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FAX COVER LETTER

DATE November 26, 2013

TO: USDA Forest Service
Objection Reviewing Officer
EMC – RPC – 6th Floor
Judicial and Administrative Reviews

FROM: Larry Yergler
Shoshone County BOCC

RE : Objection letter to Idaho Panhandle National Forest Revised Forest Plan with
Appendices and supporting Documents

2 Parts

Part 1 of 2

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USDA Forest Service
Objection Reviewing Officer
EMC – RPC – 6th Floor
Attn: Judicial and Administrative Reviews
1601 N. Kent St
Arlington, VA 22209

To Associate Deputy Chief for the National Forest System:

Please find attached the Shoshone County BOCC Objection letter to the Idaho Panhandle National Forests Revised Forest Plan with Appendices and supporting documents.

Responsible Official Faye Krueger, Regional Forester, Northern Region

Reviewing Officer: Associate Deputy Chief for the National Forest System
Responsible Official: Faye Krueger, Regional Forester, Northern Region
Objecting Organization: Shoshone County Board of County Commissioners
Lead Objector: Larry Yergler, Chairman of Shoshone County Board of County Commissioners
Lead Objector's Contact: lyergler@co.shoshone.id.us (208) 752-3331
Subject: Idaho Panhandle National Forest Revised Land Management Plan
Date: November 26, 2013
Fax: (703) 235-0138

The Shoshone County Board of County Commissioners (BOCC) wishes to object to the USFS responses to its comments on the Idaho Panhandle National Forest Revised Land Management Plan (the Plan), their adherence to the Objection Process (Process)(36 USC 219 Subparts A & B) and make a statement regarding the lack of the USFS's implementation of the coordination process, as defined in NEPA. Thus this letter contains three sections.

SECTION 1. OBJECTIONS TO USFS RESPONSES TO COMMENTS

The BOCC's May 7, 2012 letter to the USFS regarding the IPNF Draft EIS was assigned number 212. The following are the BOCC's objections to the USFS responses in the various categories.

Category 117. Snowmobiling. The BOCC letter stated that snowmobile access is very popular, an economic boon to our county, and is non-invasive to the landscape. We do not agree that snowmobiling on designated trails is traumatic to the wildlife and advocate a policy to keep the maximum number of roads open to provide maximum access to our public lands.

The USFS ignored our policy and its response was to close snowmobile access in MA1b and MA4a Research Natural Areas.

The BOCC does not support any closure of snowmobile trails, nor does it support the designation of any new Recommended Wilderness (de facto) or Research Natural Areas. It is the duty of Congress to place land into wilderness and it appears that the USFS has neglected to follow 16 CFR § 1132 (d), (e) by not holding hearings or allowing any input from other federal agencies, states, local governments, or the public prior to this plans designations.

Category 280. Best Available Science. The BOCC letter addressed concerns that the USFS needed to employ scientific means, not political, in analyzing any roadless areas and their inherent restrictions. It also mentioned a seeming lack of scientific rationale regarding the maximum size of a structure in the forest.

The USFS did not include the BOCC comment, or basic content, in its citing of our letter number.

The USFS response to the other letters was extensive and wandering and made reference to a White paper that was not titled or easily locatable. White Papers are not necessarily scientific nor peer reviewed; mostly they are opinions. We do not support science which is based on consensus, and is often political, but rather the scientific method as defined from Black's Law Dictionary:

"A step-by-step approach to solving problems. Identify and define the problem, accumulate data, formulate a hypothesis, conduct experiments to prove hypothesis, interpret results in an objective manner and repeat."

We do not believe that the USFS is using the best available science to manage its forests. The USFS maintains that the best available science in ecosystem management is by 1) protecting as much of the forest as possible from as much human use as possible, or employing as many "wilderness" areas as possible; and 2) using no management and fire, planned or unplanned, to ensure forest health.

The Government Office of Accountability in its report: GAO/RCED-94-11 (1994) "Ecosystem Management: Additional Actions Needed to Adequately Test a Promising Approach" stated,

"The administration's initiatives to implement ecosystem management governmentwide face several significant barriers. For example, although ecosystem management will require greater reliance on ecological and socioeconomic data, the available data, collected independently by various agencies for different purposes, are often noncomparable and insufficient, and scientific understanding of ecosystems is far from complete." (Page 5) It goes on later,

"For example, understanding the ecology of an ecosystem will require collecting and linking large volumes of scientific data. In addition, large volumes of socioeconomic data must be collected, organized, and analyzed to identify important relationships between human activities and ecological conditions and trends and to make necessary or desired trade-offs among ecological and socioeconomic values and concerns. However, available data are often not comparable, and large gaps in information exist. Furthermore, there is still much uncertainty about how ecosystems function—uncertainty that contributes to strong differences in the interpretation of scientific evidence." (7) (GAO/RCED-94-11 <http://archive.gao.gov/t2pbat2/152537.pdf>)

The BOCC sees the GAO concerns of 1994 as still relevant today, especially with its scant socioeconomic data and analysis.

The "National Cohesive Wildland Fire Management Strategy: Phase III Western Regional Science-Based Risk Analysis Report" (Western Regional Risk Report) of 2012, was developed by representatives of federal, state, local, and tribal governments, interested governmental and non-governmental organizations, businesses and industries to comprehensively address issues relating to wildland fire in the West. It states,

"The landscape needs active management to reduce fuels in order to reduce losses of homes, lives, and resources to wildfire. Experience with fuels treatment projects has demonstrated the value of fuels reduction to reduce suppression costs and protect land and resources, and the importance of collaborative groups, which bring a variety of stakeholders to the table to forge agreements on how to restore landscapes and reduce wildfire risk." (Page 4)

(<http://www.forestsandrangelands.gov/strategy/documents/reports/phase3/CSPhaseIIIReportNationalRiskAnalysisDraft20130802.pdf>)

The BOCC fails to see where the USFS is incorporating any data from other official sources in its ecosystem management techniques, with the exception of its involvement with the IUCN (World Conservation Union) Ecosystem Management Implementation Plan, (<http://data.iucn.org/dbtw-wpd/edocs/CEM-003.pdf>). We

would like to see the USFS take serious steps toward not just listening to others, but actually incorporating the scientific knowledge shared by others.

Category 356. Collaboration/Public Involvement. The BOCC commented that it welcomed the USFS's desire to work with communities and reminded the USFS of the various federal statutes, regulations and guidelines requiring coordination between the USFS, state and local governments. The BOCC was hopeful of continuing dialogues with the USFS as it finalized the plan.

While understanding that the major objection phase includes collaboration {36 CFR 219 (a)} between groups with differing opinions to resolve conflicts, the BOCC is extremely dismayed that the USFS did not coordinate with BOCC of not only Shoshone County but all counties within the IPNF. 36 CFR 219 (b) Specifically states: the responsible agent shall coordinate. Congress deemed that shall means "must". Coordination is an attempt to address conflicts between agencies and local government. Local government have different standing than public. As a political subdivision of the State of Idaho we are responsible for the health, safety and welfare of our citizens while ensuring economic stability of the County. On the other hand public has no obligation other than to achieve the best outcome for their personal interest.

Coordination, government to government seek to resolve conflicts between agency plans and local government plans and or policies and must be done before releasing the document to public. Shoshone BOCC, and all counties within IPNF borders seek coordination to resolve those conflicts.

We are especially disheartened to discover the Memorandum of Understanding on Cooperation for Wilderness Conservation between ALL Federal Land Managers in the U.S., United Mexican States and Canada. (See Appendix 11)

See also: 43 USC § 1712 and 43 USC § 1712. More will discussed about this in Section III.

Category 451. Wildland Urban Interface (WUI). The BOCC letter asked that they be considered in discussions on vegetation management-especially harvest or thinning. The BOCC was concerned about a conflict with the USFS management and strategies that will keep our communities safe from fires, and asked the USFS to work with it regarding WUI.

The USFS response is unsettling to the BOCC, particularly their statement, "Just because a natural, unplanned ignition occurs in the WUI area, it does not mean that the only response available is to quickly suppress the fire. There are no forestwide plan components that prohibit managing a natural, unplanned ignition in the WUI for resource objectives....While we would anticipate that most natural, unplanned ignitions would be suppressed in the WUI area due to values that would be put at risk if the fire were allowed to burn, there will likely be circumstances where natural, unplanned ignitions occurring in the WUI would be allowed to burn based on low risks to values and the resources benefits that could be achieved by allowing it to burn."

