



CLEARWATER DEFENDER

NEWS OF THE BIG WILD

A PUBLICATION OF FRIENDS OF THE CLEARWATER
SPECIAL EDITION WINTER 2020

A Call to Action:

The New Draft Forest Plan Sells Out Wildlife, Watersheds, Wildlands, and the Public Your Voice Can Correct This Problem

The Forest Service has released its draft plan revision for the Nez Perce and Clearwater National Forests. Forest plans are intended to guide national forest management for a decade, with 15 years as an upper limit. While 15 years is the maximum, Congress has allowed the Forest Service to revise plans whenever convenient. The current plans are over 30 years old and this new plan could last that long or longer. The recent administrative combination of the two forests has led to the Forest Service's decision to combine the two plans into one. This draft plan, however, does a disservice to the wildlands, watersheds, wildlife of the Clearwater region, and the citizens of this country by proposing a plan short on accountability and long on logging. Currently, both forests have individual plans that far better protect water quality, fish habitat and wildlife habitat than would the draft plan, in spite of the fact those plans date back to 1987. This is the last stage of open public involvement. You need to have participated in the public input process to file an Objection. Comments are due **April 20, 2020**.

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 undulating 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 Northern US Rockies and Southern Canadian 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 threatened and endangered species, including bull trout, Chinook salmon, westslope cutthroat trout, lynx, grizzly bear (extremely rare but at least three were documented in 2019, see insert in this newsletter), and others. It is also famous for numerous species such as fisher, wolves, wolverines, black bear, mountain goats, mule deer, bald eagles, and harlequin ducks. The new plan would significantly threaten these species and the productive and wild 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 ex-

isting Wilderness, including the Selway-Bitterroot, Frank Church-River of No Return, and Gospel-Hump Wildernesses. There are also 1.5-million acres of undeveloped roadless lands and numerous unprotected wild rivers. These are a main focus of conservation concern associated with the proposed plan. The controversial Idaho Roadless Rule offers little protection for these wildlands. The Forest Service admits that the logging levels in some alternatives



Photo by Chuck Pezeshki



Friends of the Clearwater

Keeping Idaho's Clearwater Basin Wild

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can't be reached without logging wild (and previously unlogged) roadless areas. Further, the past century has seen the front country heavily roaded, logged, and degraded; it needs to be allowed to recover, which can't occur under the heavy logging levels that are proposed. There is nothing sustainable about this proposed plan.

Our Proposal

Friends of the Clearwater created 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 chart on page 7). Several organizations have already supported this effort. Unfortunately, the Forest Service ignored our proposed alternative in the draft Environmental Impact Statement while at the same time considering an alternative by certain local politicians to increase logging levels even the Forest Service considers unsustainable. Tell the Forest Service to fully analyze the citizen alternative.

Some Important Issues Climate Crisis

The proposed plan would result in more logging, which translates to more greenhouse gases and less carbon sequestration by our forests. The Forest Service's discussion fails to recognize the anthropogenic factors causing climate change. This omission enables the Forest Service

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The Climate Crisis and Fire:

Is the Forest Service a climate denier?

- - Contrary to what the science says about logging and carbon sequestration, the draft forest plan proceeds as if logging prevents fires and sequesters carbon.
- - Research from Oregon State University suggests logging is the largest contributor of greenhouse gases in that state.
- - Soil disturbance is one of the major contributors of atmospheric carbon from logging.
- - Logging removes trees that may grow and continue to store carbon.
- - Fires mainly burn fine fuels, the same fuels that are burned in slash logging.
- - Thinning is ineffective in extreme fire weather.
- - Logging opens up areas and dries out wetter underforests, which become more flammable.
- - Wilderness and roadless areas are less prone to extreme fire than are logged areas.

to avoid discussing how logging would contribute to climate change. Indeed, logging supposedly to counter wildfires, is actually counterproductive according to the best science.

