The Clearwater DEFENDER

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Friends of the Clearwater
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Moscow, ID 83843

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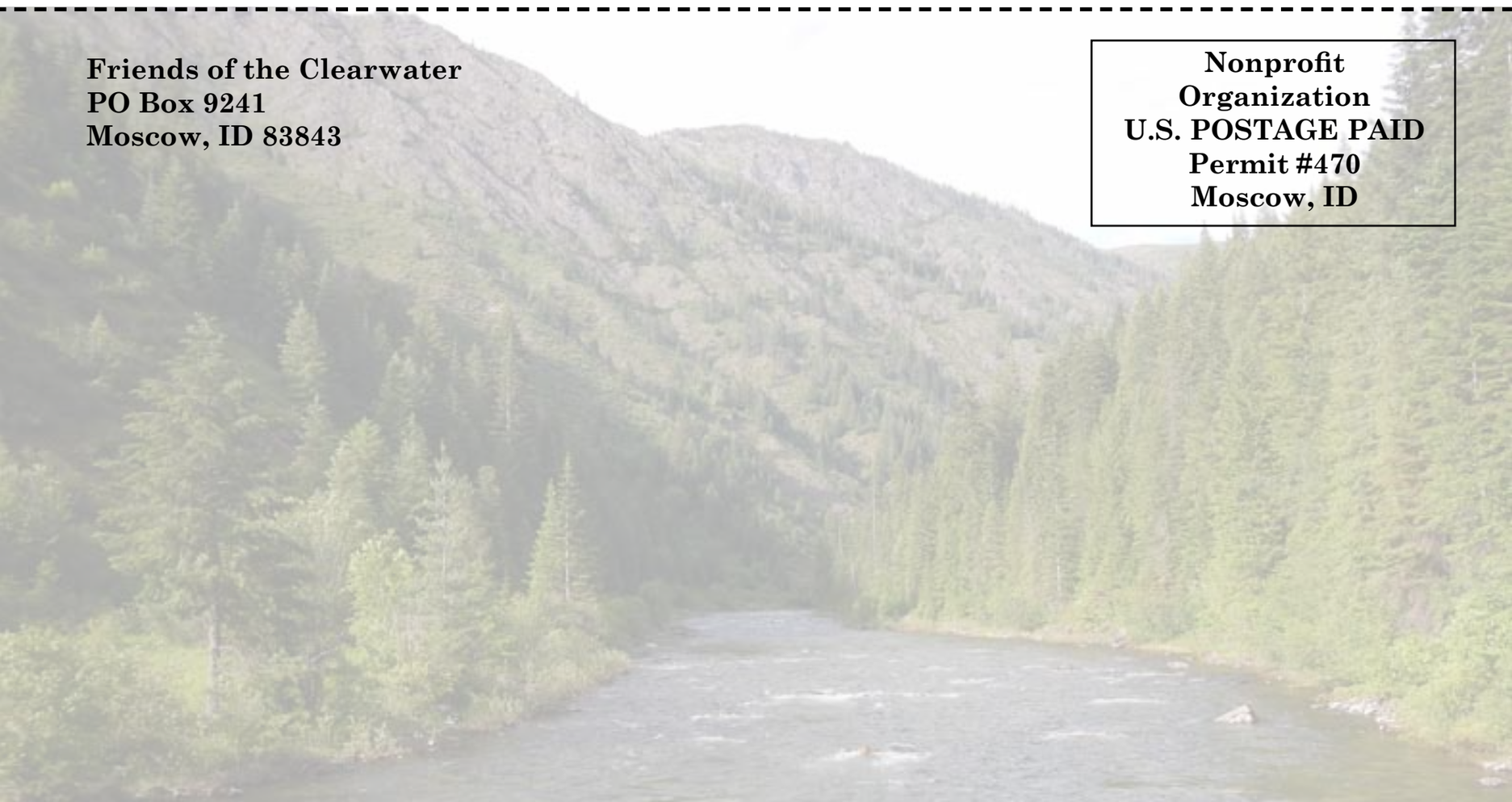

Friends of the Clearwater
Keeping Idaho's Clearwater Basin Wild

Friends of the Clearwater
P.O. Box 9241, Moscow, Idaho 83843
208-882-9755
foc@friendsoftheclearwater.org
friendsoftheclearwater.org

Friends of the Clearwater, a recognized non-profit organization since 1987, defends the Clearwater Bioregion's wildlands and biodiversity through a Forest Watch program, litigation, grassroots public involvement, and education. The Wild Clearwater Country, the northern half of central Idaho's "Big Wild," contains many unprotected roadless areas and wild rivers and provides crucial habitat for countless rare plant and animal species. Friends of the Clearwater strives to protect these areas, restore degraded habitats, preserve viable populations of native species, recognize national and international wildlife corridors, and bring an end to industrialization on public lands.

The Clearwater Defender welcomes artwork and articles pertaining to the protection of the "Big Wild." Articles and viewpoints in the Defender do not necessarily reflect the views of Friends of the Clearwater.

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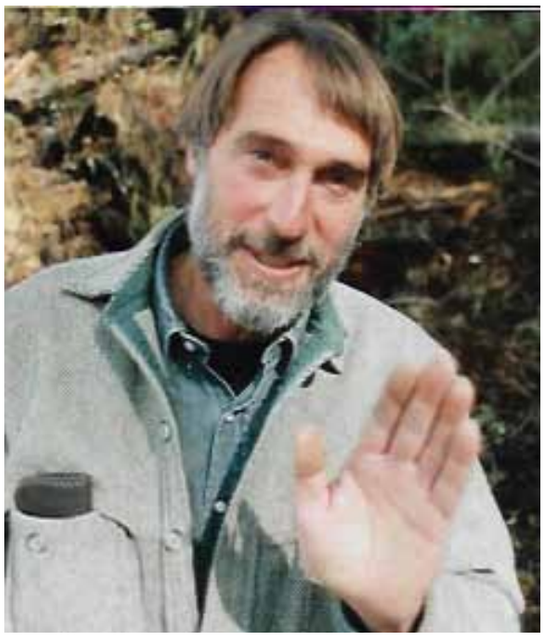
The Oregon County Community Foundation, Committee for Idaho's High Desert, and the Latah Wildlife Association!

We are testing out this new newsletter format. If you have any thoughts on the change (positive or negative) please share your thoughts with us!

In memoriam: Barry Rosenberg

By Jeff Juel



Barry Rosenberg, photographer unknown

Friends of the Clearwater has lost one of its own. With much sadness, we write that Barry Rosenberg, recipient of the 2010 Macfarlane Plank Award, died on March 28, 2022, at the age of 79.

Barry made a huge difference for national forests of the Inland Northwest starting in the early 1990s. He was recruited by Dr. John Osborn, founder of Inland Empire Public Lands Council (now known as the Lands Council), to form the organization's Forest Watch program and draw the line against rampant overcutting on national forests. In his spare time as a physician, John had written long, detailed appeals of practically all the original, first-generation forest plans for the Inland Northwest, identifying the threats they posed for water quality, human health and forest ecosystems. The Forest Service dismissed them all, essentially saying he would have to work with the agency at the level of each individual timber sale, setting what they hoped would be an impossible hurdle. Ironically, they had already helped to create their most formidable opponent.

At the time, Barry ran a tree-planting business and was witness to the devastation from logging. Years before, Barry had escaped the bustle of northern California along with his wife, Cathe, to live off the grid in the remote Priest Lake vicinity of the Idaho panhandle. At one point the Forest Service proposed a timber sale alongside their property. Barry challenged it, but after a few rounds of appeal the logging proceeded, clearcutting old growth and polluting a stream that fed their cabin's water supply. So John was calling on someone already empowered to use the appeals process.

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At that time, few in the entire country had successfully used administrative appeals to challenge national forests timber sales. Barry quickly changed that. He learned to use all angles—invoking environmental laws and forest plan standards—to hold the agency accountable for unsustainable logging. He showed how citizen monitoring of management actions and conditions in the forest could fuel citizen activism. He also led in creating a network of concerned citizens, teaching appeal writing as a way of nurturing forest watchers throughout the region. Many organizations, including Friends of the Clearwater, benefitted greatly from Barry's leadership and passion for protecting forests. Within a few years, logging levels on the forests dropped dramatically. To this day, thanks to the efforts of Barry and so many he mentored, untold thousands of acres of forests remain standing.

After leaving the Lands Council, Barry served as Executive Director of Kootenai Environmental Alliance for a number of years. And though he finally retired in 2009, he didn't stop caring about our forests, staying engaged with fellow activists until the end.

Barry is survived by his wife Cathe and stepson Thomas. He will be missed.

Mallard-Larkins Roadless Area, FOC File Photo

The Northern Rockies Ecosystem Protection Act: Description and Update

By Gary Macfarlane

Eldorado Creek Roadless Area, critical low-elevation habitat that would be protected through NREPA. Bilodeau photo

Description

The Northern Rockies Ecosystem Protection Act (NREPA) is a visionary piece of legislation that is based upon science, and would protect the public land and wildlife in the wildlest place in the contiguous 48 states. Indeed, the greatest concentration of public wildlands is found in parts of Idaho, Montana, Wyoming, eastern Oregon and eastern Washington. This region is still big and wild enough to retain native species, including grizzlies, wolves, wolverines, lynx, and runs of salmon, steelhead, and bull trout. Although these species persist, their numbers are not large enough to be healthy for the long term.

Scientists have learned that for these rare species to persist and increase, they need to have secure core habitat, and that these core areas need to be connected. Unfortunately, no national park or designated wilderness in the lower 48 states is large enough on its own to protect these native species. Thus, habitat corridors need to be established for wide-ranging species to persist and flourish. That is precisely what NREPA does.

There are three other major principles to NREPA besides protection of habitat corridors on public land. First, is the protection of unroaded and undeveloped public lands as wilderness. The largest single block of protected wilderness in the contiguous 48 states is found here – the Frank Church-River of No Return Wilderness and the Gospel-Hump Wilderness. NREPA would expand these wilderness areas, and designate new ones across the five-state area, including the backcountry (the places not accessed by roads) of Yellowstone, Grand Teton and Glacier National Parks. The National Park Service has long-standing wilderness recommendations for the backcountry of these iconic national parks. About 23 million acres of public land managed by the Forest Service, National Park Service, and Bureau of Land Management would be protected.

