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# FRIENDS OF THE CLEARWATER

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## A Call to Action: Plan Revisions for the Nez Perce and Clearwater National Forests



Weitas Creek roadless area needs your voice, FOC File Photo

threatened and endangered species, including bull trout, Chinook salmon, west-slope cutthroat trout, lynx, fisher, grizzly bear (extremely rare), and others. It is also famous for its elk herds and numerous other species, such as wolves, wolverines, black

bear, big horn sheep, mountain goats, mule deer, bald eagles and harlequin ducks. The new plan would significantly threaten these species and the productive habitat they depend on.

These forests contain nationally known wild and scenic rivers such as the Salmon, Selway, Lochsa and Clearwater, as well as 1.1-million acres of existing wilderness, including the Selway-Bitterroot, Frank Church-River of No Return, Hells Canyon and Gospel-Hump Wildernesses. There are also 1.5-million acres of undeveloped roadless lands, which is a main area of conservation concern associated with the proposed plan.

The controversial Idaho Roadless Rule offers inadequate protection for these roadless areas. For example, the Forest Service is planning to log the Eldorado Roadless Area in its proposed Lolo Insects and Disease timber sale.

The past century has seen the front country heavily roaded, logged and degraded and so it needs to be allowed to recover, not logged further and disguised as restoration.

### Our Proposal

Friends of the Clearwater has created an outline of a citizen proposal, which is informed by sound scientific principles and sets a positive future for the Nez Perce and Clearwater National Forests that emphasizes the outstanding wild, natural and appropriate recreational values for this remarkable place (see the FOC webpage at

### The New Proposed Forest Plan Falls Short

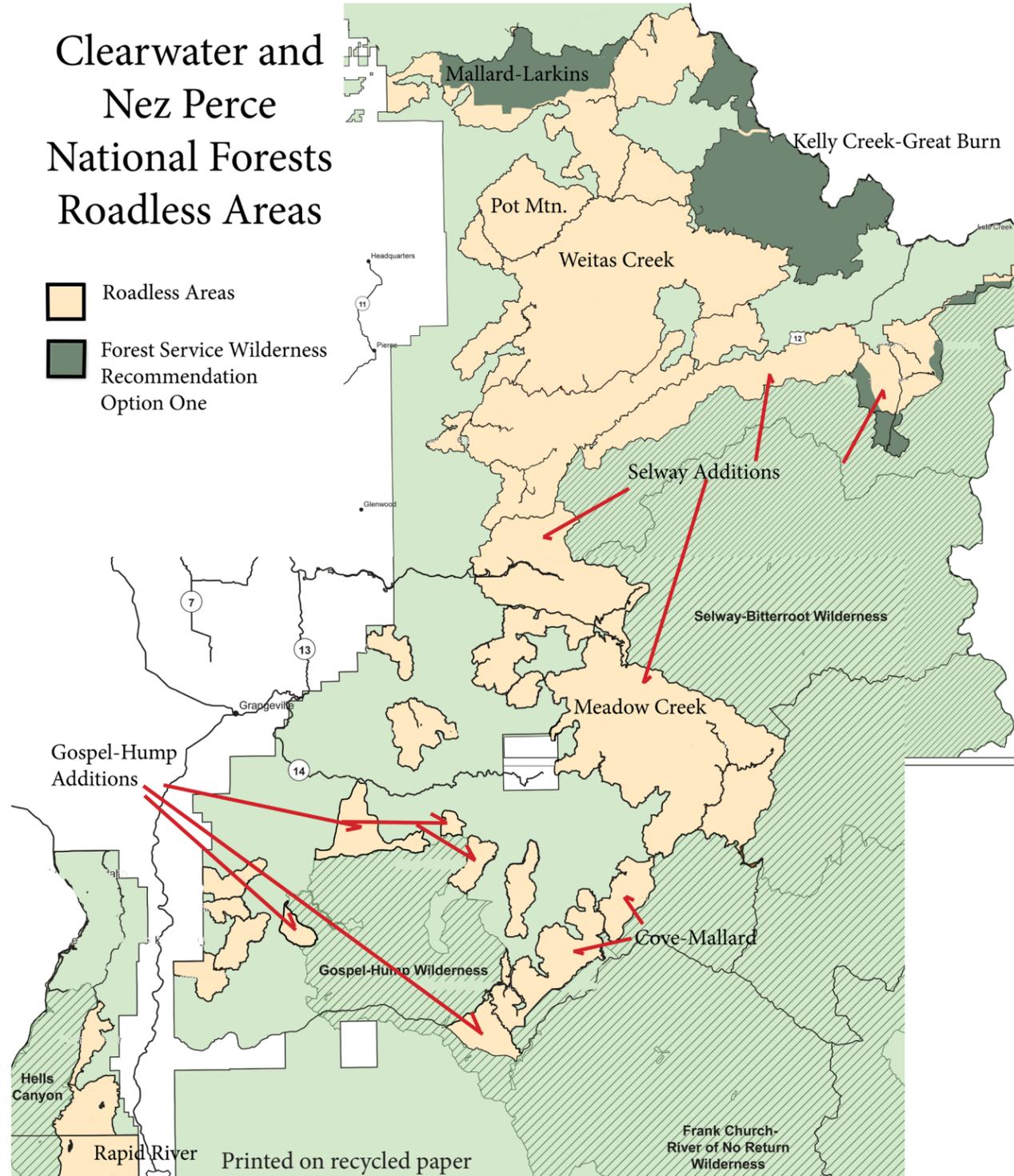
At long last, the Forest Service has released its second proposed action in the last ten years for the forest plan revisions for the Nez Perce and Clearwater National Forests. Forest plans are intended

