



# The Clearwater DEFENDER

A publication of the Friends of the Clearwater | Early Summer 2024

## Win! Wolves, bears get trapping limits

Idaho's over-the-top wolf trapping rules harm Endangered Species Act-protected grizzly bears, and the court agreed. Now Idaho's wolf trapping season is 9 months shorter.

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## Does Wilderness Work?

Wilderness Watch staff member Kevin Proescholdt dives into the debate about the Wilderness Act, now reaching its 60th anniversary.

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## How should grizzlies be managed in the Bitterroot?

The USFWS, independent researchers, and Friends of the Clearwater weigh in on how bears can recover.

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## Forest Plan Nears

After objection meeting, few steps before final Nez Perce-Clearwater plan is signed.

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**Friends of the Clearwater**  
*Keeping Idaho's Clearwater Basin Wild*

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Friends of the Clearwater  
PO Box 9241  
Moscow, ID 83843

# 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.

Friends of the Clearwater is a 501(c)(3) non-profit organization. All contributions to Friends of the Clearwater are tax-deductible.

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Editors: Jeff Juel  
Copy Editors: Terry Yackley

Cover photo: Monkeyflower, FOC staff photo.

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Elbridge and Evelyn Stuart  
Foundation, and the Latah Wildlife  
Association!

## Event Calendar

### Free the Snake | July 20th

Enjoy a hot day in the water at Hell's Gate State Park and advocate for a free-flowing Snake River. Bring your own boat!

### Summer Field Monitoring | Ongoing

If you are interested in seeing the Clearwater and helping monitor project areas, leave a message on the office phone with your contact info! 208-882-9755

### Wilderness Act 60th Anniversary Campout | Sept. 13th-15th

Camp out with wilderness lovers to celebrate 60 years of the Wilderness Act. Join us at the Wilderness Gateway campground on highway 12 on the Lochsa River.

### FOC Annual Meeting | Nov 2nd

Saturday in Moscow, Idaho

## Membership Dues Update!

After more than 15 years, FOC is increasing the cost of membership **from \$25 to \$35 annually**.

Costs of living, even in rural Idaho, continue to rise, and we are committed to giving our staff financial security as defenders of the Big Wild.

If \$35 per year is out of your budget, we offer a "living lightly" option at \$15 per year (but please only select if you need to).

You can renew your membership at [friendsoftheclearwater.org/donate](http://friendsoftheclearwater.org/donate)

# UNDERSTORY

email updates

Don't miss a thing! Receive information to make it to all of our events and action alerts to comment on proposals on the Nez Perce-Clearwater National Forests:  
[www.friendsoftheclearwater.org/get-e-news/](http://www.friendsoftheclearwater.org/get-e-news/)

## IN MEMORIAM: ROBERT “RAMON” AMON

BY CHRIS NORDEN

Last September, long time wildlands advocate Robert Amon (known better by his nickname Ramon) passed away at 86. This summer, some of Ramon’s ashes will be spread in the Clearwater by his friends. Ramon was a sharp writer, both funny and inspiring, and deeply committed to saving America’s forests. Many FOC members owe their participation in activism to his urging. Rest in Peace, Uncle Ramon.

The following reflection is from FOC board member Chris Norden:

“When I was just starting out as a faculty member at Lewis-Clark State College in Lewiston ID, I was asked to teach a course titled Ethics & Ecology that was intended to be an environmental ethics and public policy class, to include interdisciplinary forays into environmental history, literature, and philosophy also.

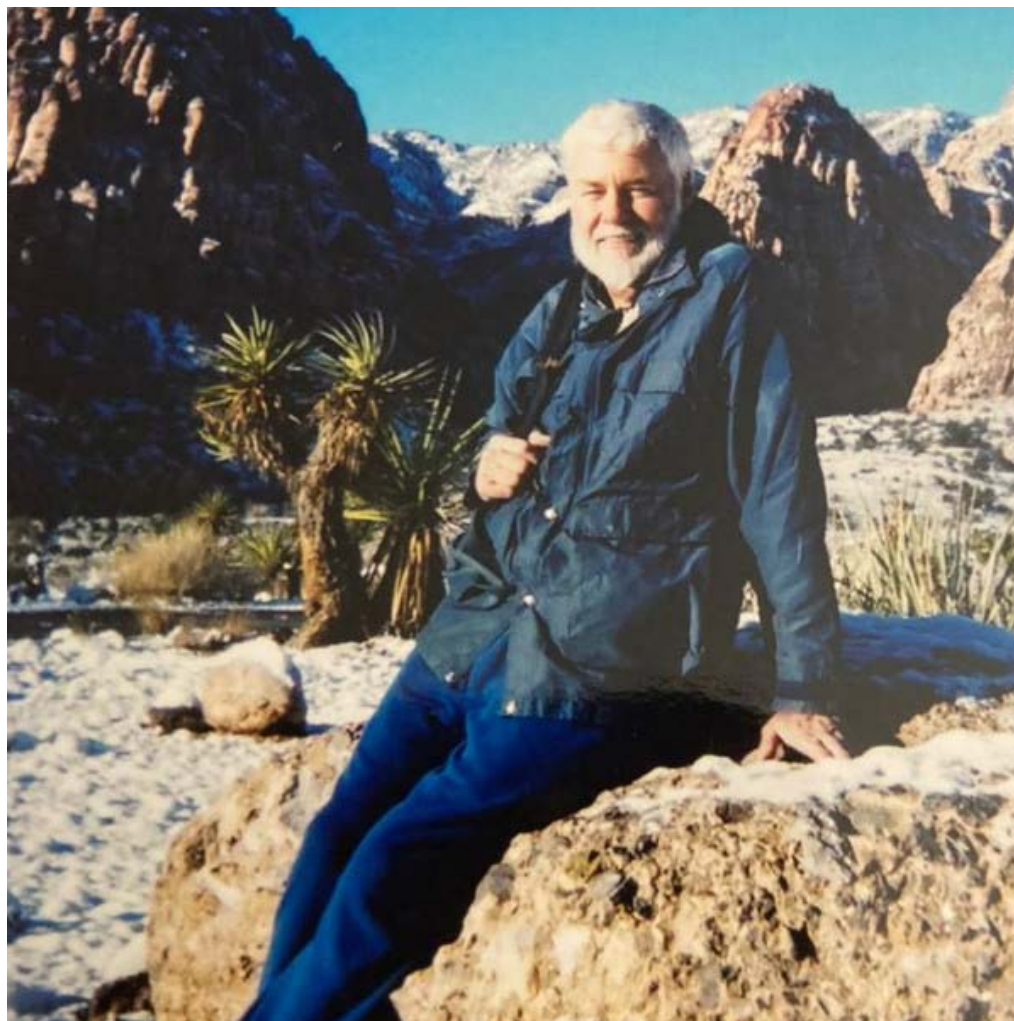
Two main innovations I introduced were to integrate Indigenous ways of knowing and also to invite guest speakers from various parts of the spectrum, meaning tribal elders and teachers, plus industry people and wildlands

defenders and activists.

