



# The Clearwater DEFENDER

A publication of the Friends of the Clearwater | Winter 2023



## Final Draft Forest Plan

The Forest Plan is here. The draft is a failure of public land policy, offering industry huge gains and evaporating environmental regulations.

The public has 60 days to object to the new plan, which we strongly recommend. Follow this QR code for more. **Pg. 4**

## Wolverine Listed

This November, the wolverine was listed as threatened on the Endangered Species Act. It's a win that we have been pushing for since 2000.

**Pg. 10**

## Annual Meeting Results

Read about awards to volunteers, activists, and of course the Macfarlane Plank.

**Pg. 12**



**Friends of the Clearwater**

*Keeping Idaho's Clearwater Basin Wild*

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# Friends of the Clearwater

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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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Foundation, and the Latah Wildlife  
Association!

## Event Calendar

### Winter Outing | January 27th

Join FOC and the Palouse Sierra Club at the Palouse Divide Lodge for skiing, snowshoeing, and evening talks about local environmental issues.

Please RSVP by emailing Paul at foc@friendsoftheclearwater.org by January 19th.

### Comment Periods | Jan 29th

Both Forest Plan Draft objections AND comments on wolverine protections are due. Find out more by reading each article in this newsletter.

### Biodiversity Ball | April, Date TBD

This April, FOC and Extinction Rebellion Palouse will host the Biodiversity Ball, a costume dance at Hunga Dunga in Moscow. Keep an eye out!

## 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/)

# NEPA WEAKENED BY DEBT CEILING ACT

By Gary Macfarlane

When Congress passed the Fiscal Responsibility Act earlier this year, the main purpose was to raise the debt ceiling and solve the fiscal crisis that Congressional inaction had created. This became necessary to pay for programs that Congress had already approved to fund. There was a lot of political maneuvering going that eventually resulted in the legislation—President Biden and Speaker McCarthy reached

rules and policy. However, this long amendment put into law damaging draft proposals that have been promoted by corporate friendly politicians from both sides of the aisle. This weakens public involvement and proper environmental analysis. While there are some practical details already in rules and policy that are codified into the new law, on the whole, the amendment creates loopholes that make damaging



*Clearcuts, like this fireline near Lowell, are included in the list of CEs that can be approved without any environmental assessment. FOC file photo.*

a deal. Part of the deal for the bill included a new section that all but approved a controversial pipeline in West Virginia and also amended the National Environmental Policy Act, known by its acronym NEPA.

NEPA is our bedrock environmental law. It requires that federal agencies analyze the impacts of projects on the environment prior to making a decision. Most legislation contains broad goals that are specified in

proposals more likely.

This article isn't a comprehensive analysis of the problems of the new law. The wording of the amendment will have to be tested in court and in agency policy to see the full implications of the new law. The following gives an general overview of the problems that we will all face. Here are a few key obvious concerns:

1. There is a codification of new and damaging regulations on categorical exclusions.

Categorical exclusions, called CEs or catex's, are projects that are deemed to have, individually or cumulatively, no effect or no significant effect on the environment. These proposals are categorically excluded from normal analysis under NEPA in an environmental impacts statement (EIS) or environmental assessment (EA). This law puts into place newer regulations on CEs. Over the recent past, the Forest Service, sometimes with the backing of Congress, has developed new regulations that have greatly expanded logging and other development on national forests via use of CEs. For example, a timber sale of 3,000 acres, which used to be analyzed in a comprehensive EIS in the Nez Perce and Clearwater National Forests, can be approved with a mere CE. Another example is that the wording of the new regulations that the Forest Service has come up with is rather vague in some specific categories, meaning just about anything could be approved without proper analysis under an EIS or EA. Since Congress approved these new regulations, via this amendment, changing them for clarity would likely only be possible through legislative action. Lastly, CEs have limited or no public involvement, depending on the category the agency determines is applicable.

This affects all proposals and tips environmental analysis in favor of development. Since development projects, except those approved with CEs (see above), go through analysis via an EIS or EA before a decision is made, strict time frames benefit development interests who could pressure the agency if their pet project is not approved within a certain time frame. While there are current guidelines on time frames,

this strict requirement would not apply to some of the most obvious things that could benefit the environment. For example, Congress has already excused the Forest Service and Bureau of Land Management (BLM) from preparing site-specific analyses of grazing allotments in a timely manner on national forests and other public lands. Thus, there is no strict timeframe to analyze these ongoing impacts or analyze the impacts when an allotment is renewed, every ten or twenty years.

3. Non-agency project proponents can prepare an EIS or EA for their proposal.

Current regulations prohibit proponents from doing an EA or EIS for a proposal. Frequently, an agency like the Forest Service or BLM will tell a proponent for a project, like a new recreation development or permit or a new mine, that the agency does not have time to do the analysis. In that case, the proponent has to find an expert third party that prepares the analysis. While this does not remove the conflict of interest (the third party is usually paid by the proponent), it does put a buffer between the proponent/sponsor and the one doing the analysis. Now, proponents can prepare their own EISs and EAs. While the managing agency, such as the Forest Service, still oversees the process and is responsible, the trend to commodify and commercialize public lands, especially in the recreation realm, means that many proposals could slip through the cracks with little agency oversight.

