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Comments: Re: Nez Perce-Clearwater National Forest draft Forest Plan

Dear Mr. Peterson

Please consider my comments on the Nez Perce-Clearwater National Forest (NP[shy] CWNF) draft Forest Plan (draft plan). I have visited the NP-CWNF on numerous occasions, and my reforestation company had finished a tree planting contract on the Forest just before the eruption Mt St Helens.

The NP-CWNF is a beautiful, fecund forest containing large, wild, unmanaged roadless areas. It is one of the crown jewels of Idaho and the nation. The benefits to our planet of its abundant wildlife, fisheries and natural forests is immeasurable. It's recreational benefits, hiking, camping, river adventures, hunting, and fishing draw many thousands of people, who, by their exposure to this wild place, expand their consciousness, appreciation and respect for the natural world, which is critical for the preservation of the Earth and all its inhabitants.

There is a management philosophy, aka "desired future condition," that drives this draft plan. The final proposed Plan will be the basis for the management of the forest for at least a decade. Therefore, I believe it is appropriate for me to comment in the following preamble on why I believe that the manifestation of the philosophy, desired future condition, it is not only inappropriate, but threatens all of the extraordinary contributions of the NP-CWNF.

#### PREAMBLE

I have been commenting on National Forest forest plans and individual Forest Service resource extraction projects/timber sales for almost forty years, and unfortunately my comments, in almost all cases, have not evoked any significant change in the proposed activities. That is because most of decisions on resource extraction proposals and forest plans are already made before they are presented to the public. There might be some minor adjustments in response to comments, but if major changes are made they usually come about in response to administrative appeals/objections and/or litigation filed by concerned citizens, the owners of the national forests. This is common knowledge amongst forest activists, and I dare say agency personnel.

The reason is obvious. I believe the Forest Service's management priority is resource extraction. It provides agency jobs and profits to the resource extraction industries, its associates and politicians. The draft plan's "claim to virtue" is that logging will help control insects, diseases and reduce the risk of wildfires without significantly damaging the forest ecosystem. Realistically, it is "follow the money."

Forest Service appropriations are tied to congressionally mandated timber targets. If these targets are not achieved the agency's budget is reduced and jobs are lost. This is evidenced by the significant loss of agency jobs in Region 1, in response to the successful citizen's challenges to its illegal timber sales, particularly in the last three decades.

This loss of jobs has left the agency with a skeleton staff of specialists who can't possibly do an adequate job of analyzing the number of sales necessary to meet its ever increasing timber targets, let alone find time to do the scientifically credible, quantitative monitoring necessary to verify their effects assumptions. Thus, it is in the best interest of the Forest Service to create, in this draft plan, plans geared to facilitate the achievement of these targets, such as weakening or removing legally accountable environmental standards and monitoring, and not

including or considering the opinions of credible scientists who disagree with the agency's assumptions.

In spite of this bias, I will try again to influence this draft plan with my comments in hopes that it will result in the protection of the forest ecosystem.

## QUANTIFIABLE STANDARDS

Quantifiable standards are a necessary component of a Forest Plan. They should be included for all the forest's resources in the proposed final Nez Perce-Clearwater National Forest's Forest Plan. This draft plan is set up to support the agency's bias of extracting as much of the forest's natural resources as possible. The trend is designing forest plans is to reduce the amount of measurable standards. The NP[shy] CWNF draft plan finds situations to replace or circumvent "standards" with discretionary judgment.

The Forest Service is legally bound to comply with forest plan standards. Legitimate standards can impede the agency from achieving its timber target and other extractive goals. The current NP-CWNF draft plan replaces many standards with vague language such as seeking to achieve "...ecological conditions capable of supporting self-sustaining populations of native species," without providing any quantitative measurements to evaluate existing conditions, and the effects after the implementation of its actions. This allows the decisionmaker to use discretionary judgement, not quantifiable facts, to support his/her decision.

## CITIZEN SCIENCE ALTERNATIVE

The Friends of the Clearwater submitted a recommendation to consider a citizen science alternative in its scoping comments to the proposed Forest Plan revision. It received a great deal of support, but of course it was not included in the current draft plan. I believe that comments by private citizens should be fully considered and it's science based alternative be included in the proposed final NP-CWNF Forest Plan. Opposing viewpoints of credible non-Forest Service scientists should also be presented in the proposed final Forest Plan and in all individually proposed projects.

I have not encountered, in recent memory, comments by credible scientists who oppose Environmental Assessment/ Impact Statements for Forest Plans or individual timber sale projects. The only information provided in these plans support the actions proposed by the Forest Service.

In the early 1980's, Forest Service scientists were free to offer their concerns about activities in proposed timber sales. These comments were found in the environmental documents and/or project files. This is no longer the case. If an employee is too outspoken and critical in his/her opposition to an agency practice, they face the risk of losing their job.

In a April 3, 2020 Ninth Circuit Appeals Court issued a ruling on the proposed the Crystal Clear Restoration Project on the Mt. Hood National Forest. The judges said, in addition to many other concerns, that the National Environmental Policy Act requires agencies to consider every important aspect of an issue. The Forest Service did not consider opposing viewpoints.