One of the very best and most memorable class visits was with Ramon in the mid-1990s while he was in town as part of his Bus Brigade barnstorm during the Cove-Mallard campaign. With his combination of wild humor, intense friendliness, and mind-blowing personal story he had the students totally mesmerized, showing how a straight (by his reckoning) business guy from the East coast could be transformed into a fully committed environmental activist.

Compared to Ramon’s visit, subsequent encounters with industry apologists running through their lists of reasons why it makes “dollars and sense” to continue destroying ancient forests and watersheds obviously rang false.

When I was winnowing through my amassed papers prior to officially retiring in 2022, I was sure to keep the note Ramon sent me after his visit, thanking me and my students for hosting him! What a gentleman and what a passionate and fierce warrior—clearly not mutually



Ramon in a desert snow. Amon family photo.

exclusive identities, as all who know recently retired FOC leader Gary Macfarlane know equally.

Ramon deeply influenced me and my own approach to teaching, perhaps most especially the idea that being a real and open human being and laying one’s values and biases on the table for students to see at the outset

was really the only way, as versus being an uptight authority figure who claims to have all the answers ahead of time.

Thanks, Ramon!”

## FOREST PLAN REVISION UPDATE: THE END IS NEAR

BY JEFF JUEL

The U.S. Forest Service is concluding its land management plan revision process, to replace the 1987 Forest Plans for the Nez Perce National Forest and Clearwater National Forest with a single Revised Forest Plan (“RFP” or “Forest Plan”) for the administratively combined Nez Perce-Clearwater National Forests

(NPCNF). On May 6-8 the Regional Forester hosted online Objection Resolution discussions, a formal procedure whereby

Objectors could dialogue with the Forest Service via online video conference about topics they raised in their objections to the RFP.

In negating any expectation that “Resolution” of objections was on the agenda, Regional Forester Leanne Marten characterized the sessions more as

a chance for her to “help clarify” the remedies a few hundred Objectors expressed or implied in their objections, identifying a multitude of problems with the RFP. But given the late stage we find ourselves in, and having seen our concerns being consistently ignored while participating during every step of this excruciating 10+ year process, Friends of the Clearwater and our co-objectors did not come away from the meeting with an increased sense of optimism for the future

management of our Forest.

A hearty thank you goes out to those participating with me on behalf of our objection, including grizzly bear expert Mike Bader, Adam Rissien of WildEarth Guardians, and FOC Board members Harry Jageman, Gary Macfarlane and Chris Norden.

Regional Forester Marten said she expects to conclude final objection review sometime late June with a formal letter of instructions to Forest Supervisor Cheryl Probert.

(cont’d pg. 11)

# GRIZZLY BEAR RECOVERY: THE NATURAL WAY

By JEFF JUEL

In last summer's Defender we reported on the results of a lawsuit resulting in a federal court judge ordering the U.S. Fish & Wildlife Service (USFWS) to update an Environmental Impact Statement (EIS) from 2000 outlining federal government actions to recover grizzly bears in the Bitterroot Ecosystem (BE). Since the court's decision, the USFWS submitted a timeline for updating the EIS that included an initial 60-day scoping (public comment) period, which ended March 18, 2024. The EIS will consider options for restoring grizzly bears to the BE, a geographic area mostly in Idaho with a very sparse grizzly population, but has nevertheless been identified as important for recovering this threatened species across its former range.

During the scoping period, a coalition of organizations including FOC submitted a letter describing the Citizen Alternative: Natural Recovery with ESA Protection and Connectivity Areas. "Natural Recovery" under this Citizen Alternative means taking actions to facilitate natural immigration from other areas with denser grizzly populations.

Under our Natural Recovery alternative, the BE—the primary geographic recovery unit—would be expanded to 21,612 square miles, encompassing the Selway-Bitterroot, Frank Church-River of No Return and Gospel Hump Wildernesses and surrounding primarily federal public lands on the Nez Perce-Clearwater and six adjoining National Forests. This boundary delineation is informed by the results of numerous peer-reviewed and published analyses of grizzly bear habitat potential.

Our Natural Recovery alternative also establishes a larger BE Demographic Monitoring Area, which includes

a buffer zone 10 miles wide surrounding the Recovery Area plus Connectivity Areas linking the BE to three others: the Cabinet-

Yaak, Northern Continental Divide and Greater Yellowstone. This would direct the USFWS to prepare a Conservation Strategy with DMA management recommendations for the Forest Service, Bureau of Land Management (BLM) and the states of Idaho and Montana. The Conservation Strategy would set standards to be amended into land management plans for the national forest and BLM lands within the DMA.

Standards and other measures in our Natural Recovery alternative are intended to increase habitat security for bears. These include:

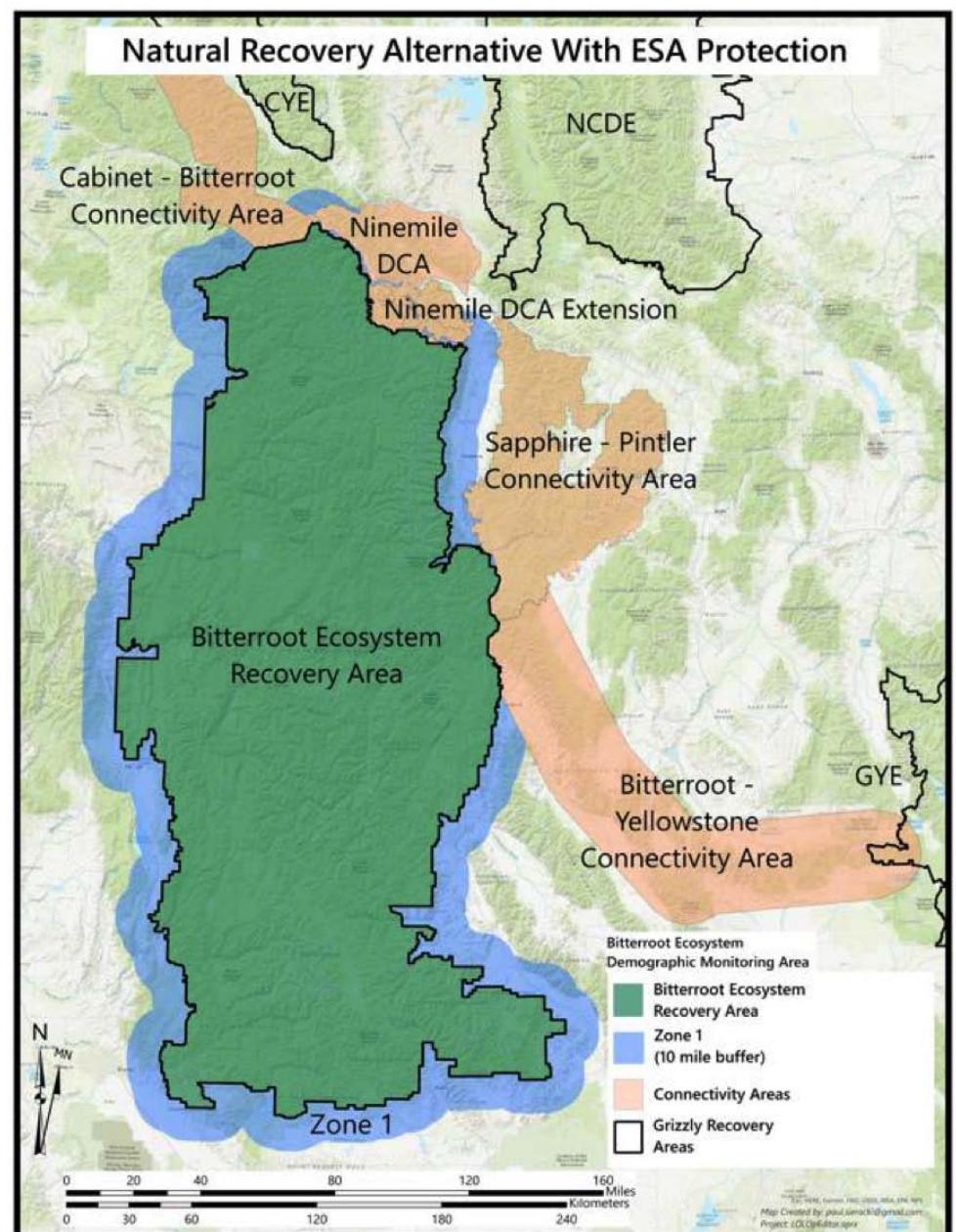
- Limiting the effects of roads, logging, livestock grazing, mining and motorized access and recreation on federal public lands in the BE and buffer zone
- developing management direction for the Connectivity Areas
- establishing requirements for sanitation such as bear resistant garbage cans/dumpsters and signage
- adopting livestock conflict reduction measures on federal public land including prioritizing non-lethal conflict reduction options when conflicts occur, and the retirement and/or closure of livestock grazing allotments.