4. Economic interests and bogus analysis are given increased weight.

Two other provisions in the new law are concerning. The increased emphasis (cont'd pg. 11)

# ***THE NEZ PERCE- CLEARWATER FOREST PLAN FINAL DRAFT ARRIVES***

*By Paul Busch*

*The single revised land and resource management plan (Forest Plan) for the administratively combined Nez Perce and Clearwater National Forests is here.*

*It was unveiled November 29th, along with a Final Environmental Impact Statement (EIS). It prioritizes extreme resource extraction above all other uses of the forest. FOC strongly denounces the plan, and plans to object to its many degradations of environmental standards forest-wide.*

*Previous commenters have 60 days to voice their opinion during the official objections period, which ends January 29th.*

*This plan was released shortly before publication, so this article is only a cursory look at its contents. Please visit [www.friendsoftheclearwater.org/forestplan](http://www.friendsoftheclearwater.org/forestplan) to read more.*



*The forested divide of the Great Burn Proposed Wilderness, including the popular Stateline Trail above Fish Lake (above) is excluded from the recommended wilderness in the Forest Plan. Haverstick photos.*

## ***What's in the plan?***

**WILDERNESS:** Roughly 263,000 acres of recommended wilderness, just 17% of the some 1.5 million acres of roadless country in both forests. Of note, the Great Burn Proposed Wilderness is basically halved on the Idaho side. See page 8-9 for maps of the proposed changes.

**OLD-GROWTH:** Standards to protect old-growth landscapes from logging and roadbuilding are extremely weak. No old-growth would be off-limits to logging in this plan, unlike in the original 1987 forest plans. There is also no requirement to maintain an inventory of existing old-growth, nor does it set standards for minimum amounts of old-growth at the forest or watershed level.

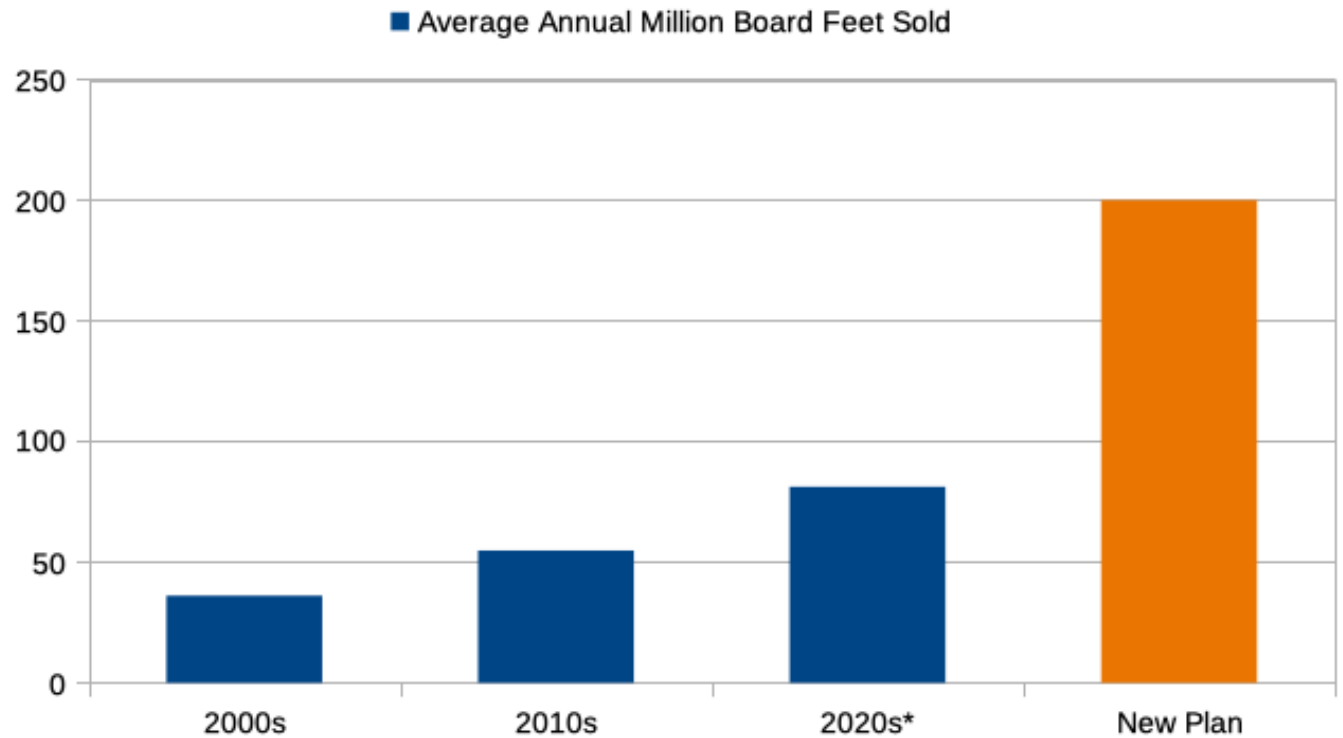
**FISHERIES:** Measurable, enforceable standards for sediment pollution are dropped, in favor of "aspirational" goals and discretionary guidelines that do not give the public any meaningful ability to hold the agency to account.

**TIMBER PRODUCTION:** Goals for forest-wide timber production skyrocket under this plan to roughly 200 million board feet annually, more than doubling current annual sales and dwarfing the production of the 2000s, when annual timber sales were between 30 and 50 million board feet on average.