Wilderness Recommendations and Wildlands

The draft plan alternatives are extremely biased against protecting natural processes. One alternative recommends no new Wilderness, but no alternative recommends all the roadless areas for Wilderness. Further, one of the alternatives provides no protection for the areas recommended Wildernesses from motorized or mechanized use. All roadless areas (including the areas adjacent to the Gospel-Hump Wilderness that were omitted in the Idaho Roadless Rule) should be protected as recommended wilderness or another equally protective category. No alternative proposes Frank Church-River of No Return additions (Cove-Mallard), the Lochsa Slope Selway-Bitterroot addition (once protected in the old Selway Primitive Area before 1963), and many others. No alternative recognizes most additions to the Gospel-Hump Wilderness as roadless, even though site-specific inventories by the Forest Service show those areas have no roads and are unlogged. Inadequate wilderness proposals exist for Mallard-Larkins (Elizabeth Lakes excluded), Kelly

Creek (unmanageable snowmobile corridors in one option, and Fish Lake is excluded from every action alternative), and the Meadow Creek addition to the Selway-Bitterroot Wilderness (no alternative includes East Fork American River, and only one includes the west half of the Meadow Creek basin). A premier wild area, Weitas Creek (which includes most of the Cayuse Creek drainage, see box on this page), over 1/4 million acres of prime wild country, is only recommended in one alternative that is not likely to be selected. The same is true for Pot Mountain, Upper North Fork, and Fish and Hungry Creeks.

Furthermore, the agency

does not propose to protect any roadless area as a non-motorized, non-mechanized backcountry area. Ironically, the Forest Service has long boasted it could protect primitive non-motorized and non-mechanized recreation opportunities in a non-developed backcountry setting without formal Wilderness designation. However, no such proposal exists in this plan to afford any real protection. Though permitted, the proposal does not suggest amending the inadequate Idaho Roadless Rule to protect other areas.

The roadless chart on page 4 and the roadless map on page 8 give more detail on the areas. Visit the FOC website for more information.



Aerial view of part of a Gospel-Hump Addition, which was destroyed by logging. The Forest Service claimed the logging and road building did not harm wilderness character!
Alpha 1 Photography photo.

Protect the Weitas Creek Roadless Area in the Draft Forest Plan!

Bighorn-Weitas (Weitas Creek), at 260,000-acres, is the largest unprotected roadless area located entirely within the Nez Perce-Clearwater National Forests. This swath of natural beauty sits within two major drainages: Weitas Creek and Cayuse Creek, with additional streams that drain into the North Fork Clearwater. What makes Weitas Creek unique is the wildlife-rich low elevation broad river valley of the areas' namesake, relatively gentle terrain, and the blue-ribbon fishery in Cayuse Creek.

Weitas Creek also offers great habitat for grizzly bears. In addition, numerous Forest Service Region 1 sensitive species are also found here. The Weitas Creek region also contains significant historical and cultural features. Of particular interest is the trail used by the Nez Perce and Chief Joseph in 1877 en route to Canada, in an attempt to escape persecution from the US military.

The Forest Service has suggested that if this area is designated Wilderness by Congress, the unmaintained 555 route beyond the Weitas Guard Station bridge would be incorporated in the Wilderness. That is precisely what our Wilderness proposal does, too!

Tell the Forest Service to recommend the Weitas Creek Roadless Area as Wilderness in the forest plan and to close the 555 route from beyond the Guard Station bridge.

Include your personal experiences and stories from this spectacular wildland, too.