The Natural Recovery alternative also calls for:

- information and education campaigns known as "Bear Aware" or "Bear Smart" to reduce conflicts and increase safety for communities, private landowners, businesses, hunters and recreationists
- identifying potential sites for constructing highway passage structures to allow



A male grizzly at a bear-baiting station near Newsom Creek on the Nez Perce National Forest in 2019.



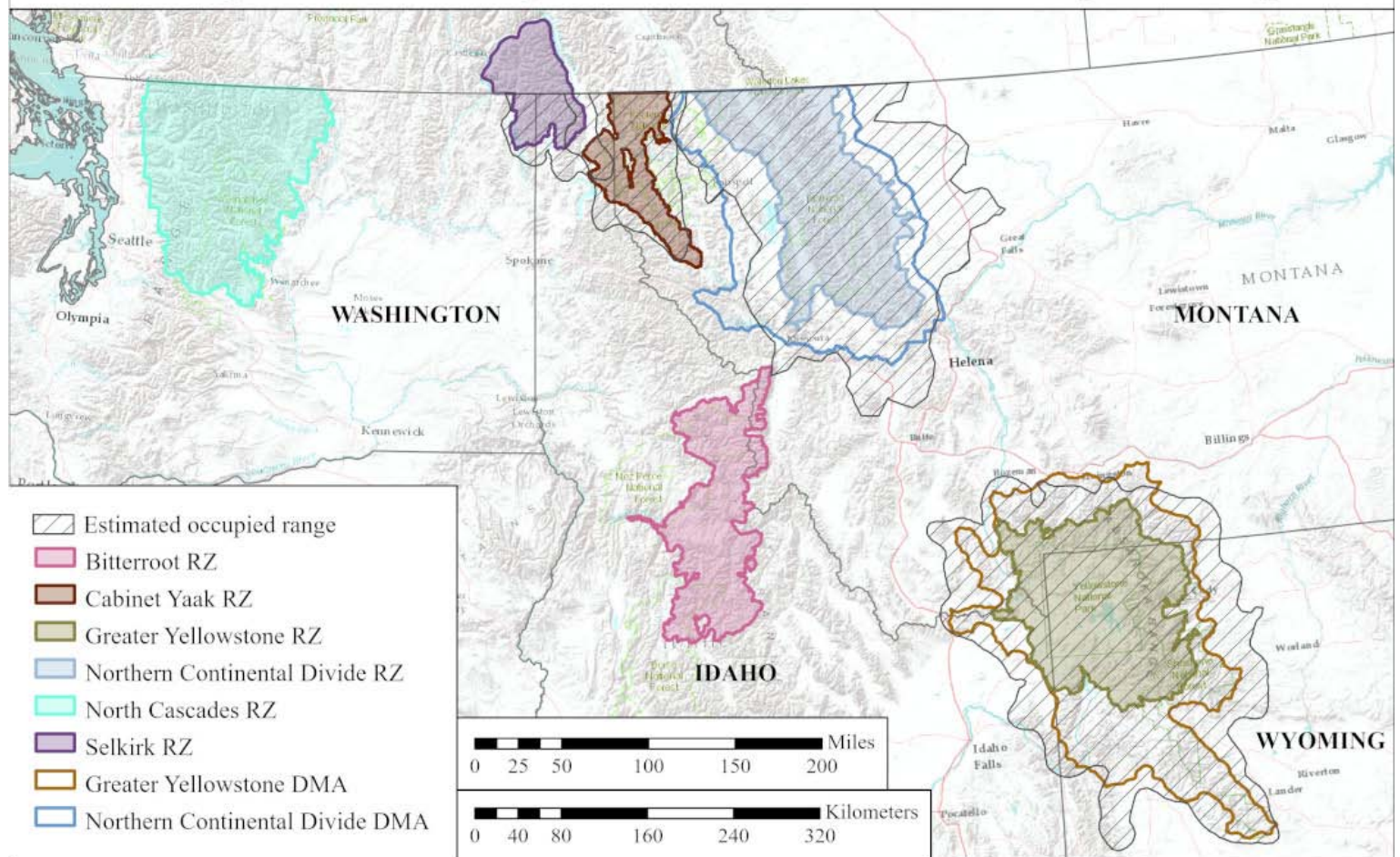
The boundaries of the Bitterroot Ecosystem Recovery Area in the Natural Recovery Alternative, from Paul Sieracki

safer passage for both wildlife and motorists

• forming a Scientific Committee comprised of state, federal, tribal and independent scientists, tasked with reviewing, evaluating, and making recommendations on recovery efforts in the BE. The committee would also evaluate potential impacts from state wildlife management regulations and practices which may pose risks to grizzly bears

Based on the USFWS's original solicitation for comments (found at <https://www.fws.gov/BitterrootEIS> along with more information), the agency may be favoring an alternative featuring artificial population augmentation. This means trapping and relocating grizzly bears from other recovery zones into the BE to establish an “experimental, nonessential population” of grizzly bears under the 10(j) rule of the

## Grizzly Bear Recovery Zones and Estimated Occupied Range



Estimated 2022 occupied grizzly bear range in 2022. Just 100 miles separates the Northern Continental Divide and Greater Yellowstone Recovery Zones. In this map, the Cascades and Bitterroot are unoccupied. Note that the Bitterroot Recovery Area is about half the size of the area proposed by FOC and allies (previous page). USFWS map

Endangered Species Act (ESA). FOC opposes this idea for three major reasons. For one, under 10(j) grizzlies in the BE would not enjoy full protections as a Threatened species under the ESA. Already the USFWS too often authorizes lethal and other heavy-

