

Data Submitted (UTC 11): 4/20/2020 7:00:00 AM

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Comments: To Whom it May Concern:

Please find attached comments submitted by the Idaho Farm Bureau Federation (IFBF).

Thank you for your consideration.

-IFBF

#### ATTACHMENT BELOW

Idaho Farm Bureau[reg] Federation 500 West Washington Street Boise, Idaho 83702 (208) 342-2688 Fax (208) 342-8585 April 20, 2020 SUBMITTED ONLINE: [https://cara.ecosystem-management.org/Public/CommentInput?project=44089Nez Perce-Clearwater National Forests](https://cara.ecosystem-management.org/Public/CommentInput?project=44089Nez%20Perce-Clearwater%20National%20Forests) Attn.: Forest Plan Revision Team 903 3rd. Street Kamiah, ID 83536 RE: Comments on Draft Environmental Impact Statement, Nez Perce-Clearwater Forest Plan Revision To Whom It May Concern: On behalf of the more than 80,000 member-families of the Idaho Farm Bureau Federation ([ldquo]IFBF[rdquo] or [ldquo]Farm Bureau[rdquo]), I offer these comments regarding the Nez Perce-Clearwater National Forest ([ldquo]NPCNF[rdquo] or [ldquo]Forest[rdquo]) Draft Environmental Impact Statement ([ldquo]Draft EIS[rdquo]). This topic is important to our members and we thank the U.S. Forest Service for the opportunity to provide our insight. Farm Bureau is Idaho[rsquo]s leading advocate for property rights and prosperity which comes through the wise and responsible use of our natural resources. Our members use the forests and rangelands in the state to graze their livestock, harvest timber, mine, hunt, fish, recreate and sustain their livelihoods. They are responsible stewards of the land and water, and many have used these resources for multiple generations. Our members take great interest when government agencies propose changes to the management of natural resources and are concerned with any proposed designations that would in any way limit or restrict their use and future development. IFBF supports certain aspects and proposals of the NPCNF[rsquo]s Draft EIS (i.e. increased timber harvest, sustained livestock grazing and no additional designations). However, there are other aspects that we are concerned about and adamantly opposed to. We offer these comments for the Forest Plan Revision Team[rsquo]s consideration. Forest Management Some of the listed Alternatives (W and X) in the Draft EIS support active forest management and timber sales approaching sustained forest yields (241 million board-feet annually) over the next 20 years. According to the Draft EIS, close to 2,500 new jobs in the region could be possible with this level of forest activity which would potentially require the re-building of several mills that were closed in the area over the last decade. On average, this would be an almost six to eight-fold increase in timber coming off the Forest over the last two decades. The benefits of active forest management to local communities should be considered in all forest plan revisions because it is good for the local and regional economy. Logs come out of the forest in two ways [ndash] they are either harvested sustainably to improve the health and resilience of the forest (while creating jobs), or they are burned to the ground or left standing for insect fodder. Jobs matter, and timber production and processing has been a cornerstone of rural communities in years past. Fortunately, for all, these economic benefits go hand in hand with our goal of healthy forests by providing good paying jobs and contributing to the local tax base. Timber dependent counties in Idaho have significant amounts of federal land within their borders, thus limiting their taxable land base. The way forward to achieving healthy timber communities is for the Forest Service to actively manage its natural resources. We support significant increases in annual timber production in the Final EIS. Wildfires and Smoke Management Smoke has become a major problem in the Pacific Northwest, and the leading culprit is wildfires on the National Forests. The lack of active forest management over the last 40 years because of frivolous litigation from environmental organizations has turned our forests into tinder boxes -

ripe for wildfire. Managing timber through logging and thinning will allow vegetative management via prescribed burning thereby minimizing smoke. Impacts to air quality are substantially reduced when forests are managed versus letting nature burn them to the ground causing dangerous airshed conditions for the people who live in populations centers adjacent to federal lands. Water sheds are also being damaged beyond repair in these wildfire events. Fires have always been a natural occurrence, but the intensity of today's fires are not natural. Also, with population centers now encircling federal forests, these occurrences need to be managed to protect the health and wellbeing of people in the airsheds downstream. Clean air, healthy forests, and healthy economies go hand in hand and are a win-win for everyone. The current condition of the NPCNF with its significant fuel loads will be ripe for wildfires as we trend toward a warmer climate. Increased fire activity will have harmful effects on air quality, not to mention putting significant amounts of carbon into the atmosphere. Healthy, managed forests will be key to keeping our air clean and serving as a carbon sink for years to come.