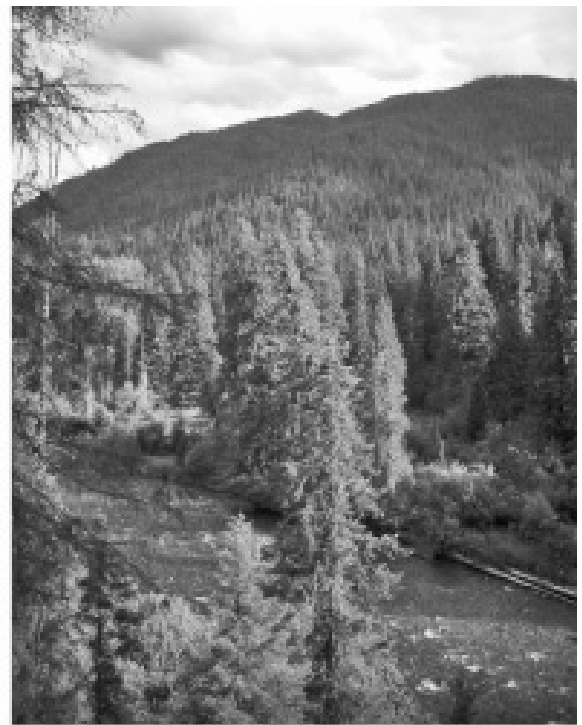


Photo by Chuck Pezeshki

Roadless Areas/Recommended Wilderness (all proposed for full protection in the Citizen Alternative)

Name	Description	Acreage	Forest Plan alternatives (W, X, Y, and Z) recommended Wilderness	FOC proposal
Weitas Creek (AKA Bighorn Weitas, includes Cayuse Creek)	Premier area, low elevation wide-stream that is unique. Boundary adjustment needed to include unmaintained 555 route past bridge	260,000	Only W which radically increases logging elsewhere	Fully Protected (Recommended Wilderness and/or protected backcountry area)
Selway-Bitterroot Wilderness Additions	Rounding out a spectacular Wilderness	See next six rows	See next six rows	Fully Protected
--Meadow Creek	Premier addition, crucial steelhead habitat	215,000, FS splits into two erroneously	Partial in W, Y, and Z	Fully Protected
--Rackliff-Gedney	Excellent steelhead habitat, much of area formerly protected as part of Selway Primitive Area	90,000	None	Fully Protected
--Lochsa Slope	Crucial addition, all formerly protected	75,000	None	Fully Protected
--Sneakfoot Meadows	Unique meadows	23,000	Partial in Z, full in W	Fully Protected
--North Fork Spruce	Contains Colt Killed Creek	36,000	See above	Fully Protected
--Selway (Bear Creek) and Lolo	Two additions, mainly on Lolo and Bitterroot National Forests	1,500	None	Fully Protected
Kelly Creek (AKA Hoodoo or Great Burn)	Long-standing proposal, crucial fishery for cutthroat	255,000, also on Lolo NF	Some alternatives carve out areas for snowmobile use, partial W, Y, and Z.	Fully Protected
Pot Mountain	Perhaps the wildest area due to shape	51,000	Only in Z	Fully Protected
Fish and Hungry Creeks	Best wild steelhead stream in Idaho	118,000	Only in W	Fully Protected
Upper North Fork	Includes Rawhide, perhaps best bull trout habitat in Idaho	63,000 also on Lolo and Idaho Panhandle NFs	Partial in W, all in Z.	Fully Protected
Frank Church-River of No Return Additions	Cove-Mallard (two areas) site of infamous timber sales in 90s, largely stopped by citizen action	63,000	None	Fully Protected
Gospel-Hump Additions	Johns Creek a crucial fish stream	55,000	None	Fully Protected
Hells Canyon Additions Rapid River and Salmon Face (#1)	Rapid River, noted for salmon and steelhead, excellent elk habitat	79,000; overlaps with Payette NF, Salmon Face, 9,000	All Rapid River in W, Y, and Z; Salmon Face none	Fully Protected
Mallard-Larkins	Long-standing protection proposal, mountain hemlocks and mountain goats	260,000; overlaps with Idaho Panhandle NF	Partial in W, Y, and Z. Elizabeth Lakes omitted	Fully Protected
O'hara Creek (#9)	Steelhead spawning and RNA	33,000	None	Fully Protected
Weir Creek (#12)	Mostly trailless wildlands	22,000	None	Fully Protected
Moose Mountain (#14)	Good elk habitat	22,000	Only in W, existing protection	Fully Protected
Pilot Knob (#6)	Nez Perce cultural site	21,000	None, some other protection proposed	Fully Protected
Little Slate Creek (#3)	Important salmon spawning	12,000	None	Fully Protected
North Fork Slate (#5)	Important tributary	11,000	None	Fully Protected
John Day (#2)	Overlooks Salmon River	10,000	None	Fully Protected
Eldorado (#11)	Low gradient stream	7,000	None	Fully Protected
Clear Creek (#10)	Important stream	9,000	None	Fully Protected
Siwash (#13)	Flanks North Fork Clearwater	9,000	None	Fully Protected
Lick Creek (#8)	Feeds the South Fork Clearwater	7,000	None	Fully Protected
Dixie Summit (#7)	Important Research Natural Area	13,000	None	Fully Protected
North Little Slate (#4)	Important watershed	6,000	None	Fully Protected