**“Already the USFWS too often authorizes lethal and other heavy handed control actions as grizzly bears come into conflicts.”**

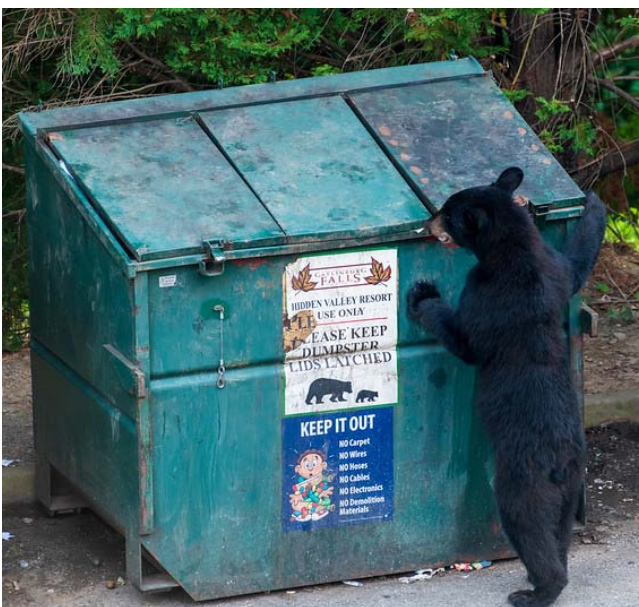
handed control actions as grizzly bears come into conflicts, so the agency would be even less likely to favor nonlethal actions for individual bears. Second, research has shown that people in Idaho would be far more accepting of grizzly bears naturally repopulating than “government bears” brought in artificially. Finally, the USFWS is likely to keep its unscientific 2000 recovery area boundary, which is too small to support a viable population and assist with grizzly bear recovery across the Northern Rockies.

From USFWS's timeline, the next (and

perhaps only remaining) formal public input opportunity will be in July 2025 when the draft EIS is issued for a 60-day comment period. After that, the agency anticipates issuing a final Record of Decision in October 2026. If the decision is to declare and/or establish

an “experimental, nonessential” population, the USFWS would institute a subsequent rulemaking under section 10(j) of the ESA soon after.

The USFWS needs to hear support for our Natural Recovery alternative and strong opposition to any experimental, nonessential 10(j) rule. Please go to our website under [www.friendsoftheclearwater.org/grizzly-bear-recovery/](http://www.friendsoftheclearwater.org/grizzly-bear-recovery/) to find our comment letters describing the Natural Recovery alternative, an alert with talking points, and a link for sending an email to USFWS director Martha Williams.



A black bear yearling failing to enter a bear-resistant dumpster in California. Puddin Tain on Flickr

# VICTORY! WOLF TRAPPING REDUCED FOR GRIZZLY BEARS

By PAUL BUSCH

Friends of the Clearwater and allies, represented by EarthJustice, won important protections for wolves and grizzly bears in Idaho. Our lawsuit, which challenged Idaho's 2021 anti-wolf bill, showed that unlimited trapping and snaring of wolves would jeopardize federally-protected grizzly bears in Idaho. The court agreed, and Idaho had its wolf trapping season reduced by 9 months in most of the state, now only legal during grizzly bear winter denning season.

The win is a crucial rebuke to anti-wildlife bureaucrats, who continue to advocate near-extinction through aggressive state management. A similar case won protections in Montana, over a similar anti-wolf bill.

## Grizzlies in Idaho

Grizzly bears do live in Idaho, but not in large numbers. Known breeding populations exist in different corners of the state. Up north, grizzlies live in the

*"If life for protected grizzlies is hard, life for unprotected wolves is abysmal"*

Selkirk range in Idaho and British Columbia and about in the Cabinet and Yaak ranges (though few are on the Idaho side). In total, roughly 50 grizzly bears live in the panhandle.

In southern Idaho, grizzlies from the Yellowstone Ecosystem have dispersed into the Island Park area as well as the Wyoming/Snake/Big Hole ranges east of Idaho Falls. Estimates place this population between 30 and 50 bears.

Both the panhandle and southeast Idaho are dangerous habitat for grizzly bears. These are areas riddled with roads, meaning easy access for humans.

Bear survival is limited by the frequency of interactions with humans and the lethality of those interactions. Areas with lots of people, guns, cars, food, and traps (like the Selkirks or Island Park) are much more dangerous for bears than places with few people, guns, cars, food, or traps (like backcountry Yellowstone), even if the habitat is high quality. In easy-access places, more hunters can mistake grizzlies for black bears, drivers can hit them along highways, and trappers can catch them in traps and snares meant for other species. These mortal meet-ups with people add up, and these populations remain close to collapse.

There are, of course, huge areas in Idaho without roads, people, or cars. The wildlands of central Idaho – some call it the Big Wild – make up the best unoccupied habitat for grizzly

bears in the lower 48. Grizzly bear researcher Dave Mattson calls it "the grizzly bear promised land," and notes it is almost impossible to guarantee the survival of grizzly bears in the lower 48 without a significant population in central Idaho.

But how do grizzly bears get there? You could reintroduce them, which would enrage some Idahoans and limit federal protections for the bears. Or, you could simply let bears walk in, making sure they were protected the whole way (see "Natural Recovery" on page 4).

Of course, protections for grizzly bears aren't perfect.



A grizzly bear with snare around neck (right) in Katmai National Park. NPS photo

Grizzlies still get killed for preying on livestock or becoming accustomed to human food, and many counties have no food storage requirements for properties in grizzly country. But equally dangerous for grizzlies are the total absence of protections for Rocky Mountain wolves.

## Wolf Trapping Fever

If life for protected grizzlies is hard, life for unprotected wolves in is abysmal. Wolves in the Northern Rockies were forcibly delisted by legislation in 2015, starting the current wave of anti-wolf state management. We are now suing for to re-list wolves (page 9).

Of the methods to kill wildlife, trapping is the most indiscriminate, since the trapper cannot decide when the trap goes off, even if the "wrong" species walks into it.

In Montana and Wyoming, grizzly bears have been killed by snares and traps set for other species. Bears that have survived have been maimed for life, missing limbs or toes. And illegal trapping of grizzly bears is almost certainly underreported by trappers – who wants to tell the feds they killed a threatened species?

The 2021 Idaho wolf law allowed year-round live-bait trapping on public and private lands in Idaho. This persistent, indiscriminate threat to grizzlies made the dangerous path to the Grizzly Promised Land even more risky. That's why we took the State of Idaho to court.

## Litigation and Next Steps

Thankfully, the court decided in favor of wolves and grizzly bears. The judge ordered the state of Idaho to prohibit wolf trapping in parts of Idaho that have confirmed grizzly sightings or consistent populations. The injunction prohibits trapping and snaring wolves between March 1st and November 1st in Idaho hunting regions 1, 2, 7, and 6. Trapping and snaring will continue during winter when grizzlies are mostly denning.

Member donations make this lawsuit possible. Thank you for your steadfast support of Idaho's native carnivores. Wolves and grizzly bears have a crucial part to play in our ecosystems, and your financial support means we can take bad policy to court for our wildlife.

