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Comments:

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Nez Perce-Clearwater National Forest

Supervisor's Office

ATTN: Forest Plan Revision

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RE: Forest Plan Revision Salmon Nez Perce-Clearwater National Forest

We are writing today to submit our official comment on the Nez Perce-Clearwater National Forest (NPCLWNF) Plan Revision. The US Forest Service has published specific requests for information they seek. Our comments address these questions as well as additional concerns we have as elected officials. We appreciate the opportunity to submit comments and information for this plan revision.

County and municipal officials are elected to manage on-the-ground daily governmental activities that involve the health, safety and welfare of visitors and local citizens. Local government responsibilities include protecting the public from adverse impacts of federal action. Local governments are the foundation upon which higher layers of government depend to ensure the peaceful and orderly existence of the American way of life - our customs and cultures. Those responsibilities most definitely include land use planning coordination participation at the starting points of all plans and through out the process, within the confines of our borders with the jurisdictional requirements; to include police powers, search and rescue efforts and other duties under 10th Amendment provisions.

While individuals and non-governmental organizations are always encouraged to take advantage of the opportunity to review proposed federal rules and to assess the potential beneficial and impacts of these proposed rules, local governments have the additional responsibility for ensuring that the proposed rules are in compliance with the enabling legislation as it pertains to protecting the health, safety and welfare of their local citizens. As elected officials, we recognize and accept the responsibility to address the proposed NPCLWNF Plan Revision that affect local citizens in a thorough and serious manner.

We submit these comments because it is important for the Agencies to recognize, fully represent and openly disclose the adverse impacts (not just the benefits) to Shoshone County, that will result from Agency actions pursuant to revising the NPCLWNF Plan. NEPA, NFMA, and 36 CFR 219 regulations require coordination with state and local governments throughout starting, creating, revising and finalizing land use plans and ensuring consistency with those state and local planning efforts.

Shoshone County Board of Commissioners, appreciates your full attention to and your serious consideration of our comments and recommendations on the revised plan.

The BOCC requests we be considered in discussions on vegetation management-especially harvest or thinning. The BOCC is concerned about a conflict with the USFS management and strategies that will keep our communities safe from fires.

The Plan need to consider human health, personal property rights, the effected economies, as well as habitat. The plan fails to offer no meaningful rehabilitation plan after a wildfire. The BOCC is held by statute to protect and enhance the public health, safety and welfare of its citizens. The USFS position is in direct conflict with the BOCC responsibilities as well as the GAO.

The GAO issued GAO/T-RCED-99-79 "WESTERN NATIONAL FORESTS: Nearby Communities Are Increasingly

Threatened by Catastrophic Wildfires" (1999) Mr. Hill, Associate Director, Energy, Resources, and Science Issues, Resources, Community, and Economic Development Division, states in part,

"During this century, two major changes have occurred in the national forests of the interior West.

First, the Forest Service's decades-old policy of putting out fires in the national forests has resulted in increased undergrowth and density of trees creating high levels of fuels for catastrophic wildfires. This has transformed as many as 39 million acres of the interior West's national forests into a tinderbox.

Second, the number of people living along the boundaries of national forests has grown significantly. As a result, the increasing number of large wildfires, and of acres burned by them, pose increasingly grave risks to human health, safety, property, and infrastructure in these areas which are commonly referred to as "wildland/urban interface" areas.

During the 1990s, the Forest Service began to address this problem by (1) establishing an objective of increasing the number of acres on which excessive fuel levels are reduced, (2) announcing a priority for such reductions in wildland/urban interface areas, (3) restructuring its budget to better ensure that funds are available for such reductions, and (4) proposing demonstration projects to test innovative approaches for reducing fuels. The Congress has supported these efforts by increasing funding for fuels reduction, authorizing demonstration projects, and authorizing a multi-year research program to better assess problems and solutions. However, these efforts are in a race against time and may fall short.