**WILDLIFE:** Elk habitat standards are gone. For almost all wildlife, firm policy is replaced with loose guidelines, which are discretionary and lack enforceable standards.

**CARBON:** The draft plan does not include an assessment of carbon stores in the forest, and falsely claims that logged forests can store more carbon than unlogged forests, contrary to the best available science.

**WILD AND SCENIC RIVERS:** The plan recommends 11 waterways for wild, scenic, and recreation designation. There are major rejections. The South Fork Clearwater was not included, and would still be open to damaging suction dredge gold mining. The main North Fork of the Clearwater was not included, citing a need for "management flexibility" to preserve the sensitive coastal disjunct ecosystem. Such language obscures the aim of the Forest Service to road, log, and destroy that habitat.



Timber production has been steadily increasing on the Nez Perce-Clearwater National Forests. The data for the 2020s is incomplete, but includes fiscal year 2024. An annual timber production target of 200 million board feet would almost certainly be incompatible with the regulations of the 1987 plan as far as sediment pollution and old-growth are concerned. These restrictions are abandoned in the new draft plan, which would severely harm the habitat of cold-water fish, rare forest species, grizzly bears, and more.

## How does the plan treat wildfire?

According to this plan we are in a wildfire crisis, witnessing uncharacteristically large and intense fire in the Clearwater due to excess fuels (trees). Their solution is industrial management of the forest to the tune of 64,000 acres of logging and prescribed burning per year.

This narrative, however, is not based in either ecological or historical reality. The Clearwater has had wildfire, both small, mixed, and large, since time immemorial. Natural wildfires create mosaics of habitat across the landscape that increase biodiversity. The Forest Service acknowledges this, but argues (falsely) that humans can create these

mosaics with logging and prescribed burning.

Weather and climate, the two principle drivers of wildfire, are not mentioned in the main land management plan. Additionally, carbon emissions from logging (the single largest source of greenhouse gas emissions on the national forests) are not mentioned as a driver of fire.



This huge clearcut, near Orogrande, was meant to "reduce fuel" and prevent fire. After the project was done, a wildfire swept through anyway. Macfarlane photo.

## How can we stop it?

### 1. Object!

Those who commented on the forest plan can object to this final draft. Objections are due by January 29th. Go to [friendsoftheclearwater.org/forestplan](https://friendsoftheclearwater.org/forestplan) to object.

### 2. Write!

Write an op-ed to a local newspaper. Share your views on this forest plan and the potential it has to disrupt our wildlands.

### 3. Share!

Use email and social media to share the facts to your network. Converse with people you don't necessarily agree with. Making personal connections, no matter how small, add up.

# NATIONAL FOREST UPDATES!

By Jeff Juel

Here is a status update on some U.S. Forest Service (FS) management actions we've been watching. We note with alarm the increasing frequency of the FS exploiting new authorities limiting opportunities for public engagement as management proposals are developed.

These authorities were snuck into unrelated high-profile Congressional legislation dealing with inflation and economic recovery. This results in the elimination of the opportunity to file formal objections of draft decisions for larger projects, and a growing variety of "categorically excluded" projects, which already limit public engagement opportunities.

**Clearwater National Forest Travel Plan** – Our litigation succeeded in forcing the FS to prohibit motorized vehicles from using the trail leading up to Fish Lake in the upper North Fork Clearwater River watershed, beginning earlier this year. Our field observations have since noted some enforcement issues, including barriers being removed, a closure sign missing, and observed motorized trespass. More recently however the FS has proposed amending the Forest Plan to remove the standards the FS had been misinterpreting for years, resulting in reduced wildlife security and ultimately our lawsuit to force them to comply. Last month we submitted our comments on the FS's Draft Supplemental EIS. Next up could be a Final SEIS with a draft Decision, beginning the Objection process once again. Or the FS could wait until the revised plan is adopted, which altogether removes the standards the FS has been ignoring.

**Big Burn, Deadwood, and Sing Lee Fuels Break Projects**

– Proposed for the South Fork Clearwater River

watershed or near the hydrologic divide to its north, each is proposed under Section 40806 of the Bipartisan Infrastructure Law of 2021, which authorizes the construction of 1,000-foot wide "fuel breaks" adjacent to roads. Each timber project may not



Mature spruce-fir forest in the Hungry Ridge Project Area. Paul Busch photo.

exceed 3,000 acres, but because the law sets no limit on the total number of such projects or how closely they might be distributed across national forests, the result can be massive clearcutting of mature and old forests along chosen roads, severely reducing wildlife security and making illegal off-road motorized use more frequent—all with limited public engagement. FOC recently submitted comments, however since the FS is categorically excluding the proposals from analysis under the normal procedures governed by the National Environmental Policy

Act, the only future avenue for public participation could be litigation.

**Lindstrom** – The FS proposes to clearcut most of an isolated square mile section of national forest land surrounded on three sides by the St. Maries State Wildlife Management Area about seven miles south of the town of

St. Maries in the St. Joe Ranger District on the Idaho Panhandle National Forests (IPNF). We submitted comments, however it would also be categorically excluded from genuine environmental analysis under the proposal.

