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First name: Gary

Last name: Bowling

Organization:

Title:

Comments: SUBJECT: Forest Plan Revision Comments

1.

I have owned property in Elk City, ID since 1993 and have managed/owned a cabin rental/bed and breakfast (Freedom River Adventures) since retiring in 2017. The sole reason I chose to retire here was the remarkable outstanding outdoor opportunities (ROOO) available. I have entertained numerous friends and family members in addition to customers who visit Freedom River. Each is amazed at the beauty of this "country" and realize Elk City is a unique place in America. My goal is to share with people the outdoor opportunities available in our forest. In the 25 years I have owned property here, I have observed incredible changes in "life" in Elk City, both in the forest and in the people.

2. When I purchased property in 1993, Elk City had a population of over 500 fulltime residents. There were 3 restaurants, 4 bars, 2 gas stations, general store, hotel, at least 5 outfitter businesses and enough students in the elementary school for 5 grades. According to census data from 1940 -1990 Elk City had a growing population and many locals estimate it peaked in 1988 with approximately 1000 residents. Since then, it has been in a death spiral and now we have about 200 fulltime residents, half of the businesses are closed and all the outfitters are gone. It would be pretty easy to make a case the 1988 forest plan was responsible for the drastic economic downturn in the area, as virtually all the local jobs depended on working in the forest.

3. From my personal observations over the past 25 years, the results of the 1988 Forest Plan are: millions of dead and dying trees, deer, elk, and moose populations at dismal levels, local job prospects eliminated, forest access closed, my favorite fishing stream (Crooked River) destroyed and the fire danger to my home significantly higher. So if the objectives were to regulate public use and access in order to "save the forest" and "clean" up the rivers. I'm not seeing it. The point is, all those restrictions on logging, mining, access, fire management policy, ranching all those rules the plan imposed on us human beings don't appear to have accomplished anything. To the contrary, one could argue all the restrictions had a detrimental effect not only on the local citizens but also on the forest itself.

4. You are to be commended for the amount of effort committed to produce the proposed 2020 plan. The man hours required must be in the thousands. I have skim read most parts of the plan but it is so long,, detailed and cumbersome, it is difficult for a non Forest Service person to plow through. However, I did come away with a couple general observations:

1. In many sections, the words. MAY, MIGHT. COULD, SHOULD. VARY, DEPEND, POSSIBLY, etc, appear when you are discussing additional restrictions ... as in "digging a hole MAY..... or cutting a tree COULD .... or using a road in this area MIGHT ... cause damage to the ecosystem. The body of the section implies an activity is acceptable but then the paragraph finishes up with a "may be detrimental" clause and therefore the activity may or may not be permitted, depending on ..... What? Is this wording intentionally vague to allow for stricter interpretation by your office at a later date? How about adding some form of numerical value to the MAY..... as in there is a 2% chance of a negative effect on the environment if a tree is cut in this area? MAY, MIGHT, SHOULD, COULD are too open ended and ambiguous.

2. Virtually every section sites a study or research paper as rationale on your decision making process. Has anyone ever questioned the accuracy and validity of these studies? Why are there no studies sited that reach different conclusions? (I know these exist at least in mining). Is it possible you are operating in an echo chamber and are not looking at data that may conflict with your planned outcome? Just saying, if I conducted a study to

prove the sky is orange..... I could get a couple pictures of an orange sky to prove my point..... you would be skeptical unless of course you were already an orange sky advocate.

5. Wild and Scenic and Wilderness: In the Free Press, Feb 2020, Supervisor Probert said

"..... we want to hear from you - the people who are most directly impacted by the way the national forest is managed". The people of Idaho County spoke in the election of 2018. Wild and Scenic and Wilderness were both on the ballot and the people of Idaho County voted by 70% .... NO. NO to any more Wild and Scenic and NO to any more Wilderness. That means NO, in any way, shape or form, and designating an area not "official" wilderness but trying to manage it as wilderness, is almost worse..... it almost looks like the Forest Service is trying to pull a fast one.

6. There are over 1 MILLION acres of designated wilderness and over 2 MILLION acres of "remote" national forest in central Idaho. How many users were there in that 1 million acres of wilderness last year? How many users last year in the 2 million acre national forest?. I'm betting the user rate on people per acre is pretty low in the wilderness and pretty high in the national forest. Not that user rate is the determining factor, but it seems like such a waste. Like having a beautiful, expensive new car you park in your garage and never drive, once a year you let the kits sit in it, in the mean time the tires rot.

7. I fly around the forest all summer and fly into the wilderness. There are literally millions of dead or burned trees in our forest, entire hillsides and it is especially bad when you cross into the wilderness.

