



Idaho Rivers United - PO Box 633 - Boise, ID 83701 - (208) 343-7481 - idahorivers.org

Protecting and Restoring the Rivers and Fish of Idaho

February 28, 2018

Zach Peterson, Forest Planner
Nez Perce-Clearwater National Forests
Supervisor's Office
903 3rd St.
Kamiah, ID 83536

Dear Mr. Peterson,

Thank you for considering comments from Idaho Rivers United about the Preparing for Alternative Development document. IRU is a 501(c)3 nonprofit environmental advocacy organization that is dedicated to protecting Idaho rivers and restoring our native fish populations. For almost 30 years, IRU has been working to defend Wild and Scenic rivers, advocate for endangered and threatened aquatic species, reform hydropower policy and promote enhanced water quality in all of Idaho's rivers.

IRU represents 3,500 river-loving, environmentally-attuned members throughout Idaho and beyond. Our members and supporters expect protection of rivers for their ecological, scenic and recreational values. Therefore, our mission is to execute outstanding and thorough river preservation and conservation work to ensure environmental integrity throughout Idaho.

Participating in public comment periods and providing river-focused expertise to the Forest Service is a high organizational priority for IRU. We want to have a communicative relationship with the Nez Perce-Clearwater National Forests to ensure that river issues are weighted as heavily as other uses on the forests. With regard to the Preparing for Alternative Development document (The Document), our work is specifically related to the following areas, and comments will directly address them:

- Aquatic Ecosystems
 - o Water and Aquatic Resources, Conservation Watershed Networks, Riparian Management Zones (RMZs), Infrastructure, Energy and Minerals, Livestock Grazing, Lands and Special Uses and Recreation.
- Wild and Scenic rivers

Water and Aquatic Resources

Recovering fish listed under the Endangered Species Act (ESA) has been a fundamental organizational priority of IRU for over two decades. The importance of cold-water habitats in the Nez Perce-Clearwater National Forests is of unparalleled importance for the survival of Idaho's anadromous and resident fish species.

In order to implement stated goals of the water and aquatic resources portion of The Document, there must first be baseline water quality data. We recommend that The Document include a water quality data collection section and that this be carried forward as an alternative in the new Forest Plan. In addition to being able to measure the success of goals water quality data is a logical starting point for the in-depth "desired conditions" section of the Forest Plan.

In 2014, IRU commented on the Proposed Action. In those comments we urged the Forests to update outdated or non-existent water quality data. There is no documentation in The Document that these data have been gathered. While IRU commends the Forests for recognizing the need to address habitat preservation and restoration for ESA-listed species, without a baseline of proper water quality data, successes cannot be measured. A logical place to include the collection of these data is in the "standards" or "guidelines" sections under the "water and aquatic resources" section heading.

Conservation Watershed Network

Managing ESA-listed fish species at a watershed level is an integral component to the success of the fish. Limiting compromising development and natural resource extraction in designated locations is also extremely important. Arguably, all the rivers and creeks found necessary under the Conservation Watershed Network section of the document should overlap with Wild and Scenic outstandingly remarkable values (ORVs). Further, these rivers and creeks should be weighted in favor of being considered suitable for the presence of the fish ORV, in order to mandate protection for ESA-listed species.

The connectivity of rivers and creek on the forests is important for maintaining, preserving and restoring ESA-listed species habitat. If the river or creek listed in the Conservation Watershed Network part of the document is also to be found eligible as Wild and Scenic, the entire length of the river ought to be considered in order to maintain the integrity of the habitat as a whole.

We also suggest the Forests encourage strict and rigorous guidelines for proposed resource extraction within the Conservation Watershed Network, such as a clause or alternative addressing mineral extraction concerns.

Riparian Management Zones (RMZs)

We also suggest that a priority be placed on buffering activities from habitat for ESA-listed species. Moreover, protecting survival of other aquatic species should be a priority. As stated previously, baseline water quality data is important for all managerial actions, especially RMZs. In order to

understand if an activity is compromising aquatic and riparian habitats (or improving it), initial water quality data must be collected and continuously monitored.

The RMZs cite the Idaho Forest Practices Act for water protection parameters. IRU wishes to see that activities on the Forests are held to at least that strict of standards, if not more so. The Forest Plan must ensure that in regards to RMZs, the most stringent of regulations are implemented to protect ESA-listed fish and other aquatic species.