# THE WILDERNESS ACT IS STILL PROTECTING NATURE, IF WE ALLOW IT

By KEVIN PROESCHOLDT OF WILDERNESS WATCH

It's unfortunate that the two UCLA biologists who blasted the 1964 Wilderness Act in an opinion essay titled, *Is the Wilderness Act Still Protecting Nature?*, (available on [zocalopublicsquare.org](http://zocalopublicsquare.org)) didn't also research the background and meaning of this vital law before attacking it. Their opinion piece contained profound errors as well as a self-serving myopia with regard to their own desired research activities in designated Wilderness.

Congress passed the 1964 Wilderness Act sixty years ago to "preserv[e] the wilderness character" of an initial National Wilderness Preservation System of 54 areas totaling 9.1 million acres. Today, in a tremendous conservation success story, the Wilderness System has grown to protect over 800 areas totaling over 111 million acres in 44 states and Puerto Rico, making it America's most essential law to preserve biodiversity and protect the genetic diversity of thousands plant and animal species, including those that are threatened and endangered. In fact, America's National Wilderness Preservation System protects over 150 distinct ecosystem types across the country. In this regard, posing the question, "Is the Wilderness Act Still Protecting Nature?" is absurd and dangerous, even more so considering the world is in the

*"What we now need on this 60th anniversary of the Wilderness Act is a reinvigoration of humility and restraint toward Wilderness"*

midst of an extinction crisis.

The protections of the Wilderness Act include a ban on logging, mining, roads, buildings, structures and installations, motorized and mechanized equipment and more. The authors of the Wilderness Act sought to save these areas as places "untrammled" or unmanipulated

by modern society, as a refuge for wildlife, and where the ecological and evolutionary forces of Nature can continue to play.

The two UCLA biologists who blasted the Wilderness Act first attacked conservation organizations that have sued the National Park Service (NPS) for



## Love Wilderness?

Join Wilderness Watch, FOC, and more at the Wilderness Act 60th Anniversary Rendezvous at Wilderness Gateway Campground off of highway 12 on the Lochsa River, Sept. 13-15th. Email [brett@wildernesswatch.org](mailto:brett@wildernesswatch.org) to find out more!

its plans to violate the Wilderness Act with logging, burning, and planting of Giant Sequoias within designated Wilderness in Sequoia and Kings Canyon National Parks in California, then assailed the

NPS for daring to limit permanent fixed climbing anchors in Yosemite National Park. They claimed that these national parks are "neither remote nor roadless," apparently oblivious of the fact that Congress has designated 768,222 acres of Sequoia and Kings Canyon National Parks as Wilderness (over 93 percent of the park),

and 704,624 acres of Yosemite National Park as Wilderness (over 94 percent of the park). Yes, the Wilderness Act applies to these national parks, and the conservation groups that the two UCLA biologists attack are merely trying to force the NPS to abide by federal law.

The real crux of the UCLA biologists' complaints is that they aren't allowed to violate the Wilderness Act to conduct whatever research they want

*Volunteers doing trailwork in the Gospel-Hump Wilderness. You can do trailwork, research, hunt, fish, boat, horseride, backpack, and climb in wilderness, as long as you follow wilderness ethics. FOC photo*

in the Maroon Bells-Snowmass Wilderness in Colorado, and other designated Wildernesses. Wildernesses are not closed to scientific research, of course, but only to those kinds of research projects that damage wilderness character and violate the Wilderness Act.

In this regard, these two UCLA biologists are little different from other interest groups that want to violate or weaken the Wilderness Act for their own personal activities. A handful of mountain bikers have tried to weaken the Wilderness Act in Congress for years to allow their mechanized machines in wilderness. Some rock climbers are now pushing Congress via the

so-called Protecting America's Rock Climbing Act to allow them to deface wilderness rock faces by pounding in permanent bolts and pitons rather than using only removable climbing protection. Trail runners want exemptions from the ban on commercial trail racing. Drone pilots and paragliders want their aircraft exempted from Wilderness Act protections. Recreational pilots want to "bag" challenging landing sites in wilderness. The list of those seeking to exempt their activities from the Wilderness Act is long, and growing.

Rather than divvying up our priceless wilderness heritage, with a slice of the wilderness pie going to any interest group that believes its own activities should be allowed regardless of the damage to Wilderness or the Wilderness Act, we need to remember that designated Wildernesses have deep values far beyond our human uses of them. Our species can still visit Wildernesses, of course, but our uses of Wilderness must not degrade the wildness of the area, with all of its intangible values. Scientists can continue to conduct research in Wilderness, but only if they design their research so as to not harm Wilderness.

We must re-learn to practice the humility and restraint toward Wilderness that the architects of the Wilderness Act believed in 60 years ago. Only then can the Wilderness Act—and the Wilderness areas it preserves—survive for another 60 years into the future. That goal will not be accomplished by chopping it up like pieces of a pie.

*Kevin Proescholdt is the conservation director for Wilderness Watch, a national wilderness preservation organization ([www.wildernesswatch.org](http://www.wildernesswatch.org)). He has studied and worked with the 1964 Wilderness Act since 1974. Among his wilderness publications is *Troubled Waters: The Fight for the Boundary Waters Canoe Area Wilderness* which, among other things, tells the story of the only time the 1964 Wilderness Act has been substantively amended.*

# MAPPING THE PLAN

By PAUL BUSCH

Readers may remember the maps of roadless areas included in the 2023 Winter edition of the Defender. In those maps, there were some mistakes, as well as some small omissions of roadless country to make the maps easier to read.

Our recent intern Kylie Wilson (also introduced in an article from the 2023 Winter Defender) happens to be a real pro with ArcGIS, a mapping software. This is just one of the creations she made during her internship, a more fully realized (and more graphically appealing) map of the wildlands of the Nez Perce and Clearwater National Forests.