Note: Numbers by roadless area names in the chart correspond to numbers on the map on page 8. Larger roadless areas are not numbered.

Existing Wilderness Administration

The Forest Service proposal barely addresses existing Wilderness, omits any mention of improving old Wilderness plans, and does not require compliance with the Wilderness Act! Rather, it requires compliance with old plans, some of which contain guidance that could be interpreted as contrary to the Wilderness Act.

Wild Rivers

Plans can only recommend eligible rivers. This is how most forest plans are done. The Forest Service, however, makes suitability recommendations in the plan, eliminating protection for hundreds of miles of streams! Of the 1,460 streams, the Forest Service originally found nearly 120 streams eligible, but revised that list to 89. At most only 37 would be protected. Under no plan alternative are Gedney Creek, Lake Creek, Tenmile Creek, Three Links Creek, or Wind River recommended for protection even though some of them were recognized in past plans.

Research Natural Areas (RNA)

Bimerick Creek Meadows would be a good addition to the RNA system, but the Forest Service omitted it.

Old Growth Forests

The existing plans protect at least five percent in each drainage and ten percent forest-wide. The proposal does not fully protect old growth forests. The citizen alternative would completely protect old growth forests from logging.

Watersheds, Soils, and Fish

The Forest Service proposed plan greatly reduces protective streamside buffers and would allow logging in riparian areas, which is currently prohibited. This would be disastrous for rare fish species like steelhead, salmon and bull trout. This proposal also contains loopholes that allow development, even if upper sediment limits are exceeded. The current plans have strict streamside buffers of 300-feet on each side of streams with fish, which are rarely violated, and upper limits on sediment in streams to protect fish and water quality. We propose that standards always be met, before, during, and after logging, or other development.

Current direction does not fully protect sensitive soils and steep slopes. The proposed plan is even worse. We propose those steep and sensitive areas be off-limits to development for watershed integrity and safety reasons.

Wildlife

The plan has almost no standards to protect wildlife even though the draft EIS provides evidence upon which to base protective measures. The proposed plan allows logging in ancient forests (old growth) set aside for sensitive species such as fisher, pine marten, pileated woodpecker, and goshawk. The

Steelhead and Standards

Steelhead (salmon, bull trout, Westslope cutthroat and Pacific Lamprey too) are in serious trouble and the revised plan offers no help for them. The proposed standards strive to maintain good habitat, but generally there is no way to hold the Forest Service accountable because the standards don't include quantifiable requirements.

- There should be no exceptions to allow logging (commercial thinning, thinning, or otherwise) which effectively reduce current 300-foot buffers to 150-feet along rivers and streams.

- Standards for sediment must be met or there should be no new road building or logging in the watershed. That means field work must verify current conditions.

