Ltr #0212

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May 7, 2012

Mary Farnsworth, Forest Supervisor
Idaho Panhandle National Forest
3815 Schreiber Way
Coeur d'Alene, ID 83815

RE: Proposed IPNF Draft Management Plan

Dear Ms. Farnsworth:

We are writing today to submit our official comment on the IPNF Draft Management Plan. We appreciate that you allowed extended time for public comment. Even with the extended time, we are sure that we have not been able to thoroughly review the document. We are hopeful there will be opportunity for continued dialogue as you finalize the plan.

You make several references in the plan to working with communities. We would welcome this coordination. Most of your federal statutes, regulations, and guidelines require coordination with state and local governments. Our comments are the result of extensive discussions with the very diversified views of our citizens who are also interested in helping develop the new plan. Our responsibilities in statute include protecting and enhancing the public health, safety, and welfare of the citizens of Shoshone County.

We oppose designating the Grandmother/Grandfather area as a wilderness study area. We ask that the Forest Plan include no new areas of recommended wilderness. Idaho has an adequate amount of wilderness. We oppose any new wilderness in Shoshone County. We do not believe that any of the proposed areas, are even candidates for wilderness when "untrammeled by man" and historic road use is considered. Our citizens that spend significant time visiting current wilderness areas suggest that the lack of management, particularly trail maintenance, is resulting in deteriorating conditions within the wilderness and these areas are available to fewer and fewer visitors. Only congressionally designated wilderness should be managed as wilderness. We would support "backcountry" designations in some areas.

With the same focus as wilderness designation, we are not supportive of restricting access with "wild and scenic," "wild river," or "eligible wild river" designations. We believe both the land and the waters can be effectively managed to protect the resources without excessive restrictions on access.

We do not support closing or restricting access to any forest road in Shoshone County without a specific compelling need. Our county has a population that is aging, working in a struggling economy, including many citizens with restrictive disabilities. As you know, our forests have a challenging vertical topography making it very difficult to enjoy our public lands without motorized opportunities. Roads should not be closed to achieve either mileage targets or ratios. Roads are necessary for access, enjoyment, recreation, economic, historic and cultural use, law enforcement, search and rescue, and of particular concern for fire protection. Specific roads in the draft plan that appear to be in jeopardy include roads 412, 6310, 320 east of the Mallard-Larkins, 201 in the vicinity of the Mallard-Larkins, and Trail #263. Special focus should be given to create loops when possible. We would ask to be consulted in every discussion about the closure of a road. It is also our position that a road, when closed, be allowed to grow closed and not decommissioned. We would recommend that you expand trail access during winter conditions. Snowmobile access is very popular, an economic boon to the communities, and very non-invasive to the landscape. We do not accept the view that snowmobiling on designated trails is traumatic to the wildlife. We would advocate a posture and policy to keep the maximum number of roads open to provide maximum access to our public lands.

We are concerned that the draft plan recognizes a need for an Allowable Sale Quantity (ASQ) to maintain forest health and promote a sustaining condition. We endorse the ASQ, but do not support your decision to only implement 1/3 of that ASQ. We do not understand how the ASQ diminished from 280 MBF in 1987 to the current 125mbf when the forest during that time is much more dense today and has increased morbidity. This would suggest that the ASQ should be increasing – not decreasing. We would ask that you make a strong statement in the plan to accept the full ASQ as your expected annual production and further state a commitment to seek adequate funding in your budget to implement the full ASQ that has been accepted as scientifically necessary to sustain a healthy landscape. We would advocate returning to the 1987 ASQ of 280 MBF.

We remain concerned about the restrictions intended for roadless areas defined as "inventoried roadless." Many of these areas have had active roads for decades that were not inventoried. We would prefer an analysis that considers site specific scientific factors rather than political definitions.

Forest communities depend on access to the forest for both social and economic benefits. Our communities have a cultural and historic relationship with our public lands. We help care for the forests and the forest provides for our livelihood. We urge you to promote a multiple use strategy to integrate the public lands and the community. It appears that your economic analysis in the plan considers the economic impact to the forest service. We would also ask that you consider the economic impact on the communities – both in the short term and in the long term.

We would ask to be included in any discussions regarding considered vegetation management – particularly harvest or thinning. We are concerned about impacts on our infrastructure as well as the best integration with our land use plan. Also of particular concern is the management and strategy planned to keep our

communities safe from fires. In many areas of our county, the forest comes directly into our people's back yards. We need to work together to make our WUI firesafe and protect our communities.

There are many mentions in the plan of specific quantity targets – i.e. recommending the development of 3 to 5 new loop opportunities. We suggest that rather than using specific "hard" numbers anywhere in the plan, insert the language "at a minimum" or "at least." Another example would be specific dimensions for a structure in the forest. What is the scientific rationale for setting a maximum of 1,200 sq. ft. for a residence? Would that not depend on the use and location of the structure?

The plan is nearly silent on discussion of mining activities, even recreational mining. Mining is a very important industry in Shoshone County and has much potential for a recreational attraction. We would urge you to not only permit the use of mining activity in the plan but to establish a plan that would encourage mining activity.

In closing, we again thank you for the opportunity to comment. Our overall view is that the forest should be managed, not observed. Decisions should be based on what appears to be scientifically best for the landscape. Benefits should provide the best results for the maximum landscape and the most people. Your management activities affect over 2/3 of the land mass of Shoshone County. Your management activities dominate our economy, our tax base, our lifestyle, and our pursuit of happiness. We are interested in being good neighbors and good partners in helping you develop a plan that is based more on science than on politics and results in a healthier forest for the entire environment and our grandchildren.

Sincerely,

BOARD OF COUNTY COMMISSIONERS

D. Vince Rinaldi

Vince Rinaldi, Chairman

Jon F. Cantamessa

Jon Cantamessa, Commissioner

Larry J. Yergler

Larry Yergler, Commissioner