**Hungry Ridge and End Of The World (HR/EOTW)** – Our federal court victory in 2022 resulted in an injunction stopping these two huge timber sale projects from going forward on the Salmon River Ranger District. The FS had filed a notice of appeal to the Ninth Circuit Court of Appeals, but in

early October decided not to follow through. So if the FS chooses to pursue the End Of The World project it must start its analysis all over and prepare an EIS as was required by the Court. Meanwhile the FS has been going through the Supplemental EIS process for Hungry Ridge, and we are filed our formal Objection on Oct. 23. The upshot is, we may soon be headed back to court later this year supporting the Court's earlier injunction on Hungry Ridge.

**Red Siegel** - Red River Ranger District. In February 2022 we commented on yet another categorically excluded proposal. The decision to log 2,327 acres and construct 24 miles of roads was signed on June 23, so our only way of preventing this would be through the courts.

**Lolo Insect & Disease** – Along with our attorneys, we are examining the National Marine Fisheries Service's new Biological Opinion (BO) for this timber project, affecting an important steelhead fishery in the Lolo Creek watershed of the Lochsa Ranger District. The August 2021 federal court injunction was recently dissolved based on the mere publication of the new BO, which essentially greenwashes the fading recovery chances of the threatened steelhead in the Snake River basin. The FS's decision authorized nearly 3,500 acres of logging, 14 miles of new road construction, 157 miles of "road maintenance and reconditioning" and 125 miles of "road improvement"—all of which would further damage spawning and rearing habitat.

**Clear Creek Integrated Restoration** – Moose Creek Ranger District. After a successful legal challenge of the 2015 decision by the Nez Perce Tribe derailed the original proposal, a new decision was finally signed on 2/17/2023, with the project being reduced in size. It still features

(cont'd next pg.)

1,540 acres of clearcuts, 242 acres of “improvement harvest”, 4,045 acres of “commercial thinning”, 57 acres of “intermediate harvest” and about 16 miles of new road construction. Only new litigation could prevent this from proceeding.

**Green Horse** – Moose Creek Ranger District. Decision signed 3/3/2023. The FS intends 1,355 acres of clearcutting, 180 acres of “salvage (intermediate) harvest” along Forest Roads located on borders of the O’Hara-Falls Creek and West Meadow Creek roadless areas, 45 miles of road reconstruction and road reconditioning and 2.1 miles of new road construction. Logging is underway since early summer, so only litigation can make a difference.

**Limber Elk** - Red River Ranger District. In February 2021 we commented on the

proposal for 2,993 acres of “regeneration and intermediate harvest”, up to 21 miles of new road construction plus, other road reconstruction and improvements. Decision pending.

**Twentymile** - Red River Ranger District. In May of 2023 we commented on a Proposed Action featuring 1,822 acres of clearcutting, 387 acres of “intermediate harvest”, 6,807 acres of “landscape prescribed burning”, 10 miles of new road construction and 36 miles of road reconstruction or maintenance. Since the FS is requesting use of new authorities for implementing such actions under a claimed “Emergency” due to elevated fire risk, there may be no further opportunity for public input prior to a Decision—even though there is no private land anywhere near the project area.



Kylie with a 20 lb hatchery Chinook salmon she caught on the Clearwater River. But she won't tell you where!

## HELLO FRIENDS!

By Kylie Wilson

*Editor's note: One of the last things Katie Bilodeau did on staff was set up an internship with a Lewis-Clark State College student, Kylie Wilson. She is finishing her first of two semesters with FOC, is already helping a ton with her GIS skills, field experience, and people skills.*

My name is Kylie Wilson, and I was born and raised in Nampa, Idaho. When I wasn't playing lacrosse in high school, I loved being outside and would venture to places like Jump Creek. I have always found the world around me to be fascinating. I had a million questions about what each tree species was or why certain rocks had holes whenever I was camping or hiking.

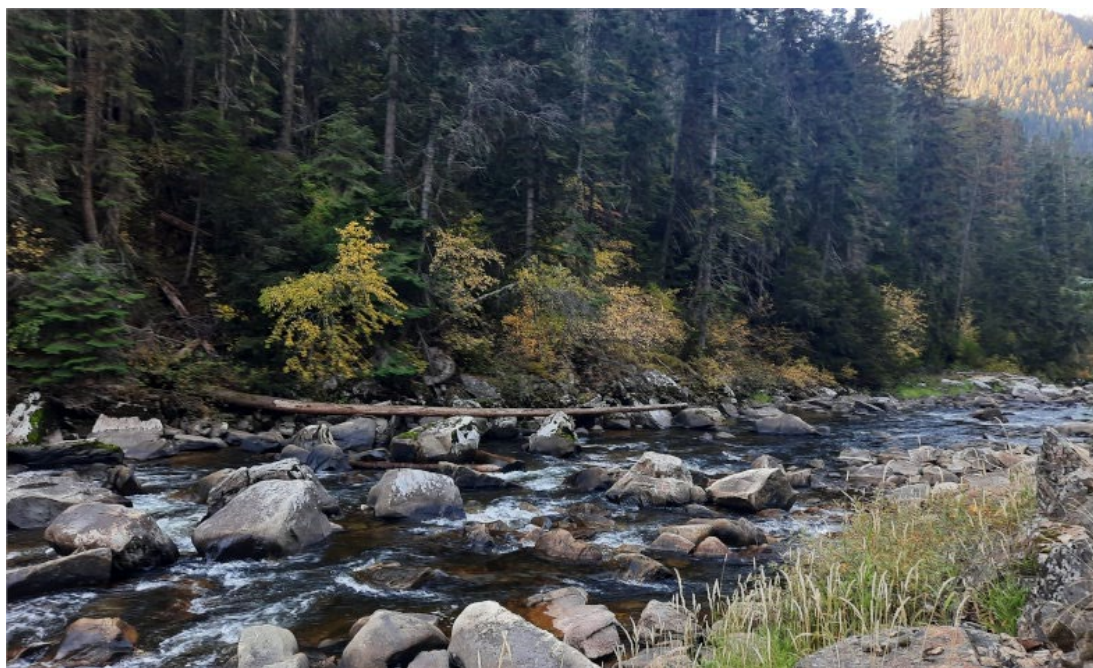
About four years ago, my partner, our three dogs, and I went on a three-month road trip with our tiny teardrop trailer. We explored many free campsites in the western United States, including North-Central Idaho. We ended up in