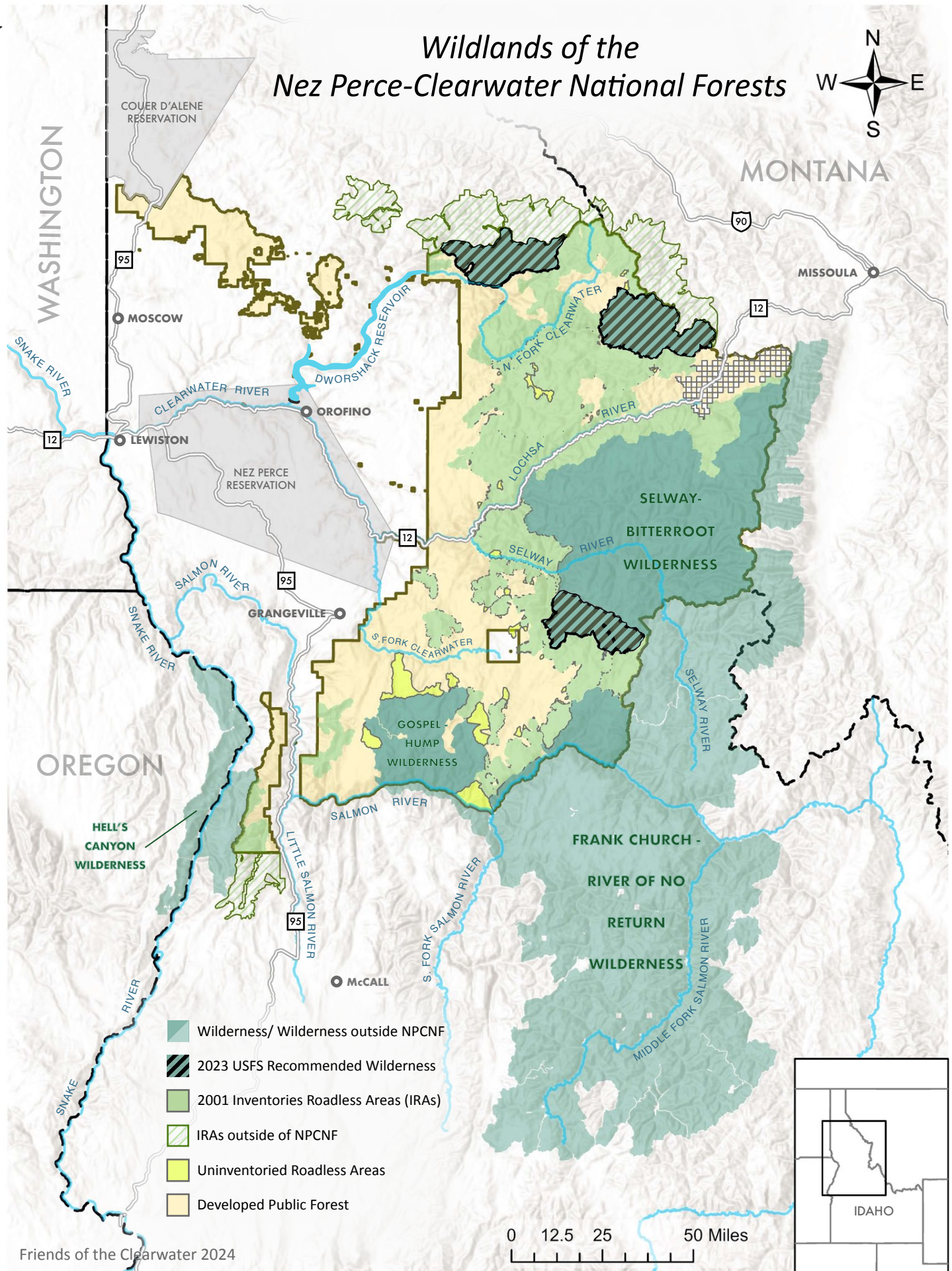
This map, which you can separately view (and download, print, etc) on our website at [friendsoftheclearwater.org/wildlands-map/](http://friendsoftheclearwater.org/wildlands-map/), attempts to simplify complex land management categories to give a bird's eye view of what is at stake in the next Nez-Clear forest plan.

This map is centered on north-central Idaho, with Montana on the right hand and Washington and Oregon at left. The brown lines are boundaries of the combined Nez Perce-Clearwater National Forests. Within that area, light tan represents roaded areas, light green represents inventoried roadless areas (areas eligible for wilderness designation), and the darker teal color is existing wildernesses, the Selway-Bitterroot, Gospel-Hump, and the northern edge of the Frank Church-River of No Return.

Three roadless areas are striped with black borders. These are portions of the Mallard Larkins (north), Great Burn (northeast), and Meadow Creek (south) that are recommended for wilderness designation in the new final draft forest plan. They amount to about 18% of the roadless areas eligible for wilderness status.

For more information on the map, as well as on the forest plan more generally, please visit [www.friendsoftheclearwater.org/forestplan/](http://www.friendsoftheclearwater.org/forestplan/).

## Wildlands of the Nez Perce-Clearwater National Forests





# PROTECT THE GRAY WOLF!

By JEFF JUEL

On April 8, wildlife advocacy and conservation groups including Friends of the Clearwater filed a lawsuit in the U.S. District Court of Montana, intending to gain protections under the Endangered Species Act (ESA) for the gray wolf in the states of Idaho, Montana and Wyoming. This action comes on the heels of the Feb. 7 determination by the U.S. Fish and Wildlife Service (USFWS) that the Western U.S. distinct population segment (“DPS”) does not warrant listing as an endangered or threatened species under the ESA.

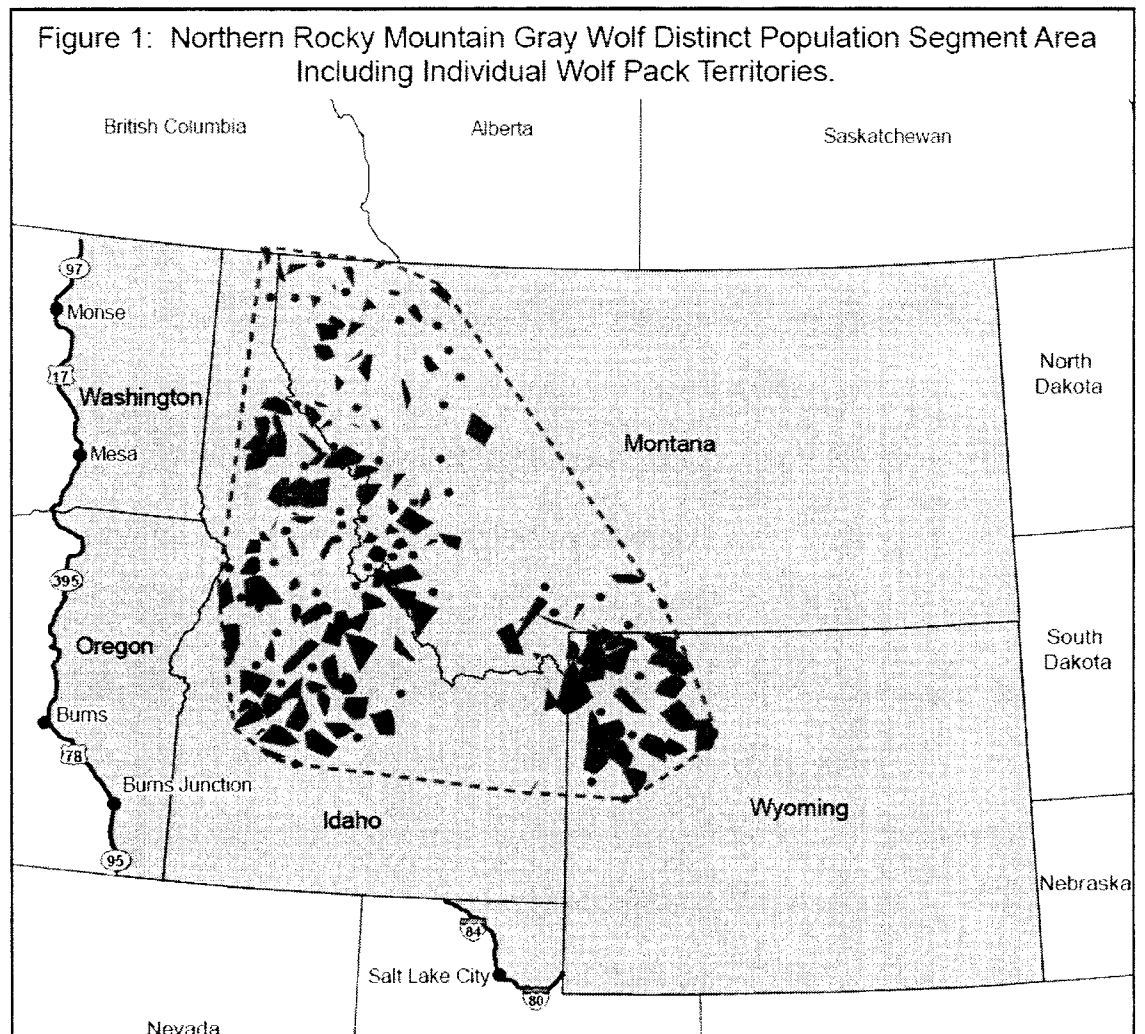
FOC is joined by Nimiipuu Protecting the Environment, Western Watersheds Project, Wilderness Watch, Protect the Wolves, WildEarth Guardians, Trap Free Montana, International Wildlife Coexistence Network, Alliance for the Wild Rockies and Predator Defense in this litigation, with Kelly Nokes at Western Environmental Law Center as lead attorney.

