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Commissioners  
Don Ebert, Chair  
John Smith  
Rick Winkel

3/26/18 CP  
— ZP  
XS KS

March 12, 2018

Cheryl Probert  
Nez Perce -Clearwater National Forest  
Supervisor's Office  
903 3rd Street  
Kamiah, ID 83536  
208-935-2513

Dear Cheryl;

We appreciate the opportunity to provide comments to the forest plan revision process on the Nez-Perce Clearwater National Forest. We also applaud your efforts to include us in these discussions. Your agency should be commended as well on your support of the Clearwater Basin Collaborative.

As Commissioners of Clearwater County, we know too well the effects that the "era of litigation" has had on the citizens of our County. We were witness to a catastrophic decline in the timber industry as a once proud and majestic heritage turned into a place where poverty and unemployment reigned supreme. At the same time, we had to endure watching that proud heritage turn into an overgrown disease infested tender box which physically threatens our homes and our people. We have also seen restrictions on access and have felt like strangers in our own home.

Clearwater County as you know has been willing and is very persistent as we participate in the management discussion. Our Commission Chairman has been a member of the Clearwater Basin Collaborative since its beginning ten

years ago and has also actively participated in the forest plan revision process for several years now. This Board has also maintained ongoing positive dialog with you and your predecessors. Our goal has always been to create and maintain a respectful relationship which would allow us reasonable influence in forest service activities. Participation in the forest management discussion takes a huge commitment of time and energy and we have shown that commitment. We take our responsibility seriously and we trust that you will give our comments due consideration.

With our efforts we have seen changes in the way our forest is managed leading to a greatly increased timber sale volume. We have also seen a more responsive agency as we work through the issues that we feel need to be changed. These things need to continue. It is also of the utmost importance that we remain good stewards of the land and maintain the commitment to restoration and rehabilitation.

We would like to address our comments to the issues your agency has identified in the correspondence of December 18, 2017.

***Issue 1:** The proposed action may not adequately apportion recommended wilderness areas across the Forest. The proposed action may not adequately apportion suitable Wild and Scenic River segments across the Forest.*

Although we understand and agree that certain areas on federal land in Clearwater County deserve protection, we do not feel that they need more protection. We feel that the Idaho Roadless Rule is more than enough protection for roadless areas. Wilderness designation takes away any chance to use reasonable means to maintain access. You cannot open and maintain trails economically with a cross-cut saw. Land protections which still allow the use of mechanical means for administrative duties make far more sense and, in most cases, offer all the protection that is needed.

We do however recognize the support by the environmental community of an ongoing timber program. Since the existence of the Clearwater Basin Collaborative we have seen a dramatic increase in active management on

the forest. This would not have been possible without the support of certain environmental groups who are proponents of wilderness such as The Idaho Conservation League, The Wilderness Society and The Great Burn Study Group.

We understand that under the 1987 forest plan the Great Burn is currently listed as a proposed wilderness. As with most things to do with forest management however there are competing interests. The Great Burn is no different as it is important to snowmobilers, miners and wilderness advocates.

Considering these things, Clearwater County would support you recommending the Great Burn as a wilderness with some important caveats.

1. There must be an area which is reserved for snowmobilers to use without restrictions inside of the current boundary of the great burn roadless area.
2. Miners must be protected especially current claim.
3. There must be a robust and perpetual timber program elsewhere in the Nez Perce Clearwater Forest.

If you could adopt a plan which addresses our concerns listed above, we could support recommending the Great Burn as Wilderness.

Mallard Larkins we feel should remain as is. It is well protected and enjoyed by many. More protection would have adverse effects on preservation of that area and, because lack of the ability for efficient trail maintenance, restrict future access.

We adamantly oppose any other areas in Clearwater County being recommended as wilderness.

We also oppose any rivers being found suitable for Wild and Scenic Designation. Wild and scenic is designed to protect from dam building. We feel that none of our rivers are in jeopardy of development. All our rivers are adequately protected with The Clean Water Act, The Endangered Species Act and NEPA. We also feel that since the Lochsa and Selway rivers are already Wild and Scenic that the remaining rivers do not rise to the level of having Outstandingly Remarkable Values in comparison.

*Issue 2: The proposed action may not adequately apportion motorized and non-motorized recreation access opportunities in the front country (Management Area 3) and backcountry (Management Area 2) areas across the forest.*

Considering that most of the forest is in roadless areas which are usable by non-motorized recreationalist, we feel that the front country should favor motorized recreation. ATV's and UTV's are the recreation of choice of an increasing majority of citizens who use the outdoors. The potential damage by these machines can be managed by providing enough opportunity to keep up with the demand. If people have a place to ride, they will not feel the need to make their own. We Support a robust trail system in the front county to be used by motorized recreationists.

*Issue 3: Desired Conditions for forest vegetation should be met through natural processes or through active management. The rate of progress towards the desired conditions should occur at a faster or slower pace. Desired conditions should include higher compositions of early seral species and increased or decreased patch sizes and increased or decreased tree densities to meet ecological habitat needs of wildlife species, maintain resiliency of forest vegetation communities and to meet social needs of forest users at a local, regional and national scale.*

Desired conditions being defined as that which is within the natural range of variability should be accomplished through mechanical means whenever possible. Natural processes should only be used where mechanical means cannot because of economic feasibility, topography, or location. There needs to be places where mechanical means are not only allowed but protected as well. Currently only 17% of the forest is in the roaded front. If we were to strive to achieve desired conditions we would have an ample timber supply to support industry, the same industry who performs all the restoration work. The rate of progress towards desired conditions should be consistent and predictable and should happen at a rate complimentary to forest health, restoration activities and industry. Tree density and patch sizes should be what makes the most sense for an area benefiting a range of

species. Patch sizes and tree densities should be dictated by what the place needs.

*Issue 4: The Potential Timber Sale Quantity (PTSQ) should be increased or decreased to better provide for a balance of ecological sustainability, economic and social resiliency. The maximum regeneration harvest unit size should be increased or decreased.*


A dramatic increase in PTSQ would better control an overgrown unhealthy forest and move towards a more natural condition on the landscape. Harvest levels are currently well below what is sustainable and as such we are seeing overgrown unmanaged conditions. We need and want an increased level of harvest at a consistent level which provides predictability for an industry which is required to invest in very expensive, long term capital assets. The maximum regeneration unit size should fit what is needed because of a condition on the ground and to meet desired condition objectives. A healthy timber program supports families in our county. It also supports county operations which service the forest with road access, law enforcement and search and rescue. Having federal forest in our county costs the county money and the forest should provide adequate economy to offset these costs.

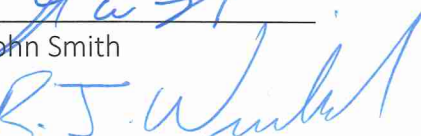
Again, we thank you for the opportunity to be involved in this process.

Respectfully,

Board of County Commissioners  
Clearwater County, Idaho

  
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Don Ebert, Chairman

  
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John Smith

  
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Rick Winkel

BOARD OF COUNTY COMMISSIONERS  
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