Moscow at the end of our trip and we stayed here for a year. During that time I worked with many students from the University of Idaho and Washington State University, and I got an itch to go back to school.

Eventually, I did it. Now I am a senior at Lewis-Clark State College pursuing a degree in Earth Science with minors in Anthropology and Environmental Studies. One of the most important things I've learned from school is to always keep my hand lens on me! There is a tiny world of minerals, moss, lichen, and insects I love to observe. By practicing these observation skills, I hope to become a scientist that makes a positive difference, and I believe my work here with Friends of the Clearwater will provide me with additional tools to do so.

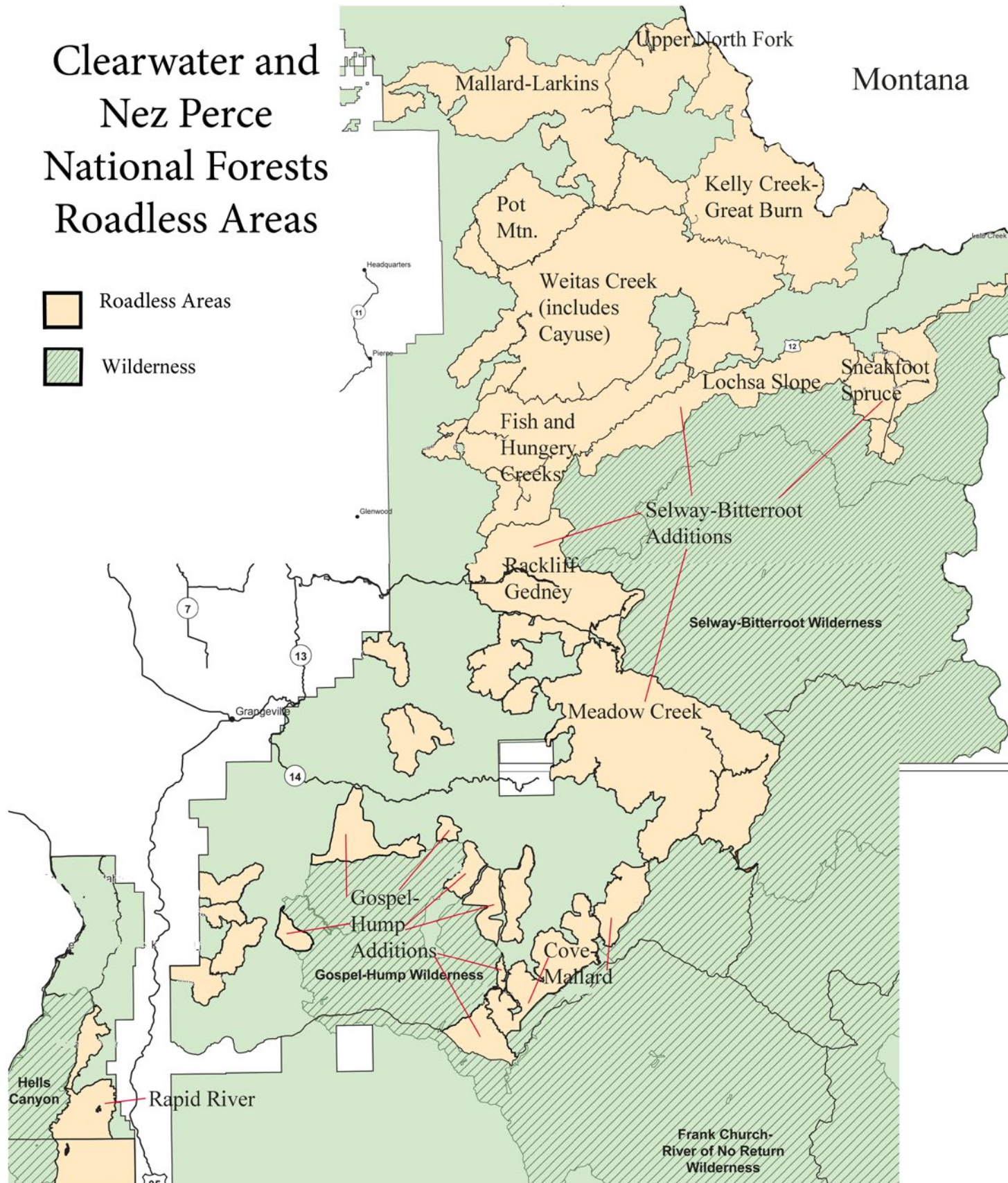
Before this internship I interned for the Idaho Department of Environmental Quality (DEQ). It has been enlightening to work on both the agency and nonprofit sides of environmental protection.