The status of the gray wolf under the ESA is long and complicated. Adoption of a 1978 rule made it one of the first species listed as Endangered. Decades later, after both artificial reintroduction and natural recovery in the western U.S. had expanded the wolf population, political pressure built towards delisting. Litigation halted USFWS delisting of the Western DPS in 2008, and again in 2009 for a Northern Rocky Mountains (“NRM”) subpopulation including Montana and Idaho. But in 2011, in what was widely seen as an election year move, Senator Jon Tester (MT) attached a legislative rider that delisted wolves in Montana and Idaho. Litigation prevented delisting of wolves in Wyoming in 2012, but by 2017 it was court-approved.

Then in 2021, FOC as part of a coalition of dozens of groups petitioned the USFWS to re-list



A wolf in Wyoming, NPS photo



A map of alleged wolf packs in the Northern Rockies circa 2009. This population of wolves, called the Northern Rocky Mountain Distinct Population Segment, including east Washington and Oregon, all of Idaho, Montana, and Wyoming, and a corner of Utah was delisted by congressional bill in 2015. USFWS

*“Ecosystems are enhanced by healthy wolf populations and predator-prey relationships.”*

the gray wolf Western U.S. DPS, citing “new laws in Idaho and Montana, and longstanding wolf management in Wyoming ...intended to reduce gray wolf populations in the core wolf recovery zone by 85 to 90 percent by incentivizing wolf killing and authorizing use of new methods to kill wolves.” That spurred a USFWS Status Review which preceded their “not warranted” determination, leading to our latest legal efforts.

Regardless of the abject cruelty demonstrated by states’ promotion of

aggressive killing regimes that feature aerial gunning, killing pups for bounties, widespread traps and snares, night hunting, shooting over bait, and even running them over with snowmobiles, the decimation of wolf populations makes no sense ecologically. The many ecosystem types wolves inhabit are unique communities of plant and animal life enhanced by the healthy wolf populations and predator-prey relationships. Wolves have been described as a keystone species, and scientists have noted

its return has triggered cascading ecological shifts toward increased bird and mammalian diversity, dampened population fluctuations of prey species, and changed patterns of vegetation.

Those of us having the opportunity to directly observe wolves in our incredible shared landscapes see them as our wild relatives in this community of life. Because the USFWS is failing in its oversight and conservation duties, we are asking the court to step in and reject the primitive, fear-based impulses exhibited by state wildlife agencies.

# ***SPECIES SPOTLIGHT: PACIFIC LAMPREY – VAMPIRE FISH OF THE CLEARWATER***

By PAUL BUSCH

*Introducing species spotlight! In each edition of the Defender, we will look at one native species that makes the Clearwater unique. Our first species is the utterly strange, yet special, Pacific lamprey.*

## **Natural History**

Pacific lamprey (*Entosphenus tridentatus*) are eel-shaped jawless fish. Lamprey aren't actually eels, but a kind of very primitive cartilaginous fish, like sharks and rays. They were some of the very first fish to evolve, at least 350 million years ago during the Cambrian explosion – before trees existed! Instead of a jaw, they have a circular mouth filled with teeth, which adult lamprey use to suck blood and fluids from larger fish and whales in the ocean (but they don't kill their host).

Like salmon, they are anadromous, meaning they migrate between the Pacific ocean and freshwater streams to spawn. They spawn in gravelly, cold-water streams like the

*“Lamprey are a key ceremonial food source of the Nez Perce and other Columbia Plateau Tribes”*

South Fork of the Clearwater, laying upwards of 100,000 eggs in summer. Unlike salmon, though, newly-hatched, eyeless lamprey drift into the slow moving parts of streams, dig themselves into the sand, and filter-feed on algae for up to six years. In this stage they are most sensitive to pollution and high temperatures.

After their larval stage, they grow eyes and their circular-saw mouth, and start a long journey to the ocean. Little is known about their life at sea, but we do know that they attach themselves to a big host fish or whale for two years or more, just hanging on and sucking blood. After a buffet of liquid fish (and a big growth spurt), fattened adult lamprey start the journey back inland to spawn.

The way home is not easy! For one, adult lamprey don't eat at all on the trip home, living solely off of fat reserves. For another, it's very difficult for a mostly finless fish to get over falls and dams. They use their circular-saw mouths to latch on to and inch their way over boulders and waterfalls.

Once they reach their spawning habitat, they mate and die, starting the cycle over again.

## **Conservation**

Like other anadromous fish, their survival depends on managing the four H's: habitat, harvest, hatcheries, and hydropower. In particular, hydropower has led to enormous population declines. Lamprey are weak swimmers, and do not swim up fish ladders as easily as salmon and steelhead. Reservoirs also degrade lamprey spawning habitat and expose them to increased predation.

This collapse has harmed local Indigenous people. Lamprey are a key ceremonial food source of the Nez Perce and other Columbia Plateau Tribes, often caught by hand during migration. Their fatty meat is very nutritious and is often smoked and fed to children.



*Pacific Lamprey. USFWS photo.*

Nez Perce Tribal elder Horace Axtell recalled: “My great aunt was a medicine woman, and she would collect the fat that would drip off an eel as it was cooking over a fire. She would store the fat in a small bottle and use it for oil in lamps and for medicines.” (source: critfc.org)

White settlers largely overlooked the lamprey, or used them for bait. At the Celilo hatchery, (at the now-flooded Celilo falls), tens of thousands were caught and ground into fish food for salmon, basically propping up one rare species with another. It didn't last long though. After the damming of northwestern rivers in

the 1960s, populations collapsed.

In 2003, the Center for Biological Diversity and other northwest environmental groups petitioned the US Fish and Wildlife Service to list the fish on the Endangered Species Act. Unfortunately, the USFWS (denied, not enough evidence) sidestepped listing lamprey as a threatened species, instead creating a collaborative organization, the Pacific Lamprey Conservation Initiative, that has so far failed to alter the long-term declines of lamprey in the West. Such collaborative efforts are politically expedient but often legally unenforceable, undercutting the agency's broad powers to protect our native wildlife.

