

Data Submitted (UTC 11): 1/11/2023 5:06:56 AM

First name: Karla

Last name: Eitel

Organization:

Title:

Comments: I would like to register my comment that I ask the Forest Service to proceed with the No Action Alternative as described in the SDEIS.

I have many questions about the wisdom of the amount of infrastructure improvement necessary to conduct a short-term project (maximum lifespan 20 years). I do not believe that the plan adequately addresses how climate change impacts will be mitigated in the project (Climate Change p. ES10). Both action alternatives would degrade streamflow and permanently remove wetlands and reduce groundwater levels (p. ES14). In the face of water stress due to climate change, these impacts are unacceptable. Further, the impact of increased noise, transportation on roads that are already challenging to maintain, and the potential for spills to impact sensitive habitat are all risks that are unacceptable for this sensitive watershed. Stream temperatures are already elevated and problematic for endangered fish in the area, and the SDEIS states that stream temperatures would rise even further if this project moves forward (p. ES-15). Whitebark pine would be compromised along with many other endangered and threatened species, and an increased potential for colonization by non-native species.

The part of the SDEIS that is most concerning, however, is the violation of Treaty rights reserved by the Nez Perce Tribe in 1855. The Tribe has said unequivocally that their concerns have not been addressed by the SDEIS nor has their input been considered adequately in consultations. The SDEIS states:

The Forest Service has therefore concluded that the SGP would have adverse impacts to tribal rights and interests under either the 2021 MMP or the Johnson Creek Route Alternative.

As a sovereign nation, they are not a "stakeholder" in this process but rather a governmental entity with reserved rights that will be violated should any alternative but the "NO ACTION" alternative move forward. To proceed without mitigating impacts to Treaty rights (if mitigation is even possible) would perpetuate an unjust relationship between the US Government and the governments of the Nez Perce, Shoshone-Bannock, and Shoshone-Paiute sovereign nations. This is simply unacceptable and needs to be addressed very specifically.

The question that I would like answered is: how can the Forest Service justify ignoring legally binding agreements between sovereign nations?