In my free time I love to look at rocks, get my hands dirty in the garden, play with my fur babies, and fish for chinook, coho, and steelhead on the Clearwater River. The Clearwater region is so incredibly beautiful and I look forward to helping protect it!



Many of the current slate of USFS projects take place within the South Fork Clearwater watershed (above). This area is home to salmon, steelhead, bull trout, and westslope cutthroat. Logging and roadbuilding both cause sediment pollution that degrades the habitat of these species.

# Clearwater and Nez Perce National Forests Roadless Areas



The above map, created by FOC staff, shows all of the large unroaded areas of the Wild Clearwater. These do not perfectly line up with the official map of inventoried roadless areas that were

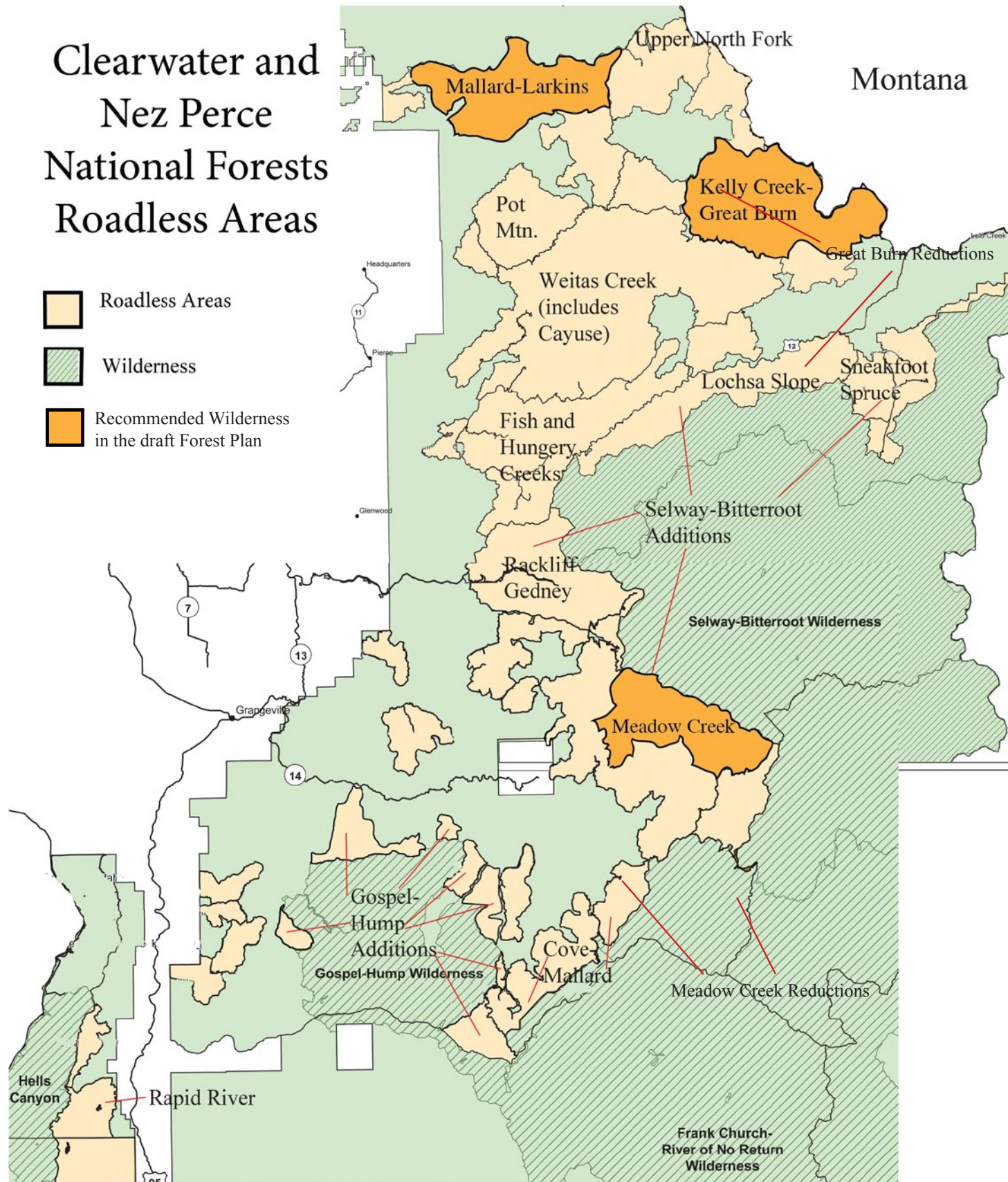
created for the Roadless Rule. FOC's map is more accurate. It includes more roadless acreage adjacent to the Gospel-Hump Wilderness, for example, however,

even this map is not perfect. Some unroaded areas have been developed in the decade since this map was made. The visionary Northern

Rockies Ecosystem Protection Act (NREPA) would protect all of the undeveloped, unroaded, and wild areas of the Clearwater.