These efforts may fall short because the Forest Service lacks a cohesive strategy for overcoming several barriers to effectively and efficiently reducing fuels on national forests. These barriers include (1) potential conflicts between fuel reduction efforts and other agency stewardship responsibilities, including protecting air quality, watersheds, and wildlife habitat; (2) program incentives that tend to focus efforts on areas that may not represent the highest fire hazards;

(3) agency contracting procedures that are not designed for removing large amounts of materials with little or no commercial value; and (4) the high costs of such removals, which may be as much as several hundred million dollars annually." (Pages 1-2)

He goes on to state,

"In recent years, the number of people living along the boundaries of the national forests has grown rapidly. As a result, the increasing numbers of larger, more intense fires pose grave hazards to human health, safety, property, and infrastructure. Not only have lives been lost, but because smoke from such fires contains substantial amounts of fine particulate matter and other hazardous pollutants, the fires can pose substantial health risks to people living in this wildland/urban interface. Catastrophic wildfires threaten not only human health, lives, and property, but also infrastructure vital to nearby communities." (Page 3) (GAO/T-RCED-99-79 <http://www.gao.gov/assets/10/107694.pdf>)

Ten years later, in March 2009, the Government Accountability Office published GAO-09-443T: "FOREST SERVICE Emerging Issues Highlight the Need to Address Persistent Management Challenges". In part, Robin M. Nazzaro, Director Natural Resources and Environment testifies,

"Since 1999, we have issued numerous reports calling for various improvements in the Forest Service's approach to wildland fire management. Most recently, we have focused on four primary steps we believe the agency, in conjunction with Interior, needs to take to better understand the extent of, and address, the nation's wildland fire problems and to help contain rising federal expenditures for responding to wildland fires. Specifically, we have called on the Forest Service to:

"Develop a cohesive strategy that identifies options and associated funding to reduce potentially hazardous vegetation and address wild/and fire problems. Despite our repeated calls for a cohesive wildland fire strategy, the Forest Service has yet to develop one.... In January 2009, agency officials told us they were working to create such a cohesive strategy, although they had no estimate of when the strategy would be completed. Establish clear goals and a strategy to help contain wild/and fire costs. In 2007 and 2008, we reported that the Forest Service was taking a number of steps intended to help contain wildland fire costs, including improving its decision-support tools for helping officials select strategies for fighting wildland fires, but that the agency had not clearly defined its cost-containment goals or developed a strategy for achieving those goals- steps that are fundamental to sound program management.

Continue to improve its processes for allocating fuel reduction funds and selecting fuel reduction projects. Also in

2007 and 2008, we reported on several shortcomings in the Forest Service's processes for allocating fuel reduction funds to field units and selecting fuel reduction projects, shortcomings that limited the agency's ability to ensure that funds are directed where they will reduce risk most effectively.

Take steps to improve its use of a new interagency budgeting and planning tool. In 2008, we reported on the Forest Service's and Interior's development of a new planning tool known as fire program analysis, or FPA.... While recognizing that FPA represents a significant step forward and shows promise in achieving certain of its objectives, we believe the agencies' approach to FPA's development hampers the tool in meeting other key objectives. First, FPA has but limited ability to project the effects of different levels of fuel reduction treatments and firefighting strategies over time, depriving agency officials of information that could help them analyze the long-term impact of changes in their approach to wildland fire management. Second, FPA, as the agencies have developed it, cannot identify the most cost effective mix and location of firefighting assets for a given budget. Rather, it analyzes a limited number of combinations of assets and strategies to identify the most cost-effective among them....

In addition to these issues, we have also reported on the Forest Service's difficulties funding fire suppression activities within its appropriated wildland fire budget; in many years, the agency has transferred money from other Forest Service programs to pay suppression costs. We reported in 2004 that such transfers between programs had caused projects to be delayed or canceled, strained relationships among land managers at different agencies, and created management disruptions within the Forest Service, and we recommended several measures to minimize the impacts of funding transfers and to improve the estimates on which the agencies base their wildland fire budgeting requests. Nevertheless, fire-related funding transfers continue, occurring in fiscal years 2006, 2007, and 2008- with the Forest Service transferring \$400 million from other programs in fiscal year 2008 alone." (Pages

2-5) (GAO-09-443T <http://www.gao.gov/products/GAO-09-443T> See Appendix 1)

One community within our county, Pinehurst, is listed with the EPA as an area of non-attainment with the Clean Air Act. The USFS plan to let WUI fires burn, could affect Pinehurst's attempts to achieve attainment status, which involves no more than one non-attainment day per year, for three consecutive years.