Second, is the protection of corridors as noted above. NREPA would provide the mechanism for identifying and protecting these corridors. For example, connecting habitat between Glacier National Park, the Big Wild (the massive wildland complex of which the Clearwater Country is the northern half), and the Greater Yellowstone Country will help species like wolves and wolverines survive impacts of global warming.

Third, is the protection of key rivers in their free-flowing condition. NREPA would designate nearly 2,000

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Watching Politics pollute the 30x30 promise

By Katie Bilodeau

Days into his administration, on January 27, 2021, President Biden signed Executive Order 14008, "Executive Order on Tackling the Climate Crisis at Home and Abroad." This order promoted various domestic actions and commitments to fight climate change, including a promise to "listen to the science and meet the moment." The executive order included the 30x30 promise: "to achieve the goal of conserving at least 30 percent of our lands and waters by 2030." Since then, different agencies within the Biden Administration have invited public comment on how to achieve these specifics, including what agencies that manage our public lands can do. Friends of the Clearwater has partaken in several agency invitations for comment and has provided science to accompany our comments.

When the US Department of Agriculture (USDA) asked for public comment (March 2021) on new strategies for "advancing climate-smart agriculture and forestry," FOC drafted a comment and solicited sign-ons from other organizations.

We provided science that supported protecting public forests—carbon sinks—as opposed to logging them. (Current logging levels on national forests emit far more carbon than wildfire.) With the help from our allies at Western Watersheds Project, we also provided and discussed the science that supported significantly cutting back grazing on public land; livestock grazing contributes to global warming and makes impacted lands more vulnerable to the effects of warming. When the Council on Environmental Quality (CEQ) asked for public input on the agencies' plans (October 2021), we submitted the same science, noting that the USDA's final climate plan (developed after the March 2021 comment period) entirely ignored the cheap and easy strategy of preserving standing forests in order to mitigate carbon emissions. We also noted that the USDA plan mentioned "prescribed grazing," a concept analogous to a doctor prescribing the average person sugar to achieve health benefits. To date, we aren't aware of what CEQ has specifically done with public input.

Early this year (January 2022), the Administration rolled out another public-comment period in conjunction with President Biden's executive order on the climate crisis. The Department of the Interior (DOI), on behalf of an inter-agency group that includes CEQ, the USDA, and the Department of Commerce (DOC) invited public comment on what they are calling an "American Conservation and Stewardship Atlas." These government agencies are creating an atlas for the public and wanted feedback on how the atlas can best "serve as a useful tool for the public" and how it "should reflect a continuum of conservation actions." The "continuum of conservation actions" language caught FOC's skeptical eye.

In early compliance with the climate-action executive order, the DOI, the USDA, CEQ, and DOC released Conserving and Restoring America the Beautiful (May 2021), a report introducing a "continuum of conservation," and noted early opportunities for successful collaborative conservation. They specifically included "creating more parks...in nature-deprived communities." Absolutely nature-deprived communities need more greenery—not only are human mental and physical health tied to the presence of plants, but plants mitigate the higher temperatures connected to urban areas, the "heat-island" effect. But we must not allow politicians to bait-and-switch this with what we need to do to combat climate change—actions that most effectively start with protecting the wild areas remaining.

"Protecting intact forests and ungrazed meadows is an easy way to mitigate carbon emissions"

Conserving 30 percent of lands by 2030 isn't a political invention. Intact forests sequester significantly more carbon than homogenous, plantation-like forests. Intact forest soils, when not plowed for roads or disturbed by machines dragging trees to loading areas, also store carbon. Mountain meadows, when undisturbed, are carbon sinks, but can become carbon sources when trampled or grazed. Science suggests that we do the most to protect biodiversity and mitigate climate change when we choose to protect standing forests, rangelands, and meadows from logging and grazing. So absolutely we need more parks, but we shouldn't let the Administration substitute that need to excuse the government from pursuing more significantly helpful strategies.

FOC submitted comments for the

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Are roadless areas protected? A "shelterwood cut with reserves" in the West Fork Crooked River IRA, FOC staff photo

Cattle damage along Utah's Pariah river in Grand Staircase-Escalante Nat'l Monument, Western Watersheds file photo

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conservation atlas to DOI, CEQ, DOC, and the USDA. We emailed out this comment period to folks on our email list, and we thank everyone who took the time to send their own comments. Highlights from FOC's comments are below, but you can read the full comments at https://www.friendsoftheclearwater.org/american-conservation-stewardship-atlas/. We requested that the agencies, when creating the conservation atlas, to do the following:

1. Substantively define "conservation" and "restoration."

Don't allow the USDA, through the US Forest Service, to mislead the public by counting a 5,000-acre-clearcut-logging project (like the "Hungry Ridge Restoration Project) as "restoration."

2. Count wilderness, but account for cattle.

Count wilderness, wilderness study areas, and the undeveloped and roaded portions of national monuments and national parks toward the 30x30 goal, but temper what counts depending upon active grazing in the area.

3. Do not count grazing or logging as conservation.

Both are associated with higher carbon emissions and mitigating climate change means managing the land as a protected space where these activities are disallowed.

4. Old-Growth and Roadless Areas aren't fully protected - yet.

Document old-growth forests and roadless areas, but do not count them towards 30x30 until they have substantive protections against logging. A meaningful data source will consider where these areas exist, and will denote that the government has not protected them and that they are still vulnerable. A meaningful data source will also update the status of these unprotected areas regularly to document the amount of old-growth and roadless areas we still lose annually to US Forest Service logging projects.

5. Measure conservation gains - and losses.

Measure conservation work in a way that records the losses and gains so the public can see the net progress. For example, decommissioning and recontouring 50 miles of Forest System Roads in a national forest in one year is restorative work that looks positive in a vacuum. However, the net progress looks quite different if the Forest Service also build 100 miles of new or temporary roads in the same area that same year. Context is important.

FOC hopes the DOI, the USDA, the DOC, and CEQ take these comments to heart. Counting city parks towards the 30x30 initiative—a conservation initiative that scientists had originally envisioned for larger, less fragmented wild and natural landscapes is misinformation. Likewise, defining "restoration" with clearcut logging and failing to demarcate unprotected wild areas misleads and disserves the public when scientists are increasingly and specifically describing what we must do to avoid the worst of climate change and biodiversity loss. "Greenwash," is a term for "disinformation disseminated by an organization so as to present an environmentally responsible public image." The USDA and the DOI, through the words and deeds of the US Forest Service and the Bureau of Land Management, commonly greenwash logging and grazing. The Administration should take great care not let these agency partners greenwash a conservation atlas so it inaccurately lends the appearance of progress towards President Biden's 30x30 commitment. There is another word for bias information that misleads the public to promote a political goal: "propaganda."

Roadless Area Conservation Act:

A bill that could do better

By Katie Bilodeau

In this session of Congress (2021-2022), congressional members of both the House and Senate have introduced identical bills pertaining to national roadless-area protection. Named the "Roadless Area Conservation Act of 2021," the House bill, HR 279 and the Senate bill, S 877, purport to provide "lasting protection for inventoried roadless areas within the National Forest System." The stated purpose of the bill is clear, but whether it can accomplish such lasting protection is another question entirely. The structure of HR 279 is unusual. Many laws will begin with a statement on why Congress is passing the law and what Congress hopes to achieve. For example, in the Endangered Species Act (ESA), Congress found that "various species of fish, wildlife, and plants in the United States have been rendered ht as a consequence of economic growth and development..." and that Congress meant, in passing the ESA, "to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved." Purpose-and-policy statements like these can assist courts in interpreting the law's substantive provisions, but they are not binding themselves.

Hanson Meadows, Great Burn, Pezeshki photo

Purpose-and-policy statements appear at the beginning of many statutes, and they are generally short. For example, in the ESA, the purpose-and-policy statement is about one full page of text in the bill that became the Endangered Species Act. The remaining eighteen pages of the bill contains the substance; these pages establish definitions and create the legal framework we associate with the ESA. This framework includes the requirements to consult with the proper wildlife agency on whether a federal project will jeopardize (i.e., further substantively endanger) a listed species and requirements to use the best available science and information for biological opinions that analyze harm. The Wilderness Act is similar; Congress declares the policy underlying the Wilderness Act with one subsection, a short paragraph, while the remaining provisions substantively flesh out how the Wilderness Act will accomplish its policy "to secure for the American people of present and future generations the benefits of an enduring resource of wilderness."

HR 279 diverges from the structure of these other environmental laws. This bill is six pages, using five of those pages to proclaim why roadless areas are important and to proclaim the bill's intent to provide "lasting protection." But again, purpose and policy statements are not binding. What is very short, diverging from laws like the Endangered Species Act or the Wilderness Act, is the substantive provision, the part of the law that would mandate or prohibit activities. The substantive provision states only that the US Forest Service "shall not allow road construction, road reconstruction, or logging in inventoried roadless areas where those activities are prohibited by the Roadless Rule." Instead of listing substantive provisions of any roadless rule that prohibit or permit road construction, road reconstruction, and logging, the statute references the reader to one of three Forest Service regulatory roadless rules. These three roadless rules are the 2001 Roadless Area Conservation Rule ("2001 Roadless Rule"), the 2008 Idaho Roadless Rule, and the 2012 Colorado Roadless Rule. A citizen can find the Idaho and Colorado roadless rules if that citizen knows where to look—the Code of Federal Regulations contains most of the current regulations. But, during the 2001 Roadless Rule's history of litigation, where it was struck down and re-instituted by various courts, the rule was removed

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Connections

By Jeff Juel

Jeff Juel and Janet Torline around a possible "mother" tree in the Bitterroots, Paul Busch photo

"[T]rees and plants have agency. They perceive, relate, and communicate; they exercise various behaviors. They cooperate, make decisions, learn, and remember—qualities we normally ascribe to sentience, wisdom, intelligence. By noting how trees, animals, and even fungi—any and all nonhuman species—have this agency, we can acknowledge that they deserve as much regard as we accord ourselves."
—Suzanne Simard, Finding the Mother Tree: Discovering the Wisdom of the Forest

In our efforts towards conservation of wild forests, we often invoke the concept of "biological diversity." To most people, the term brings to mind the multitude of native fish, wildlife, and plant species and how those species interact with one another in our favorite wild places.