In the Clearwater, populations of lamprey are nearly extinct. The 10-year average returning lamprey at the Lower Granite Dam is only 102 per year, down from perhaps tens of thousands prior to hydropower. Almost all individual Clearwater and Snake River basin populations are listed as critically imperiled or possibly extinct, as per a 2019 USFWS assessment. The exceptions are in areas adult fish have been reintroduced by the Nez Perce Fisheries, like Asotin Creek, the Grande Ronde River, and the South Fork

of the Salmon River. The Nez Perce and other Northwest Tribes have been very active in advocating for and reintroducing lamprey.

The fate of the lamprey, much like for salmon and steelhead, depends on breaching the Lower Four Snake River dams. As of 2024, political efforts to breach the dams have stalled, though staunch opposition to breaching is waning as fish populations collapse. Friends of the Clearwater advocates for a future without the Lower Snake Dams, and with Pacific lamprey, perhaps the strangest critter in Idaho. (See more photos on next page)



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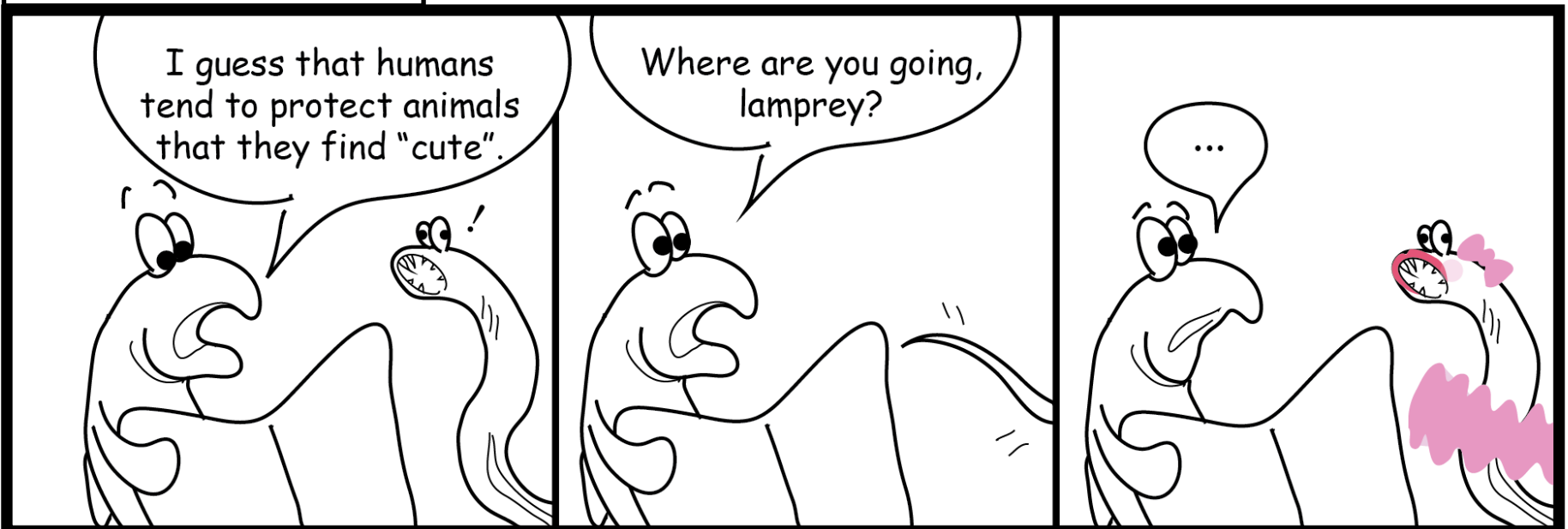
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ABOVE, LEFT: A young Tribal member catching lamprey in Oregon. USFWS/Oregon Zoo Photo ABOVE, RIGHT: The fangs of a Pacific Lamprey sucked to a window. USFWS/Sean Connolly

### Coyote's Comics: "Cute Animals"



(Cont'd from Forest Plan, page 3)  
Though Marten did not indicate a definite date for the Record of Decision (ROD) approving the RFP, it is widely expected to be sometime this year. A potential complication might be consultation requirements under the Endangered Species Act (ESA). Neither the National Marine Fisheries Service (oversight agency for anadromous species such as salmon and steelhead) nor the U.S. Fish and Wildlife Service (for all other ESA-listed species on the NPCNF) have issued their Biological Opinion (BO) as required by the ESA

before a ROD is issued. Though these agencies are no doubt busy with their many other duties under the ESA, it is still notable that the Forest Service's final Biological Assessment triggering the BO writing was issued almost a year ago. BOs typically include "terms and conditions" that include monitoring requirements, supplementing those in the RFP along with identifying thresholds of unexpected effects on listed species, which would trigger later re-initiation of consultation or even impose constraints to Forest Service management discretion. The delay in releasing their BOs

suggest the Forest Service's RFP for the NPCNF represents a level of risk to listed fish and wildlife that gives these consulting agencies pause. The National Marine Fisheries Service and the U.S. Fish and Wildlife Service can be held accountable by federal courts if their oversight of the Forest Service and other agencies do not adequately protect and recover listed species.

Readers can learn more about the concerns Friends of the Clearwater and our conservation partners have expressed about the NPCNF Forest Plan by accessing our

Objection and previous comment letters, on the FOC webpage under [www.friendsoftheclearwater.org/forestplan/](http://www.friendsoftheclearwater.org/forestplan/).

### Not sure how to help the forest?

Consider taking photos as you recreate on our public lands, and a few notes. If you see something that seems wrong - a closed gate wide open, a clearcut next to a stream, illegal tree-cutting or motorized use, etc - send an email to a district ranger on the national forest (and CC us as well!). You can find their contact at [www.fs.usda.gov/nezperceclearwater/](http://www.fs.usda.gov/nezperceclearwater/)

Every summer, the Rocky Mountains change their tune. The summer sun casts away blizzards, dismisses rain clouds, and evaporates fog.

When all of winter's humidity is wrung out, the whole of the Clearwater enters a kind of annual drought, waiting for autumn rain to fall again.

*So what keeps the rivers running?*



Seeps and springs, while small, are persistent folk.

Every day, cold water drips through the pine duff and fills the belly of every frog, fly, and fisher in town. When grand walls of snowpack are but a distant memory, spruce and salmon alike sing the praise of the seep.

End of year donations account for some *40%* of our annual revenue, so we are looking for generous seeps to keep things flowing month to month.

**Monthly donations are a win-win:** You get to make easy, small-scale donations, and we get a little bit of liquidity during the dry season.

## Heck yeah I'll be a seep!

I'll sign up for MONTHLY donations of:

- \$5       \$25       Other \_\_\_\_\_  
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Scan the QR code above or enter this URL in your browser:  
[www.friendsoftheclearwater.org/donate](http://www.friendsoftheclearwater.org/donate)

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\*Friends of the Clearwater does not keep physical or electronic data of your card information. We shred every one of these once we set up the first payment.

If you are uncomfortable mailing your information, please call the office at 208-882-9755 and Paul will gladly help you set up a monthly donation!