In 2008, GAO Report: "GAO-08-433T WILDLAND FIRE MANAGEMENT Federal Agencies Lack Key Long- and Short-Term Management Strategies for Using Program Funds Effectively", Robin M. Nazzaro, Director Natural Resources and Environment testified to Congress,

"Faced with an incendiary mix of accumulated fuels, climate change, and burgeoning development in fire-prone areas, and constrained by our nation's long-term fiscal outlook, the federal wildland fire agencies need to commit to a more considered, long-term approach to managing their resources in order to address the wildland fire problem more effectively and efficiently. They have taken an important first step by establishing and updating federal wildland fire policy. Development of strategies and management tools for agency officials to use in achieving the policy's vision, however, has been uneven. The agencies are making progress in certain areas, including improving funding allocation processes for reducing fuels and requiring appropriate management response to fires that occur. In addition, the agencies are continuing to develop FPA, which, if implemented appropriately, could

significantly improve the agencies' ability to allocate their resources effectively. But broader efforts have stalled- as in the development of cost containment goals and objectives- or even lost ground, as evidenced by the agencies' retreat from their earlier commitment to develop the cohesive wildland fire strategy we have called for. If the agencies are to achieve lasting results in their efforts to address the wildland fire problem, they will need a sustained commitment by agency leadership to developing both a long-term strategy that identifies potential options (and their costs) for managing wildland fires and the tools for carrying out such a strategy. " (Pages 13-14) {{GAO-08-433T <http://www.gao.gov/products/GAO-08-433T> See Appendix 2)

The implications of this lack of financing and cited inappropriate spending for projects are particularly distressful to the BOCC, whose own operating budget has been seriously impacted by the forced curtailment of its legacy industries of timber harvest and mineral extraction.

The BOCC wishes the USFS to be participatory, as suggested by the GAO, in a truly cohesive wildfire strategy

mentioned in our comments regarding best available science, that does not include the non-suppression of any fires within our county.

Shoshone County has developed a WUI Plan with Idaho Department of Lands, Forest Service, and other agencies and will work in conjunction with all agencies to the best of our ability and BOCC support fire suppression within the county boundaries.

Roadless Areas

The BOCC states our concern about the restrictions intended for roadless areas defined as "inventoried roadless", and that many of these areas had or have roads, were active for decades and were not inventoried. The BOCC seeks site specific analysis using scientific factors under the Idaho Roadless Rule", rather than political definitions.

We strongly assert that all areas within IRA classification are governed by the Idaho Roadless Initiative and supported by the Idaho Association of Counties. The BOCC wants IRAs within our county to have the least amount of restrictive use possible and offer that multiple use for recreation, natural resource extraction and a management scheme that supports best management practices including fire suppression, grazing, motorized use, and generally for economic benefits of the Shoshone County residents.

The BOCC asserts that due to the probable location of roads in any area of the county, including backcountry, the lack of a road being on a USFS map, does not mean there is/was no road. The BOCC would like all roads already established in the forest to remain open and accessible for multiple use, fire breaks and predator management. Water quality is an important matter to our communities and the USFS should bring point source matters to the BOCCs attention.

Recommended Wilderness.

The BOCC opposes any Recommended Wilderness or Wilderness areas. Based upon the definition of wilderness, regarding the requirements to be "untrammelled by man and no historic roads", the BOCC maintains that there are no areas that can or should be considered.

"Forest Service Manual (FSM) 1923.03(1) provides the Forest Service policy on management of recommended wilderness areas: "Any inventoried roadless area recommended for wilderness or designated wilderness study is not available for any use or activity that may reduce the wilderness potential of an area. Activities currently permitted may continue, pending designation, if the activities do not compromise wilderness values of the area." There are no sections of land large enough that has not been "trammelled by man or that has no roads or trails". The area doesn't meet the integrity of wilderness because of: trail pungents and bridging made of dimensional treated lumber used, the existence of number nine telephone wire, the fact you can hear logging high line horns from/on the peaks from all directions;

The USFS is required to identify possible areas as Recommended Wilderness, which is true; however, there is only a requirement to consider wilderness and no requirement to "recommend" any such areas. It is only the "authority" of Congress to place land into Wilderness.

The BOCC retains its policy of no new wilderness designations of any type. Some more specific reasons follow: The State of Idaho currently has over 4 million acres of wilderness, more than any other state in the continental US.

