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First name: Bill
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Organization:
Title:
Comments: January 26, 2024

Regional Forester (Reviewing Officer) Northern (R1) Regional Office

Attn: Nez Perce-Clearwater Forest Plan Objection 26 Fort Missoula Road

Missoula, MT 59804

RE: Nez Perce-Clearwater NFs Forest Plan Revision #44089 Objection

Mr./Ms. Reviewing Officer,

I am writing to file an objection to the Nez Perce-Clearwater NFS Forest Plan Revision #44089. My objections to this plan are based on Issues with areas of the plan that concern wilderness designations for roadless areas, old growth, watershed and aquatic protection, wildlife, and expanded logging. The issues associated with these areas of the plan revision were included in my previous comments about the forest plan revision DEIS. This plan revision fails to provide adequate protections required by the Endangered Species Act. This plan revision also fails to adequately address action required by the Biden Administration's climate change, old growth forest protection and 30X30 initiatives.

The wilderness recommendation in this plan is 263,000 acres. This is only 17% of the roughly 1.5 million acres of roadless country in both forests. This is inadequate to insure protection of grizzly bears and other endangered and threatened species. The plan fails to even study all of the qualifying areas. The most important roadless area for wildlife, the 250,000 acre plus Weitas Creek (including Cayuse Creek), is not proposed for wilderness. In addition to this areas inclusion as managed wilderness other areas including the the Selway-Bitterroot Wilderness additions around Elk Summit, the South Lochsa Face, Gedney Creek, Rapid River (an addition to Hells Canyon Wilderness),Pot Mountain, a critical area for mountain goats, Fish and Hungary Creeks, Cove-Mallard (which would be additions to the Frank Church-River of No Return Wilderness), Upper North Fork, the Gospel-Hump Wilderness additions and Moose Mountain should be included in this plans wilderness designations. Additionally, this plan effectively cuts the Kelly Creek/Great Burn area in half because the state-line trail is excluded. 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. Also, the Elisabeth Lakes country is omitted from inclusion as wilderness in the Mallard-Larkins. I object to this plans wilderness designations. This plan would be greatly improved by designating these important roadless areas as wilderness. The best available science tells us the best way to protect wildlife (including endangered and threatened species), is to set aside areas where roads, motorized vehicles and human mechanical devices are prohibited. This plan fails to adequately protect our wildlife, watersheds and the forests in roadless areas by not designating and managing them as wilderness.

I also object to this plans consideration of and protection of old growth. This proposed new plan fails to include measurable and enforceable old growth standards. 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.

Older fir-spruce forest, a common habitat in mid-elevation central Idaho, would have no protections under the new plan. 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. This is unacceptable. This proposed plan could be greatly improved by including standards like those included in the old plan. The failure to provide old growth protections in this plan is a direct violation of President Side's Executive order to protect old growth.

This plan is also insufficient in its protection of watersheds and the aquatic life they contain. This plan weakens protections for endangered species including salmon, steelhead pacific lamprey and bull trout as well as cutthroat trout. This plan endangers watershed and aquatic life by reducing stream buffers stream buffers 50% on a few watersheds and 67% on 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 plan would be great improved by increasing stream buffers and restoring measurable stream sediment for watersheds

Another objection I have regarding this plan is that it is lacking in wildlife protections.

Unlike the current plans, there are no road density standards and motorized vehicle standards to protect elk habitat. These standards also protect grizzly, wolverine, lynx, fisher, and mountain goat habitat. There are no hard and fast protection standard 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. Restoring measurable and enforceable road density standards and preventing all motorized vehicle use in roadless areas will protect wildlife habitat and improve this plan.

I object to this plan revisions consideration of the greatest threat our planet faces, climate change. This new plan revision would increase logging nearly 6 times over the average in the 2000. This massive increase is falsely portrayed as restoration. It is unacceptable that the Forest Service fails to recognize science that shows the activities on the national forests that produce the most greenhouse gases are logging operations. Fires cause less carbon emissions than logging. It is unacceptable to disregard recent forest fire science and recent fire experience to plan on cutting and thinning a forest to save and protect it. I object to this plans failure to adequately address and minimize greenhouse gases emitted by logging and the soil compaction and carbon sequestration deficits caused by logging in our national forest. This plan would be greatly improved by minimizing logging in the forest not increasing it.

As a citizen owner of our public lands, l object to this plan in many ways as outlined above. By not providing adequate measurable, quantifiable and enforceable standards for evaluation, this plan limits and restricts citizens ability to monitor and hold the forest service accountable for management decisions that endanger wildlife and fail to preserve our forests for future generations. I appreciate your consideration of these suggestions to improve the Nez Perce[shy] Clearwater NFs Forest Plan Revision #44089.

Sincerely,

Bill Beck