And during our visits to these places, although we often notice things like mushrooms or millipedes on the forest floor, seldom do we contemplate the diversity they might signify for the vast assemblage of species living beneath the ground's surface.

The soil harbors huge reservoirs of biological diversity, with over 40% of terrestrial organisms associated with soils during their life cycle. This reservoir includes animals such as nematodes, oribatid mites, enchytraeids, tardigrades, springtails, ants, ground beetles, centipedes, millipedes and earthworms, fungi, the single-celled bacteria and archaea, and protists, (a kingdom separate from animals, plants or fungi which includes algae, amoebae and slime molds). Together these organisms comprise the "soil food web" where one thing eats another—or is eaten—and so forth.

Despite longstanding scientific investigation, general public awareness of this underground ecology has been limited. In recent years this has changed, thanks in part to groundbreaking research by ecologist Suzanne Simard of the University of British Columbia, and reports of her discoveries in popular media. Her research centers on connection and communication between organisms in forest ecosystems as facilitated by mycorrhizal (fungal) networks, and the intricate symbiotic relationships thus formed between organisms of different species.

Trees can share water, nutrients, and even information between themselves

The profound role of fungi was noted by the renowned biologist E.O. Wilson, who once wrote, "Most life on land depends ultimately on one relationship: the mycorrhiza, the intimate and mutually dependent coexistence of fungi and the root systems of plants." Mushrooms, the fruiting body of fungi, are just the tip of the iceberg. The main fungal body is the mycelium, the mass of tissue growing in soil and other substrates such as dead wood or other biomass. In turn, mycorrhizae are part plant, part fungus, consisting of the mycelia and the roots of plants. But it is the mycorrhiza's functions that are most fascinating.

Consider a genus of fungi, Rhizopogon, commonly known as a false truffle. They form mycorrhyzae with several conifer tree species. Mycorrhizae might appear as a swollen, whitish mass of mycelium surrounding the tips of tree roots. It is the structure where water and nutrients exchange between the Rhizopogon and the tree, to the benefit of both. The Rhizopogon mycelium absorbs water and other essential nutrients such as nitrogen from the soil more efficiently than roots, due to the fact that the hyphae (filaments that make up the mycelium) are able to penetrate small spaces and efficiently extend much more widely than tree roots. And while trees thus receive enhanced access to building blocks essential for growth in this symbiotic relationship, in turn the Rhizopogon feed on carbon (energy) in the form of plant sugars produced by trees. There are potentially multitudes of different fungal species in a given ecosystem, effecting similar and often quite different roles as networking entities.

The complexity of mycorrhizae's ecological roles are astounding. Following a hunch, Simard fed CO2 concentrated with a radioactive carbon isotope to individual trees via plastic bags placed around their branches. Recall that plants need carbon dioxide from the atmosphere along with sunlight to photosynthesize and grow. To her delight, she soon found an increase in radioactive carbon in the composition of surrounding trees. It turns out that the mycorrhizal network facilitates sharing of nutrients between trees! And the trees don't even have to be of the same species.

The plot thickens further. Scientists have found that large, old trees tend to be more connected to neighboring trees through this mycorrhizal network than the younger ones. These hub trees literally influence the health and fitness of all the trees in the forest, leading to the notion of "mother trees." And they act selectively; feeding seedlings that might be shaded and therefore otherwise unable to survive. Or transferring resources from dying trees to healthy ones. Oddly enough, there are even accounts of the roots of stumps being kept alive through this network, years after the tree was cut and its photosynthesis halted. It even turns out hub trees can favor offspring from their own seed more than unrelated trees of the same species.

"Mycorrhizal networks facilitate sharing nutrients and information between trees"

Fly amanita mushroom, Snyder photo. Mushroom caps are just the tip of the iceberg in the fungal web.

The complexity of chemical transmission between plants goes beyond nutrient transfer. Information itself is a currency. In the human body, glutamate and glycine are common neurotransmitters facilitating signals in brain and spinal tissue across synapses (the connections between neurons, or nerve cells). In plants, glutamine and glycine are involved in triggering the aforementioned exchange of nitrogen and carbon through mycorrhizal networks, and they also help to

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facilitate fundamental metabolic functions within plants. Experimentally, stress signals have been shown to transfer from injured plants to healthy ones across mycorrhizal networks even more rapidly than carbon, nutrients or water. Healthy plants can then produces defense enzymes, increasing their resistance to the pest afflicting their neighbors.

Since it's commonly accepted that neural connections facilitating the functioning of the human brain and nervous system give rise to what we call "intelligence", this begs the question—do trees, plants, or other non-animal life forms also possess intelligence? Our own nervous systems control internal biological functions, and also muscle activity effecting behaviors we see as signs of intelligence. So is this ecological entity we call a "forest" exhibiting intelligence, given the complexity of the below-ground connectivity between organisms, given the behaviors it facilitates?

"What does matter—to our very survival—is what humans believe about other living things"

These communication networks not only appear underground. In response to attack by defoliating insects, trees transmit airborne volatile chemical signals. Scientists have found that, neighboring trees cued by those signals are able to marshal defenses against the defoliating insects.

Here's an example of another, more complex network. Some fungi cause tree decay, leading to woodpeckers being able to excavate nest cavities, which are later used as nests and dens for other species, such as squirrels, who eat false truffles and thus spread spores, benefitting trees by the creation of mycorrhizal networks, which help to grow large trees, which eventually provide decaying wood structures for woodpeckers.

It turns out there are many such networks interacting with each other, nested within what is called a "meta-network." These meta-networks provide for interactions and feedback among the various connected entities, leading to structure and function that define "complex adaptive systems." In such systems, change and adaptation occur constantly as a result of these interactions. Is this intelligence?

Some would answer yes, because individuals they study perceive, process, and communicate with other organisms and the environment, and remember and use this information to learn, adapt, and heal themselves and others. Another scientific view is that, within this meta-network, a forest's mycorrhizal networks are most crucial in organizing other networks, given their critical role in establishment and growth of trees. Fungi are "keystone" species because they are vital nodes in this network of connectivity. Russula brevipes, for example, is a fungal keystone species which has the most connections to other species in mature forest ecosystems.

This essay barely scratches the surface of what scientists have discovered about these complex adaptive systems. And of course, science itself is a process that leads to far more questions than answers. But clearly, as major actors on this stage of life on earth, humans play an outsized role. And far too often, our acts sever natural connections, resulting in vast unintended consequences, literally shaking the foundation of the life-giving biosphere, these complex adaptive systems that have given rise to our very existence.

This calls into question what exactly is "intelligence", and who or what actually possesses it. Because the term is of our own creation, perhaps the question itself is not so relevant. What does matter—to our very survival—is what humans believe about other living things, forests, ecosystems, and even the entire biosphere, and our actions based on those beliefs, and ultimately, the consequences of our actions. For example, in North America what little is left of the vast, pre-settlement extent of old-growth forests is still being targeted for clearcutting, such as with the Nez Perce-Clearwater National Forests' Hungry Ridge project Friends of the Clearwater is challenging in court. And with the Dead Laundry project "treatments" are proposed allegedly to "enhance" old growth, reflecting the prevailing management paradigm of dominating and controlling nature rather than acting in harmony in the acknowledgement that we actually know so little about these wondrous forests. Does anyone really believe that ripping centuries old trees from the web of life is enhancing anything but greed?

In "The Social Life of Forests" writer Ferris Jabr wrote in the New York Times, "The razing of an old-growth forest is not just the destruction of magnificent individual trees—it's the collapse of an ancient republic whose interspecies covenant of reciprocation and compromise is essential for the survival of Earth as we've known it." This theme of reciprocation, between humans and the plants, animals, and spirits of the natural world, is common in the myths, lessons, and other stories handed down over countless generations of aboriginal peoples. This wisdom has been largely dismissed by the empires that have largely conquered and displaced native cultures, too often with tragic genocidal consequences. To the degree we yet fail to heed this ancient wisdom, western civilization—and humanity itself—approaches the brink of its own tragic demise.

Of her book "Finding the Mother Tree" Suzanne Simard states, "This is a book—not so much about us saving trees, it's more about how the trees will save us." The connections she describes are lessons to us, from the trees and from everything they touch. If we heed those lessons—if we allow ourselves to feel the connections—like the mother trees we will be able to grow, heal and truly enhance.

Wildfires appear destructive on the surface, but a genetic reservoir remains unscathed underground. This snag forest in Hell's Canyon Wilderness, is in part a reflection of the diversity of a living soil.

Where are wolves protected in 2022?

By Paul Busch

In February of 2022, a federal judge overturned an October 2020 decision that delisted wolves in the lower 48 US States, effectively putting wolves back on the Endangered Species List (ESA).

Or so you might think. In reality, wolves are legally endangered in 44 states. Sort of. It's complicated.

Southwest

Southern AZ/NM – Mexican wolf experimental population boundary

Northern AZ/NM – Previously unprotected, now endangered

The Mexican wolf is a subspecies of the gray wolf, natively found in the American Southwest. Their populations number ~200 in the wild, with at least as many in captivity. They are largely the descendants of captive wolves, released for the last 35 years in reintroduction programs. Reintroduction programs can limit the protected status of species, and to date the wolf population in Arizona and New Mexico is considered a "non-essential experimental" population (ExPo) that carries a level of protection below what a threatened species would. It is a cynical compromise on behalf of anti-wolf advocates to keep them protected in name only.

Their recovery has been slow, stunted by the genetic bottleneck of the population as well as poaching. Ironically, due to the recent court case, a Mexican wolf that crossed the border out of the ExPo into Northern Arizona would be considered endangered, and have more protections than within the ExPo area. However, most remain in their stronghold of the greater Gila ecosystem.

