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First name: Gavin

Last name: Lewis

Organization: Ida-Lew Economic Development Council

Title:

Comments: ATTACHMENT BELOW

IDA Lew Economic
Development Council PO
Box 393 Grangeville, ID
83530

Cheryl Probert, Forest Supervisor
USDA Forest Service
Nez Perce-Clearwater National Forests
903 3rd Street
Kamiah, ID 83536
March 30, 2020

RE: Comments to the Draft Environmental Impact Statement: Revised Land Management Plan for the Nez Perce-Clearwater National Forests

Dear Cheryl,

Ida-Lew Economic Development Council (Ida-Lew) is a private-public non-profit promoting the stable growth of Idaho and Lewis Counties. Our role is focused on retention of existing business, assisting startups, supporting community development and facilitating attraction of new businesses. We appreciate the opportunity to provide comments to the Nez Perce-Clearwater National Forest (Forest) revised land management plan. We have reviewed the Draft Environment Impact Statement (DEIS) in regards to economic and social sustainability from the perspective of Idaho and Lewis Counties' businesses and community. We recognize that the Forest Plan Revision process looks to identify broad-based environmental and socio-economic impacts associated with the proposed alternatives and recognized Management Areas within the framework of the National Environmental Policy Act.

The Nez Perce Clearwater National Forest (NPCNF) lies across seven counties of north central Idaho. Each of these counties were historically established around pioneer grit and perseverance related to extracting natural resources from the landscape. In the mid 1800's gold drove nonnative settlement in the region. Mining, in part, built an agricultural community as many Native Americans and non-natives grew food in the Snake and Clearwater River lowlands that fed the mining communities in the more mountainous areas. Many of these mountainous areas are now designated as the lands managed by the NPCNF. In the early 20th century, following the gold rush, timber prospectors arrived and staked out large tracts of land for private industrial forest management activities. Forest resource management and resource utilization has provided much of the fabric which founded the communities of north central Idaho and communities adjacent to the NPCNF. Documentation is provided as an attachment for referenced data facts, figures and points.

The importance of the wood products sector to this region of Idaho cannot and should not be understated. According to data from the Idaho Department of Labor, the wood products industry contributes just over \$1 billion to the regional Gross Domestic Product (or 22% of GDP) in the seven county region. In 1991 the region's employers included 39 wood products manufacturers, the wood products industry employed 5,470 people in 1994. According to the University of Idaho College of Natural Resources (Station Bulletin 110, January 2020) in

1994 just over 800 mmbf was logged from private forest lands, 300 mmbf from Idaho State lands and 350 mmbf from federal lands across all of Idaho and sawmill production was just over 1.8 billion board feet. By 2015 harvest levels on private lands was down 100 mmbf to 700 mmbf, State remained the same at 300 mmbf and federal harvest levels dropped by half to 175 mmbf; the number of sawmills dropped to 14 and only 1,963 jobs remained. Idaho County lost 46% of their sawmill jobs in this time frame.

The University of Idaho reports that in 2019 of the 1.3 billion board feet harvested 69% came from private lands, 17% from state and 14% from federal lands. Employment within the sector includes loggers, transportation, supportive industries (tire and machine shops) in addition to natural resource professions. The people behind these jobs are what make up communities. Without additional harvest from the Forest it is unlikely the private and state land harvest levels will provide sustainable harvest to support our communities.

An unforeseen negative impact in the NPCNF Region communities aligns with the initiation of the Stewardship Contracting program. Adopted as a pilot program in 1999, expanded in 2003 and in 2014; this program severely limited small purchasers' ability to compete. Small producers' ability or lack of to obtain required bonding necessary limited their ability to secure long term contracts facilitated under Stewardship Contracting. An analysis by the Pinchot Institute, Policy Report 01-06, identified option for consideration to develop contracts that could be handled by local contractors to act as stabilizing opportunities in rural communities. Outside of the Stewardship contracting tool, the NPCNF offerings for small business set-aside has been in decline. Additionally, the increased use of IDIQ contract offering also eliminates the service and construction related contracting opportunities from National Forest managed sites for rural small businesses.

