Data Submitted (UTC 11): 11/4/2014 12:00:00 AM

First name: Lynn Last name: Murray Organization:

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Comments: Comments on Nez Perce/Clearwater Forest Plan Revisions

November 4, 2014

Forest Supervisor Brazell, Nez Perce/Clearwater National Forest

As frequent yearly visitors to the Nez Perce/Clearwater National Forests for the past 40+ years, we are writing today to comment on the proposed revisions to the Nez Perce/Clearwater National Forests Plans. We consider these two forests vital to our lives and essential to the continued health of our region. They supply the clean water we drink, contribute to the air we breathe, protect vital species diversity, and provide numerous recreational opportunities for us, our children and our grandchildren. Therefore, we make the following recommendations in regard to any proposed changes to the forest plans:

- 1) Water quality standards, especially in respect to sediment limits and streamside buffers, must be rigidly enforced throughout the forest and especially on steep slopes. Indeed, steep slopes and other sensitive areas should be off-limits to all development. Also, it is past time to end all development in 'old growth' stands on these forests as they are increasingly rare but vital to the health of our National Forest ecosystems.
- 2) The Committee of Scientists report (commissioned by your agency when you first proposed revising forest plan regulations) recommends that we involve science, not politics, in all of our decisions impacting our national forests. We ask that the Forest Service adopt three of this committee's recommendations: a) scientific involvement in the selection of "focal Species"...and here we especially ask that the U.S.F.S. adopt a complete and robust list of "focal species" and a thorough population monitoring program in accordance with the Committee of Scientists' report. b) Independent scientific review of proposed conservation strategies before plans are published. c) scientific involvement in designing monitoring protocols and adaptive management.
- 3) The "Species of Conservation Concern" should be expanded to include the following sensitive species: grizzly bear (a species that appears on our forest with increasing frequency), black-backed woodpecker, peregrine falcon, common loon, harlequin duck, wolverine, black swift, bald eagle, bog lemming, ringneck snake, and western toad.
- 4) The roadless areas on these forests should not be compromised by development before a wilderness proposal is submitted to Congress, and the following areas should be included in any future wilderness proposal: Pot Mountain, all of Weitas Creek, and all of Meadow Creek. (When we plan to enter roadless areas to log virgin timber certainly the suggestion is that the U.S.F.S's "sustainable logging practices" are actually not sustainable. If they were sustainable then we should be able to survive on lands we've already cut over. What happens when, as the human population continues to grow, we've cut all available lands on the Nez Perce/Clearwater Forests? In this time of the 6th great extinction, your proposals for cutting more roadless lands will only contribute to this mass extinction. It will also contribute to increased global warming as we reduce our forest's ability to absorb carbon. The managers of the Nez Perce/Clearwater Forests must lead in the areas of global warming and species extinction rather than allow themselves to be pressured into viewing the last remaining roadless areas only as economic opportunities. We therefore ask that the Nez Perce/Clearwater Forest Plan address the concept of global warming and specifically state how this Plan will help ameliorate this problem).
- 5) Motorized recreation should be excluded from all roadless areas. These vehicles are already responsible for many problems on the forests and as new types of vehicles are manufactured in the future they will generate

even more problems. Had the U.S.F.S. confronted this issue when it originally arose it could have avoided much of the destruction caused by these vehicles.

6) The allowable size of clearcuts should not be changed in the new forest plan. We worry that any increase in the allowable size of clearcuts, even for "emergency" situations, will ultimately lead to the conversion of this tool into a standard logging practice, something that has proven disastrous in the past. Nature has managed forests for eons, has protected and provided for such species as the Goshawk, without clearcuts. Let nature continue that process on national forest lands without U.S.F.S intervening even with the best of intentions.

The Nez Perce/Clearwater Forests comprise the most important acreage in the northern U.S. and the southern Canadian Rockies, containing some of the least developed landscapes in the lower 48 states. In spite of this, however, these forests are home to numerous endangered species. Current changes proposed by the U.S.F.S. to the current forest plan governing these forests would significantly increase the threat to these species and the productive habitat they depend on. We ask you, therefore, to wisely consider these species and the importance of this intact ecosystem as you complete the current forest-planning cycle.

Sincerely, Lynn and Vince Murray
717 East First Street
Moscow, Idaho 83843

(208) 882-7616 lynnandvince@yahoo.com