Midwest

Minnesota – Threatened
Wisconsin/Michigan – Previously unprotected, now endangered

People are often surprised to find out that the Great Lakes supports over twice as many wolves as the Rocky Mountains. Minnesota continues to harbor a population around 2,500, largely concentrated in the woody wetlands of the northeast corner of the state, a major increase from the nadir of 200-700 wolves in the 60s. Minnesota has largely been more protective than nearby Wisconsin and Michigan, which have been more vocal in pushing for large-scale hunting. That reached a fever pitch in 2020, when Wisconsinites slaughtered 216 wolves in the span of one week. Notably, Ojibwe Tribal members, who were guaranteed half the wolf tags as part of their Tribal rights, chose to use none of them in protest of the hunt. There are an estimated 1,000 wolves in Wisconsin, and 600 wolves in Michigan.

As of the most recent court decision, these wolves are now fully protected, a huge win for the Great Lakes population.

An Idaho wolf, Idaho Fish and Game photo

The Northern Rockies

ID, MT, WY, Eastern OR/WA, far NE Utah – Previously State managed, all remain

Perhaps nowhere in America are wolves as contentious a political issue as the Northern Rockies.

Wolves were almost totally extirpated throughout the US by 1970. There were, however, Forest Service reports of wolves in the high divide country between Idaho and Montana near the headwaters of the Selway into the 1970s. By 1986, Canadian wolves crossed into the US near Glacier National Park. This "Magic Pack" showed the possibility of a natural recovery, not a reintroduction. The benefit of this natural recolonization is that, for almost 30 years, the wolves of Northern Montana and the Idaho panhandle had full protection under the ESA (since they weren't an experimental reintroduction). Ultimately, federal agencies rejected the path toward natural recovery.

The Northern Rocky Mountain (NRM) Wolf Recovery Plan was finished in 1980. It established reintroduction as the method to recover wolf populations in Idaho, Montana, and Wyoming. It also outlined unscientifically low population thresholds for the states to meet that would trigger delisting. So began the road to reintroduction, opposed by many (including FOC) for it's weaker protections for "non-essential experimental" populations. Starting in 1995, wolves were reintroduced into central Idaho and Yellowstone National Park.

By 2002, wolves had repopulated to meet the delisting thresholds set by the NRM plan. However, peer-reviewed science, the environmental community, and ultimately the 9th Circuit Court of Appeals considered the population thresholds unscientific and too low for the massive area specified.

In 2011 a bipartisan law settled the wolf question in the Northern Rockies. Mike Simpson (R-ID) and John Tester (D-MT) added the notorious "wolf rider" to the omnibus appropriations bill. The spending bill was meant to keep the government open, so any bill that hopped on had a great chance at becoming law.

The rider literally doesn't mention wolves. It simply forces the DOI to accept the 2009 EIS ruling that de-listed the Northern Rockies subpopulation of Gray Wolves, and disregard the court cases that overturned that decision.

Barring an emergency listing, it is difficult to see federal protections for wolves of the Northern Rockies without an act of Congress. At time of printing, there is a petition to the USFWS to relist the Northern Rockies population, led by Western Watersheds Project. FOC is on that petition.

Pacific States

Western Washington, Western Oregon, California – Formerly state managed, now protected

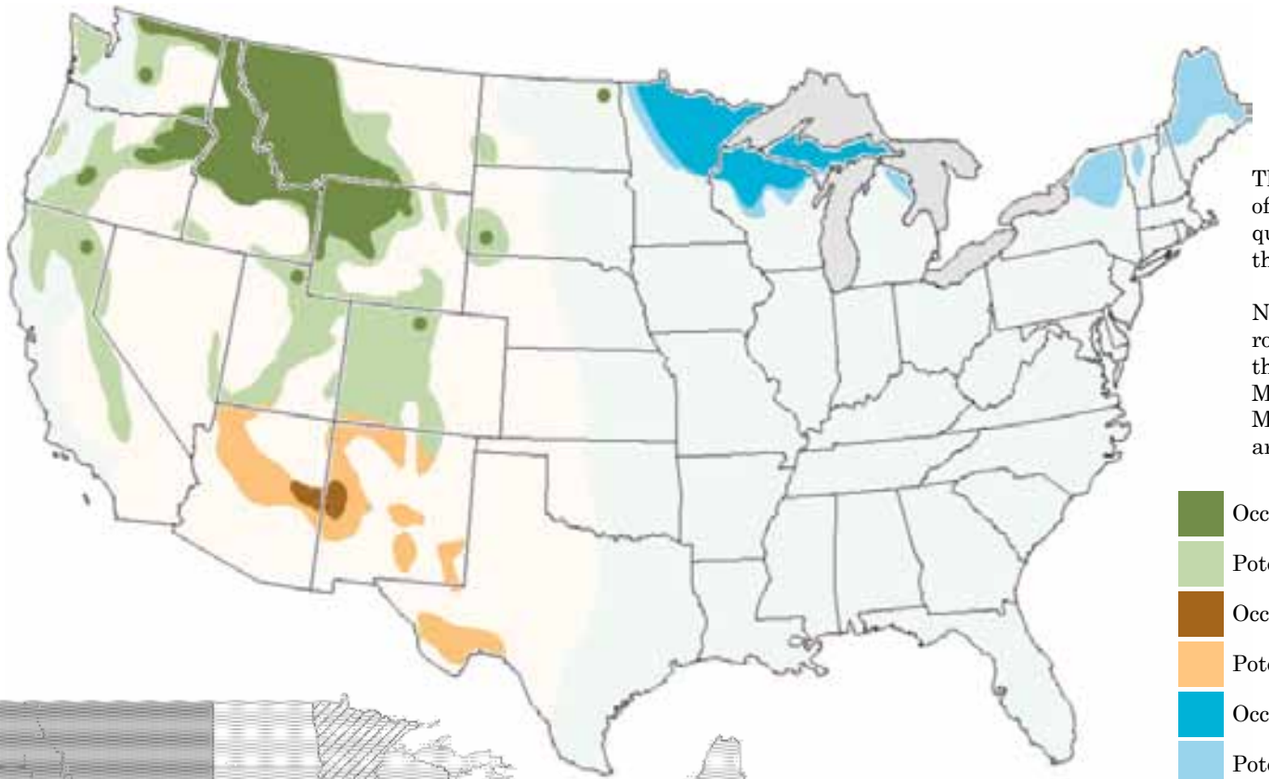
For the wolves of the Pacific, this court ruling gives them the full protection of the ESA. This is a big win for them - much of their habitat in the Cascades and Sierras has yet to be reoccupied. While the national forests of the West Coast have largely been logged and roaded, designated wilderness and national parks may offer sanctuary for the returning predator.

What's Next?

"Umbrella logic" is the term I came up with that captures the rabid response to the legal protections of predators.

Two men are standing under an umbrella. "Why do we have to use this?" One man says. "I'm totally dry." The man throws the umbrella to the ground and promptly gets soaked.

Rebounding wolf populations signal that protections are working, not that they are unneccesary. As long as the most violent voices in predator management have the most say, then those protections can't go away. Interior Secretary Deb Haaland has spoke on the possibility of emergency listing for wolves in the Rockies - but actions speak louder than words.

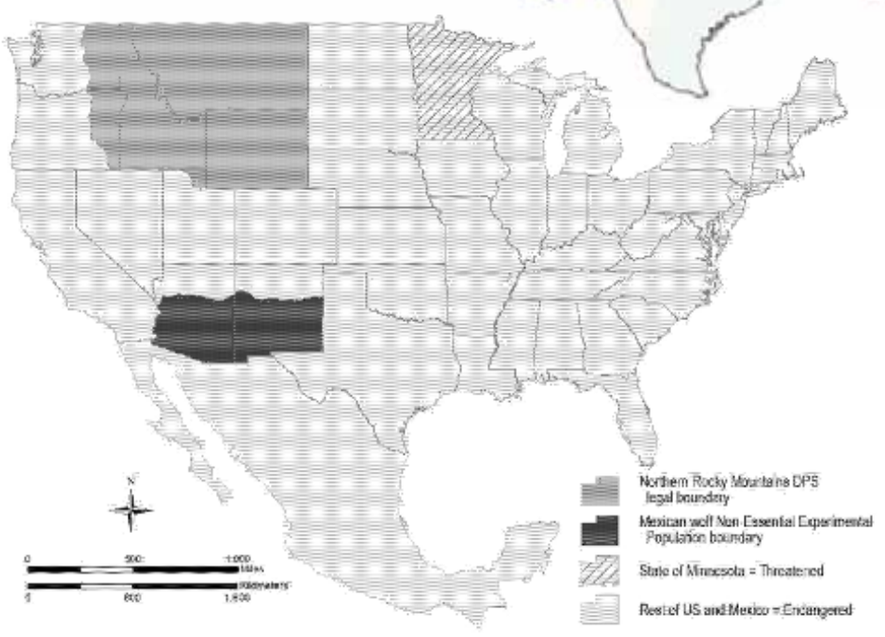


This map shows an estimate of wolf distribution and high quality habitat throughout the lower 48.

Note that this is a very rough estimate and that the demarcation between Mexican wolf and Rocky Mountain wolf populations is arbitrary.

- Occupied Rocky Mountain*
- Potential Rocky Mountain
- Occupied Mexican
- Potential Mexican
- Occupied Eastern/Great Lakes
- Potential Eastern/Great Lakes

*Although this map assumes all western wolves are descendents of reintroduction, this *is not* true. N. Idaho, Montana, and N. Washington wolves are likely naturally recolonized populations.



The second map shows the current legal boundaries of wolves in the lower 48 states, and is taken from a recent court case.

The Northern Rocky Mountains DPS is unprotected/state managed. Note that the reintroduced Mexican wolf population has less protection than even a threatened species does.

Figure 1: Current legal status of C. lupus under the Act. Northern Rocky Mountain DPS and Mexican wolf Non-Essential Experimental Population are not part of the listed entities. All map lines are approximations; see 50 CFR 17.11 and 17.84(k) for exact boundaries.

FOC Event Schedule!

Climate March: Saturday, April 23rd, meet at East City Park in Moscow Marching with the Wild Thang dragon to Friendship Square to show support for climate action!

