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Comments: I am writing to object to the Revised Forest Plan (draft RFP) for the Nez Perce-Clearwater National Forests and the Proposal to promote logging of old growth on the Nez Perce and Clearwater National Forests. Too much of old growth on the Nez Perce-Clearwater National Forests has already been lost due to logging and roadbuilding over the decades.

I have hiked in the Nez Perce - Clearwater National Forests, especially in the Mallard - Larkins area and other portions of the northern side of the Nez Perce National Forests. I go to the Nez Perce - Clearwater National Forests to see pristine forests, not cut-over land. Wildlife and fish benefit from protection of old growth, including salmon, trout, fisher, pine marten, northern goshawk, pileated woodpecker, white-headed woodpecker, wolverine, and Canada lynx.

For old growth to exist, the Forest Service must accept that natural processes should be free to function unimpeded by human demands. Old growth is not a place for the Forest Service to experiment with attempting to "increase resilience" or otherwise "manage" it with logging.

Additional roadless areas beyond the approximately 17% of roadless areas on the Nez Perce - Clearwater NFs should be recommended for wilderness. All areas recommended for wilderness protection in the Northern Rockies Ecosystems Protection Act should be recommended for wilderness.

Please create a new forest plan that does not allow logging in any old growth. Unfortunately, the RFP classifies much old growth to be "undesirable," claiming "these forest types are over-represented compared with historic conditions." The opposite is true. With every logging project and road on the Nez Perce - Clearwater National Forests, more old growth and future old growth is lost. In addition, the Forest Service directs the clearcutting and even aged logging in centuries-old trees from the Nez Perce-Clearwater National Forests. The RFP even directs the logging of "desirable" old growth, removing large old trees while still calling it "old growth." These large trees are the essence of wild forests and old growth. As Robert G. Lee, states: "Trees in old-growth are large and tall. Their lifespans exceed that of humans by centuries, so they serve as symbols of immortality. They embody the realms of the earth and spirit, because they are rooted deep in the earth and are so tall they touch the heavens. ...Old growth opens a door to different experiences of space and time." The Forest Service needs to consider the special value of old growth forests and fully protect them.

Timber production should be reduced well beyond the 200 million BF recommended - in order to provide carbon reserves to protect the climate.

Elk habitat standards should be returned to the plan, and strengthened.

There should be an assessment of carbon stores in the forest.

The South Fork of the Clearwater and North Fork of Clearwater should be added as recommended wild and scenic rivers.