



MINERAL COUNTY BOARD OF COMMISSIONERS

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SANDERS COUNTY BOARD OF COMMISSIONERS

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April 20, 2020

Zach Peterson, Forest Planner
Nez Perce-Clearwater National Forests Supervisor's Office
903 3rd Street
Kamiah, ID 83536

Dear Zach:

The Mineral and Sanders County Commissioners (MSCC) have come together to provide comments on the Nez Perce-Clearwater Forest Plan Revision (FPR). Our counties and their citizens have a long tradition of working and recreating in the Nez Perce-Clearwater National Forest.

With an emphasis on our economies, MSCC's comments will be focused on areas of the FPR that we believe are most important to our surrounding communities and counties that will be impacted by the management decisions made by Nez Perce-Clearwater Forest. While MSCC supports management that addresses all resource needs, for purposes related to the FPR, our focus will be on timber and vegetation management, recreation, forest health and wildfire.

With the emphasis on our local economies, we want to point out first, what we believe is an oversight in the **Nez Perce-Clearwater Forest Plan Assessment**. Our daily work, recreation, and business activities do not recognize state, county, or forest boundaries. As stated above, our citizens and businesses have a long tradition of working and recreating in the Nez Perce-Clearwater National Forest. Mineral County, Montana shares a portion of its boundary with the Nez Perce-Clearwater Forest in the highly controversial area surrounding the Great Burn which crosses the Montana/Idaho border in the Hoodoo Pass area. Sanders County, Montana is located within an hour and a half of the Nez Perce-Clearwater and both Sanders and Mineral Counties are home to large sawmills. There is also a large post and pole operation in Mineral County. Any other timber dependent industry that I have missed? Chapter 6.0, Socioeconomic Conditions and Trends report however, is confined to Idaho with the primary analysis area defined as the five counties in north central Idaho that are adjacent to, or in the immediate vicinity of, the Nez Perce-Clearwater National Forest. While Mineral, County was acknowledged in the secondary economic analysis area, Sanders County, located within an hour and half of Nez Perce-Clearwater Forest, was not included anywhere in the Analysis.

We have four areas of concerns with this oversight:

- The economic stability of both counties should weigh heavily in the Nez Perce-Clearwater FPR.
- The additional timber needs of our two sawmills should be included in the analysis for milling capacity and timber supply needs.
- Our counties should weigh heavily in the decisions made around priority areas identified for management in the FPR and for future vegetation management projects.
- The heavy recreational use that comes from and through our counties should be considered in the recreational portion of the analysis.

With these things in mind, **we respectfully request that you include both Mineral and Sanders Counties in the primary economic analysis area for the Forest Plan Assessment.**

While timber harvest volumes and acres treated are currently on the rise, the past 2 or 3 decades have seen dramatic drops in active management across all of our National Forests. With over 90% of Mineral County (the highest in all of Region 1) and nearly 60% of Sanders County tied up in National Forest System (NFS) lands, we depend heavily on the resources they provide for our economic stability, with timber and recreation the primary drivers.

Prior to the dramatic reduction of active management and changes in other policies on our National Forests, our local communities were thriving, maybe not in the way the larger cities were, but our businesses were open and people were working. Local community banks were busy making loans to local businesses and private citizens. Our schools were full and our hospitals were well funded. Our local sawmills were running at or near capacity, loggers were working and log trucks could be seen on the highway and lined up at our local fuel stops and convenience stores. Weekends brought year around recreation business to the area, motels, grocery stores, restaurants and of course bars, were busy. Snowmobiles and ATV's were lined up at the same fuel stops and convenience stores that had been busy with logging traffic during the week. Local hardware stores, service and mechanic shops, and tire shops were also busy and we even had a local snowmobile dealership.

All of this changed as a result of the reduction in active management, commercial timber harvest and recreational opportunities. Logging trucks were no longer a common sight on the highways, businesses closed or curtailed operations, banks closed or curtailed business, weekend recreational traffic dropped off, and citizens began moving away in pursuit of other job opportunities. School enrollment dropped off dramatically and some schools that were previously B schools no longer have enough students to put a sports team together. Students anxious to participate in sports now have to be bussed to other schools with the same enrollment issues and together they have enough players to have a team.

As part of the reduction in active forest management, forest health has deteriorated and millions of acres of our NFS lands are now considered to be at risk to the effects of insects and disease. As a result, wildfire size, severity, and intensity has grown to catastrophic proportions and our summers are filled with smoke as we watch the natural resources we need go up in flames.

However, awareness has begun to grow around these deteriorating forest health conditions and forests are looking for ways to increase forest restoration on a larger scale, increasing forest product outputs, improving forest health and reducing wildfire risk, and increasing recreational opportunities.

The Nez Perce-Clearwater is one of our nearest forests in a network of Forests (Lolo, Kootenai, Nez-Clear, St. Joe, Coeur d'Alene, and Bitterroot) we consider to be in our area of interest that effect the economic structure or our rural counties. Our local sawmills depend on a consistent, reliable supply of economically viable timber at a volume level that provides the opportunity to operate efficiently and maximizes their ability to provide high paying jobs to our citizens.

