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Comments: DRAFT FOREST PLAN COMMENTS

Thanks for this opportunity to comment on the draft plan for my two forests. I will comment chiefly on those subjects in which I have either special knowledge or a special interest.

RANGE OF ALTERNATIVES

I believe that good forest management would be best served in a new alternative can be developed. It would allow a fairly high level of timber harvest (120 MMBF or even a bit more) and recommend for Wilderness designation the areas on both forests that have the greatest and longest support to be set aside. These areas are: ALL of Meadow Creek, not just the east side, ALL of the Great Burn proposed wilderness without the insane snowmachine plan, all of Mallard Larkins, and at least some portions of the Bighorn-Weitas Roadless Area. This alternative would, I think, widely be seen as realistic and fair.

IDAHO ROADLESS RULE

I am correct, I think, in concluding that the draft plan does not call for road building or other forms of irreversible entry into any roadless areas on either forest. That is a sound idea. Numerous experts and well as more than one Regional Forester have accurately pointed out that there is a good-reason why these two forests have many acres that remain roadless: they lack economic resources that would make development logical or profitable. Something akin to custodial management is what is appropriate and would also represent a good use of taxpayer money.

MANAGEMENT OF PROPOSED WILDERNESS AREAS

National direction and even historical decisions made by this forest all dictate that areas proposed for eventual designation by Congress as Wilderness should be MANAGED AS WILDERNESS UNTIL CONGRESS DETERMINES OTHERWISE. Most of the alternatives in the draft documents do NOT follow this wise and necessary guidance. That must be changed.

It's highly likely given the short sighted nature of Idaho politics that in the end, the Forest Service, will not recommend much land for Wilderness. So, what little actually gets recommended, must be managed in the interim to protect wilderness values: peace, quiet, no machines, saving rare plants and animals, etc.

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At least some of the roadless lands that do not get recommended as Wilderness, should for other reasons be managed as primitive, non-motorized. Based on my 45 years of work on both forests, these areas include: Elk Summit and Sneakfoot Meadows, and, PotMountain.

CULTURAL RESOURCES

The chapter on cultural resources is lengthy and also very vague, and fails to commit the Forest Service to the clear and necessary goal of protecting and preserving these resources.

The draft plan, does include useful chapters on both the Lolo Trail and on Pilot Knob. These are two of the most important cultural and historical sites on the forest.

But, a VTAL CHAPTER ON THE SOUTHERN NEZ PERCE TRAIL (Wise'Iskit) IS MISSING. This is the third most important place of its type on the forest, and is deserving of lengthy and clear guidance to ensure its protection. The SNPT is eligible for listing on the National Register, and the various statutes that pertain to historical resources mandate that eligible sites like this be maintained by the Forest Service to retain all their historical values. Damage mitigation is not appropriate. This SNPT chapter needs to clearly indicate how the trail and adjacent lands will be managed. For starters, NO machines on or near the road, no new roads anywhere near it, and also adding the SNPT onto the FS formal listing of trail routes.

THE MEADOW CREEK ROADLESS AREA (ALL OF IT-BOTH SIDES) IS TREATED POORLY IN THE DRAFT

Three of the four alternatives repeat a fiction and a fraud-the crazed notion that there are two Meadow Creek Roadless Areas. This is a foolish notion invented over twenty years ago by a now deceased Forest Supervisor who correctly concluded that the east side of Meadow Creek (including Running Creek, Green Mountain, Bargamin, etc would never be logged or developed. He also entertained the foolish dream that somehow West Meadow Creek could be logged. That was a stupid idea then, it still is, and even the folks involved in the Clearwater Collaborative work have concluded that West Meadow Creek will not be logged or even kept open to machine use. That is the same position held by the Nez Perce Tribe. Citizen efforts to add all of Meadow Creek (about 225,000 acres) to what was then the adjacent Selway-Bitterroot Primitive Area date back to 1948, and have never been relaxed or abandoned.

These long efforts to set aside the entire drainage of Meadow Creek were based on the presence of two great resources, neither of which is even mentioned in the DEIS: Meadow Creek provides about 1/3 of the total flow of the lower Selway River and is a major traditional Tribal fishery and a vital source of clear water, even during spring runoff and, both sides of Meadow Creek contain major cultural resources that will best be maintained by Wilderness designation.

In summary, there is no reason to treat Meadow Creek as two parts. The SNPT is present on both sides, and the vital village site in the meadows of the valley along the trail from Green Mtn to Red River Hot Springs needs Wilderness protection.

ALL OF THE PROPOSED GREAT BURN WILDERNESS NEEDS TO BE RECOMMENDED FOR PROTECTION

Alternative Y has a very foolish scheme to demolish this proposed Wilderness by deleting a large segment of high country along the Montana border, so that snow machines can go there to terrorize wildlife and damage cultural resources. The plan calls this misuse "historical," which it is NOT. New, high powered snow machines are the ones now capable of using this high, steep region. They are a NEW use of the area, and their use has come long after the decades of hard work done by the Great Burn Study Group to help set aside this while roadless region. So, if historical reasons are to be guidance, then the true historical source is the work of the Great Burn Study Group and not the recent arrival of new types of machines. The proposed deletion would also be unlocatable on the ground and completely unenforceable. This deletion is a stupid idea than needs to be dropped from all of the alternatives.

CONCLUSION

The final decision can include a selected alternative that provides a good level of timber harvest on the many acres of these two forests that are suited to that purpose. The selected alternative should at the very least recommend all of Mallard Larkins (including Five Lakes Butte), all of the Great Burn and all of Meadow Creek as Wilderness and also plan on managing them as Wilderness until Congress determines otherwise. This type of a decision would provide jobs, protect culture and help both water qualitative and endangered species.

Sincerely,

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