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First name: David

Last name: Patenaude

Organization:

Title:

Comments: Hello,

In almost every way, the new plan is worse than in 1987. There is no accountability and little chance of enforcing any provisions in these plans.

The wilderness recommendation is 263,000 acres, a measly 17% of the roughly 1.5 million acres of roadless country in both forests. (not all of the qualifying areas were even studied). The most important roadless area for wildlife, the 250,000 acre plus Weitas Creek (including Cayuse Creek), is not proposed for wilderness. Kelly Creek/Great Burn is eviscerated, and the state-line trail is excluded, cutting this bi-state gem in half.

Meadow Creek (an addition to the Selway-Bitterroot Wilderness) is the only new place to be recommended, however, the boundary halves the roadless area and fails to protect most of the Meadow Creek watershed. There are few measurable and enforceable standards proposed in the new plan. This is unlike the two 1987 plans which had quantifiable, measurable, and relatively enforceable standards.

For example, standards in the 1987 Nez Perce Forest Plan to protect old growth were the basis for our recent successful lawsuit victory on the Hungry Ridge Timber Sale, litigated by Advocates for the West. Specifically, the two 1987 plans have numerical standards to protect old growth, 10% forest-wide and 5% for each smaller watershed. These areas are currently off-limits to logging.

The new draft plan eliminates those standards, proposes no protection for old growth in the most abundant forest types, and allows logging down to a bare minimum in old growth for the remaining forest types.

One of the major problems of the new proposed plan is the weakening of protection for aquatic habitat. First, stream buffers are reduced by 50% in a few watersheds and 67% in the rest. There are even exceptions in the inner buffers next to the streams. Current standards that measure sediment are eliminated in favor of vague guidelines. This will harm salmon, steelhead, Pacific lamprey, bull trout, and cutthroat trout.

Unlike the current plans, there are no road density standards or motorized trail standards to protect elk habitat. These standards also protect grizzly, wolverine, lynx, fisher, and mountain goat habitats. There are no hard and fast protection standards for grizzlies, which are just beginning to recover in the area. The scant wilderness recommendation does not protect enough grizzly, mountain goat, wolverine, lynx, fisher, or marten habitat.

The new plan would increase logging nearly 6 times over the average in 2000. This massive increase is portrayed as a restoration rather than the damaging kind of activity it is. Logging is conflated with restoration in the new plan. The Forest Service fails to recognize the science that shows the activities in the national forests that produce the most greenhouse gases are logging operations.

Regards,