## LOGGING

Annual logging levels should not be increased in the final Forest Plan. The draft plan's Alt Z proposes an increase of 60-80 million board feet. Two other alternatives propose annual logging levels over 200 MMBF. Because the document is designed to increase logging levels, the agency can say, with a straight face, that these levels would comply with the draft plan

Almost all timber sales are justified by the specious, hackneyed, 'forest health, restoration and wildfire reduction'

myth. In reality timber sale levels are the result of top down pressure to insure profits to the timber industry and its associates, and to secure agency jobs. Logging levels must be predicated on scientifically credible monitoring results of similar types of timber sales in areas that share similar ecological characteristics on the NP-CWNF. The results of the monitoring must conclusively show that the proposed logging levels, accompanied by the means to achieve them are sustainable while not degrading the affected environment.

## GRIZZLY BEARS

The draft plan does not provide an adequate standard of protection for grizzly bears. They are once again inhabiting the NP-CWNF, and as an endangered species they require extraordinary protection. They are barely considered in the draft plan. At the very least the Final Forest Plan should consider critical habitat, road impacts, migration corridors, and whatever else is need to sustain a viable population of grizzlies in the NP-CWNF ecosystem.

## CLIMATE CHANGE

The draft plan fails to consider that fact that all associated logging activities, including the removal of biomass, the use of fossil fuels in road construction and in the cutting and processing trees, are significant cumulative contributors to the Earth's changing climate. The draft plan avoids including information by credible scientists who are knowledgeable about the loss of carbon sequestration as a result of the cumulative effects of logging activities. The draft NP-CWNF Forest Plan does not adequately address the problem and demonstrate how its proposed activities can increase carbon sequestration. The final NP-CWNF Forest Plan needs to rectify this omission.

## ROADLESS AREAS

The final Forest Plan should recommend to Congress that all the existing roadless areas in the NP-CWNF be considered for wilderness designation. These areas have avoided the adverse impacts of logging and roadbuilding activities. They retain the genetic and biological diversity necessary to sustain a fully functioning forest ecosystem. Roadless areas in the NP-CWNF contain clean, fully functioning streams, good wildlife and fish habitat, and soils that can sustain a forest. Logging these areas will remove these characteristics.

## ORGANIC DEBRIS

The draft Forest Plan does not adequately consider the impacts to forest soils and the loss of carbon sequestration as a result of removing large amounts of biomass during logging activities. The constant contribution of various species and size of dead and fallen trees are essential to a fully functioning forest ecosystem. They are converted by fungi and insects to produce forest soil. The decomposition process provides the forest with essential nutrients that feed the forest and provide habitat for wildlife. In a Forest Service designed forest, many thousands of trees/biomass are removed and thus cannot provide these critical functions. Instead, the Forest Service tries to compensate by leaving an inadequate one time batch of trees on the ground after its regeneration logging. It could take hundreds of years after clearcut, seed tree and shelterwood logging for the forest to replicate the soil building qualities of natural secession, timing and deposition of various sized trees.

This is becoming a much more serious issue considering that the draft plan has only three management areas, and two permit logging. The proposed final Forest Plan must consider the cumulative effect of the removal of biomass from past timber sales along with the increase in the size of active timber sales especially since regeneration logging is the most common logging method.

## OLD GROWTH

Old growth forests should be protected in the Final Plan and not be subject to active agency manipulation as proposed in the draft plan. Discretion by the decisionmaker now plays a dominant role in the forest planning process and replaces the standards of the previous forest plan that protected old growth areas. The draft plan allows active management of old growth on vague and general assumptions. Many of the trees in old growth forests have survived for hundreds of years. They are a rarity and provide an essential component of a fully functioning forest system.

The draft plan does not fully consider that old growth forests have a symbiotic relationship, intra and inter connected with all of the forest components within an area. That old growth areas have survived the frequent changing forest circumstances for hundreds of years is testimony that it works. It passes on these genetic characteristics to new generations of trees.

Old growth forests should be left alone, and not manipulated. Every attempt at manipulating an growth forest to conform to the Forest Service's vision, changes and damages the relationship between the trees and its natural, self sustaining system. It can alter the structure of the soil, wildlife habitat and ground water system.

#### FISH AND WATER QUALITY

The Final Forest Plan must contain stringent, enforceable quantitative and measurable fish and water quality standards that cannot be circumvented by discretion. The final Forest Plan needs quantifiable fishery standards that will prevent degradation of salmon and steelhead habitat and needs to keep 300 ft. stream buffers. The failure to have standards that prohibit logging, and road construction in riparian zones could result in increased water temperatures, and loss of organic debris recruitment. Lack of enforceable water quality standards could also lead to sediment deposition that could impair stream biota, fish spawning and rearing habitat. It could also result in sediment filled streams that would become shallower and wider and contribute to the warming of streams to the point that it could not support cold water fish species like westslope cutthroat and bull trout.

#### CONCLUSION

The final Forest Plan should not support and facilitate the Forest Service's bias towards resource extraction and replace enforceable standards with discretionary judgement as it does in the draft Forest Plan. I believe that if my concerns described in the above comments to the draft plan are not seriously considered and adhered to, it could have significant adverse impacts to the forest ecosystem and could lead to the extirpation of many species and impair the forest's natural ability to sustain itself.

Please include me on the NEPA mailing list for all activities associated with the NP[shy] CWNF Forest Plan process. Also, please acknowledge the receipt of these comments. Thank you for your consideration of my comments.

For the Earth,

Barry Rosenberg