The area doesn't meet the integrity of wilderness because of: trail pungent, bridging, existence of number nine telephone wire, the fact you can hear logging high line horns from/on the peaks from all directions;

The county's citizens who visit current wilderness areas have advised the BOCC that the "lack of remote management and particularly regarding trail management is causing deterioration within Idaho Wilderness Areas and the limiting access that are currently available are inaccessible to fewer and fewer visitors.

The Watershed drainages of 2-3 miles are not like Idaho's other areas of 6-7 miles in length.

The importance of predator control within the Roadless areas, the Mallard Larkin, is a designated "Pioneer Area" that does allow helicopter use at landing site pads, this administrative use can be utilized by Idaho Fish and Game or their designated agents.

Hunters should be allowed access with snow machines or equipment, to assist in the predator control in the spring, fall and winter.

Any discussion of heartbeats based on a standard, would be and is opposed, based on the historical and current

use. The use has shown group sizes of up to 30 Girl and Boy Scout, and 4-H users. Heartbeat limits effect family groups of 6 to 8 family members, their horses and dogs. Limits would and will stop many great family outings the have been historically used by members of our community and the visiting public. Changing the heartbeat situation in the proposed wilderness will greatly affect the economic impact from the Mallard Larkin area. 90% of the users access the area because a group can take their own chainsaws and/or equipment, as do hunters, to clear the trails in summer. If crosscut saws had to be used the amount of area use would diminish greatly. The trail networks will suffer greatly, because of volume of volunteers will be drastically reduced!

Grazing has been historically used by the outfitters in the area. Corrals of up to 30 to 40 head of horses and mules have been used and must be allowed.

The proposed Wilderness Area includes mining districts. One only need look at historical aerial views from Google map, to show roads and historic mining sites complete with existent structures and equipment. A map of the "Mining Districts of the State Idaho" shows the districts that are located within the Proposed Wilderness Areas.

The Idaho Parks and Recreation recreational grants program, "funding provisions at least 30% of funds received annually by the state must be reserved for uses relating to motorized recreation, at least 30% must be reserved for non-motorized recreation, and the remaining 40% must be given preference to projects that provide for innovative recreational trail corridor sharing by motorized and non-motorized use." (Pg 9. Idaho Parks & Rec, Recreational Grant Programs Guide fiscal year, 2014

<http://parksand recreation.idaho.gov/sites/default/files/uploads/FY201%20Final%20Grant%20Manual.pdf>)

The proof in the fact that the last 25 years of management and local public input and utilization of the area, has improved many of the trail systems to include commercially-treated dimensional pungent for the protection of riparian, delicate and fragile zones, to also include modern camping practices along the lakes, the trailhead facilities include new outhouses, informational billboards. Many volunteers are the maintaining trails systems; the user volunteers have a large amount of personal equipment and the knowledge to conduct the area trail maintenance. This perpetuates the use in a very responsible manner. The Volunteer groups with equipment (chainsaws) and the knowledge are from industries such as loggers and backcountry Horsemen groups that can pack equipment and crews into the area.

There is grave concern of the past utilization of trail funding within the proposed Mallard Larkin area, and example is the "Pole Mountain trail from Table Camp campground to Five Lakes Butte, the trail was reconstructed with motorized tracked equipment and the use of that funding now being turned into proposed wilderness area. As a Class "A" trail with said mechanized production of that trail and in the creation of that trail by mechanized equipment for reconstruction in many areas and now to be considered as non-utilized by man or as full "wilderness integrity" after the mechanized equipment utilization, that alone should "disqualify it", in that part of the area. This the main trail, right through the heart of the boundary between the Panhandle forest in the Clearwater national forest from Pole Mountain to 5 Lakes Butte. The trail is right through the center on the ridgeline that would be like saying that I 90 was constructed and then that was taken out, claiming it now creates wilderness integrity, when it doesn't meet the integrity of wilderness. From the trail looking to the south you see the timber harvested land within the Collins & Skoll creek drainages and to the north is a little more untouched, but that was part of the 1910 fire which is now cycling through its lodge pole stances, of the life cycle stands and it's also full of beetle kill right now and is ripe for a catastrophic fire. The question of safety should be addressed adamantly.