The BOCC was not meaningfully considered in any development of this plan, and strongly objects to any WUI being allowed to burn based on a subjective decision as to what the value of a resource benefit is. This completely fails to consider human health, personal property rights, the effected economy, 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/110/107694.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 wildland 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 wildland 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.¹⁰ 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 Fire Wise 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.

There are almost countless locations within the plan where the USFS states it is experiencing budget woes, constantly mentioning constrained and unconstrained. 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, let alone any areas considered as W.U.I..

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.

Category 553. DEIS General. The BOCC letter stated our concern about the restrictions intended for roadless areas defined as "inventoried roadless", and that many of these areas had roads, were active for decades and were not inventoried. The BOCC seeks site specific analysis using scientific factors rather than political definitions.

The USFS indicates that there was only one response listed and that - ...all IRAs listed should be managed as wilderness... , yet our #212 is placed as a respondent. The BOCC take exception to this listing and assert that absolutely the opposite is the case. We strongly disagree and instead, assert the policy that all areas within IRA classification are governed by the Idaho Roadless Initiative and send a supporting document from the executive director of Idaho Association of Counties (See Appendix 6). The BOCC want 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 County.

The BOCC asserts that due to the probable location of roads in any area of the county, including backcountry, the USFS meet with us prior to any established of IRA's and submit data that supports its positions. 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. If water quality should become a site specific issue, the USFS should bring it to the BOCC's attention.

Category 713. Recommended Wilderness. The BOCC commented to the USFS that it opposes designating the Grandmother/Grandfather area as a Wilderness Study Area; in fact the BOCC stated it also opposes any Recommended Wilderness or Wilderness areas. Based upon the definition of wilderness, regarding the requirements to be untrammled by man and no historic roads, the BOCC maintains that there are no areas that can be considered. There is no section of land large enough that has not been trammled by man or that has no roads or trails. The county's citizens who visit current wilderness areas have advised the BOCC that the lack of management and particularly regarding trail management is causing deterioration within the wilderness areas and limiting access available to fewer and fewer visitors.

The USFS generalization of all similar comments fails to mention anything about the lack of any land in the county that legally complies with this designation. Due to failed wilderness criteria, this should never have been omitted as a comment, let alone from the BOCC comments. The USFS responded that it is required to identify areas as Recommended Wilderness, which is true; however, in the plan revision there is only a requirement to consider wilderness and no requirement to "recommend" any such areas. As stated earlier, it is the duty of Congress to place land into wilderness and it appears that the USFS has neglected to follow 16 CFR § 1132 (d), (e) by not holding hearings or allowing any input from other federal agencies, states, local governments, or the public prior to this plans designations. The USFS response, "The amount of acres available for active management far outweighs the Forests capability to do management, given current budgets" is simply not appreciated. The decision to put our forests into wilderness categories seemingly because of its fiscal inability to actively management them, is unacceptable.

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: pungent, bridging, number nine telephone wire, you can hear logging high line horns from/on the peaks from all directions;

The rise/ fall in elevation (3000 ft) does not support characteristics exhibited by the Frank Church Wilderness, the Selway-Bitterroot and other Idaho wilderness areas where the rise/fall of vertical is 5000+ drops.

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 Mallard Larkin as a designated pioneer area would allow helicopter use and landing pads, 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/is opposed, based on the historical and current 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 stop a great family outings the have been historically used by members of our community;

Changing the heartbeat situation in the proposed wilderness and the numbers of utilization groups will greatly affect the economic impact from the Mallard Larkin area because of the lack the use by the public, 90% of the user 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.

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 new 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 Area in the Upper St Joe River. Some of the claims may be patented as well. (See Appendix 3).

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://parksandrecreation.idaho.gov/sites/default/files/uploads/FY2014%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, trailhead facilities to include new outhouses, informational billboards, volunteers maintaining trails, and using volunteer groups that have personal equipment and the knowledge to conduct area maintenance. This also can perpetuate the use in a responsible manner. Volunteer groups with equipment such as chainsaws and knowledge, from industry such as loggers and backcountry Horsemen groups, can pack equipment and crews.

There is grave concern of the past utilization of trail funding within the proposed Mallard Larkin area, 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 of reconstruction in many areas and be considered as non-utilized by man or as full wilderness integrity after the utilization, that alone should disqualify it, the part of the area is 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, 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.

Currently under the pioneer area management plan, Search and Rescue can utilize the advanced backcountry emergency rescue system of life flight helicopters, the use of 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.

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 offer 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, Idaho backcountry experience of primitive pioneer areas and the use of a designation of "Pioneer Area" can be successful. Supervisor Ranotta McNair proposed it as a "Special Area" in the 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 setup of other volunteer groups with the equipment and knowledge, will save the expense to the taxpayers and the Forest Service budgets when cooperatively working within the County government and local user groups. With the coordination of County Resource Committee's, the use of State RTP grant funds (through state motorized vehicle stickers) that allow the maintenance of non-motorized trails also, 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 Panhandle Forest.

Category 728. Wilderness Study Area. The BOCC commented to the USFS that it opposes designating the Grandmother/Grandfather area as a Wilderness Study Area; in fact the BOCC stated it also opposes any new Recommended Wilderness or Wilderness areas.

The USFS response did not address our comment when it said, "Not including the Grandmother/Grandfather area as a wilderness study area because one of the conditions when this area was acquired by the Forest Service was that the area would remain open for single track motorized use. As such, this does not fit the requirement for wilderness and should be released as a study area and managed for multiple uses. Consider expanding access for ATV operation, either by converting some single track trails to ATV, or creating some new ones;"

The BOCC understands the area was previously designated a Wilderness Study Area by the BLM and must remain so statutorily through the land exchange. The BOCC in asserting its policy of no Wilderness Study Areas, states that it would like to see this status removed. Please see entire entry above on Recommended Wilderness for a statement of policies, conflicts and potential resolutions. Our policies and recommendations remain same for Wilderness Study Areas.

Category 752. Eligible Wild & Scenic River. The BOCC stated it was not supportive of restricting access with "wild and scenic", "wild river", or "eligible wild river" designations because these and other areas can be effectively managed to protect the resources without placing excessive restrictions on access.

The USFS response was that the USFS is required to consider and evaluate rivers on lands they manage for potential designation in their planning processes. While this is true, there is doubt that the USFS must list them as such, and that the USFS has followed proper protocol before listing them in this plan. (See 16 USC § 1271-1287)

The BOCC re-iterates its current policy, coordination with USFS in any such designated areas. It would also like for the USFS to demonstrate it has completely complied with See 16 USC § 1271-1287. We oppose any new proposed Wild and Scenic River of any kind.

Category 862. Mines/Mining. The BOCC stated that the plan is nearly silent on discussion of mining activities. This legacy industry is very important to the county and there is a real potential for a recreational mining attraction.

The USFS response was, "The desired condition for minerals, FW-DC-MIN-01, provides direction for the Forest to contribute to meeting the demand for mineral resources." FW-DC-MIN-01 states in part, "Mineral materials are made available based upon public interest, material availability, in-service needs, and protection of other resource values, including consistency with desired conditions for other resources. Geologic features are conserved for their intrinsic values and characteristics." The stated Objective for Minerals is, "Annually, the outcome is the reclamation of one abandoned mine site."

The BOCC views this response as a failure to comprehend the economic contribution mining, and recreational mining has had and continues to have on the county, in fact on the entire State. The USFS fails to allow mining in many management areas of the county. The USFS seems to be unaware of the immense geological deposits of silver, gold, lead, zinc, copper in the county. By no means have these resources been depleted. Their extraction is necessary for virtually everything used by humans; such as vehicles, computers, phones, machines etc. Their extraction was mandated during the World Wars to aid our nation's defense, and may be needed in the future. If the USFS reviews the Mining Districts Map, they will notice that very little of the county land mass does not contain a mining district, which indicates minerals were located and mined.

Although the plan refers to the General Mining Act of 1872 and the Mining and Mineral Policy Act of 1970, it fails to address the wishes of Congress in the rights of the citizens to explore and purchase the minerals, but to occupy and purchase the lands as stated in the General Mining Act of 1872. Nor do we see where the plan fosters and encourage private enterprise, or the orderly and economic development of domestic minerals, etc as Congress declares in the Mining and Mineral Policy Act of 1970. The Federal Land Policy and Management Act (FLPMA) at 43 U.S.C. §1701(a)12 Declaration of Policy, states, "the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970 (84 Stat. 1876, 30 USC 21a) as it pertains to the public lands." The plan fails to address this as well. Upon further review of FLPMA at 43 U.S.C.

