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R. Skipper Brandt, Chairman Mark Frei Denis B. Duman BOARD OF IDAHO COUNTY COMMISSIONERS April 20, 2020 Cheryl Probert, Forest Supervisor Nez Perce-Clearwater National Forests 903 3rd Street Kamiah, 1083536 RE: Cooperating Agency Economic Comments to the Draft Environmental Impact Statement: Revised Land Management Plan for the Nez Perce-Clearwater National Forests Supplemental to Letter Dated March 31, 2020 Dear Cheryl, Please find our additional response to the DEIS and Draft Forest Plan Revision in regards to economic and social sustainability. We recognize that the Forest plan Revision process within the framework of the National Environmental Policy Act looks to identify broad-based environmental and socio-economic impacts associated with the proposed alternatives and recognized Management Areas. Throughout the forest planning process the Counties have expressed emphatically that the Forest does not take community economic sustainability seriously. 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. Within Clearwater County, a former hunting camp became the town of Elk River and the home to the world's first all-electric saw mill. 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 provided for referenced data facts, figures and points is readily available from Clearwater County Economic Development. 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 GOP) in the seven county region. In 1991 the region's employers included 39 wood products manufacturers, the wood products industry had in 1994 5,470 people employed in sawmills. 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 700 mmbf, from State 300 mmbf and federal harvest levels dropped to 175 mmbf; and the number of sawmills dropped to 14 and only 1,963 jobs remained. 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 shops, machine shops) in addition to natural resource professions. The people behind these jobs are what make up 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 options 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 1010 contract offering also eliminates the service and construction related contracting opportunities from National Forest managed sites for rural small businesses. [bull] The Counties preferred harvest levels are represented by Alternative W, which provides for a sustainable harvest offering to increase existing lumber milling infrastructure and would remove a certain amount of 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 could be increased 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. Clearwater County has analyzed the economic cluster around natural resource management, which remains a significant contributor to the local and regional economy. 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/contentjuploads/2018/07/Idaho2017-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, Washington, and Montana; 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 ecotourism. 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 became a significant economic driver in rural areas and the GEM Trail development effort began to brand and market these 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 & Ufe 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. The Hoodoo area offers tremendous potential for highly valued ORMV loop development and provides connectivity for Forest visitors looking for a backcountry experience. Connecting loops and long loops are in high demand among ORMV communities. The Hoodoo country offers high value loop trail networks that could drive destination event development by local rural communities. The economic tie to local National Forest lands has over the past century and with wise management into the future can/will provide for sustainable economic opportunity in adjacent communities; however in the recent past the negative impacts due to limitations have had demonstrated negative economic impacts. According to US Department of Interior Reports (MLA 15-92 Mineral Resources of the Kelly-Cayuse Study Area) and a 1993 internal USFS Report Minerals and Geology Resource Assessment North Fork of the Clearwater River Wild and Scenic River Study there are known locations of rare earth and crucial minerals throughout the Hoodoo area being considered in Alternative's No Action, W, Y and Z. The national importance of rare earth elements for national security was recognized in Executive Order 13817. Pursuant to this Executive Order the Federal Register (83 FR 7065) published a list of minerals and mineral

groups deemed critical which includes minerals/mineral groups known to exist in the Hoodoo area. National security is of utmost importance; however, from the perspective of local economies the resulting jobs developed as a result of extracting and processing these critical minerals would provide direct and indirect economic gains. Alternative X management of the Clearwater River Basins consistent with the State of Idaho Rivers Program direction is desirable; mineral extraction activities would be allowed to continue within river systems. The Counties have historic relationships with forest leaders, the Forest staff are members of our communities and our children play and compete with each other on the courts/fields across the region. 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 space for soul restoration and mental relaxation. Our economies and individual livelihoods are closely tied to the Forest; therefore, we respectfully demand just and fair consideration of the impacts the DEIS proposed action will have in our communities. We look forward to working with you as a Cooperating Agency and as a neighbor throughout the Land Management Plan Revision process for the Nez Perce-Clearwater National Forest.

Sincerely, R. Skipper Brandt, Chairman Mark Frei Denis B. Duman