# Clearwater and Nez Perce National Forests Roadless Areas



This version of the map includes areas the Nez Perce-Clearwater National Forest recommends for wilderness designation. Only three are recommended: Mallard-Larkins, Great

Burn, and Meadow Creek. The Great Burn roadless area is much reduced from the 1987 Clearwater Forest Plan. Also dropped were additions to the Selway-Bitterroot Wilderness along

the elk-summit road.

The 1987 Nez Perce Forest Plan did not include any recommended wilderness, so technically it is an increase. But it is not much. Only the

Meadow Creek IRA is included, and only half of its total acreage.

## **WOLVERINE LISTED AS THREATENED THROUGH ESA**

By Jeff Juel

The Endangered Species Act (ESA), one of the bedrock environmental laws of the U.S., turns 50 on December 29th. We celebrate by noting a November 29 U.S. Fish and Wildlife Service (FWS) news release announcing a “final rule to list the distinct population segment of the North American wolverine in the contiguous U.S. as a threatened species under the Endangered Species Act.” This is an outcome FOC has fought for since 2000. However our celebration is somewhat tempered.

The North American wolverine is a medium-sized carnivore found within the Rocky Mountains and North Cascade Mountains in the contiguous U.S. and alpine regions, boreal forests, and tundra of Alaska and Canada. Wolverines are snow-adapted, cold-climate, territorial animals with large home ranges. It is highly vulnerable to traps, both those targeting wolverines and those for other furbearers

and carnivores. So it is disheartening that the final rule also includes an interim provision under ESA section 4(d) that exempts harming or killing wolverines “incidental to lawful trapping for other species.” This makes little biological sense since traps themselves cannot distinguish species, and such trapping is one of the reasons cited for listing.

Also, the interim provision would exempt habitat disruption “resulting from forest management activities associated with wildfire risk reduction.” In other words, the FWS is buying into Forest Service and industry propaganda that large-scale clearcutting and road building is “restoration” and reduces risk to humans and the built environment, which scientists identify as patently false.

FOC will comment on these aspects of the interim rule 4(d) before the deadline of Jan. 29, 2024.

## **HOW WILL A FREE SNAKE RIVER AFFECT SHIPPING? FED’S ANALYSIS IS FLAWED**

By Lin Laughy

The Army Corps of Engineers and Bonneville Power Administration (BPA) recently completed an environmental impact statement on Lower Snake River transportation. That document, the Columbia River System Operations Environmental Impact Statement (CRSO) is flawed.

The CRSO Environmental Impact Statement assumes if barging on the lower Snake River ceased with the breaching of the lower Snake River dams, all wheat now trucked to the ports of Lewiston, Clarkston, and Wilma would be trucked an additional 65+ miles one way to the McCoy unit train loader near Oksdale, Washington or the Endicott loader 42 miles west of Pullman, Washington.

In the EIS the Corps and BPA eliminated any possibility of transporting wheat on the Great Northwest Railroad, the line that runs from the Port of Lewiston, ID to Ayer Junction near Pasco, WA, where it connects with Union Pacific and BNSF Railways. The Great Northwest line closely parallels the lower Snake River, often passing within a stone throw of grain elevators from which barges are currently loaded. The EIS’ federal partners ignored the fact that Clearwater Paper in Lewiston imports chemicals and exports paper products by rail; Idaho Forest Group ships lumber by rail; many ingredients for making fertilizer arrive by rail, and dry peas, lentils, and garbanzos leave by rail. The federal partners also chose to ignore that during river closures of up to 14 weeks for major lock and dam repairs, the preferred alternative of shippers who would otherwise barge their wheat is often rail.

Transporting wheat

by truck is by far the most expensive mode, assuming barging subsidies are excluded in the calculations. If the Corps and Bonneville Power were able to exaggerate the number of grain trucks on the highway as a result of the loss of barging, the agencies could lend support to maintaining the status quo on the lower Snake River. Eliminating any possibility of shipping grain that is now barged on the Great Northwest Railroad would add over two million truck miles to grain transportation costs, along with increased greenhouse gas emissions, wear and tear on roadways, highway vehicle accidents etc.

Not content with only a thumb on the scale, the federal partners further deceived the public by claiming all the wheat transported from the ports of Lewiston, Clarkston and Wilma to unit train loaders would be hauled by semi-trucks with a capacity of 26,000 pounds or 910 bushels. Under the heading Highways and Highway Congestion, the EIS states “The approximate capacity of the typical grain truck is 1,000 bushels,” and adds that one can identify the number of trucks needed to haul a given amount of wheat by dividing the number of bushels by 1,000. However, the standard in the industry for hauling grain other than from farm to local elevators is a truck/trailer combination that carries 65,000 pounds, or 2,275 bushels. The Corps and BPA thus more than doubled the initial number of false truck miles by claiming formerly barged wheat would be hauled to unit train loaders by semi-trucks. A suspension of intelligent thought is required to believe (cont’d next pg.)



A wolverine in Glacier National Park. Tyler Grudowski photo.

**EXPLORE  
CLEARWATER COUNTRY  
THROUGH OUR WEBSITE  
[friendsoftheclearwater.org](http://friendsoftheclearwater.org)**



Smaller trucks are used at farms for collecting crops. The Corps and BPA used these lighter-duty vehicles, rather than full 65-ton trailers, to estimate driving mileage that would accompany dam breaching. WDA photo

the experts who prepared the Transportation and Navigation section of the \$70+ million EIS did not know the difference between the capacities of a semi-truck and the grain truck configurations typically seen on the region's highways.