Rennaissance Fair: Sat/Sun April 30th/May 1st - Vollunteers needed to help sell crepes!

Gary's Retirement Party: May 29th - See back page.

Clearwater Country Report
Receive monthly action alerts
and comment on proposals on the
Nez Perce-Clearwater National Forests
friendsoftheclearwater.org/get-e-news/

EXPLORE CLEARWATER COUNTRY THROUGH OUR WEBSITE!
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House Oversight Committee hearing on fire

By Katie Bilodeau

Forests and wildfire intersect with many other topics. Themes include wildfire's relationship to climate, wildfire's relationship to logging, the effectiveness of firefighting tactics, the impacts and scale of Native American burning, and the most effective way to protect communities from fires going forward. The Committee on Oversight and Reform, the U.S. House of Representatives' primary investigative committee, tried to scratch that immense surface very briefly this past month. On March 16, 2022, this committee held a hearing on forests and wildfire that was streamed; you may still watch it at on YouTube. After the hearing, the committee provided the public an opportunity to submit written comments. Friends of the Clearwater staff watched this hearing and submitted comments, both to correct stated misinformation, but also to highlight where the Oversight Committee might investigate the US Forest Service's abuse of taxpayer money. Just as a two-hour hearing is not nearly long enough to understand the issues above, this short article won't be, either. Below are excerpts of comments that FOC provided to this committee.

Some of the misinformation spouted might have been corrected had the Oversight Committee invited more scientists. The majority party in Congress guides the hearings and sets witness numbers. There is a pre-set balance to witnesses; the minority party is guaranteed a certain number of witnesses determined by the number the majority party invites. Democrats could have invited as many witnesses as they wanted. They invited only four, which limited the Republicans to one witness. Including a courtesy invite to the Chief of the US Forest Service, this hearing amounted to six witnesses in total. For an investigative committee, one would hope congressional leaders would be more focused on meaningful investigation than party politics.
Of those four witnesses, Democrats invited only one scientist that could speak with expertise on fire ecology.

Excluding questions, Dr. Dominick DellaSala provided a refreshing six-minutes of science in a 135-minute hearing. For the majority party that gives such lip-service to science, six minutes of science was not enough. The dearth of scientists was especially striking as committee members and witnesses from both parties made statements that belied a deep-seated misunderstanding of the nuances of fire ecology. Dr. DellaSala brought a professional background of over 300 publications, from articles and books, focusing on climate change, wildfires, and biodiversity. And his main message was that the committee wasn't hearing all the facts.
Before diving into the nuances, we must remember that mixed-severity fire, with high-severity pockets, has existed for millennia in places like northern Rocky Mountain forests. Snag-forest habitat, created in the high-severity parts of a larger fire mosaic that kills over 75 percent of trees, hosts incredibly high biodiversity and creates rare habitat that some species need. So while there is not a place for high-severity fire in our communities, our wild places do need mixed-severity fire.

Bulldozer line from Johnson Creek firefighting, FOC file photo

The increase in wildfire activity we are seeing is a product of climate change, not fuel build-up as so many witnesses and committee members appeared to presume. Climate and weather, not fuels, primarily drive fire severity. Dr. DellaSala spoke of a warm, dry period and active fire season in the early 20th Century. History supports this, too. The Great Burn of 1910 occurred before any US Forest Service implemented any fire-suppression tactics, so one of the largest wildfires in the United States occurred before any alleged fuel build up. This Great Burn occurred because of climate and weather, specifically a dry spring, a hot summer, and three August days of 70+mph winds. A cool, wetter period during the mid-20th Century coincided with fire-suppression tactics, which lulled us into a perception that we can control fire. But, after about 1985, we have started to see warmer and dryer weather again, but that is a result of climate change. Dr. DellaSala testified that climate change—which causes extreme drought, hot temperatures, and dry winds—is primarily driving the wildfire activity we see now.

If climate and weather primarily drive wildfire, and our world is getting warmer, then the root of increased wildfire activity is carbon emissions, not fuel build up. The singer-songwriter Ms. Carole King, another witness, provided context for carbon emissions we might attribute to the management of our national forests. Ms. King pointed out that while coal, oil, and gas get a lot of attention, logging emits carbon, and taxpayers subsidize this carbon source to the tune of nearly $2 billion a year. And both Dr. DellaSala and Ms. King rightly pointed out that protecting homes means home-hardening. The science suggests that the chance a home is lost in a wildfire is directly connected to how flammable the home itself is as well as the materials within the first 130 feet of it.

Friends of the Clearwater's comments supported both witnesses' testimony with additional scientific citations, including scientific studies that clearly demonstrate logging emits more carbon from forests than wildfire. Logging on national forests exacerbates the situation driving severe fires because logging contributes up to three times the carbon emissions that logging purports to save by altering fire behavior. Chief Moore testified that fire threatens carbon storage in forests, but the science suggests that carbon storage is most threatened by logging, a point the Chief neglected to address.

Fire severity is not greater where fire has been absent; science suggests that, as a secondary driver, logging can actually exacerbate fire behavior. Logging negatively impact a forest's microclimate. Logging opens up the forest floor to sunlight, which dries out the forest floor and can increase the temperature of the stand. Strong winds can travel more easily through open stands. Thinning cannot stop the weather or climate, so it cannot stop high-severity fires. For low- and mid-severity fires, there is less than a five-percent chance that thinning will impact fire behavior at all. We cannot log our way to resilient forests, and science is providing increasing evidence that we increasingly damage our future prospects by acting on this belief.

While most of the Oversight Committee had questions that suggested an agenda, Representative Rashida Tlaib (D-MI) asked a sincere question, one that occurred to her as she was listening to the witnesses. Rep. Tlaib asked Ms. King how much the American taxpayer subsidizes for private timber companies to destroy and cut down trees. This question is a very relevant one for the Oversight Committee; one of this committee's specific jobs is to investigate abuses of taxpayer money. With our comments, FOC provided a report by economists that analyzed that the logging program on federal forests continues to cost taxpayers $1.5 to $2.0 billion per year. Along with other grassroots organizations, we provided evidence of a different type of abuse of taxpayer funds: firelines that the US Forest Service builds during fires.

Friends of the Clearwater, along with Friends of the Bitterroot and Klamath Forest Alliance, compiled for the Oversight Committee a fact sheet and accompanying pictures that argues a need for the committee to investigate the Forest Service's wasteful practice of building expensive firelines. In Oregon, California, Montana, and Idaho, our groups have documented or referenced instances where the Forest Service has authorized firelines where they cannot benefit communities and where their construction

(cont'd next page)

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damages environmental and cultural resources. This includes building firelines into Wilderness or roadless areas. This includes, in one instance, a hiker encountering a contracter finishing his contract to cut a fire line after the fire was no longer a threat. Many of the firelines that the US Forest Service authorizes are excessive—they are located in areas where they cannot help, and often result in creating sediment, fragment habitat, and often leave long-term degradation. And, along with the federal logging program, this is another wasteful practice that taxpayers fund.

You may find the link to this oversight hearing as well as review what FOC submitted, both our comments and the fireline fact sheet, on our website at https://www.friendsoftheclearwater.org/congressional-oversight-hearing-on-fire/. We sincerely hope that this hearing is only the beginning of several other investigations, which need to critically examine how the US Forest Service uses taxpayer money to degrade forests in the name of fire. Combating the fire season means combatting carbon emissions, which means protecting standing forests and a total stop to logging in old, mature forests that haven't had human management. The US Forest Service's actions on our national forests, which we fund, are at odds with reducing carbon emissions, and reducing carbon emissions is what will stop fire seasons from getting worse.

Motorized trail up to Fish Lake, FOC staff photo

Court holds motorized use illegal in Big Burn

By Gary Macfarlane

On March 13, U.S. District Court Judge Winmill ruled that the Forest Service violated its Clearwater National Forest Plan as well as the U.S Forest Service's Travel Management Rule for the area in allowing motorized vehicles into the Fish Lake part of the proposed Great Burn Wilderness (the area is often referred to as Kelly Creek or the Hoodoo Roadless Area). The Forest Service recommended Congress designate the locale as wilderness in 1987. Friends of the Clearwater (FOC) challenged the Clearwater National Forest Travel Plan for Recommended Wilderness in 2021 to protect Fish Lake, the Fish Lake Trail, and other areas of the Forest from motorized use harmful to bull trout, grizzly bear, elk, and other species. Friends of the Clearwater was represented by John Mellgren of the Western Environmental Law Center and David Bahr of Bahr Law Offices, both in Eugene, Oregon. FOC's own Katie Bilodeau served as local counsel.

The decision builds on a 2015 court decision that found the Clearwater National Forest's Travel Plan governing motorized use failed to comply with federal law. In that case, where FOC, the Palouse Group Sierra Club, and Alliance for the Wild Rockies, were plaintiffs, represented by David Bahr of Bahr Law Offices, the court ruled the Forest Service had violated the Clearwater Forest Plan's requirement to protect elk habitat in specific areas by authorizing motorized use and had violated the Travel Management Rule requiring minimization of impact from motor vehicles.

Rather than abide by the court's ruling and its own Forest Plan, the Forest Service continued harming wildlife and again violated the plan when, in 2017, the agency decided to allow motorized use on the trail to Fish Lake, in a recommended wilderness area. The Forest Service has had over seven years to correct the unlawful deficiencies with the Travel Plan and did nothing. This decision confirms the earlier ruling that allowing motorized trail use in these areas is unlawful. The decision recognizes that the Forest Service utterly failed to follow the Travel Management Rule and the Forest Plan. This suggests motorized use on the entire Clearwater National Forest may have no legal basis.

Fish Lake in the Big Burn Recommended Wilderness, Brett Haverstick Photo

Judge Winmill also ruled the Forest Service failed to adequately protect the best summer elk habitat, based on the latest science. Areas that contain the most important elk habitat, for which the Forest Plan has established the highest standard of protection, include not only the Fish Lake Trail, but also some other large roadless areas.