Currently under the pioneer area management plan, Search and Rescue can utilize the advanced backcountry emergency rescue system of life flight helicopters, the ATVs or two wheel motorcycles and snowmobiles for all of the recreationalists' emergencies. The County search and rescue team is the lead agency to protect the citizenry out in the backcountry and the exclusion of those tools within any area of the County will be opposed adamantly from the County.

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The severe limitations that go with wilderness are very restrictive and take away too many management tools like: like motorized rescue efforts, motorized hand tools for the general traveler, the ability to suppress fire and management ability in general is threatened by potential litigation by the whims of any opinionated fancy.

Shoshone County BOCC adamantly opposes any proposed wilderness within county lines.

Shoshone County adamantly opposes Wilderness within county bodies and strongly favors a designation of "Special Area" with present management style and protection. We have expert testimony from Sandy Podsaid in an affidavit which exhibits his long history of use as a Guide/Outfitter/User for 30+ years. BOCC hopes to work with Forest Service to offer continued protection for a valued county area, while affording the most useful management approach.

The BOCC supports the following:

1)Propose only "special designation" under the Idaho Roadless Rule. The ability to call the Mallard Larkin a Pioneer area is currently within the management options of the forest plan. We feel the current management style and historic uses fall under the Idaho Roadless Rule, would be the best management scheme. "Special Area" will maintain the historical usages and values the heritage dear within our community, continue existing protection which is in place now and in the future and continue with practices that our citizens have utilized for over 30 years.

2)The Special area is to be called the "Mallard Larkin Pioneer Area" as it is named now. The fact that historical use as the "Pioneer Area" is a perfect example of how current needs and uses of the management tools needed to accomplish this exquisite area. The Idaho backcountry experience in primitive pioneer areas and the use of a designation of "Pioneer Area" can be successful. Even Supervisor Ranotta McNair proposed it as a "Special Area" in the IPNF draft plan. The County is willing to adopt this within its recreational resource plan and work with the forest service on the management plans within the pioneer area to create the protections that the majority of the public will accept and enjoy.

3)Possible use of motorized trail bikes for clearing the trails, or some of the trails, it will lower the cost per mile and increase the efficiency of clearing the trail systems. Mountain bikers would have access on most of the routes.

4)The formation and setup of other volunteer groups with the equipment and the knowledge, will save the expense to taxpayers and the Forest Service budgets, when cooperatively working within the County government and with local user groups. With the coordination of County Resource Committee's, the use of State RTP grant funds (through state motorized vehicle stickers) will allow maintenance of non-motorized trails, with the coordination between co-governing agencies and local County governments working together this will show a stronger community effort for the use of areas such as the special pioneer designation for the Mallard Larkin or possibly other special area designations within the Forest plan.

Economic General.

The BOCC noted its statutory responsibilities include protecting and enhancing the public health, safety, and welfare of the citizens of the county. The county has a population that is aging, working in a struggling economy and includes many citizens with restrictive disabilities. Our forest communities depend on access to the forest for both social and economic benefits. We ask you to consider both the short and long term economic impacts on the communities. The USFS management activities dominate our economy, our tax base, our lifestyle and our pursuit of happiness.

The EIS needs to consider the affects of policy change that will have an effect on every forest community in the Forest, by adequately consulting businesses, residents, and the local government, that will capture the impacts, past policies have had on the socio-economic stability of forest communities.

Further solutions include:

The BOCC proposes a solution to these issues by conducting a relevant economic study which has individual considerations for social and economic impacts to every forest community, at all levels, and then making discretionary decisions that are mandated in N EPA to protect the economic stability of forest communities and not just the Forest Service. Plans need to ensure the best outcome for productive harmony of man and his environment.

1)The Plan should review the management area proposals for Backcountry non-motorized Year-round. The acres recommended under management classifications should be re-evaluated with the consideration that further restrictions to recreational access on forest lands, will have negative economic implications for Shoshone County. In order to accomplish this, the forest will need to re-evaluate the forest health Inventoried Roadless Areas which lie within the areas recommended for Proposed Wilderness Management Areas, and remove all acres listed within those areas, which currently have roads within them, regardless of whether or not those roads are currently recognized in the road data base or travel map.

2)The plan should seek funding, and strive to achieve at a minimum timber outputs. It is our belief that revenues generated from forest restorations, would more than cover budget shortfalls. Sustainable yields are within the forest growing capabilities because of the moderate temperatures, elevations and the plentiful rainfall in our area of Idaho.