Consider this example. In 2022, 635,000 tons of wheat from the Ports of Lewiston, Clarkston and Wilma passed through the locks at lower Granite Dam. A ton of wheat contains 33.33 bushels. In 2022, barges thus transported 21,164,550 bushels of wheat through the Lower Granite locks. According to the EIS, if

the lower Snake River were breached, all this wheat would be trucked to the McCoy or Endicott unit-train loaders. If each truck load contained 1,000 bushels, as claimed in the EIS, 21,165 truck loads would be required. However, if that same volume of wheat were hauled by the typical 65-ton capacity grain trucks that haul 2,275 bushels, 9,303 truckloads would suffice. The EIS overstates the number of truck loads that would be on the road by 227%.

On average, a little over 30% of the grain now barged on the lower Snake passes through Lower Granite dam. In the EIS's transportation scheme, additional costs for grain

transport without barging would presumably accrue to much of the other 70% of grain volume involved.

The Army Corps of Engineers and Bonneville Power Administration misled the public with regards to wheat transportation costs associated with the EIS' MO3 alternative, breaching the lower Snake River dams. The conclusions of the Transportation and Navigation section are a sham, and the public will pay the price—twice.

The use of the transportation data in the CRSO EIS in other studies or reports will most likely contaminate their results.

(cont'd from NEPA, pg 3.) on economics tips the scale to favor development. The other is that the agencies can now use bogus analysis to dissemble the public about the costs of no action. A good example is how the Forest Service has recently alleged that logging is necessary to prevent fire and therefore logging is more environmentally preferred. The science as it applies to the forest types in the Wild Clearwater Country does not support such a view.

In sum, the new amendment will help the trend to commodify, commercialize, and marketize public lands. It could also excuse developments such as highways or other infrastructure, from any environmental analysis even if public tax dollars are used for the proposal.

Only time will tell how problematic these changes will be in the real world on our public lands. On paper, at least, NEPA looks weakened again by corporate interests in Congress.

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### Coyote's Comics: "Critical Habitat"

"THE SURVIVAL OF AN ENDANGERED SPECIES IS DEPENDENT ON THE PRESERVATION OF THE HABITAT ON WHICH THEY ARE ADAPTED."



"THIS IS THE ONLY MEANINGFUL METRIC FOR SURVIVAL..."



## ANNUAL MEETING RESULTS

For those that missed the annual meeting, held November 4th at the 1912 center in Moscow, here is a brief look at what went down.

### Volunteer Awards - Dominic Royael and Gail Tabor

Moscow locals Gail Tabor and Dominic Royael are a treasure to work with. Both of them are long-time FOC members who have contributed a lot of time in the office this year, helping on virtually every mailer, newsletter, and project they can. Huge kudos to their help!

### Activist of the Year - Alex Budd of PNW-FCA

“Forest Defense is Climate Defense” has slowly become one of the catchphrases of the current era of forest activism. The link between our climate and the planet’s old forests are becoming more and more apparent (check out the Chuck Pezeshki article 6), and that connection has been well-publicized by Alex Budd, a young activist in Portland who is the sole part-time employee of the Pacific Northwest Forest Climate Alliance, or PNW-FCA.

Alex, originally from Colorado, is an intelligent, hardworking, and empathetic young man. The PNW-FCA has had an incredible year, gathering hundreds of comments on the Biden administration’s old-growth initiative, as well as leading a major protest of Wall Street-financed timber groups this Septmeber.

That protest, which took aim at the pro-corporate “Who Will Own the Forest” conference in Portland, brought in hundreds of protesters. PNW-FCA and allies held a rally, gave counter-presentations, hung signs, projected slogans, drove a fire truck, and more! Alex’s leadership helped bring Indigenous voices, scientists, and public lands advocates together at the protest, and serves as an example of what could be possible Inland.

### Plank Award - Sam Mace

Sam Mace was honored with Friends of the Clearwater’s highest honor, the plank award. This is for her many years of dedication in protecting wildlife, especially salmon and steelhead. She understands, better than most, the challenges facing human social landscape in the Pacific Northwest. She was raised on



Steve Paulson, Sam Mace, and Jeff Juel with the Macfarlane Plank.

the Oregon coast, growing up in a timber town. It was there she saw first hand the impacts of industrial extraction, both to wildlife and fish. Seeing fish populations collapse first-hand taught her the value of protected wild places. She later moved to Spokane, and took part in the Cove-Mallard campaign of the 1990s.

Sam has worked for various conservation organizations over the years including the Inland Empire Public Lands Council (now the Lands Council), Trout Unlimited, and Save or Wild Salmon. In spite of political pressures, Sam has always maintained her integrity and vision for a livable future for

wild, anadromous fish and the role they play in the ecosystem and human societies. She has been a great friend and confident to Friends of the Clearwater. She was always willing to listen to and offer sound, sage advice.

She is the consummate professional, a great activist, and all around wonderful person. Her love of the natural world, and how that has always guided her advice and conservation work, is one of her most remarkable traits. At the annual meeting, she emphasized the power of community in conservation work, saying that strong friendships are the bedrock of the environmental movement. We couldn’t agree more. Thanks Sam for all you have done and do!

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