"After a similar court order seven years ago, the Clearwater National Forest dragged its feet on responsibly managing motorized recreation in this crown jewel of Idaho's wild places," said John Mellgren, general counsel at the Western Environmental Law Center. "This new court order makes it abundantly clear forest managers cannot ignore federal law and must involve the public in deciding where and when to allow motorized recreation on federal public lands."

The ruling was not perfect, however. It concluded that the Forest Service had adequately evaluated impacts under the National Environmental Policy Act even though it had failed to follow the Forest Plan and minimize impacts from off-road vehicle use. Further, Judge Winmill has not yet rued on the remedy for the continuing violations. That ruling will be coming later once both sides have submitted additional legal briefings.

While we don't know what the Court will decide as a remedy on the wildlife protection standard, what the latest ruling and the earlier ruling and the 2015 found that the Forest Service is out of compliance with the Forest Plan and lawsuit settlement areas that contain the most important elk habitat. Aside from the Fish Lake Trail in the proposed Great Burn Wilderness, there are other areas that meet those criteria. The Forest Service has been foot-dragging on the following areas for 7 years after Judge Lodge's 2015 ruling:

Approximately 200,000 acres, of the Weitas proposed Wilderness in the Northern Rockies Ecosystem Protection Act, particularly Cayuse, Fourth of July, and most of Weitas drainage.

Approximately 50,000 acres of Fish and Hungery Creeks and another 25,000 acres just east, in the same roadless area, proposed as Wilderness in the Northern Rockies Ecosystem Protection Act.

Approximately 10,000 acres proposed as part of the Mallard-Larkins Wilderness in the Northern Rockies Ecosystem Protection Act.

We also don't know what remedy would be imposed in order to minimize conflict, as per the executive orders. That will require another round of public comment.

John Mellgren, Dave Bahr, and Katie Bilodeau have done great work. Thanks!

(Roadless cont'd from page 5)

from publication in the Code of Federal Regulations. So, even though the 2001 Roadless Rule governs all inventoried roadless areas outside of Colorado, Idaho, and currently the Tongass, the rule itself cannot be found in the Code of Federal Regulations. HR 279 thus sends a reader on a goose chase to find other references to figure out what HR 279 permits and prohibits. Beyond such access barriers, the three roadless rules need a substantive revamp, given how the Forest Service currently administers them.

The roadless rules aren't as protective as they once were because the Forest Service now commonly applies the roadless rules' logging loopholes. Many folks likely don't realize that there even are loopholes that allow for logging in inventoried roadless areas. For example, did you know that the 2001 Roadless Rule and the Idaho Roadless Rule allow logging "generally small diameter timber" in order "to improve threatened, endangered, proposed, or sensitive species habitat"? While one is hard pressed to find an instance where logging has improved threatened, endangered, proposed, or sensitive species habitat, there are many counter examples. For example, the US Fish and Wildlife Service listed grizzly, lynx, and bull trout under the Endangered Species Act, in part because of habitat destruction—impacts from logging and roadbuilding. And did you know that, in California, to get around the "generally small diameter" tree provision in the 2001 Roadless Rule, the Forest Service has gone so far as to conclude that trees under 21 inches diameter at breast height were "small diameter" when authorizing logging? In this view, most trees in some of the West's dryer forests could be logged under the Roadless Rule.

"The roadless rules aren't as protective because the Forest Service applies loopholes to log."

The Forest Service counts logging as a benefit or detriment to roadless, depending on whether the agency is predicting future impacts or evaluating past ones. While the 2001 Roadless Rule allows cutting only if it will "maintain or improve one or more of the roadless characteristics," FOC has found no instance where the Forest Service analyzed, post-project, whether activities accomplished that stated goal. Rather, the agency forgets the justification for the logging, and when it considers past actions in roadless areas, it summarily categorizes logging as an activity that degrades roadless areas. In both Idaho and Montana, FOC found examples where the Forest Service evaluated logged roadless areas years later when considering what to recommend as wilderness. The Forest Service did not consider whether logging had "improved" roadless characteristics (as forecasted in the environmental analyses). Instead, the Forest Service categorically excluded from wilderness recommendations the roadless areas where logging had occurred, even in instances where logging was only two percent of the entire roadless expanse.

Of course logging to improve roadless characteristics makes no sense. But, this language, which originated in the 2001 Roadless Rule and carried over into the 2008 Idaho Roadless Rule, has existed long enough that we can now document that falsity. And the Forest Service has used this falsity to log national roadless areas under our noses. From 2010-2018, the Forest Service in Montana authorized over 33,000 acres of logging in national inventoried roadless areas. Between 2010-2020, the Forest Service has disclosed accounting to Friends of the Clearwater that is has already authorized or is currently considering what amounts to 86,000 acres of logging in the national inventoried roadless areas in the national forests of Idaho. Because the roadless rules allow logging loopholes and the Forest Service is exploiting those exceptions, cementing these loopholes into law will not protect roadless areas. For this reason, HR 279 and S 877 need amending in order to truly provide the "lasting protection" that the "Roadless Area Conservation Act of 2021," with its lengthy policy statement, purports to achieve. In short, this bill needs to replace and bolster the protection that the US Forest Service can no longer provide in its roadless rules.

Friends of the Clearwater has teamed up with the John Muir Project (which is familiar with the issues in the national roadless areas in California, mentioned above) to educate Congress on what the roadless bill, as currently written, just cannot do. It cannot provide lasting protection for inventoried roadless areas. Together, staff from our organizations are meeting with congressional staff to educate members of the House of Representatives (and eventually the Senate) on the current state of roadless-rule management described above. We are advocating to amend this bill using science more recent than two decades old and our on-the-ground knowledge of how the US Forest Service is exploiting its own regulations. Specifically, all of the nation's inventoried roadless areas, including those in the Tongass National Forests and national forests in Idaho or Colorado, should be brought under one system of governance that protects the nation's inventoried roadless areas equally.

Strengthening roadless protection means eliminating the roadless rules' current logging loopholes, narrowing any tree-cutting exceptions to very specifically defined public-safety needs, and prohibiting the sale or removal of those specific exceptions. With necessary amendments, Congress can transform a bill that intends to protect the nation's inventoried roadless areas into one that actually does.

(NREPA cont'd from page 3)

miles of rivers and streams as wild and scenic rivers under the Wild & Scenic Rivers Act. Rivers are the lifeblood of the region. Runs of salmon, steelhead and native trout need cold, clean, free-flowing rivers.

Wallace Stegner, the great Western writer, called wilderness the "geography of hope." NREPA represents the "geography of hope" not only for the entire wild Rockies bioregion, but for the Wild Clearwater Country. The Clearwater is the northern half of the Big Wild and is centered on the Clearwater Basin, with wildlands also extending into the St. Joe and Salmon River watersheds. The Gospel-Hump Wilderness and the northern portion of the Frank Church-River of No Return Wilderness are found here. Additions such

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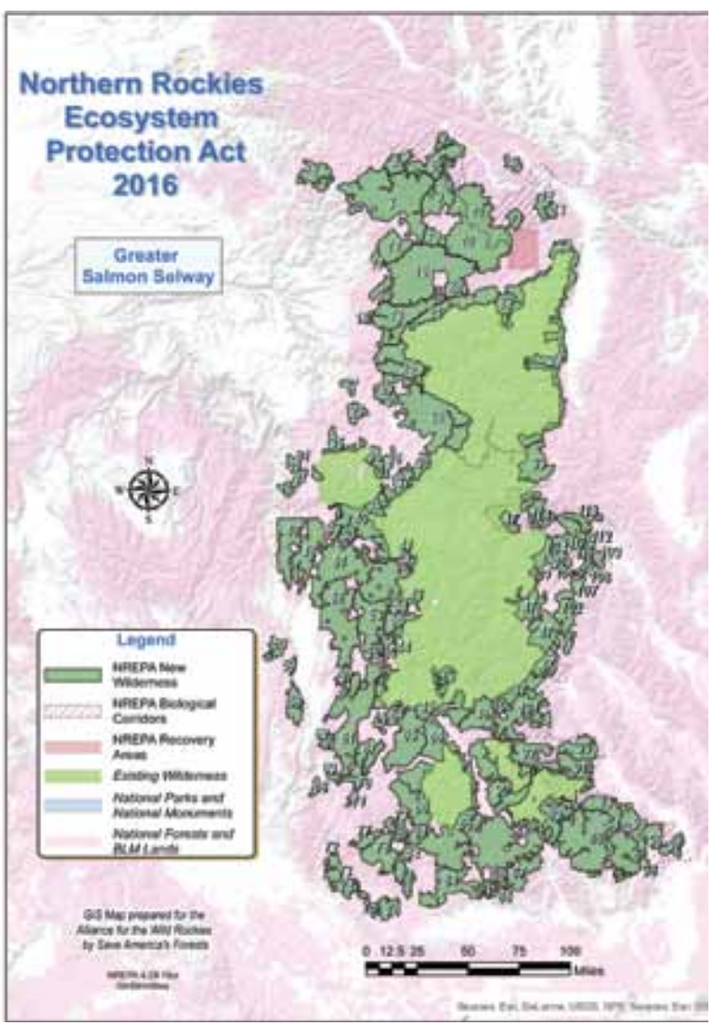