- The plan appendices contain quantitative definitions of high quality fish habitat. Those must become the standards by which management is judged.

- To protect the best habitat, logging, road building, and other development must be kept out of roadless areas.

current plan allows no such logging, except in uncommon circumstances, and our proposal prohibits logging in these areas altogether. 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 percent of the forests as old growth for wildlife, even though research suggests more should be protected, from 20 to 50 percent, de-

pending on forest type. 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 few quantitative standards. Further, the terrestrial species of conservation concern (unlike the list of plant species) are focused mainly on dry forests, which are very uncommon on these two national forests. The result is the Forest Service wants to log in an attempt to make all forests look like dry forests. Other species sensitive to disturbance or logging will suffer. Fisher, though listed as a species of conservation concern, would be shortchanged. Black-backed woodpecker, pine marten, and goshawks should also be a species of conservation concern (SCC). These 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 in-

formation indicates a substantial concern about the species capability to persist over the long-term in the plan area.” Unfortunately, the SCC list omits other species even though Region 1 noted a substantial concern about their long-term viability. These include the peregrine falcon, bald eagle, black-backed woodpecker, black swift, common loon, bog lemming, western toad, and ringneck snake. Ask the Forest Service to include all of those species on the Forest Plan SCC list, or else disclose the best scientific information available that unequivocally demonstrates there are no longer viability concerns for those species.

The draft plan does not even suggest a new 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, indicator species from the extant plans apparently become 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.

Exploitation (logging, recreation, grazing, and mining)

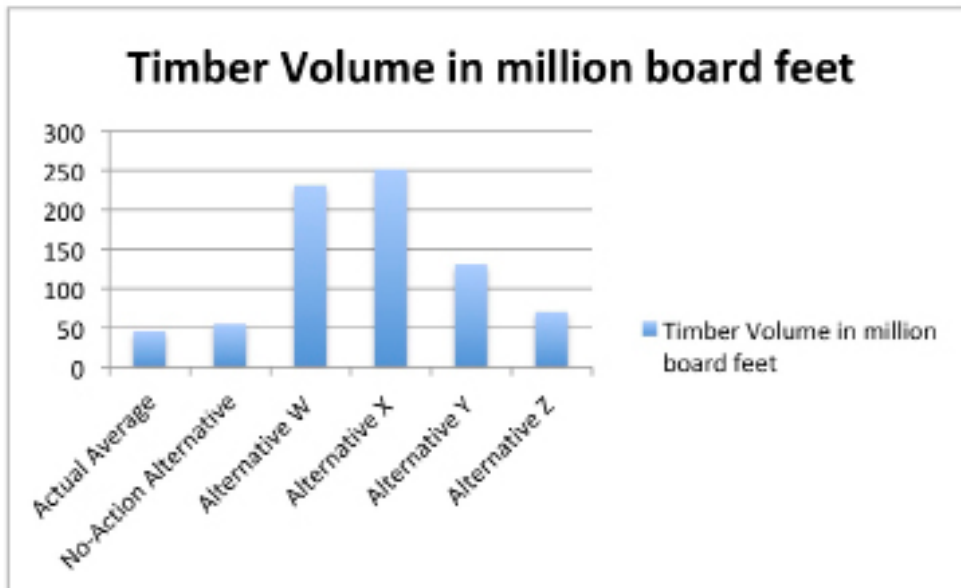
Under every action alternative, logging levels increase (see chart on this page). Current levels are such that water quality standards in the existing plans can’t be met. Motorized and mechanized recreation increases under every alternative over the current condition for the summer season. Snowmobile use would expand over the current condition—not allowed on most of the forest—in three of the four alternatives. Draft plan direction encourages more commercial use that could conflict with the public. Grazing would be the same under every alternative. The agency

won’t close vacant grazing allotments under any alternative though these have not been used in years. Minerals are similar for every alternative. The two national forests don’t appear to have oil and gas deposits, yet the Forest Service proposes no measures to close areas to mining (metals) nor does it suggest mineral leasing (oil and gas) should be precluded. Closing the two forests would prevent speculative exploration ventures that could harm water quality or wildlife habitat. The plan fails to address protocol for suction dredge mining.