to guide national forest management for a decade, with fifteen years as an upper limit. The recent administrative combination of the two forests has led to the Forest Service decision to combine the two plans into one. Dissapointingly, the proposal does a disservice to the wildlands of the Clearwater region and the citizens of this country by proposing a plan short on accountability and long on vague platitudes. Currently, both forests have individual plans that far better protect water quality, fish habitat and wildlife habitat than would the proposal, in spite of the fact those plans are outdated (1987). This is the first stage of public involvement. A second stage will occur when the Forest Service releases a draft environmental impact statement expected sometime in 2015.

### A Special Place

At nearly 4-million acres, the Clearwater and Nez Perce National Forests are the northern half of the Big Wild, the largest intact ecosystem in the continental United States. This area has tremendous diversity, from low-elevation habitat with coastal disjunct species in wet cedar forests, to wind swept ridges with mountain hemlocks on mountain peaks. According to two World Wildlife Fund studies done in 2001 by Carlos Carroll, et. al., the Clearwater River drainage is the most important area in the U.S. Northern-Canadian Southern Rockies for large forest carnivores, even more important than iconic places, such as Yellowstone and Jasper National Parks. This area contains some of the least developed and ecologically significant landscapes in the lower 48 states and is home to numerous

## Clearwater and Nez Perce National Forests Roadless Areas



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friendsoftheclearwater.org/the-place/). It also takes advantage of the opportunity to create economic benefits through genuine restoration work such as road decommissioning. Several organizations have already supported this effort.

The adjacent chart to the right provides a quick comparison of some key resources.

## Some Important Issues

### Wilderness Recommendations and Wildlands

The Forest Service does not recommend any of Weitas Creek, Pot Mountain, Fish and Hungery Creeks, the Upper North Fork Clearwater, additions to the Frank Church-River of No Return (Cove-Mallard), or Hells Canyon (Rapid River) Wildernesses. Proposed additions to the Selway-Bitterroot Wilderness are small and leave out the vast majority of acreage, including key portions of Meadow Creek and all of Gedney Creek, Warm Springs Creek along the Lochsa Slope and most of the wildlands near Elk Summit. The proposed plan does not even recognize most additions to the Gospel-Hump Wilderness as roadless, even though site-specific inventories by the Forest Service show those areas are roadless. Inadequate proposals exist for Mallard-Larkins (Elizabeth Lakes) and in one of the options, Kelly Creek (unmanageable snowmobile corridors).

Furthermore, the agency does not propose to protect any roadless area as a non-motorized, non-mechanized backcountry. The second option (see chart) allows motorized use in the special management areas. Ironically, the Forest Service has long boasted it could protect primitive non-motorized recreation opportunities in a non-developed backcountry setting without formal wilderness designation. The existing, albeit small, Mallard-Larkins Pioneer Area, is one example. However, no such proposal exists in this plan to afford any real protection to any roadless area. Though permitted, the proposal does not suggest amending the inadequate Idaho Roadless Rule.

### Wilderness Administration

The Forest Service proposal barely addresses existing wilderness and omits any mention of improving old wilderness plans.

### Wild Rivers

The Forest Service does a fairly good job in making recommendations, but still omits Weitas Creek.

### Research Natural Areas

The Bimerick Creek Meadows are omitted.

### Old Growth Forests

The proposal does not fully protect old growth forests. The existing plans do protect a small amount. Our proposal would completely protect old growth forests from logging.

### Watersheds, Soils, Fish and Wildlife

The Forest Service proposed plan has loopholes for all protection measures, including streamside buffers.

However, this proposal contains loopholes that allow development, even if upper sediment limits are exceeded. The current plan has streamside buffers, which are rarely violated, and upper limits on sediment in streams to protect fish and water quality.

We propose that standards always be met, both before and after logging, or other development. Current direction does not fully protect sensitive soils and steep slopes. Neither does the proposed plan. We propose those steep and sensitive areas be off-limits to development for watershed integrity and safety reasons. The proposed plan allows logging in ancient forests set aside for sensitive species (old growth). The current plan allows no such logging and neither would our proposal.

In addition, we propose a higher percentage of old forests, based upon scientific research, for the different kinds of forest habitat. The current plan protects only 10% of the forests as old growth for wildlife, even though research suggests more should be protected. We also suggest that road density and motor vehicles be limited to protect elk habitat. Current plans have some protections. The new proposed plan has no standards, merely guidelines.

