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RE: Nez Pierce-Clearwater Forest Planning:

#### Introduction

We are group of students majoring in Environmental Studies at Gonzaga University. Although we are not frequent visitors to the Nez Pierce-Clearwater National Forest, we truly want to help shape what the park will be like in the future. We mainly focused on the Management Areas described in Chapter 3 of the July 2014 Proposed Action document. The rest of this document will be devoted to commenting on each management area designation individually.

In general, we agreed with the document's proposals. In particular, we favored the 2012 Reinitiated Plan option because it designated more land as recommended wilderness and special management areas. However, we were surprised by the brevity of the sections and a number of our comments stem from this concern. While some of our questions may be too specific for the broader focus of the Forest Plan, we hope that you will keep our concerns in mind as you continue the planning process.

#### Wilderness

We believe that wilderness should remain as close to the natural ecological state as possible. Such a goal helps to protect the ecosystem from human interference and give visitors as an authentic experience as possible. In order to promote this vision, we believe that language should be added to prioritize the first guideline (MA1-GDL-RWILD-01) over the second guideline (MA1-GDL-RWILD-02) when the two are in conflict. This is because the second guideline, which focuses only on the scenic integrity of the area, has the potential to cause damage to the habitat in attempt to "enhance" the scenic quality of the area. On the other hand, the first guideline focuses on limiting human impact to a minimum, which seems more likely to promote a natural state.

#### Special Management Areas

To what extent would motorized vehicles be used by the forest service to monitor the area? Would there be any prescribed burning or fire suppression in these areas? I agree with all the Standards and the Guidelines as described in the Special Management Areas, they all seem reasonable. One question comes to mind with the Guidelines, the Nez Perce Tribe is allowed to use motorized equipment with prior authorization from the Forest Service, is that a difficult thing to coordinate? Shouldn't they be able to just fish and hunt when they need to? The 2012 plan seems to be the better of the two options because it has more items categorized and fewer things left unevaluated.

#### Recreation

While outfitters and guides do fill a need in the park system, we believe that limitations should be placed on the number of such businesses that are allowed to operate in the parks. This is in the hopes of preventing the rampant commercialization and impact on wildlife that has occurred at some of the larger parks (such as the Grand Canyon). While this may not be a problem now, we believe that it is better to safeguard against future issues that may arise. Some possible limits could include restricting the number of outfitters that are allowed to operate in the park, limiting the group sizes, cap the frequency of the expeditions, restrict the areas they can access, or have standards for the types of equipment that are brought into the park.

We are also concerned about how you would enforce your restrictions on the activities in some of the Management Areas - especially in the wilderness areas.

Research Natural Areas

We feel that the term "non-manipulative research" is open to a lot of interpretation. As such, we would like you to give a more specific definition. This would give better criteria with which to determine whether or not to allow a certain activity. However, once you had allowed a certain type of research, how would you monitor the impact that it is having on the ecosystem? Conversely, is there the possibility of hikers or other visitors interfering with the research? If so, how would you keep the public informed?

Another concern we had was how the national forest would handle invasive species in the MA. Biodiversity would seem to be an essential quality of RNAs, making an invasive species a particular threat. However the methods that are needed to eliminate the invasive species can often cause large human impacts on the ecosystem themselves.

#### Wild and Scenic Rivers

In this section, we were primarily concerned about what happened to the eligible wild and scenic rivers if congress denied them a wild and scenic designation. What status and management plan would these rivers fall under then? Could there be a management plan that limited certain activities on some of the more vulnerable rivers (like a special management area for aquatic bodies)?

Also, we would like to know how much of the riparian zone is included in the MA and how conflicts between management plans along the border would be solved.

#### Back Country

In all instances of the Idaho Roadless Rule being a default for the backcountry, could there be a middle alternative? What are the implications of the new forest plan on the people of the Nez Perce Tribe, and do they have good representation of their needs. It seems there are a great deal of people living in the area on or surrounding area of the National Forest, has there been enough public notification of the new regulations and are they able to, or interested in contributing their ideas? I believe the reduction in the number of rangers since 2010 when the National Forests combined sounds more like a consolidation of a business. I think there needs to be more positions available to manage these forests by people in the area. If the purpose of combining the forest was to find a way to decrease the budget there are other ways to supplement funds. Are there areas of the forest that need to be harvested for lumber? I understand they are working toward unified forest planning but there should be more and not less people involved in the planning process.

Idaho is known for its recreation enthusiasts, is there going to be a significant number of limits for the motorized vehicle portion of the forest? Have the people who utilize the forest in this manner had time to review the proposed changes, and is it clear what those changes will entail? I could see some issues arising in areas previously allowing four wheelers and snowmobiles discontinuing access. Families have been using these areas for this purpose and sometimes travel a far distance to use their expensive equipment in these areas far from town. Will there be a website dedicated to notifying the public of areas that allow for these activities and which are prohibited? Local businesses might suffer due to the decreased number of out of town recreation seekers. My opinions are based on the idea that Idaho is known for its trails and motorized recreation, and I don't want to see areas close that once were open during this reclassification process.

#### Front Country

First, we would like to address the statement in this section that, "most of this MA consists of the areas with roads, structures..." Does this mean that there are undeveloped areas that are being considered for front country designation? If so, what is the reasoning behind this decision? We feel that it would be better to put such areas under a backcountry MA when possible.

On another note, the section's sole guideline states that "management activities should be consistent with the scenic integrity objective of low to high." If possible, we would like you to mention where the scenic integrity objectives are defined. This would be especially helpful to the public who is not as familiar with the technical language and layout of the document. Also, we feel that the large range of the objective - low to high - gives too much room for interpretation. If taken to the extreme, it could allow for rampant construction of infrastructure far outside the need of the park. We believe that management practices should work to maintain the highest possible scenic integrity for the area. The scenic integrity should be allowed to change based on a true need, going down to low integrity if deemed necessary. However, it should only be lowered enough to fulfill the

immediate need.

In addition, we would like the forest plan to go into greater detail about the different activities that would be allowed in the front country. While the recreation does cover some of this material, I feel that there are some aspects that are specific to the MAs. For instance, how would the current activities allowed in the park be affected by the new designation? This should go beyond simply which activities were banned or allowed in more areas and attempt to address how the quality of the activity would be impacted (i.e. hikers disturbed by the sound of motorized vehicles). We believe that these questions need to be asked in order for the forest plan to adequately begin to plan appropriate strategies to address the conflicting needs and desires of different activities and groups.

Finally, I would like to point out that the vegetation management is a key factor to the continuation of the motorized and non motorized recreation. If there is noticeable destruction to the vegetation due to recreation, there should be a restriction placed on the area until vegetation is rehabilitated. On the other hand, if there is too much vegetation inhibiting the trails and roads obstructing the activities of patrons management needs to step in and clear the areas. As far as monitoring the areas, I noticed that the language was vague and needs some clarification as to what the actual monitoring consists of. Will there be people filling out surveys in the recreation areas themselves to get a good idea of the public's interest in the forest plan? The future of the beloved wilderness? I feel there should be some kind of input from people who are using the land not just exclusively from those who are active with the forest planning process.