

This document represents Idaho County Commissioners' response to the Nez Perce-Clearwater NF's Forest Plan revision process; specifically economic and social sustainability analysis and alternatives development.

Economic and Social Sustainability

Although the Forest has not completed the alternatives, and therefore the effects, we want to provide our expectation of the process as it relates to economic and social sustainability. These comments should not be new as they are addressed in Idaho County's Resource Plan (County Plan) and have been communicated to you through our representative as part of our agreed upon process; our letter dated October 18, 2016.

Over the last 30 years, under the current 1987 Forest Plan, there has been no economic sustainability attributed to the forest. The best example of this is yet another closure of a mill in our area. There also has been a continual reduction to access to the forest. The forest has had an aggressive road obliteration and closure program for over a decade. Although we see the need for some of these road closures, we do not see an interest in the forest to replace or provide for the economic and social needs of the County.

The Forest spends hundreds of thousands of dollars developing plan components and analyzing the effectiveness of these components to ensure ecological sustainability. What we do not see, but expect to see, is the same effort to develop plan components and analyses to ensure economic and social sustainability, including protection of local customs and cultures. Our County Plan identifies actions we believe can help ensure economic and social sustainability. We have also made suggestions through our representatives, although the Forest does not appear to be interested in pursuing any of our ideas to date.

Our expectation is that the Forest will take economic and social sustainability as seriously as they do ecological sustainability. We expect that the Forest will work with, coordinate with, and consult with us directly as you move through the process. To date, we are disappointed with the time it has taken to respond to our requests, concerns and suggestions.

We also expect the analysis concerning economic sustainability to include a cumulative effect analysis. This analysis needs to include the reductions of suitable timber lands and output from the 1983 Forest Plan. These reductions need to include suitable timber lands lost to land exchanges/transfer/or similar, wilderness or recommended wilderness, and the Idaho Roadless Rule.

Alternative Development

We fully expect the Forest will develop/ coordinate all alternatives with the County Plan. We also expect one alternative to meet/implement as much of the County Plan as possible, and if parts cannot be met, an explanation as to why. The Planning Rule, Section 219.4 Requirements for Public Participation, specifically (b)(1) which states, “The responsible official shall coordinate land management planning with the equivalent and related planning efforts of... local governments.” Currently, we have not seen this coordinated effort that “shall” happen with us or our County Plan.

Section (b)(2) goes on to state that, “...the responsible official shall review the planning and land use policies of... local governments, where relevant to the planning area. The results of this review shall be displayed in the ... (EIS) for the plan... The review shall include consideration of:” and then states four items. Our expectation is that the Forest will coordinate this review with the County. We believe this review needs to be completed prior to the completion of the alternative process. It would not be logical to complete the alternative phase without this review for the following reasons:

1. The objectives of the County Plan need to be understood to understand the impacts of the revised plan, 219.4(b)(2)(i).
2. The Forest needs to understand the compatibility and interrelated impacts with the County Plan to be able to develop reasonable alternatives, 219.4(b)(2)(ii). Alternatives are used to address issues.
3. The Forest needs to look for opportunities to address the impacts identified or contributed to joint objectives, 219.4(b)(2)(iii). These would be included in the alternatives.
4. The Forest needs to look at opportunities to resolve or reduce conflicts, within the context of developing the plan’s desired conditions or objectives, 219.4(b)(2)(iv). These plan components have to be developed as part of alternatives.

The coordination and review of the County Plan (219.4(a) & (b)) and alternative development are closely related. Given the Forest’s timeline, this effort, which should include close coordination with the County, needs to start immediately. We look forward to working with you on this part of the revision process.