§1732 "Management of use, occupancy, and development of public lands (b) Easements, permits, etc., for utilization through habitation, cultivation, and development of small trade or manufacturing concerns; applicable statutory requirements" we read toward its end, "Except as provided in section 1744, section 1782, and subsection (f) of section 1781 of this title and in the last sentence of this paragraph, no provision of this section or any other section of this Act shall in any way amend the Mining Law of 1872 or impair the rights of any locators or claims under that Act, including, but not limited to, rights of ingress and egress. In managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." Since the vast majority of Shoshone County has identified and unidentified mining districts (mines, equipment, roads), any road closures in these areas within the plan are directly violate of FLPMA. (See Appendix 3)

The BOCC is opposed to any management areas denying access to the county rich mineral content, and proposes coordination with the USFS in any instance, in the plan or any other time, where they may want to deny such access.

Category 1250. 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. It appears that the USFS economic analysis in the plan considers the economic impact to the USFS; 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 USFS generalized response was, "The value of activities, outputs, and uses of the Forest is recognized in the social and economic section of the FEIS. This section describes the social and economic environment and provides an analysis of the jobs and income generated by alternative."

The BOCC does not agree with the USFS response the social and economic section of the FEIS adequately address our concerns or the economic impacts to the residents of our county. The following is a list of some of our objections:

1) The Economic Impacts presented in the Social and Economic Analysis on pages 45-50 of the FEIS Appendices is inaccurate with regard to future economic output levels/revenues, forecast for recreation on the IPNF. It is impossible that these economic outputs can be met when the IPNF is proposing to further restrict recreational access especially in Heartbeats (number of persons/animals in group together) and or motorized access in differing MAs.

2) The Economic Impacts presented in the Social and Economic Analysis on pages 45-50 of the FEIS Appendices is inaccurate with regard to future economic output levels/revenues, forecast for timber outputs on the IPNF. Paragraph #1 on page 20 of the ROD states that the average volume sold over the IPNF in 2008/2009 was 52.5 MMBF/year. Paragraph 2 states that the revised plan provides for a predicted annual volume sold of 44.6 MMBF/year. Given these numbers, which we believe to be relatively accurate, how does the IPNF explain how the predicted output levels for saw timber on the IPNF (page 48, Table 21 of the FEIS Appendices) will

increase from the current level of 27,184 CCF to the predicted level of 83,849 CCF? This analysis is obviously flawed and inaccurate.

3) The Economic Impacts presented in the Social and Economic Analysis on pages 45-50 of the FEIS Appendices is inaccurate with regard to future economic output levels/revenues, forecast for wildlife and fish on the IPNF. The largest portion of these outputs is generated from big game hunting activities. Given the fact that the habitat productivity with respect to big game species especially with the addition of wolf predation, has steadily declined on the majority of IPNF lands over the last decade, it is not surprising that big game population numbers have followed this trend. (We believe that the lack of forest management has been a major reason for these habitat declines). Given the fact that big game populations are the primary driver for Idaho Fish and Game economic outputs, and the fact that both big game habitat, and population numbers are currently on a downward trend, how can the IPNF possibly forecast increased future economic for IDF&G on the IPNF, without first having a solid plan in place that will reverse those trends. The 2013 Hunter check station numbers are 1000 hunters are approximately lower than 1993. And this is a large decrease in ravin activities in our county in just the opening weekend (See Appendix 4) We do not believe such a plan is reflected in the 2013 IPNF Land Management Plan.

4) Page 8 of the IPNF FEIS states: "The management direction in the 1987 Forest Plan emphasized the production of timber, with the majority of MAs allowing or promoting timber management. In the 1990s, the Forest Service began to focus on ecosystem management and ecological sustainability. This change in policy and direction resulted in a decreased emphasis on Forest health, because of lower active use of all management tools available, ie: commercial timber production and an increased emphasis to restore vegetation or as a means to address other resource requirements or needs. There is a need to reanalyze timber harvest levels and revise them."

Where is the economic analysis that shows the impacts to rural economies as a result of this "change in policy", before the policy was implemented. Is such an analysis not a requirement of NEPA Section 4332 Cooperation of Agencies; Reports; Availability of Information; Recommendations; International and National Coordination of Efforts? We believe that this "change in policy", is in direct violation of the Multiple Use Sustained Yield Act of 1960. Where is the EIS, including the detailed studies that show the effects of the loss of timber jobs to the communities because of a change in policy to not manage the forest as is required in the National Forest Management Act. The NFMA has the requirement to manage the forest for production of natural resources.

5) The BOCC is concerned that the agency has considered Secure Rural School (SRS) payments to counties as annual revenue considerations and may have used this to support income revenue from forest service to counties as economic advantages. With the budget crisis at the National level, the County and all school districts in the county are affected by this loss of non-guaranteed revenue. We are also concerned that there is no revenue from the forest to help maintain road budgets for counties and schools within our county.

When the forest reserves were created in 1906, states and counties had grave reservations about the loss of tax revenues but were reassured by Gifford Pinchot, the father of the Forest Service, "that it was indeed the best circumstance for all because of an endless supply of money annually to help with the development of schools and highways to better settlements within those forest boundaries." (See Appendix 5)

Next year for the first time since Shoshone County became a county, in 1861, we will not be able to fund our road budget to a level that will provide health, safety and welfare of our citizens. The school districts within the county also face lost revenue and this directly affects their ability to provide good education and quality buildings to hold school.

Two years ago when reauthorization of SRS funds was doubtful, the Idaho Association of Counties (IAC), our representative body for all counties within Idaho, asked us to do a study and answer questions as to how this would affect our county road budget. (See Appendix 6) Based on the loss of SRS funds these figures are relevant economic data that was never asked for by the Forest and not supplied by the County. SRS funds are 44% of our budget and thus revenue from 25% Fund must make up that difference or the following: We would have a loss of 9 positions out of 27 full-time and 5 winter temporary positions and could only service 2/3rds of our routes daily. This would directly affect state mandated school bus routes and emergency services access. In addition to not being able to provide health, safety and welfare for our citizens it would also lead to a decline in population base for the County.

In all small rural forest communities, the loss of one job has more than that affect. With a small citizen populous every citizen plays more than one roll in the community, as examples: volunteer fireman, ambulance personnel, baseball coach, trail clearer and in general community volunteer.

Page 25 of the Draft ROD, under Environmentally Preferable Alternative, #5 states; "Achieve a balance between population and resource use, which will permit high standards of living and a wide sharing of life's amenities." The sheer magnitude of this statement speaks for itself. When you say "Achieve a balance... which will permit *high standards of living...*" this means the high standard of living must exist in *EVERY* community within Forest boundaries.

Also in NEPA Section 4321 – Congressional Declaration of Purpose "To declare a national policy which will encourage *productive and enjoyable harmony* between man and his environment; ... and stimulate the health and welfare of man; ..."

The loss of over 500 wood products jobs in the last 35 years, living wage income and the decline of population that go with that, are not *high standards of living*. Shuttered businesses in all 7 cities in Shoshone County are not *high standards of living*. School district #391 Kellogg, Idaho who cannot pass a school levee because people can't afford to pay any more taxes, is not a *high standard of living*. Shoshone County Road Department, who will not be able to fund our road budget next year for the first time in over 100 years because of the loss of Secure Rural School funds and because of loss of revenue from timber sales is not a *high standard of living*; and these examples are not "a wide sharing of life's amenities."

"The Final EIS alternative analysis compares the various values the public uses to determine their quality of life varying from economic resource extraction values (timber harvest and minerals) to less tangibly-defined resources such as wilderness values and backcountry protection."

The analysis which determined that management proposals in Alternative B modified as the most "Environmentally Preferable," are flawed. The following questions are but only a few questions which effect community stability of every community within Shoshone County and the IPNF boundaries and have not been addressed by the FEIS.

They are:

- 1) How will a decrease in the ASQ and/or annual timber harvest volume on the IPNF permit a high standard of living or improved quality of life for those Shoshone County residents currently employed as managers and extractors of those resources?
- 2) How will a decrease in motorized recreation opportunities permit a high standard of living or improved quality of life for those Shoshone County residents currently employed in any of the wide range of jobs which are currently supported by motorized recreational use on DIPNF lands?
- 3) How will forest management policies, such as the policies currently governing MA1b – Recommended Wilderness and MA5a – Backcountry non-motorized year round, permit a high standard of living or improved quality of life for Lincoln County residents currently employed in the management of timber resources, or any of the wide range of jobs which are currently supported by motorized recreational use on KFN lands?
- 4) Where is the analysis that shows the loss of, not only timber product jobs, but also entire logging companies; including the personal taxes from equipment, property taxes of those company buildings?
- 5) What is the job multiplier for each job in the wood products industry and how does it relate in the new ecosystem management scheme?
- 6) Where is analysis that addresses the effects the loss of revenue from ecologically driven management and not considerations for economic stability will have on Shoshone County, the school districts within the County and the citizens?
- 7) Where is the economic study which shows impacts of a plan on the health, safety and welfare of the citizens of Shoshone County?
- 8) When was the last study done to actually determine the impacts agency policies have done to local forest communities?
- 9) The USFS did not coordinate with Shoshone county for any economic figures or input that so gravely impacts the human lives of the county.