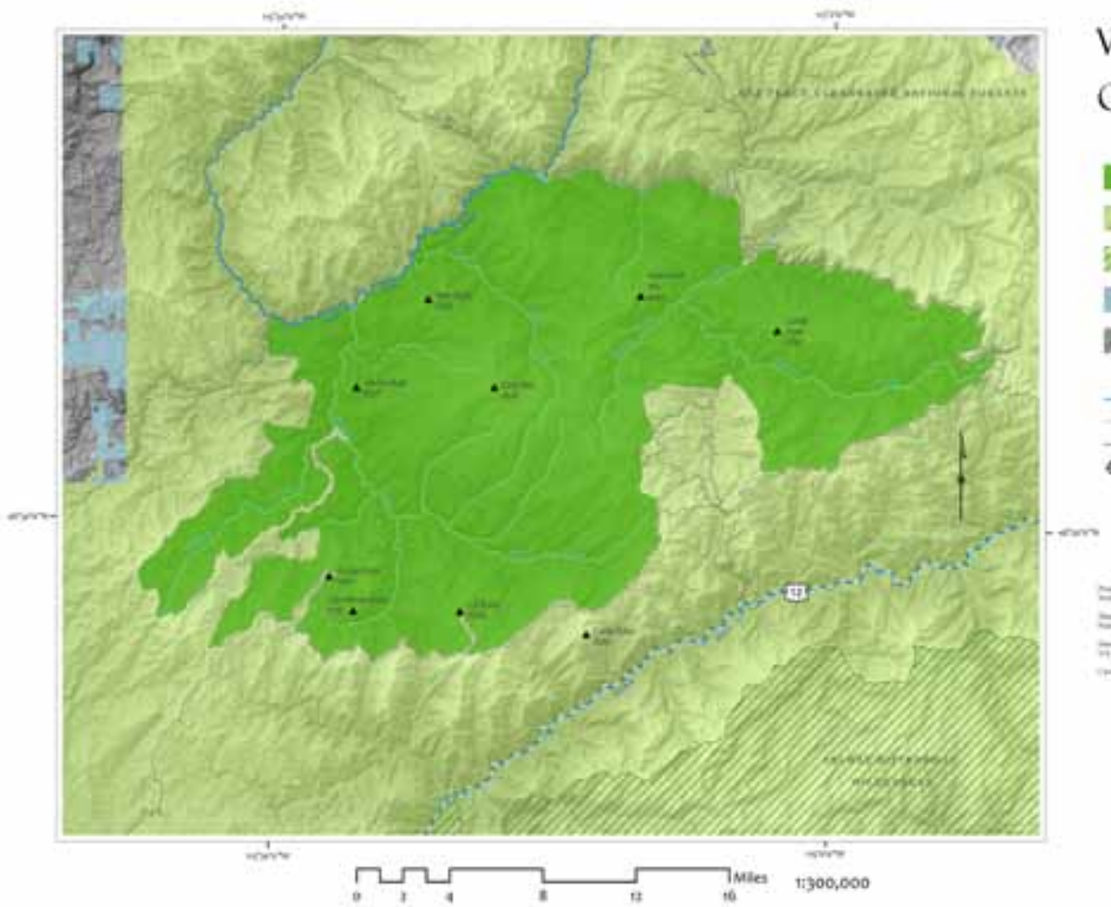

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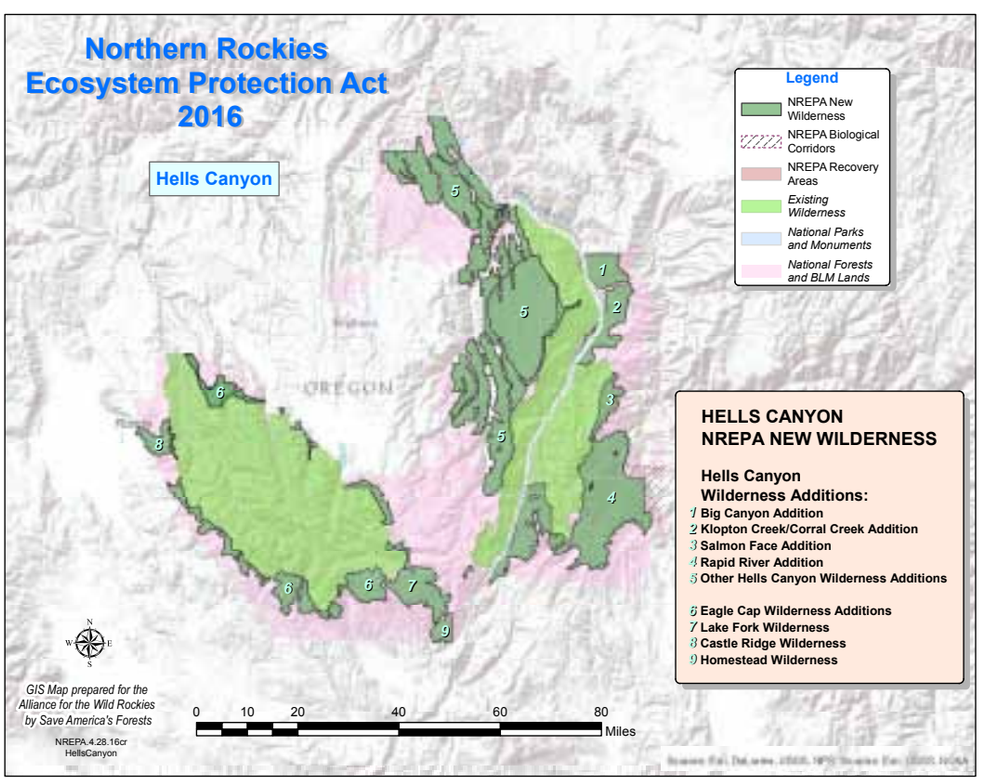
as Cove-Mallard and Johns Creek, would be made to those wildernesses. Only the narrow, winding, rough Magruder road divides this wild area from another very large wild area, the Selway-Bitterroot Wilderness. Meadow Creek, Elk Summit, the Lochsa Slope, and Gedney Creek would be added to that wilderness. Incredible wildlands like Weitas Creek, Pot Mountain, Fish and Hungery Creeks, Kelly Creek/ Great Burn, Mallard-Larkins, and the Upper North Fork Clearwater would be designated wilderness. Rivers and streams like the North and South Fork Clearwater, Colt-Killed Creek, Kelly Creek, Cayuse Creek, the Little North Fork Clearwater, and Three Links Creek would be designated as wild and scenic rivers.

Wild Clearwater Country is perhaps the wildest part of the wild Rockies. From the wet, ancient cedar groves to the headwaters of the Lochsa and Selway Rivers, it has an amazing diversity of life. Endemic species like the Coeur d'Alene salamander, rare inland species like the Pacific Dogwood, and iconic species call this area home. NREPA would ensure that these species continue to find adequate habitat in the Clearwater Basin.



Update

Recently, we learned that a hearing for NREPA had been canceled, at least according to Representative Russ Fulcher, R Idaho. He thanked Representative Joe Neguse (D Colorado), the House Natural Resources Subcommittee chair for canceling the hearing during another hearing. One has to wonder whether Rep. Fulcher is worried many of his constituents actually support NREPA.

One must ask the same question of Representative Neguse, what is he worried about? After all, it is only a hearing to gauge public input, which is supposedly the role of government in a democratic republic.

If the party in power in Congress really wants to live up to the goals proferred by the current administration, there is no better single action than to have a hearing on and then pass NREPA. If the White house is really serious about its 30x30 proposal, it would push for passage of this legislation (NOTE: There is good reason to be skeptical of the Administration's commitment to protecting wildlands and biodiversity and of its 30 by 30 proposal. See the related article in this newsletter).

There seems to be a strange truism in Washington DC these days: Democrats are afraid of Republicans and Republicans are afraid of Republicans. So it goes.

Forest Service reconsiders Dead Laundry

By Katie Bilodeau

Dead Laundry is a proposed project in the North Fork of the Clearwater, and the public comment has appeared to give the Forest Service pause in charging right into a bad logging project. The Forest Service first sought public scoping on logging in the northeast part of the Clearwater National Forest, between Kelly Creek and Hoodoo Pass, in March of 2020. In April 2021, the agency sought comments on a draft environmental assessment. Later that year, in December 2021, the Forest Service released its final environmental assessment and draft decision finding no significant impact, with a public objection period that ended in mid-February. And on March 25, 2022, the Forest Service notified objectors that the North Fork District Ranger had withdrawn his draft decision. The letter notified objectors that the draft decision notice would be "reissued at a later date" with a new objection period. Thank you to all who have commented and objected in 2021. Pressure and facts have given the Forest Service pause.

And the agency should pause. Dead Laundry would inflict intensive logging on almost 3,600 acres of Clearwater Country with over twenty-six supersized clearcut-like openings, would build 52 miles of "temporary" roads and 12 miles of permanent roads, and would reconstruct or maintain approximately 150 additional miles of road. This logging project also targets trees in old growth and inventoried roadless areas. Under the National Environmental Policy Act (NEPA), environmental assessments are meant to ascertain whether a project might have significant environmental impacts. If there are possible significant impacts, NEPA requires an agency to conduct an environmental impact statement. Yet here, the Forest Service maintained in the December decision notice on Dead Laundry that the work summarized above would have no significant impact on any environmental component in the North Fork of the Clearwater. If that seems like an incredible claim, that's because it is.

While this project is concerning for many different reasons, ranging from wildlife to roadless, there are two particularly concerning features worth mentioning here. The first is this new, Forest Service-created fiction that the agency is starting to test, and staff at FOC don't expect this will be the last attempt. The Dead Laundry project proposes over 150 acres of "Old Growth Enhancement," a concept the Forest Service developed without any apparent scientific basis. "Old Growth Enhancement," means the Forest Service would authorize the cutting and removal of trees from old growth, and that tree removal would somehow enhance what remains. When Gary Macfarlane and I were chatting with the North Fork district ranger at a forest-plan public meeting a few years ago, the district ranger asked us what we thought of this new concept. Both Gary and I responded that we'd always be interested in any science on the subject. The district ranger responded something to the effect of, "Well, I'm not much of a science guy..." That sums up "Old Growth Enhancement" as well.

Looking east overtop an area where the Forest Service as recorded a "road" in its inventory, Bilodeau photo.

Old roadbed proposed for reconstruction in Dead Laundry where a wetland now exists, Bilodeau photo

Old growth and mature forests don't exist because of the Forest Service or any human management—they exist because of ecological processes and lots of time. The legacy of wildfire, insects, and disease diversify forest trees in both age and size. These ecological disturbances turn trees into snags. Snags are food sources for insects, which themselves become food sources for birds. Other trees fall to the ground and provide denning habitat for mammals. Protecting old growth is certainly achievable—but it requires protecting the area from human management so natural processes continue to work their magic.

The North Fork Ranger District isn't the only entity trying to float a conceptual, unscientific idea that humans, through logging, can create old growth. We have seen sign-on letters from legislators to nonprofits that discuss "restoring" the structure and composition of old growth. The word "restore," however, is a management-action word. The idea that one can conduct a management action in old growth is antithetical to the idea behind it.