The Proposed Action lacks a sound scientific basis for conserving wildlife species. The Committee of Scientists report (commissioned by the agency when it first proposed revising its forest planning regulations) recommends a process that includes (1) scientific involvement in the selection of focal species, in the development of measures of species viability and ecological integrity, and in the definition of key elements of conservation strategies; (2) independent scientific review of proposed conservation strategies before plans are published; and (3) scientific involvement in designing monitoring protocols and adaptive management. Please ask the Forest Service to adopt those three Committee of Scien-

Issue	FOC's Proposal	Existing Plans'	New FS Proposal
Roadless and Recommended Wilderness  <b>See the map on the last page.</b>	Fully protects all roadless areas 1.5 million acres (ma.). Recommends additions to the Gospel-Hump Wilderness which the agency failed to study.	Theoretically fully protects 37% (0.56 ma.) Moderately protects another 19% (0.23 ma.)	<u>Option One:</u> Fully protects 16% (0.27 ma.) <u>Option Two:</u> Fully protects 22% (0.33 ma.) Moderately protects another 14%. (0.21 ma.)
Wilderness	Provides specific and accountable direction	Current direction has extra loopholes for administrative use of motorized equipment and structures.	Vague language and proposed conditions could conflict with wild, untrammled wilderness.
Climate Change	Reduces carbon emissions and promotes climate stability	None	Wrong-headed proposal to log forests under the ruse of climate change.
Fisheries and Watershed Protection	Measurable and mandatory standards	Measurable and some mandatory standards.	Loopholes that weaken existing direction.
Wildlife Habitat	Measurable and mandatory standards to protect all habitat.	Some measurable and limited mandatory standards for some species.	Loopholes that further weaken existing protection. Limited additional protection for other species.
Logging	Limited to roaded areas that meet water quality and wildlife standards.	Some roadless acreage protected, as is some old growth.	Loopholes allow logging just about everywhere including most roadless areas.

Includes direction as per the 1993 Clearwater National Forest lawsuit settlement agreement

tists recommendations.

The Proposed Action includes a list of 13 terrestrial wildlife "Species of Conservation Concern" (SCC), which are defined as "Any species, other than federally-recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the Regional Forester has determined that the best available scientific information indicates a substantial concern about the species capability to persist over the long-term in the plan area." Unfortunately, the SCC list omits ten other species the Regional Office currently believes there is a substantial concern about their long-term viability. These are the peregrine falcon, bald eagle, black-backed woodpecker, black swift, common loon, Harlequin duck, wolverine, bog lemming, western toad, and ringneck snake. Ask the Forest Service to include those 10 species on the Forest Plan SCC list, or else disclose the best scientific information available that unequivocally demonstrates there are no longer vi-

ability concerns for those species.

Likewise, the SCC list omits the Threatened grizzly bear, of which occasional recent occurrences have been noted on the Clearwater National Forest, and which historically inhabited both these two Forests. The grizzly bear is a flagship species, defining the very essence of "the Big Wild." Please ask the Forest Service to include the grizzly bear on its SCC list.

The Proposed Action does not even suggest a list of Focal Species, which the regulations define as "species whose status and trends provide insights to the integrity of the larger ecological system to which it belongs." Instead, it requests public input on focal species. Please ask that the Forest Service adopt a robust list of focal species and thorough population monitoring program, in accordance with the best science found in the Committee of Scientists (1999) report.

### Keeping National Forests Public

There is no direction for land exchanges. FOC proposes that the agency work with Congress or private conservation interests to purchase inholdings. National Forests must never be given to the state to manage, either.

### Allowing Natural Processes

The proposed plan has desired future conditions that would result in massive manipulation. Where there are trees, the agency wants different trees. Where there are openings, the agency wants more trees. This is wrong-headed and scientifically suspect. Natural processes have a far better record in creating diverse forests than does the agency. To the degree possible, natural processes like fire, rain and wind should determine future conditions.

## What You Can Do

1- Write the Forest Service **by September 15, 2014**

Forest Plan Revision, 903 3rd Street, Kamiah, Idaho 83536

or via email at [fpr\\_npclw@fs.fed.us](mailto:fpr_npclw@fs.fed.us)

2- Attend a Public Meeting:

- **July 28, 6-8 PM** Lewiston, Idaho, Idaho Fish and Game Office 3316 16th Street
- **July 30, 6-8 PM** Moscow, Idaho 1912 Center 412 E. Third Street
- **August 4, 6-8 PM** Lolo, Montana, Lolo Middle School 11395 HWY 93

3- Points to consider in your comments:

- Support FOC's citizen alternative.
- Ask the Forest Service to recommend as wilderness and/or protect all roadless areas including the additions to the Gospel-Hump identified by FOC (<http://www.friendsoftheclearwater.org/gospel-hump-additions-2/>). If you know specific areas, please mention them in your comments.
- Demand that water quality, wildlife habitat and fish habitat standards be enforceable and non-discretionary, without loopholes.
- Tell the Forest Service that natural processes have a better record than does the agency in creating diverse forests. The desired future condition should be process rather than end-point oriented.