3)The forest needs to develop and implement vegetation management strategies which are designed to improve big game habitat productivity. We ask that the agency take these comments as meaningful input. This plan revision must be revised through local coordinated efforts with more emphasis placed on revenue generation to facilitate projects that can accomplish the forest restoration needs and our eco-system goals. In addition more emphasis must be placed on the use of grazing to enhance desired conditions. Shoshone County sights the fact that during decades of timber production exceeding 60+MMBF/year, more road building and easier hunter access to all areas of the forest, elk as the indicator species increased in numbers exponentially. Adding to that fact is that during the 1960's areas within Shoshone County, sheep brought in by rail car grazed up one side of the canyon and down the other, were removed in late summer and forage was improved so well that ungulate populations thrived because of it.

4) The Forest responsible officer needs to stay apprised of local plans and policies, be mindful of situations that occur in communities within IPNF boundaries as well as those on the forest, that are affected by Forest policies and seek to reconcile any differences.

Follow 36 USC § 219.62 - Social and economic sustainability, or the capability to meet the needs of the present generation without compromising the ability of future generations to meet their needs. "Economic sustainability" refers to the capability of society to product and consume or otherwise benefit from goods and services including contributions to jobs and market and non-market benefits; and "social sustainability" refers to the capability of society to support the network of relationships, traditions, culture, and activities that connect people to the land and to one another, and support vibrant communities.

This directive strongly asserts that social and economic sustainability are to be an objective of the Forest Service and by so doing covers obligations to every community in the forest.

2)Fires that pose a high risk of being unable to be contained on FS lands impact adjacent private property, lands suitable for timber harvest and nearby communities should be suppressed. Increase in forest restoration levels with harvest will naturally reduce the fire risk over time by maintain good forest practices of reduced fuel loading and forest health.

3)Grazing rights have been removed from most of the forest. Not only does the BOCC support grazing rights for individuals we feel that forests of the past were more fire resistant, attained better habitat for not just grazing animals but wildlife in general. In fact the loss of grazing in the past 3 decades shares the blame with fire suppression for the conditions of lands that have had major catastrophic fires in the last decade. We support and will drive an effort to include grazing as a land management practice. We offer supporting documents to show that the benefits of grazing can even reverse global warming. Please see "Wildlife History of Northern Nevada" and "What Could the Massacre of 40,000 Elephants Possibly Teach Us?" <http://articles.mercoi.com/sites/arch/ive/2013/03/30/grazing-Vivestock.aspx>

4)Mining is and has been a way of life since the Shoshone County was one on the original seven counties in the creation of the Idaho Territory, both industrial and recreational. There are mining districts throughout much of the forest, we seek to protect all rights under the 1872 Mining Law and the forest must have the ability to extract natural resources within those districts.

National Environmental Policy Act (NEPA) [portions thereof]

In 42 U.S.C. § 4321 Congress declares that it is the purpose of this act to declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality.

In 42 U.S.C. § 4331- Congressional Declaration of National Environmental Policy

(a)The Congress,... declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments, ... including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.

(b)In order to carry out the policy set forth in this chapter, it is the continuing responsibility of the Federal Government to use all practical means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs and resources to the end that the Nation may-

(c) assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings:

(d) achieve a balance between population and resource use which will permit high standards of living a wide sharing of life's amenities: and...

The Council On Environmental Quality (CEQ)

The CEQ was also created under 42 U.S.C. § 1500.1 PURPOSE (a) to set goals (section 101) and provide means (section 102) for carrying out the policy. These CEQ provisions guarantee that federal agencies act according to the letter and spirit of the Act. (b) procedures must be of high quality, accurate scientific analysis, expert agency comments and public scrutiny are essential to implementing NEPA. (c) original intent of NEPA is not better documents but better decisions that count to foster excellent action.

42 U.S.C. § 1500.2 POLICY (b) Environmental impact statements shall be concise, clear and to the point and shall be supported by evidence that agencies have made the necessary environmentally analysis. (e,g) require alternatives that will avoid or minimize adverse effects upon the quality of the human environment and to use all practicable means to restore and enhance the quality of human environment.

Thank you,
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