Allowing Natural Processes

The proposed plan has desired future conditions that would result in massive manipulation. Where there naturally are trees, the agency wants different trees or openings. Where there naturally 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 the agency does. To the degree possible, natural processes like fire, rain and wind should determine future conditions. The plan has desired future conditions that would result in massive manipulation and release of carbon.



Thank you to everyone that attended the citizen protest outside the Best Western in Moscow prior to the Forest Service public meeting.
Serena Hofdahl photo - The Daily Evergreen.

The below chart compares the existing 1987 Forest Plans with the new, single draft plan for both forests, and FOC's Citizen Alternative. Please tell the Forest Service to fully analyze the Citizen Alternative in the Final Environmental Impact Statement.

Issue	Existing Plans*	Draft Plan**	Citizen Alternative
Roadless and Recommended Wilderness	Should fully protect 37% and should moderately protect another 19% of the roadless base	Acreage varies by alternative. Under some alternatives recommended areas would allow motorized/mechanized use. The Forest Service would most likely develop areas not recommended and they would be lost	Protects 100% of roadless base (1.5-million acres), including additions to the Gospel-Hump Wilderness, which the agency has failed to study; no motorized/mechanized use would be allowed
Wilderness	Current direction has extra loopholes for administrative use of motorized equipment and structures	Desired conditions could conflict with wild, untrammeled Wilderness, vague language used throughout	Provides specific and accountable direction, in accordance with the Wilderness Act
Climate Change	None	All alternatives would increase greenhouse gases and lose carbon sequestration potential due to logging	Reduces carbon emissions and promotes carbon sequestration
Fisheries and Watershed Protection	Includes some quantitative standards and public accountability	Extensively weakens existing conditions by offering little to no quantitative standards and public accountability***	Includes quantitative standards to ensure public accountability
Wildlife Habitat	Includes some limited quantitative standards for certain species	Further weakens existing protections. Grizzly bears and their habitat needs are largely ignored	Includes quantitative standards to ensure public accountability. Also promotes connectivity
Logging	Allowed in some roadless areas and old growth under the guise of fire prevention and "restoration"	Allowed just about everywhere including most roadless areas, old growth, riparian areas, and wild and scenic corridors	Limited to already developed areas that meet water quality and wildlife standards. No logging in roadless areas or old growth

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

** The Forest Service does not have a preferred alternative in the draft plan.

*** Standards: Clear quantifiable parameters designed for ecosystem function that the agency must meet when planning projects. When a project doesn't follow these parameters, a citizen could stop that project with a lawsuit to enforce the plan. This is the accountability built into forest plans.