We cannot mimic nature to make it ecologically identical to the result of natural forces governing an area for hundreds of years. And let's not forget what "restoration" means to the Forest Service. The Hungry Ridge Restoration Project is a 7,144-acre logging project and it features clearcutting old growth.

The other concerning feature of the Dead Laundry logging project is the 200-plus miles of roadwork proposed where the Forest Service doesn't seem to fully understand the current conditions. This area of the Clearwater once included a checkerboard of private ownership belonging to a timber company. The timber company transferred land back to the government in a land exchange two decades ago. So, there is an excess

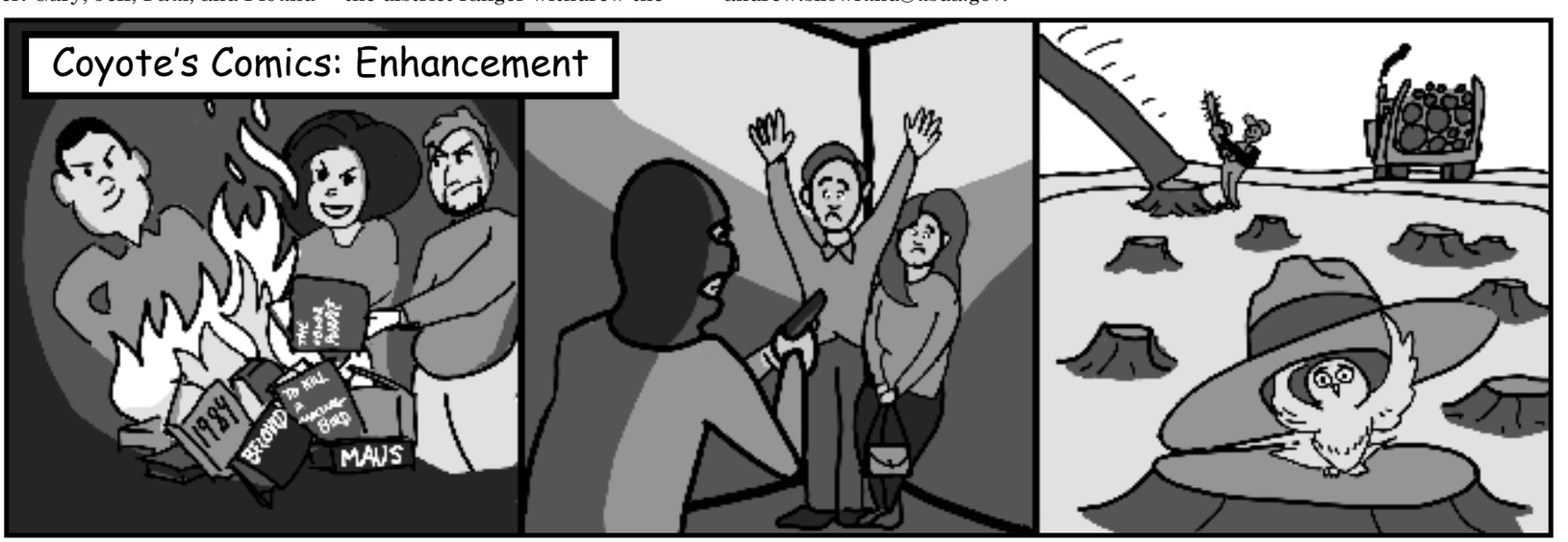
A salamander nymph in the former roadbed. Katie Bilodeau photo.

of old roads in this area, and the Forest Service has admitted that it doesn't have complete information on the extent of those roads.

Last fall, in September 2021, the entire FOC staff took a field trip out to the Dead Laundry area to explore different corners of the proposed project. Gary Macfarlane and I found proposed road "reconstruction" in an area with the features of a wetland: soggy soils, vegetation that thrived in soggy soils, and even running water. Gary, Jeff, Paul, and I found a road so long abandoned that it has essentially become a wetland, complete with salamander nymphs. This gave me an opportunity to test the underwater capabilities of my camera. FOC submitted these monitoring photos and our findings to the Forest Service in our objection on Dead Laundry. But really, it's the Forest Service's job to know existing conditions before it decides on large logging projects.

We are pleased that the district ranger withdrew the decision, and urge the Forest Service to abandon this logging proposal entirely. We encourage the public to keep the pressure on the Forest Service, whether it be objecting to the decision notice if the Forest Service re-issues it at a later date, or reaching out to the North Fork district ranger now to encourage him to withdraw the logging project entirely. You may reach District Ranger Andrew Skowlund at 12740 Highway 12, Orofino, ID 83544 or by email at andrew.skowlund@usda.gov.

We'd like to thank our members and supporters, especially those who took time to comment on the Dead Laundry project. To preserve these great wildlands takes endless pressure, endlessly applied, and that is most effectively done together. And for those who support FOC financially, thank you. Membership donations like yours get FOC staff out in the forest to ground-truth and fact-check the Forest Service.



"Education Enhancement" "Financial Enhancement" "Old Growth Enhancement"

Gary in the 80s. He still uses that pack!

Gary in the Clearwater

Gary's wish for government to follow the law is yet to come true.

On my retirement

By Gary Macfarlane

It was 1994, if memory serves, when I first met Steve Paulson, the founder of Friends of the Clearwater (FOC) when I moved to the Palouse from Utah. I struck up a friendship and had the great fortune to go with Steve and Sue Nelson, his wife, on an extended two-week backpack trip into Kelly Creek, a prime wilderness candidate, in the late summer of 1994. Steve was also heavily involved in the Cove-Mallard Campaign in the 1990s to prevent logging of a crucial area that should have been designated as part of the Frank Church-River of No Return Wilderness. At the time, I told Steve I had "retired" from full-time conservation work at the end of 1993, which I had done for over a decade in Utah with the Utah Wilderness Association. I did let him know I wanted to volunteer a lot of time. At that time FOC was an all-volunteer organization. For work, I was picking up odd jobs here and there and a few years later I eventually landed at the Moscow Food Co-op.

Little did I know that my "retirement" from full-time conservation work would only last until 2001. The departure of Kristin Ruether to go to law school, Friends of the Clearwater's first staff person, and a brilliant one at that, necessitated a search for a new staff member. I was a board member then. I told the rest of the FOC Board I would take on the job, providing we didn't find a candidate in the search. Even though the pay was minimal, I expected another staff person would be found as we had some very good applicants.

Two decades later, I have retired again, though with the same caveat as before—I will help as a volunteer for FOC. I turn 65 this month and I'm not as spry or sharp as I was once. April 1st was my last day as an employee (not an April Fool's joke, I promise!). I have no doubt FOC is in good hands. The current staff—Katie Bilodeau, Jeff Juel, and Paul Busch—already do the vast majority of the conservation work to protect the Wild Clearwater Country. I have grown to love and admire them as colleagues and friends. They possess the knowledge, skills, and temperament to make great strides in protecting this incredibly unique place. I fully expect they will achieve success in spite of the challenges ahead. The current board—Tanya Gale, Chris Norden, Brett Haverstick, Harry Jageman, Beth Hoots, Julian Matthews, Lynne Nelson, and Steve Paulson are a solid governing body. I have known some of these friends for many years and greatly respect their commitment as the unpaid directors of the organization, accountable to the membership.

Together, the board and staff have been implementing a transition plan to ensure stability. This has been a carefully considered process, spanning many months, yet also flexible as needs and problems arise. It would be remiss of me to forgo asking for your continuing support in this time of change, financial and/or as a volunteer. Enclosed is an envelope for your convenience if you are interested in giving an additional donation, volunteering to help out FOC, or both. Expenses are increasing. While staff salaries have grown over the years, they are still very modest. Further, the board is evaluating organizational needs with an eye to hiring another staff member.

The Clearwater Country is a remarkable place—one that I fell in love with at first sight. From the breaks of the Salmon to the Bitterroot crest, from the headwaters of the St. Joe, North Fork, and Little North Fork, to the forests of the Palouse Ranger District, it is the north half of the wildest region in the lower 48 States. Outstanding rivers like the Selway, Lochsa, South Fork Clearwater, and Rapid Rivers are found within the bounds of the Nez Perce and Clearwater National Forests. Old growth cedar, salmon, steelhead, bull trout, wolverine, lynx, and even the rare great bear call this place home. And the challenges to protect this place have never been greater—global warming on an accelerating pace, the federal land management agencies captured by special interests, the body politic in denial and shambles, and rapid population growth in Idaho and elsewhere are just some of these. Amidst this all, FOC has stood steadfast and spoken truth to power.

In spite of these challenges, together we all have achieved some important protection of wild places. Thanks to our monitoring work, done by staff and members of the Friends of the Clearwater, the development of roadless areas—crucial habitat for many species—has largely been thwarted. This contrasts with some other national forests and pubic lands where there is no local organized group to watchdog the agencies. We have stopped, at least temporarily, a large timber sale in the Lolo Creek drainage, a place important for steelhead and fisher. These are just some of the more recent successes. There are many others. We must be eternally vigilant as success tends to be temporary and losses tend to be permanent. The work done by FOC on two important reports is also holding the Forest Service accountable and will play an important role in ongoing legal efforts. It is a sad comment on the state of the US Forest Service that citizens have little or no sway with the agency except in court. In the past, the agency did, at times, listen and make changes when faced with evidence their direction was wrong. That is rarely the case anymore.

Lastly, I want to thank all of the FOC members and supporters, conservation colleagues, and friends who have enriched my life and spoken out for wild country, wild rivers, and wildlife. You have all been an inspiration to me. I may see you on some backcountry trail or volunteering with me in the FOC office in the future.

We will be having a retirement party and potluck the Sunday of Memorial Day weekend, May 29th, at the 1912 Center in Moscow from 5pm-9pm.

Please RSVP by May 20th by calling (208-882-9755) or emailing (foc@friendsoftheclearwater.org) the FOC office!

If you have photos of Gary you would like to contribute to our slideshow, please email them to jeremiah.busch@gmail.com