How much sediment is running off those burned mountains down into the streams? Makes one wonder; just how healthy is the forest in the wilderness? One would think it is the healthiest in the country, no human intervention only nature.....should be a model environment ... is it? And if not,..... WHY would we want to increase its' size? Are the current management practices of doing nothing really providing a healthy forest? I'm all for keeping the wilderness, I like the fact I can walk out my back door and not cross a road until I get to Montana, but don't add any more.

8. Road closures: How many miles of roads, logging roads and ATV trails have been gated or obliterated in the past 25 years? Why were they closed? At one time, 20 years ago, I was all for restricted travel areas, that's were I elk hunted, with very good success. But times have changed, at least in the Elk City Zone, I spend a lot of time in the woods and most of the elk I see now are within sight of a road, a road used by cars not just ATV's. A large percentage of the elk are around town, around people. The restricted travel theory isn't accomplishing anything now. Furthermore. if additional trails were open, on a use percentage basis, they all would get less use, and therefore less damage. As it is now, in the summer the few trails that are open are used very heavily, it would be nice to disperse the herd a little.

9. Logging: Somewhere in the proposal it said 4,350 acres per year are designated for logging. Just at the rate the trees are dying from the Hemlock Moth and the beetle; that's a drop in the bucket number. We have over 2 million acres of forest, 1.2 million "suitable for production" and the proposal is to log 4,350?

If the beetle and the moth are going to kill the trees anyway, why not log them? Otherwise, they are going to bum. My input would be to double or triple the acreage logged.

10. Prescribed burning: The current prescribed burn should be maximized. And somewhere in the plan I saw the National Forest Revenue Act of 1908, where it sounded like 25% of the revenue from logging on federal lands would go to the county school system under the Secure Rural Schools & Community Self Determination Act of 2000. Idaho county schools could definitely use the funds. I didn't notice any proposals to selectively log or thin any areas to improve forest health. On my own property, I was advised to selectively log and thin 25 years ago

by a state forester and he returned last summer for another evaluation, he said it looked great, very healthy stand of trees..... if I can do it, why can't you?

11. The WILDLIFE section of the plan doesn't mention the economic value of wildlife. From hunting and fishing license to fuel to groceries to accommodations at my bed and breakfast, wildlife equals money. No wildlife, no money. You should probably remove the statement about "iconic elk herd" its not iconic any more....probably the saddest herd in the west. And speaking of sad, what happened to the moose? I used to have them in my yard every day in the mid 90's.....now all gone? I didn't see much mentioned about moose in the plan.....maybe I missed that section. And they didn't just move somewhere else, they are gone.

12. Mining: 3.5.2 ENERGY & MINERALS, 2nd paragraph says "In the Mining and Minerals Policy Act of 1970, Congress declared that, in the interest of the nation, it is the continuing policy of the federal government to foster and encourage private enterprise in the development of domestic mineral resources and the reclamation of mined land." After the first two paragraphs where Congress declares, FOSTER AND ENCOURAGE, this plan spends the next 20 pages citing restrictions and limitations, laws, studies and research papers restricting mining and energy, I couldn't find ONE place where it encouraged either?

13. IN SUMMARY, my inputs are to pick the plan option with the following

- a. No more designated wilderness, no more managed as wilderness, no more anything with wilderness,
- b. No more wild and scenic
- c. Unless otherwise directed by congressional mandate, remove gates on all closed logging roads, and ATV/snowmobile trails. Open all the trails possible.
- d. Maximize logging
- e. Maximize prescribed burns
- f. Open more area and ease restrictions to mining, manage mining through a bonding process to reclaim any damages.
- g. I'd like to say do something for the elk, deer and moose herds, but because the agency refuses to acknowledge the effect of wolves, there is no option to pick.
- h. Canadian Lynx, do not list as anything, (protected, endangered). Doing so, will result in "shutting down" a major portion of the forest and will be more detrimental than the bull trout.

14. The mission of the Forest Service is: to sustain the health, diversity and productivity of the National Forest and grasslands to meet the needs of present and future generations. The 1988 plan did not sustain the health of the forest, the productivity of the forest or meet the needs of that generation. I hope the plan of 2020 will do better. Just in case you have missed my point in the previous 13 paragraphs: More regulation is NOT the answer. The sign says, 'LAND OF MANY USES' it seems to me over the past 30 years we have been living under the "LAND OF LITTLE USE" policy. For the good of the forest, my hope is this plan will be restrictive enough to protect the forest but open enough to allow the citizens of our country to enjoy it.

PS: please acknowledge receipt at gb16737@yahoo.com. I'm having trouble connecting with the internet.  
Thanks