plan environmental impact statement. The agency did, however, develop an alternative around a local rural county's desire to radically increase logging levels.

The FS failed to analyze and include FOC's Citizen Conservation Biology Alternative in the draft plan. Our alternative is based on the best available science, and generated approximately 10,000 comments during the scoping period. This is a key omission by the FS in the draft plan.

The draft plan poses a severe threat to the remaining 1.5-million acres of undeveloped wildlands in the Clearwater. The FS has indicated that any roadless areas not recommended as wilderness in the new forest plan could be developed (logged). These irreplaceable roadless areas, which provide some of the best habitat in the Basin, should instead be recommended as Wilderness, including the roadless areas adjacent to the Gospel - Hump Wilderness, which were wrongfully omitted in the 2008 Idaho Roadless Rule. Weitas Creek, in particular, deserves to be recommended.

The draft plan barely addresses existing designated Wilderness, and omits any mention of improving old wilderness stewardship plans. Idaho Rivers United has a good analysis of the flawed study of wild rivers eligible for permanent protection.

## Standards for watersheds and fish & wildlife habitat

There are no quantitative standards for protecting watersheds and fish habitat in the new draft plan. This is a huge problem, as the current plan has enforceable standards that the agency must adhere to. Riparian buffers could be developed and logged, and cobble embeddedness (sediment) could greatly increase, impairing water quality and spawning grounds. Considering the current crisis facing wild steelhead and salmon, this draft plan could further drive each species towards extinction. Standards for elk habitat could also be greatly compromised. Standards for old-growth

The draft plan would allow logging in designated old growth, a departure from current standards that protect old growth habitat from development. This could greatly affect old-growth dependent species like the imperiled Northern Rockies fisher.

#### Grizzly bear recovery

In 2019, three or four grizzly bears were observed on the Clearwater and Nez Perce National Forests. The last confirmed grizzly prior to this was in the Kelly Creek drainage in 2007, which was shot and killed by a hunter. Despite the new bear sightings, grizzly bear recovery is ignored in the draft plan. Natural corridors on both forests could be fragmented with roads and increased motorized recreation, as well as the permitting of mechanized (mountain bikes) recreation. There would be little-to-no secure habitat for grizzlies outside of designated Wilderness.

#### Climate Change

Every alternative in the revised plan increases logging levels for these two forests and eliminates the forest's potential to sequester carbon, which is sorely needed. Both forests would be largely manipulated to achieve agency "desired conditions."