The EIS done by IPNF staff was completely inadequate, did not consider the affects the policy change would have on every forest community in the Forest, did not adequately consult businesses, residents, and local government, and in fact, does not capture the impacts that past policies have had on the socio-economic stability of forest communities.

The BOCC proposes the solution to these issues is 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 by NEPA to protect economic stability of forest communities* and not just the Forest Service. Then once that study has been done use continual monitoring through frequent coordinating meetings asking; "How have we, the USFS, done?" Use this input to adjust current plans for the most discretionary decision to ensure the best outcome for *productive harmony* of man and his environment. Further solutions include:

1) The IPNF should review the management area proposals for MA1b - Recommended Wilderness and MASa - Backcountry non-motorized Year-round. The acres recommended under these management classifications should be re-evaluated and with the consideration that further restrictions to recreational access on IPNF lands, will have negative economic implications for Shoshone County. In order to accomplish this, the IPNF will need to re-evaluate the forest health Inventoried Roadless Areas which lie within the areas recommended for the above referenced Management Areas, and remove all acres with those IRA's which currently have roads within them, regardless of whether or not those roads are currently recognized in the KNF's road data base or travel map.

2) The IPNF should seek funding, and strive to achieve at a minimum timber outputs equal to the ASQ of 280MMBF/year which is outlined in paragraph 2 on page 21 of the ROD. It is our belief that the revenues generated from this level of harvest, would more than cover the budget shortfalls that the IPNF currently claims are preventing the IPNF from achieving this higher ASQ output. Sustainable yields with our forest growing capabilities from the moderate temperatures, elevations and plentiful rainfall.

3) The IPNF needs to develop and implement vegetation management strategies which are designed to improve big game habitat productivity. Higher levels of ASQ not only produce more timber for revenue but also enhance big game habitat, specifically elk as an indicator species has shown to benefit from increased timber production. Proof to substantiate this is that during the decades from 1970 to 1990 when 70MMBF/year was produced in the CDA River drainage, elk herd growth was exponential. As a logger and a hunter, living here in Pinehurst, it was not just happenstance but common everyday encounters where elk had to get off the logging roads on the way to work and when we would get to the equipment there were indications that the elk actually licked grease off the equipment during the night. Year after year elk numbers improved not in spite of timber harvest but because of timber harvest. (\$219.6 Assessment local knowledge)

4) This concept "*change in policy*" as an overall theme of managing for ecological outcomes primarily and only considering social and economic outcomes secondarily is doomed for failure. Without primary attempt to generate revenue the revised IPNF plan will fail.

The desired outcomes the IPNF plan revision hopes to achieve are misleading and unachievable. Much like the recent "too big to read" bills have been misleading to the general public and have shown surprise consequences, this plan revision also leaves undesired, unsought consequences. Where the primary objective of using ecosystem management is to attain the desired forest condition, without recognition for emphasis on economic stability, the desired management philosophy in fact, will exhibit the *opposite* outcome by degrading the forest to an undesirable state. Not only will the condition of the forest deteriorate under ecosystem management, but also as a secondary effect, forest communities cannot be sustained because of the loss of economic stability that Congress mandated agencies must assure under NEPA policy. A further outcome will result: Without a forest plan driven first by revenue creation and then using these revenues to rehabilitate eco-systems, the Forest Service will not be able to survive. One need only to look to the present state of government to realize that Congress cannot continue to spend money on National Forest Lands without some assurance of *monetary return* to the federal budget.

We ask that the agency take these objections as meaningful input and *heed our warnings*. This plan revision must be revised through local coordinated efforts immediately with more emphasis placed on revenue generation to facilitate projects that can accomplish 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 in the Pine Creek area 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. These two facts are omitted and not supported by reports, but instead serve as evidentiary information which should be considered under §219.6 (a)[1] local knowledge and also [2] coordination with local government.

5) The solution is complex, will take proactive consideration and discretionary action by the responsible officer as called for in §219.7. "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 those differences.*"

An example would be to increase allowable, emergent timber sales because of disaster situations affecting the health, safety and welfare of citizens within an IPNF community. Meaningful input from local government officials within their designated boundaries must be *both considered and resolved*.

Category 1404. Supply-ASQ & Predicted Sale Volume. The BOCC expressed concern that the plan recognizes a need for an Allowable Sale Quantity (ASQ) to maintain forest health and promote a sustainable condition. The ASQ is endorsed, but not the decision to implement only 1/3 of that ASQ. It is unclear how the ASQ diminished by over half from 1987, when the forest today is denser and experiencing increased morbidity. Logic dictates the ASQ should be increasing, not decreasing. A strong statement is sought in the plan to accept the full ASQ and further a statement that the USFS will commit to seeking adequate funding to implement the full ASQ; which is scientifically necessary to sustain a healthy landscape.

The USFS responded, "An analysis was completed to determine the sustainable level of timber harvest in response to desired conditions and management requirements... If budgets increase, the Forest has the ability to increase timber volumes above the predicted timber volume sold up to the ASQ level. The ASQ level is the maximum that would be sustainable, given constraints and management requirements for other resources. The Forest cannot harvest what is grown because of limitations from other resources, such as grizzly bear, water quality, and old growth. The EIS does describe the effects on forest health and vegetation composition from management under current budget levels... The quantity or amount of each objective was based largely on our current and recent past budget levels. We expect future budgets to stay relatively flat or decrease. It would be disingenuous to portray unrealistic objectives based on unconstrained or much higher budget levels. The objectives are realistic projections of what we expect to accomplish annually or over the life of the Plan."

The BOCC objects to the USFS responses. We object to the amount of timber harvest volume that the IPNF Forest Plan forecasts to offer as a stated objective, (120.6MMBF/year), over the first decade of the plan. We

believe that this volume should be the amount of the 1987 Plan, and that the IPNF is easily capable of both producing, and harvesting timber at a much higher level than what has been forecast in this plan. The reasons for this objection are:

1) Page 20, paragraph 1 of the ROD states that the established allowable sale quantity (ASQ) in the 1987 Forest Plan was 280 MMBF/year. . There is little doubt that the IPNF is more than capable of producing well over 120.6 MMBF/year at a sustainable rate over a long period of time, without compromising any of the other resource values present on the IPNF, including water quality, and fish and wildlife. Given these facts, harvesting timber at a rate of less than the ASQ over this period of time is simply unacceptable and does not consider either the health of the IPNF, or the economic stability of Shoshone County and our local governments.

2) Page 20, Paragraph 2 of the ROD states; "The Final EIS re-analyzed the ASQ based on changes in policy and ecosystem needs, and also considered an evaluation of timber suitability as required at 36 CFR 219.14." and "The revised Plan outlines the ASQ as 120.6 MMBF/year over the first decade. The revised Plan also provides a predicted annual volume sold of 44.6 MMBF/year based on current budget levels."

A. We would like to know specifically what "changes in policy" and "ecosystem needs" the re-analysis of the ASQ were based on. These "changes in policy" and ecosystem needs" must have been considerable considering the ASQ was reduced by over half in comparison to the 1987 adjusted ASQ.

B. This number, 44.6 MMBF/year, is also listed as the objective for annual estimated predicted volume sold, on page 39 of the revised Plan. It is stated in the ROD that this number is based on current budget levels. There is simply no excuse for the IPNF to have a stated objective for timber harvest that is only 45% of the stated ASQ for the Forest. The timber receipts that would be collected by increasing harvest levels from 44.6 MMBF/year to a level closer to the stated ASQ of 280 MMBF/year would more than cover the current budget shortfall which the IPNF claims is dictating the lower harvest levels. In addition, there would be numerous other benefits to the economies of the local governments of Shoshone County Idaho, the State of Idaho, and the United States as a whole, from the IPNF harvesting timber at higher levels.