[middot] Ida-Lew's preferred harvest levels are represented by Alternative W, which provides for a sustainable harvest offering to maintain existing lumber milling infrastructure and would remove pressure from private and state lands as sources of supply to maintain current wood products employment. An annual harvest allocation of 221-241 mmbf would be similar to levels experienced in the early-mid 1990's. It is highly likely with a sustainable harvest level the existing level of employment will be retained in the logging and wood products sector. According to data provide by the Idaho Department of Labor, there are 3,082 jobs directly tied to logging and wood products manufacturing in the NPCNF region. The economic multiplier for these jobs is 2.47.

Beyond the direct and indirect economic benefits are the social sustainability benefits that bolster community capacity. Living wage jobs provide families with financial security that enable them to build social capital. Social capital in rural communities can make or break programs that are reliant on volunteers to support program delivery (4-H leaders, coaches for athletics, governance committee participation, etc.).

During the mid-1990's communities were encouraged to diversify and build on tourism. According to the Idaho Travel Council visitor surveys (<https://commerce.idaho.gov/content/uploads/2018/07/Idaho-2017-TUSA-Regional-Final-Report.pdf>) the majority of visitors to Idaho and the NPCNF region are visiting friends

and family and are coming for an out of doors activity. Based on the survey data: the majority of visitors to this region are from Idaho (39%), Washington (17%) and Montana (11%); the majority (30%) of visitors spent the night in the home of friends/family while 18% stayed in campgrounds/RV parks; 20% of visitors came to camp or experience the out of doors; however, less than 5% of visitors came for eco-tourism. The average age of visitors to the NPCNF region was 40, over 90% of visitors reported as Caucasian/white and had household incomes of over \$50,000. According to data compiled by the Idaho Department of Labor, in 2019 tourism accounted for 5,677 jobs in the NPCNF region and \$247 million in gross domestic spending.

In the early 2000's the regions' community leaders and NPCNF managers began to develop and attract Off Road Motor Vehicle Users (ORMV). ORMV visitation is a significant economic driver in Elk City. The GEM Trail development effort is building a brand rural communities are using to market local ORMV events and opportunities. The Idaho Department of Parks & Recreation evaluated the economic impacts of ORMV

users across Idaho in the Idaho State Parks & Recreation Economic Impact and Importance of Snowmobiling, off-highway vehicle and Power boating in Idaho, 2016 & 2017. In this report ORMV activities are reported to contribute \$ 1 billion to Idaho's economy and the report suggests "When we invest in the foundation of recreation economy, our public lands, waters and mountains produce a compounding return in the form of healthier communities, healthier economies and healthier people." In Idaho ORMV growth has increased from 40,000 registration in 2000 to over 150,000 in 2017. In 2017 survey data suggests 181,000 ORMV trips were taken in the NPCNF region over half of which were taken by out of area ORMV enthusiasts. These trips infused an economic impact of \$27 million into this rural region.

Alternatives X and Y provide the most opportunity to expand ORMV tourism offerings in NPCNF Regional communities. The Counties strongly recommend the Forest select action that enhance ORMV opportunities across the Forest.

Organized ORMV events are increasing in popularity and take advantage of designated loop routes to offer enthusiasts a high quality experience. According to a University of Idaho College of Agriculture & Life Sciences report (2012, Economic Importance of off-highway vehicle recreation) there were 73,000 in region rider trips and 98,000 out of area rider trips taken in 2012. Out of County riders spent \$11 million in the NPCNF region associated with these rides. In 2017 the reported expenditures by ORMV riders in the NPCNF region was \$22.6 million. ORMV registrations have increased from 140,000 in 2012 to over 160,000 in 2017; ORMV recreation is a growing area of opportunity for rural communities.

A recent survey in Elk City indicates that over 70% (range 70% - 100%) of visitors to area hotels/motels are there with ORMV's. Connecting loops and long loops are in high demand among the single track ORMV community. Further ORMV loop development will allow small communities to benefit from increased visitors and lead to destination event development.

The economic tie to local National Forest lands has evolved over the past century however in the recent past the negative impacts due to limitations in harvest output and ORMV access have had demonstrated negative economic impacts in adjacent communities. With wise management into the future the Forest can and will provide sustainable economic opportunity in adjacent communities.

All of the areas businesses and residents have a strong relationship with the Nez Perce-Clearwater Forest. The communities of the Nez Perce-Clearwater Forest have an up close and personal relationship with it as a backyard, a source for food, jobs and mental relaxation. Our economies and individual livelihoods are closely tied to the Forest; therefore, we respectfully provide these comments focused on economic and social impact considerations to the DEIS.

Sincerely,
David McKnight
Chairman