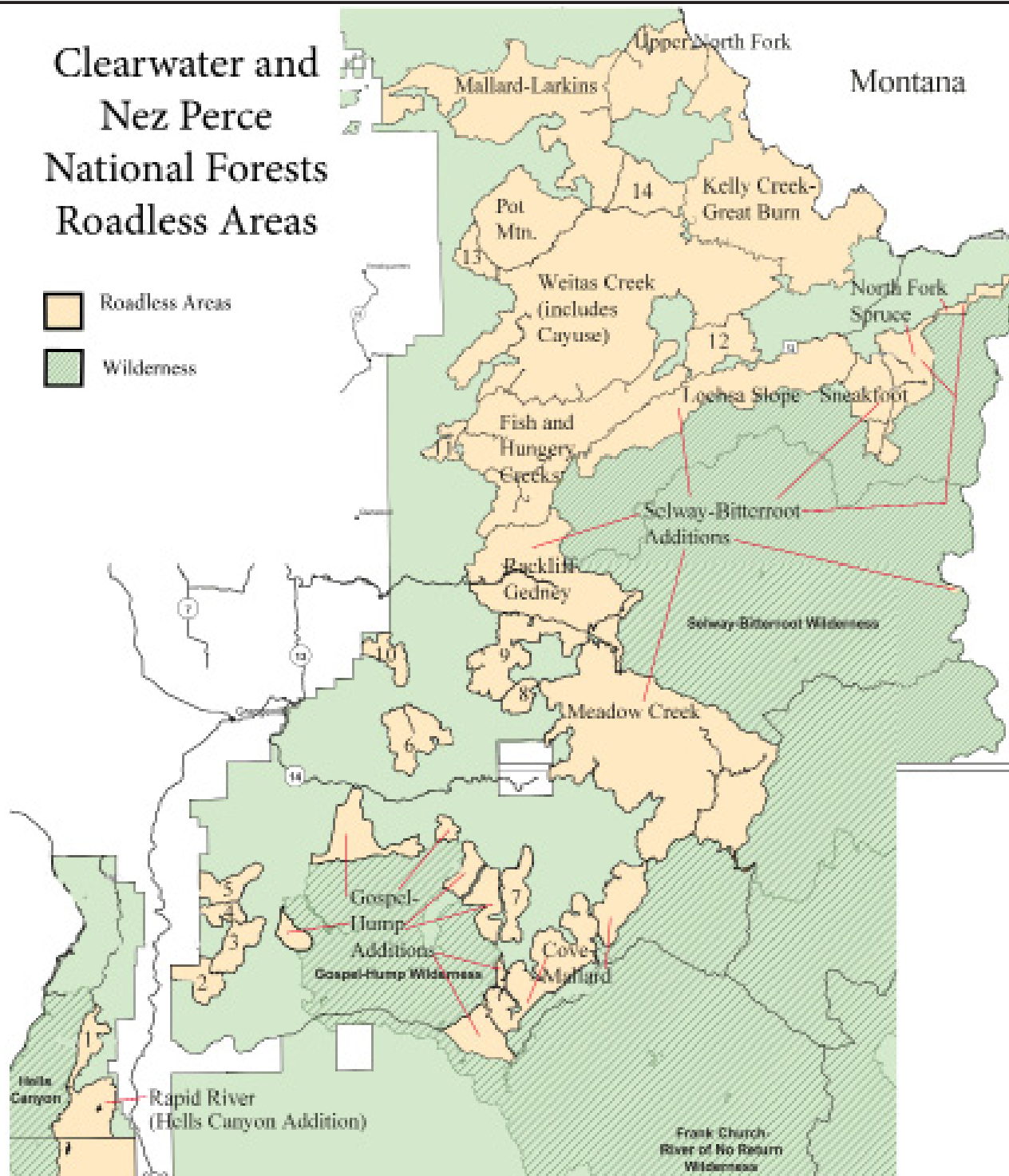
What You Can Do

Please submit a public comment **by April 20, 2020**. Comments can be emailed to sm.fs.fpr_npclw@usda.gov. They can also be mailed to: Forest Plan Revision, 903 3rd Street, Kamiah, Idaho 83536.

Support FOC's Citizen Alternative

1. Ask the Forest Service to recommend as wilderness and/or protect all 1.5-million acres of roadless areas, including the Gospel-Hump Additions, in the new forest plan. Weitas Creek is perhaps the most crucial roadless area.
2. Demand water quality, wildlife habitat and fish habitat standards be quantitative, enforceable, and non-discretionary, without loopholes. Tell the Forest Service to also protect habitat for grizzlies so they can recover in the Clearwater.
3. Tell the Forest Service that natural processes have a better record than does the agency in creating diverse forests. Desired future conditions should emphasize process, rather than end-point oriented conditions.
4. Enrich and personalize your comments with stories and experiences.

Clearwater and Nez Perce National Forests Roadless Areas



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