3) Page 8 of the IPNF FEIS states: "The management direction in the 1987 Forest Plan emphasized the production of timber, with the majority of MAs allowing or promoting timber management. In the 1990s, the Forest Service began to focus on ecosystem management and ecological sustainability. This change in policy and direction resulted in a decreased emphasis on commercial timber production and an increased emphasis on timber harvest as a tool to restore vegetation or as a means to address other resource requirements or needs. There is a need to reanalyze timber harvest levels and revise them."

There may be a need to re-analyze ASQ but Shoshone County still supports the maximum ASQ of 280 MMBF/yr from the 1987 plan as the desired amount. The above paragraph also states that the Forest Service is now focusing on ecosystem management and ecological sustainability. To our knowledge there is no credible science currently in existence that proves that these higher levels of timber harvest on the IPNF are not ecologically sustainable. The paragraph quoted above also states that there is an "increased emphasis on timber harvest as a tool to restore vegetation". We support managing the entire forest with the best management practices and best science available and especially support common sense approach. In fact we are not supportive of limiting vegetative management through timber harvest to just General Forest. The NFMA and MUSYA direct managing all forest lands within the IPNF and if any area needs vegetation restoration then some prescription should be used.

There is a major scheme around the nation that fire suppression is the major cause of the degraded vegetative state of America's forest. We adamantly disagree that fire suppression created this horrible state of the federal lands but instead insist that lack of proper management and in most cases a complete lack of any management that has degraded the forests in Shoshone County to their current condition of explosive catastrophic fire state. In addition, given the history of fire suppression and lack of management on the IPNF, there are currently thousands of acres on the forest that if not treated with mechanical vegetation management strategies sometime in the near future, will likely be burnt up by wildfires. The management direction proposed above, will lead to large scale, high intensity wildfires which will decimate thousands of acres on the IPNF, put watersheds at risk, and threaten the health, safety and welfare of the citizens that we commissioners took an oath to protect, should not be the "new direction" for timber management on any forest in America, especially not the forests in Shoshone County.

4) Page 133 of the revised plan, under Timber states: "Timber management is used to move vegetation towards desired condition and to reduce fuels. Activities for timber management may include the following: Intermediate timber harvest (commercial thinning, improvement cutting, etc.); Regeneration harvest with treatments that are even-age in nature (clearcut, or two-age regeneration), or uneven-age (group selection or single tree selection); and Salvage of dead or dying timber. The predicted volume sold (under current budget levels) is 45 MMBF/year. It is anticipated that an average of 4400 acres per year would be harvested to achieve this timber volume and move vegetation towards desired conditions."

At this harvest level, given a 100 year harvest rotation schedule, (likely longer than needed on the majority of the IPNF), 440,000 acres or less than (20%) of the IPNF, would be managed for timber production. Given the fact that these lands can easily be simultaneously managed for the benefit of both, fish and wildlife, and water quality, as well as many other resources, it is unacceptable that the other 80% of the IPNF would essentially be managed with fire as the primary vegetation management tool. Wildfire not only has a high potential to damage the fish, wildlife, and water resources present on the IPNF, but emissions from those fires will unnecessarily contribute large amounts of carbon to the earth's atmosphere.

5) Past failures of the USFS to comply with the 1987 Forest Plan ASQ and timber harvest have economically and socially damaged Shoshone County and all the communities within the IPNF and severely threaten the health, safety and welfare of the citizens that we elected officials took an oath to protect. Significant changes to communities: heritage, custom and culture have occurred with loss of revenues to schools, reduced revenue to counties, job loss and loss of access to our forest for recreationalists all following 1987 management directives.

US Forest Service practices in the past two decades have contributed to the loss of 1000's of citizens in the county's population base that peaked at 23,000 in the 1980s. These have also impacted the three major school districts causing shrinking enrollment and inability to maintain school facilities to the standards which government agencies readily enjoy.

The lack of timber harvest is directly responsible for over \$1,000,000,000 in lost County income, have forced the closure of sawmills, closure of businesses, and now pose risk to the health and safety of the citizens in Shoshone County because of the inability to maintain roads and bridges in the county. Next year's road and bridge budget for the county cannot be funded. In NEPA Section 1508.27 (b) [2] specifically addresses the significance of society as a whole and the severity of an action (2) degree to which the proposed action affects public health or safety and forces federal agencies to not only consider but address.

(http://www.uidaho.edu/~media/Files/orgs/CNR/PAG/Reports/PAG_IB-14_8-14-11)

The 1987 forest plan called for 280MMBF/yr. of timber production, but in the past 3 decades was not achieved and has caused severe irreparable damage to the infrastructure of Shoshone County. The new forest plan which seeks to cut back on timber harvest and instead change policy to ecosystem management is totally unaccepted by Shoshone County.

6) Shoshone County is unique in that we are considered a Superfund site and there have also been CERCLA cleanups on USFS managed lands because of toxic contaminates. The forested areas within several watersheds, are not just forests, but barrier protection systems, and must be protected as such. A denuded hillside caused by catastrophic fire does not just wash sediment into streams and Coeur d'Alene Lake but also toxic contaminates which pose a threat to citizens and contamination of public and private property.

Healthy forests occur when they are managed and an unhealthy forest poses a threat to the health, safety and welfare of all citizens and land within Coeur d'Alene River system. Special considerations must be given and a specific management plan developed to mitigate these circumstances ASAP. This plan should include thinning, timber harvest, salvage logging, retained access to all areas for immediate fire suppression to protect these areas.

We support this with documents from Panhandle Health ICP Director Jerry Cobb. (See Appendix 7)

BOCC proposed solutions include:

1) The IPNF needs to redefine their objective for the annual timber volume offered in the plan to a level closer to the stated in the 1987 plan of 280 MMBF ASQ, and increase budget levels devoted to timber harvest to whatever is necessary to meet that objective. While redefining the ASQ to the 1987 levels is important, more importantly, annual harvest for revenue that support communities within the IPNF there must be the ultimate outcome. Specifically Shoshone County objective for annual ASQ 40 MMBF for forests within our county boundaries is necessary to maintain *productive harmony* as NEPA declares, for the health, safety and welfare of our citizens and to protect our county socio-economic stability.

2) The BOCC adamantly opposes any wilderness proposal within Shoshone County borders and adamantly oppose any additional new areas within IPNF boundaries as opposed wilderness. Insist that there be flexibility in the management of all Idaho Roadless Rule areas and that all backcountry lying within those boundaries must have the benefits of extraction of natural resources, including timber harvest, mineral exploration and recovery, stand removal to allow for long term benefits, fires suppression, salvage logging, wood product recovery to enhance biomass projects and access. In general the policy of the BOCC is all forest

areas within county boundaries receive best management practices that not only enhance the area but also allow the greatest economic benefits to the County. (See Appendix 10)

3) Meet with the BOCC to seek immediate planning and action to restore all forested lands within CERCLA cleanup and Superfund Watersheds to protect the Coeur d'Alene Lake Basin. This plan should cover both short term and long term management objectives, include fire mitigation projects, salvage logging, timber harvest, stand replacement of undesirable and short lived species (lodgepole pine, sub-alpine fir etc.) and the utmost effort taken to supply revenue for Shoshone County local governments and the IPNF.

4) Revenue for timber harvest for benefit of Roads and Schools, instead of stewardship sales, is not only important but must be the practice if Shoshone County and the other smaller more rural timber counties within IPNF boundaries are to survive.

5) Manage all levels of the forest for the maximum economic benefit first and ecological benefit second.

6) Modify the alternative, B Modified to allow for maximum forest benefits, 1987 ASQ levels, a committed effort to annual timber harvest numbers that generate enough revenue to support school and road maintenance obligations, require economic indicators to drive every ecological project. Industry and revenue from income generated by industrial concepts is the only answer to guarantee economic stability of local communities, IPNF, and the US Forest Service.

7) 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 IPNF.

8) Restore timber harvest yields to the level of the 1987 Plan to reduce the fire risk in accordance with 36 CFR§ 219.11(2)(c). 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 timber harvest will naturally reduce the fire risk over time by maintain good forest practices of reduced fuel loading and forest health.

9) Review land suitable for timber harvest and do not place a limit on acres of IPNF suitable for timber harvest. Best management practices should include all areas within the IPNF except Congressional protected Wild and Scenic Rivers or designated Wilderness.

10) 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” (See Appendix 8) and “What Could the Massacre of 40,000 Elephants Possibly Teach Us?”

<http://articles.mercola.com/sites/articles/archive/2013/03/30/grazing-livestock.aspx>

11) 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 St. Joe and Coeur d'Alene Basins. We seek to protect all rights under the 1872 Mining Law and must have the ability to extract natural resources within those districts.