Infrastructure

Infrastructure that may be proposed for installation, construction or alteration adjacent to rivers or creeks that are habitat for ESA-listed species must have special consideration to ensure that activities do not compromise habitat requirements. In order to uphold Forest Plan alternatives of enhancing and restoring ESA habitat, infrastructure cannot compromise these plans, or those within the Conservation Watershed Network or RMZs.

Infrastructure construction or deconstruction can affect Wild and Scenic rivers ORVs on the Forests. In particular, infrastructure projects cannot compromise the free-flowing integrity of eligible or suitable Wild and Scenic rivers. Wild and Scenic protections must be considered and included in this section of the Forest Plan and all correlated alternatives.

Energy and Minerals

When reviewing mineral exploration proposals we recommend that the Forest Plan address projects in relation to RMZs and abide by the categorical buffers. Where a mineral exploration or extraction operation compromises the integrity of RMZs, the most stringent and strict parameters must be applied.

Best Management Practices (BMPs) for mining in Idaho should be merely a starting point for the degree of regulations applied to energy and mineral-related activities.

We also recommend that Conservation Watershed Networks and Wild and Scenic rivers receive specific considerations with regard to energy and mineral projects, as they may also impact ESA-listed habitat and ORVs. In order to understand if a project is to upset habitat requirement or a pristine Wild and Scenic eligible or suitable river, baseline water quality information must be obtained and continuously monitored. Projects must be properly and sufficiently bonded, every time, to ensure the Forests are not financially responsible for lasting impacts from energy and mineral activities.

Livestock Grazing

Grazing activities under no circumstances can come into contact with riparian or aquatic habitat for ESA-listed species. Livestock operations can have significant impacts on aquatic and riparian

ecosystem health. The Forest Plan must detail specific alternatives for grazing permits to address ESA habitat requirements.

Moreover, livestock grazing cannot compromise Wild and Scenic ORVs. Depending on the specific ORV, livestock should not be permitted within the buffer of a Wild and Scenic river. As stated before, it is imperative that water quality data be gathered, so that impacts of livestock may be better understood prior to granting a livestock-grazing permit.

Livestock grazing permits need to be issued in consideration of enhancing the integrity of Conservation Watershed Networks, RMZs and Wild and Scenic rivers.

Lands and Special Uses

Similar to other activities on the forest, Lands and Special Uses activities cannot compromise goals of ESA-listed habitat preservation and restoration actions. In addition, Special Uses cannot compromise Wild and Scenic ORVs under any circumstance.

Language in this section of the Forest Plan must outline how impacts to Wild and Scenic rivers and ESA-listed habitats from special uses will be mitigated.

Recreation

Recreation on the Forests should be a significant managerial priority. The existing Wild and Scenic rivers, wilderness areas and adjacent lands and rivers bring significant revenue and use to the area. Activities to maintain the pristine nature of the Forests for the continued use of these places, must be included in the Forest Plan, as well as detailed alternatives to manage recreation impacts.

Recreation activities cannot compromise ESA-listed habitat requirements, water quality or any other ORVs on the Forests. Creating a robust and multi-dimensional management plan to be included in the Forest Plan is necessary.

Wild and Scenic rivers

The list of eligible rivers identified by the Forests and through collaborative efforts is impressive. The value of Wild and Scenic rivers to the Forests cannot be understated. Not only do Wild and Scenic rivers create management priorities to sustain the pristine qualities the region, these rivers also preserve necessary habitats for ESA-listed species and offer world-renowned recreation opportunities. Wild and Scenic rivers in Idaho only increase opportunities for a recreation-based economy, and a vigorous buffer from our changing, uncertain climate.

While identifying eligible rivers during the forest planning process is a clear and concise practice, finding rivers suitable or not suitable is much broader in scope and requires extensive research. Suitability analysis is an important step toward preserving a river's ORVs, and ensuring a legacy of protections for a given river. This analysis must be done in a detailed, collaborative fashion with ample opportunities for robust public involvement.

As stated at the outset, IRU values the opportunity to be involved in this Forest Plan revision process and to offer guidance and expertise for the protection of the immensely important aquatic ecosystems on the Forests. The Nez Perce-Clearwater National Forests have some of the most important habitat for imperiled salmon, steelhead, bull trout and cutthroat trout in the lower 48 United States. The Forests also boast one of the highest concentrations of candidate Wild and Scenic rivers, as well as existing Wild and Scenic Rivers, in the nation. Therefore, IRU will always be a voice advocating for the preservation and restoration of the rivers and creeks of the Forests.

Thank you for your time in reading these comments, and we look forward to working with you in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ava Isaacson', followed by a stylized flourish.

Ava Isaacson

Conservation Associate