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Comments: Dear Nez Perce/Clearwater,

Your new draft plan has serious legal defects and needs a revision with Adoption of the Citizen Alternative in its entirety.

1. Substituting "best management practices" for quantitative standards, which currently exist in the forest plan eliminates a necessary basis for maintaining optimum forest conditions for trees, wildlife and fish.
2. Your proposed logging increases to placate one county's request for economic consideration is a sellout to welfare logging interests. The forest is required to adopt the most environmentally friendly methods yet the suggestion is an increase of current harvest. Increased logging will harm stream quality, atmospheric conditions, riparian areas, old growth and roadless areas. This will not survive legal challenge.
3. Ignoring the many citizen comments opposing your scorched earth proposal is astounding. You need to accept the Citizen-Science Alternative.
4. The environmental impact statement fails to address and consider climate effects of clearcutting & increased logging. Every forest alternative you list is defective in this regard. Trees contribute to preservation of the atmosphere and a reduction of welfare logging needs to occur.
5. The proposed revision does not adequately analyze grizzly bear recovery by considering bear population, habitat & recovery.
6. The revision has no plan for steelhead maintenance or recovery. The existing plan has empirical standards for steelhead, making the revision illogical.
7. The revision needs to recommend every current roadless area for inclusion into the Wilderness Act. All roadless areas are either adjacent to existing wilderness or when considered totally are large enough to warrant protection. You could get creative and create a new designation of "backcountry preservation", and prohibit welfare logging, motorized vehicles, flyovers, trapping, bear baiting and every human action which denigrates wilderness-eligible forest. Once you ruin wilderness, it's gone.
8. The current plan protects old growth but the revision does not. Another incongruity. The proposed legal test in the revised plan contains defective language which would allow desecration of old growth units and the wildlife which inhabits it.

Conclusion; Replacing quantitative standards with an "adaptive management" concept is not in the best interests of the forest you are charged with caring for. When will "caring for the land" commence? You need to stop caving to the welfare logging interests and start listening to the owners of this country's public lands, the citizens.

If the defective draft revision is adopted as we conclude it will be, it will be appealed, challenged & remanded by the District Court for a correct analysis. Interminable litigation!