SECTION 2. Objections to the USFS application of 36 CFR §219

Subpart A

1) **§219.4 Requirements for public participation.** The BOCC is a subdivision of the State of Idaho and jurisdictionally responsible for the health, welfare and maximize the socio-economic stability of its citizens. The BOCC rejects the notion that the County government it is within the classification of "Public" in this statute and should not have had to its comment letter included with the public's. Additionally, The BOCC has rarely participated with the USFS during planning process, with its May 7, 2013 letter commenting on the Draft EIS being the most significant and recent. The USFS has failed to demonstrate that any BOCC opinions regarding the planning process were considered in the end product. We see this omission as a violation of 36 CFR §219.4(a), §219.4(a) 1(4) and §219.4(b).

2) **§219.8 Sustainability.** The BOCC repeatedly reported to the USFS its concerns that the plan will necessarily negatively impact the socio-economic sustainability of the citizenry. We feel that the outdated documentation regarding the ever-increasing socio-economic impacts to the area were cited yet not considered in the plan. We see this as a violation of 36 CFR §219.8(b).

3) **§219.10 Multiple use.** The BOCC considers the plan to fail to fully appreciate the complete scope of "multiple use" and denies this in vast areas of the forests. The reduction in areas available for timber harvest, mineral extraction and recreation is in direct conflict of the BOCC's statements to the USFS. We view this as a violation of 36 CFR §219.10(a) and 36 CFR §219.11.

Subpart B

1) **36 CFR §219.52. Giving notice of a plan, plan amendment, or plan revision subject to objection before approval.** The BOCC objects to the publication of the Notice of Objection Filing Period (Notice) in a "newspaper of record" that is not distributed in Shoshone County, while the County contains the largest portion of the IPNF and has its own newspaper. A similar notice was published in two Montana publications regarding the Kootenai NF Plan, demonstrating a conflict in procedures. The USFS needs to take steps to ensure each county newspaper located in an affected county is a "newspaper of record"; otherwise, the public within the affected county has not truly been properly "noticed".

The BOCC was not in receipt of the complete set of documents for the Plan until October 7, 2013, which was ten days into the Process.

The revision process began under a different set of CFR's (Appeal) and was changed to the objection process on April 9, 2012. The original comment period for the Appeal process was from January 3, 2012 through April 7, 2012. On March 21, 2012 the comment period was extended an additional 30 days to May 7, 2012. It is unclear how comments filed prior to the March 21, 2012 were handled by the USFS, since the Objection Process had not been activated in the Federal Register yet. Did they have to resubmit objections after their original comments?

2) **36 CFR §219.56 Objection time periods and process.** The BOCC objects to this statute's rigidity in light of the failure of the USFS to comply with it in several areas. The USFS failed to make available its planning documents at the time stated they must be made available. The USFS website for the IPNF had and continues to contain flaws. One such flaw is the link to the Objection Process CFR is for 36 CFR §218 not for 36 CFR §219. Other flaws include links that do not work or deny the viewer access.

The documents provided did not comply with either Article 102(c) of the NEPA of 1969 as amended and US Forest Service's 2011 NEPA Handbook 1909.15 at Chapter 25.1. Both require the inclusion of the entire comments of at a minimum, all federal, state, tribal and local governments. Appendix G of the FEIS provides no copies of any comments. Particularly it does not even acknowledge receipt of the BOCC's separately signed letter co-written by the Benewah, Boundary, Bonner, Kootenai and Shoshone County Commissioners, which is listed as letter #214 (Boundary County BOCC). The same letter was listed as #217 (Kootenai BOCC) and a code of #214. Shoshone County BOCC is not listed similarly. It is unclear as to this omission affect our county's standing to comment. The Appendix requires the reader to trust the USFS on its categorical lumping of like comments together in a conglomerated summary concern and offers a conglomerated response. Ms Farnsworth stated in a November 14, 2012 meeting with the BOCC that the reason for this was to reduce the volume of the document. Compact disks of copies of all comments were provided at the meeting, 12 days before the November 26, 2012 objection deadline. Some comments were listed being available with a link, but the links do not work. The logic of the USFS for failing to comply with NEPA & FSH Manual requirements is considered absurd in light of 40 CFR 1502.7 and the USFS Handbook 1909.15 at 23.1 both state that the page limits on a complex Final EIS shall normally be kept to under 300 pages. The Final EIS and its accompanying Appendices total over 1,200 pages, or over 4 times the suggested length. The USFS seems unconcerned about the immense discrepancy in volume in this instance.

On November 4, 2012 the BOCC requested information and a meeting with the IPNF Supervisor. A meeting date of November 14, 2012 was agreed upon by the USFS. The Supervisor requested possible topics of the meeting. On November 8, 2012 the BOCC sent a list of potential, yet not all-inclusive, list of meeting topics and re-iterated the need to be in receipt of some of the information requested prior to the meeting. The BOCC request was denied by virtue of none of the information being made available prior to the meeting, and some has still to date not been made available. The BOCC strongly feels that the lack of possession of the requested information will affect its ability to adequately object to the plan.

The BOCC strongly objects to the rigidity of the extension of objection deadlines as only applicable to weekends and holidays. This statute should only be valid if all *other* portions of the process have been successfully met. The USFS has in our opinion violated the statute; it should be held accountable for being causal to the need for

an extension to allow for proper documentation and review and objections. There is no provision for this in the statute.

Please note: The BOCC strongly objects to the IPNF Land Management Plan beginning under the Appeal Process and its statutes, and finishing under the Objection Process and its statutes. We feel that once a Process has begun, it needs to be followed through to its completion. This would avoid conflicts in the Planning phases.

The BOCC asserts its right to present local knowledge, which may include affidavits and support of this BOCC Objection Letter. 36 CFR §219.56(a)1 Assessment.

SECTION 3. SUPPORT FOR SHOSHONE COUNTY STANDING THROUGH COORDINATION

The Shoshone County Commissioners (BOCC, Shoshone County, or Commissioners) present this document with supporting documentation for "*coordination*" on government to government basis, citing court case determination, portions of NEPA regulations, which not only support coordination but also offer protection to local government for economic stability, and jurisdiction within the boundaries of county borders.

36 CFR §219.4 (b) Coordination with other public planning efforts. (1) The responsible official shall coordinate land management planning with the equivalent and related planning efforts of federally recognized Indian Tribes, Alaska Native Corporations, other Federal agencies, and State and Local governments.

The BOCC, is a governing body, a political subdivision of the State of Idaho, sworn by oath to uphold the United States Constitution, Idaho State Constitution and to protect the health, safety, and welfare of the citizens of Shoshone County. These protections provide the use of all practical means possible to ensure economic stability for the present and future existence of the County.

Shoshone County invoked coordination March 11, 2009 with Resolution 2009-07, and notified USFS Regional Forester Tom Tidwell in a letter dated June 15, 2009. (See Appendix 9) NEPA Statutes elevates standing of state and local government to standards above the general public and give special considerations for the term coordination. In the first paragraph of the above resolution, ..."the Board recognizes its mandate provided in Idaho statutes to (1) protect and enhance the public health, safety, and welfare of the citizens of Shoshone County, (2) protect the tax base and encourage the economic stability of Shoshone County, and (3) encourage mining, forestry, and other primary industries and businesses to promote future growth;"....and continued statements there in, the BOCC asserts equal, not subordinate status under coordination as stated in NEPA, NFMA, FLPMA, ESA, and other federal laws.

As local government representing our constituents positions through coordination, all agencies have much broader duties to comply with. Through Congressional declaration, agencies must listen to local input, must analyze local position to determine whether there is conflict between proposed agency action and the local plan

or policy and must use good faith effort to resolve any existing conflict to achieve consistency between the proposed plan, policy or action and the local plan or policy.

The Merriam-Webster dictionary definition of "coordinate" is "equal in rank, quality, or significance", meaning that a person or party operating in "coordinate" fashion, is operating as a party of equal importance, rank or significance, not subordinate. (See: <http://www.merriam-webster.com/dictionary/coordinate>)

CONGRESSIONAL MANDATE

43 USC § 1712 orders that the Bureau of Land Management coordinate its "land use inventory, planning and management actions with... Any local government..." Congress directs that the agency implement this requirement by doing the following:

1. Keep apprised of state, local and tribal land use plans;
2. That consideration is given to local plans when developing a federal plan, policy or management action;
3. Provide early notification (prior to public notice) to local government of development of any plan, policy or action;
4. Provide opportunity for meaningful input by local government into development of the plan, policy or action: and
5. Make all practical effort to resolve conflicts between federal and local policy, and reach consistency.