**Designations** Alternatives W, Y, and Z in the Draft EIS propose substantial increases in Wilderness designations. Land and resources in Wilderness are tied up for perpetuity, meaning no active management and wildfires are left to burn without intervention. Currently, there are 750 Wilderness Areas in the U.S., totaling over 109 million acres. Wilderness designations are only created by an act of Congress. However, if the Forest Service recommends acreage for Wilderness under its Plan Revision, it will be managed as de-facto Wilderness until Congress officially designates it as such, which could be decades or never. Wildfires will burn unimpeded in these areas just adding more smoke to already critical airsheds. We oppose any new recommended Wilderness Designations in the Final EIS for this reason. These same Alternatives have a number of river and stream segments listed as "suitable" for Wild & Scenic River designations. A major issue with Wild and Scenic River designations has been restrictions on resource use, including grazing. Court cases have resulted in the elimination and/or reduction of grazing in some previous Wild and Scenic River designations. The proposed designations in the Draft EIS would most definitely need to be studied to determine impacts on grazing permittees on those river segments. We recommend the Forest communicate with all livestock permittees that would have any proposed Wild & Scenic River proposal adjacent to, or running through, their allotments. We also request further study and analysis of these river segments and their potential impacts to grazing.

**Grazing Issues** The Draft EIS proposes a stubble height guideline that will make it difficult for livestock grazing permittees. It calls for monitoring "green line" vegetation and managing livestock so that a six-inch stubble height along the green line of the riparian area is achieved at the end of the season. This is an arbitrary guideline, and impractical to apply on a forest-wide scale. It will be burdensome to permittees with more accessible stream reaches within their allotments. Neither does it consider the stubble growth from the time the cattle are removed until the end of the growing season. We recommend that this guideline be purged from the Final EIS. Additionally, there are provisions that have been identified in the Draft EIS related to non-listed Endangered Species Act (ESA) fish species. All the action alternatives would include provisions for the protection of non-ESA listed native fish species' redds from livestock trampling. The impact on livestock management associated with non-ESA listed fish may be significant. Over time, some permittees may elect to vacate their allotments due to workload and financial impacts. The Forest Service is not required to apply measures for all native fish, therefore making this guideline arbitrary and unwarranted. Broad guidelines pertaining to all native fish should be removed from the Final EIS.

**Big Horn and Domestic Sheep Management Issues** Although there is no longer any active sheep grazing on the NPCNF, we do not support the complete removal of sheep Animal Unit Months on the forest. Domestic sheep grazing is still a viable option and an important industry to the State of Idaho, and eliminating sheep grazing from the NPCNF management plan is inconsistent with the 2010 Idaho Bighorn Sheep Management Plan. The Draft EIS contains an arbitrary standard that will severely impact domestic sheep grazing. The arbitrary standard prohibits sheep grazing within 16 miles of bighorn sheep occupied core herd home ranges. The Forest Service does not manage big horn sheep and therefore it is improper to apply arbitrary buffers between big horn and domestic sheep. The Forest Service should coordinate with the State of Idaho to utilize voluntary best management practices for separation between domestic sheep and bighorn sheep within population management units. This coordination will make the forest plan consistent with Idaho's Bighorn Sheep Management Plan.

**Conclusion** The agriculture and natural resource industries are the backbone of the state and region's economy, history, and culture. It is imperative that our National Forests be managed in a responsible manner to benefit both the environment and the economies of the

communities in which they reside. Additional designations and mismanagement will only lead to further deterioration of our National Forests, and the loss of utility of their resources. Farm Bureau members appreciate the Forest Service's environmental analysis of the NPCNF. As the Forest looks to revise and update its management plan, we ask that you fully embrace the principle of multiple-use and sustained-yields. IFBF supports the proposals and concepts of increased timber harvest, sustained livestock grazing, and overall active management of the NPCNF. We oppose any further Wilderness and/or Wild & Scenic River designation recommendations. On behalf of the entire membership of the Idaho Farm Bureau, I thank you for your consideration of these comments. Please contact Braden Jensen, at 208-342-2688, if you have any questions regarding this topic. Sincerely, Bryan Searle, President Idaho Farm Bureau Federation