In addition to the essential contributions the timber program provides to our rural timber dependent communities, revenue generated through timber receipts is the primary economic driver for nearly all work that gets done on our National Forests. The Nez Perce-Clearwater Forest has an opportunity through the FPR process to emphasize the important roll our forests play in supporting our timber dependent communities and our forest products industry.

Second only to the timber resource, recreation (primarily motorized) is an important part of our economic structure as well. Providing revenue to maintain and improve recreational opportunities is essential. Additionally, now is the time to look at policies that have adversely affected recreation in the past and into the future such s the decision in 2016 that shut down the use of snowmobiles in the Great Burn IRA. This decision was made within the administrative framework of the Forest Service and could be removed in the same manner. This single decision has had a huge adverse effect in the winter recreation economy business in our counties. **We respectfully ask that the forest reverse this decision. Additionally, we ask that you continue to maintain the current high level of emphasis on recreation and look for any other opportunities to improve and increase opportunities for motorized recreation on the forest.**

Developing and maintaining an adequate road system is essential to the vegetation and recreation program development. Before any roads are closed, we need to look into the future and make sure we are not hampering future timber or recreation programs and we are leaving roads that will provide safe access for fire fighters and the general public. Loop roads provide alternative access routes in the event something causes a closure and they are excellent for ATV use. WE regularly work on projects where we are going back in on old road locations that have been obliterated and building new roads to access additional timber. Closing roads is expensive and rebuilding them again adds cost to projects.

The total number acres included in the Nez Perce-Clearwater NFS lands is 4,074,832. Approximately 75% of these acres are administratively withdrawn and no harvest is allowed. Approximately 20% is in the suitable base and 5% is unsuitable but harvest may occur to accomplish other resource objectives.

As commissioners and residents in Sanders and Mineral Counties, we support active forest management that maximizes economic values, improves forest heath and reduces the threat of wildfire over a larger landscape in a shorter period of time and helps provides expanded employment and business opportunities for our citizens.

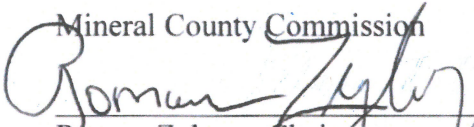
With these things considered, we propose the following recommendations for the Nez Perce-Clearwater Forest Plan Revision.

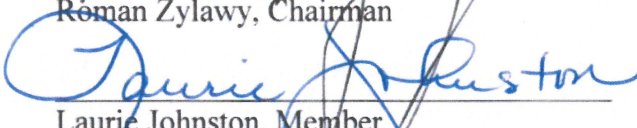
- **With nearly 75% of the forest excluded administratively from timber harvest we strongly believe the maximum number of acres possible should be kept available for timber management purposes. With that, we support the timber suitability map alternative X with regard to the suitable acres of 969,187 and the Unsuitable acres of 835,649 where harvest may occur to accomplish other resource objectives.**
- **Utilizing the acres proposed above we recommend harvest levels of 180 mmbf per year to 200 mmbf per year with all non-saw products (post and pole, firewood, pulp) counted separately in addition to that volume.**
- **Maximize motorized recreation opportunities. The Great Burn IRA should be managed as primitive with motorize use restricted to snowmobiles.**

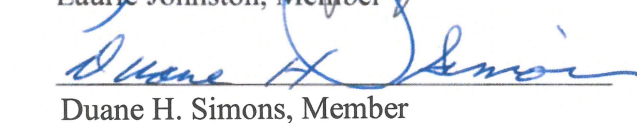
- Although we don't support any additional Wilderness at this time, we would support a process that would bring all interest parties together to discuss future management of all Recommended Wilderness Areas and Inventoried Roadless Areas in Idaho and Montana.
- Because of the concerns with unintended consequences, we do not support any Wild and Scenic River designations.
- Develop and maintain a road system that maximizes access for vegetation management, recreation, public access, and safe firefighter access.
- Silvicultural prescriptions should be used that emphasize forest health and promote maximum forest growth potential.
- Logging methods that maximize production and reduce harvest costs while improving safety should be allowed as long as the desired end result is achieved.

In closing, we want to thank the Forest for all the hard work they have invested to develop these alternatives and provide in depth opportunities for public comment. We look forward to working with you as this project develops over the next few months or years.

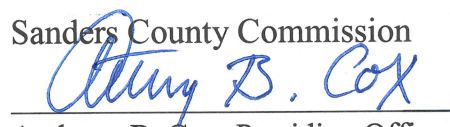
Mineral County Commission

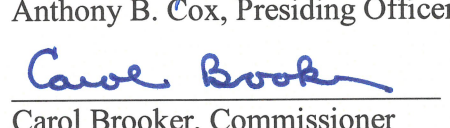

Roman Zylawy, Chairman

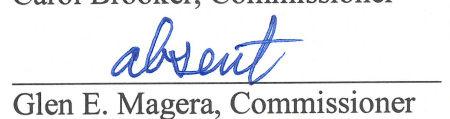

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