The National Forest Management Act requires the Forest Service to coordinate with local government; in 16 USC § 1604, Congress ordered the Service to "develop, maintain, and as appropriate revise land use resource management plans...coordinated with the land and resource management planning process of State and local governments and other Federal agencies."

COURTS DEFINE "COORDINATION"

The Courts which have been put to the task of defining the meaning of the term have gone to the dictionary definitions. In *California Native Plant Society V. City of Rancho Cordova*, 172 Cal. App. 4th 603, 91 Cal. Rptr. 3d. 571 (Third App. Dist. 2009) the Court said this of "coordinate":

"... the concept of 'coordination' means more than trying to work together with someone else. Even under the City's definition of the word 'coordination' means negotiating with others in order to work together effectively. To 'coordinate' is 'to bring into a common action, movement, or condition'; it is synonymous with harmonize." (Merriam-Webster's Collegiate Dictionary. Supra, at p. 275, col. 1) Indeed, the very dictionary the City cites for the definition of the word 'coordinate' defines the word 'coordination'- and therefore, the city satisfied its 'coordination' obligation under the general plan at the same time it satisfied 'consultation' obligation under the plan—that is not true. While the City could 'consult' with the Service[Fish and Wildlife] by soliciting and considering the Service's comments on the draft EIR, the City could not 'coordinate' with the Service by simply doing those things. . . . by definition 'coordination' implies some measure of cooperation that is not achieved merely by asking for and considering input or trying to work together."

Recognizing that Congress is the Supreme Law of the land, that They have exclusive power over federal lands and in the exercise of that exclusive power they have mandated BLM and Forest Service to "coordinate" their land use planning with local government. Coordination is a process far stronger than cooperation, collaboration or consultation. It is not supremacy and does not carry with it any type of veto or control over federal management. It does, however, authorize local government to come to the negotiation table on an equal basis with the federal management agency, which has the obligation to use *good faith* to resolve any conflicts between local and federal policies and plans.

In June of 2012 in Lewiston Idaho, at the Idaho Association of Counties, Commissioners and Clerks mid-summer convention, there was a presentation by Cynthia Moses-Nedd, Department of Interior liaison from Washington DC and Randy Myers, NACO, liason for the Department of Agriculture on coordination. Both specifically reinforced the commitment of their departments that BLM and Forest Service were to coordinate with local counties and supplied highlighted documents.

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—

- (2) assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings:
- (5) 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) 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 environmental analysis. (e,f) 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.

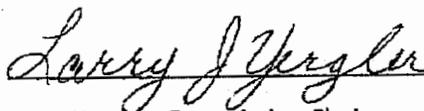
Objection: No Attempt to Coordinate/Resolve Conflicts

With the above information supplied on coordination and Shoshone County's invoking coordination in 2009 the County objects that we were not included in plan preparation throughout the various stages of planning in the full spirit of coordination as mandated by Congress in NEPA, FLPMA, NFMA and the other various acts. Areas in our comments to the revised IPNF plan were meaningful input that represents the policy or local plans of the County, deserved strong consideration into the development of the plan and in areas of conflict between federal and local policy. In the Draft ROD page 25 under Relationship to Other Entities you state, "that county governments that county plans were considered as the planning process developed." There is only mention of consideration not *coordination*. Under State (pg 26) you state, "The Forest coordinated information with State agencies during all phases of the plan revision process.

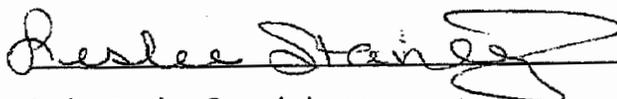
Shoshone County seeks an effort to resolve those conflicts and reach consistency since there was no conflict resolution before release to the public of the 2013 revision and draft ROD and/or before entering the objection process. Upon release of the **proposed plan decision** there were several areas of conflict between the plan and BOCC comments and there was no attempt to reconcile this meaningful input through coordination.

The plan decision would be improved through better USFS knowledge and more awareness of, the definition of coordination, the obligations of federal agencies through this process and a stronger, more numerous meeting schedule between agencies and local government. Keeping apprised of local plans and more involvement by local government participation, with awareness of local economic need, will strengthen support for timber production under vegetative management plans especially in the legal arena. Coordination between USFS and local entities, by law, must happen at all levels of plan revision from the initial stage to implementation to ensure the utmost advantages to economic stability of *every* county within the IPNF boundaries while protecting the local culture and heritage of the forest communities. Stronger efforts in government to government coordination will give additional support for projects while ensuring utmost support for economic stability of every community within the IPNF boundary. We are in the process of revising our current Comprehensive Plan and a supplemental Natural Resource Plan. We strongly recommend use of a "no effects" document which will view effects of Forest Service planning as whether the agency proposed plan or policy in comparison to local planning processes; has no effect, may effect or will effect on local plans including economic stability, culture, heritage, etc.

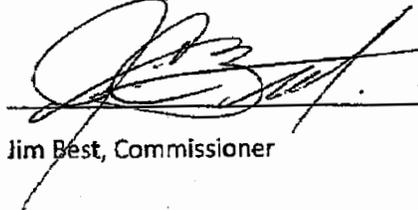
Signed this 26th day of November, 2013



Larry Yergler, Commission Chair



Leslee Stanley, Commissioner



Jim Best, Commissioner

OTHER CONTRIBUTORS TO THIS OBJECTION:

Sandy Podsaid, Shoshone County Resource Coordinator

Jann Higdem, Shoshone County Resource Advisory Committee (SC RAC)

Don Capparelli, SC RAC

Marc & Peggy Daugherty

James McMillan, SC RAC

John Specht

Joe Guardipee, Wardner Mayor-Elect

Linda Yergler

Bob Lowe

Wayne McCarroll

Tom Sudul

APPENDICES TO FOLLOW

CONTRIBUTORS TO BOCC REV IPNF LAND MANAGEMENT PLAN OBJECTION LETTER

Sandy Podsaid, Shoshone County Resource Coordinator
Jann Higdem, Shoshone County Resource Advisory Committee (SCRAC)
James McMillan, Esq., SCRAC
Don Capparelli, SCRAC

Amy Bigspring
Bernie Wilmarth
Bob Lowe
Brad Corkill
Brian Higdem
Carol Young
Chuck Reitz
Cindy Carlson
David Sherman
Ed Anderson
Frank Durham
Fred Brackebusch
Grant Brackebusch
Guy Sande
Jay Huber
Jay Young
Jeff Waechter
Joan Block

Joe Guardipee
John Fuller
Kip McGillivray
Larry Huber
Lee Haynes
Linda Yergler
Loeanna Hansen
Mark & Peggy Daugherty
Mike Dunnigan
Nila Jurkovich
Ninette Reitz
Robin Stanley
Ron Hurd
Ron Roizen
Steve & Deb Thomas
Todd & Karen Darby
Tom Sudul
Tyson Clyne
Wayne McCarroll

**Shoshone County Residents in Support of the
Shoshone County Commissioners' Objection Letter
to the USFS IPNF Revised Land Management Plan**

John Fuller
517 2nd Street
Kellogg, ID 83837
Retired from Constant Aviation
Work part time at O'Reillys Auto Parts

David Sherman
410 5th St
Wallace ID 83873
David Sherman Engineering

Dwight W. Suitter
207 Northview
POB 137 Smelterville, Idaho 83868
WW2 vet, millwright, miner and construction superintendent

Cynthia L Carlson
202 W Cameron Ave
Kellogg, ID 83837

I am the Owner/Broker of Cindy Carlson Realty. I have lived in the Silver Valley since 1974. My husband is a life time resident of the Silver Valley.
We have raised our family here and have enjoyed the opportunities of outdoor life that the Silver Valley has provided.
Being a business owner and resident of the Silver Valley, I would like to support the USFS Plan Objection Comments.
Thank you,
Cynthia L Carlson

Edward F. Anderson, real estate broker, farmer
PO Box 327
Kingston, ID 83839

Candace D. Anderson
PO Box 327
Kingston, ID 83839
home maker

Randy and Claudia Childress
60 Beaver Creek Road
Wallace, ID 83873
Babin RV Camp, Babin's Junction and
RealTeam Real Estate Center CDA

We are in agreement to the objections stated to the USFS IPNF Plan. We have been affected in a negative way by what has occurred in the past several years.

Fred W. Brackebusch
P.O. Box 1019
Kellogg, ID 83837
Geological Engineer
Retired President of New Jersey Mining Co.
Owner-President of Mine Systems Design, Inc. (Consultant for mine backfill technology and mining systems)

Joan F. Block
517 2nd St
Kellogg, ID 83837
Financial Consultant with First Allied Securities, Inc

Harold W. McCarroll
1014 N. Syringa St.
Post Falls, Idaho 83854
Retired from Downtown Toyota Spokane, Washington

Brad Corkill
Owner
Whiteman Lumber Company, Inc.

Steve Thomas
340 Mountain Ridge Lane
Kingston, Id 83839
US Army Retired

Barbara Foster
PO Box 1126
Pinehurst, ID

To: Faye Krueger, Regional Forester, Northern Region

From: A. T. Sandy Podsaid,
357 mountain Ridge
Kingston Idaho, 83839

Re: IPNF Revised Land Management Plan

Date: November 26, 2013

SWORN AFFIDAVIT OF A T Sandy Podsaid

Comes now the affiant, A T Sandy Podsaid, having been duly sworn, say that I am over the age of eighteen and reside in Shoshone County, Idaho.

- I have been a resident of Idaho since 1973.
- I have hunted, fished, run a pack string, a jet boat, vehicles, and flowing over 11 different River drainages within Idaho, I have been in 5 to 6 different wildernesses in Idaho, one in Oregon and one in Wyoming. I have professionally guided over 27 years in Idaho in three years in Oregon.
- I have been an outfitter or guide in Idaho and in the Mallard Larkins Pioneer area for over 27 years.
- In operated my own business, as a professional guide or outfitter in the Mallard Larkins Pioneer area. I have encountered groups sizes of 30 or more persons, they would include campfire girls, Boy Scouts, hikers, University groups and backcountry Horsemen groups.
- I have made my living 99% of the time in the Mallard Larkins Pioneer area from 1984 pretty much to date, I lived in a tent eight months of the year most of the time. I spent much of the other time of the year on horseback, ATVs, snowmobiles or pickup trucks traveling the upper St. Joe River area, the Little North Fork River and the Mallard Larkins Pioneer area.
- Within the years of operating as a professional within the Mallard Larkins Pioneer area I have watched the trail systems be maintained by the forest service with mechanized equipment, helicopters, dynamite, hand tools and tracked excavation machines. The trail maintenance included pressure-treated dimensional lumber, helicoptered and packed in, to build bridges and pungent tread work to help protect the fragile environment. I have witnessed probably more than 30 miles with trail being reconstructed or rebuilt to allow access to the many diverse users.
- I have operated as the lead guide of an outfitter operation that has had as many as 40 had of stock, horses and mules, 20 people to include employees and guest in one camp with that amount livestock. In addition to the people in the stock, stock dogs were also present. That meant that up to 60+ heartbeats were in the same area at the same time providing guided services under a special use permit to the citizens of the United States, to include guest from many places all over the world. Those foreign guests have come from Germany, Australia, and other countries in Europe. In the years passed those services also included television camera and production crews.
- In those many years I have cleaned trails, cleared culverts, rerouted trails and assisted in making the trail system a safe and passable way for my clients and the public to use.

- I have cut out portions of the trail that it had microburst laying large number of three-foot diameter hemlocks, stacked on top of each other, that have taken 3 to 4 days to clear. Additionally myself or my crew have cleared large Red Cedars that blocked trails, fallen across trails uphill, and spanned the creeks and trails, in sizes of 10 to 13 feet in diameter.
- Myself or my crew have picked up hundreds of yards of number nine telephone wire, that spanned between lookout towers when fire towers were manned. There is still many miles of number nine telephone wire in existence within the proposed Mallard market area.
- Although the Mallard Larkins is a wonderful area, when you're on top of the peaks between the forest divide, you can hear the highline whistles from the logging operations to the northwest from Montana and Rutledge Creeks, and to the south and east from operations within the Skull and Collins creek drainages. The additional sounds of the low-flying aircraft, jet aircraft accessing the Spokane airport are quite loud on a quiet day.
- I have witnessed many users in the Mallard Larkins, they are local residents within may be 100 miles or more, some understand the need to utilize and bring a small chainsaw so they can access their trip through the trail networks of the proposed wilderness areas. It would be a shame to limit the volunteer efforts that are accomplished within the trail network for the Mallard area. I do not believe that certain individuals or groups who want the wilderness experience of "untrammled by man" would not support any future use of mechanize handtools. The necessity of mechanized handtools to include chainsaws, brush saws and/or small motorized jackhammers for trail maintenance, the non-use of these tools would severely restrict the amount of access within this wonderful area.
- My professional and private opinion would be to propose that the Mailard Larkins Pioneer area be listed as a special area under the Idaho roadless rule. This would achieve the historic use for the users and would fully fit within our heritage of this special area.
- The continued non-motorized use of vehicles has maintained and been part of the Mallard Larkins Pioneer area from approximately 1984, can be and would be, I believe supported by all.
- in 1986 or 87, I was part of a group, as a professional guide took the Friends of the Mallard Larkins, to include James Hagedorn, Evert Hagan, Dennis Baird, Grant Simons, Craig Gerky Idaho Wilderness Society and Dave Johnson of the Lewiston Tribune into the area. At that time I was in support of the Mallard Larkins Pioneer area becoming a Wilderness, that was many years ago. I have now adamantly changed my thoughts and position of support of the full designation of Wilderness. The education that I have acquired 25+ years of operating in a wilderness area and visiting many other wilderness areas in Idaho and in Oregon, have changed that view.
- I've learned that the forest service who is charged with the trail maintenances, within all of those wilderness areas, accomplish very little with the limited budgets that they have available, the short timeframe for the summer seasons and the skill levels of the part-time employees assigned to trail maintenance. To lose the many volunteers that are willing, to do the work necessary, to have access throughout an areas within the backcountry and the mechanized equipment is totally essential.
- I was the hunt manager for an outfitting company in the Frank Church Wilderness of the name McKay Bar, I operated five backcountry hunting camps, three backcountry ranches, 100 head of stock, 36 employees, three jet boats and hundreds of square miles within are permitted area.

- The Mallard Larkins Pioneer area, from surveyors Ridge to Canyon work center is only about a 5 to 6 hour horseback ride north to south. One could walk that in maybe less time. This is a very small area compared to most other wilderness areas within Idaho. I have witnessed very minimal use within the Frank Church River of No Return Wilderness, compared to the Mallard Larkins area that has been used for many years by local residents within Shoshone County and surrounding counties.
- The use of best management practices and educating the public on proper area usage, is easily accomplished by the trailhead billboards and information on them.
- In watching the sad decline of the elk populations, within my past outfitted operating area of the upper St. Joe to include the Snow Peak Wildlife Management Area, which is jointly managed by IDFG and the Forest Service, it greatly saddens my heart to witness the decline of these great elk herds, that I've been able to share with many citizens and clients from the United States, Canada, Mexico, New Zealand, Australia, England, and Germany.
- To watch the negative affects that have come to the backcountry areas, because of the lack of grazing, forest management and current wildlife management practices of the last 20 years, has been the demise of many of are ugulent species. With very limited management and or no access to the predators in these remote areas, the predators become king.

If you wish any further informationf, from my experience within the "Mallard Larkins Pioneer Area" or the upper St. Joe River area, Please feel free to contact me.

Further, the affiant saith not.

DATED this 26 day of November, 2013

Alexander J. Podsaid, Jr.
[Signature]

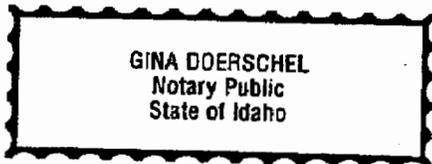
State of Idaho)

S.S.

County of Shoshone)

On this 26th day of November, in the year 2013, before me Gina Doerschel, personally appeared Alexander J. Podsaid, Jr., proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument, and acknowledged the he/she executed the same.

S
E
A
L



Gina Doerschel
Notary Public

My Commission Expires on 2/2/2018

COMMISSIONERS:

JIM BEST, District 1
LARRY YERGLER, District 2
LESLIE STANLEY, District 3

email: bocc@co.shoshone.id.us

Office Phone: 752-3331
Fax: 752-4304



County of Shoshone

700 BANK STREET, SUITE 120
WALLACE, IDAHO 83873-2348

PEGGY WHITE, CLERK DISTRICT CLERK
AUDITOR and RECORDER

email: pwhite@co.shoshone.id.us

Office Phone: 752-1264
Fax: 752-1896

US Forest Service Plan
RE: Comments

As time is ticking away for our comments on the Forest Plan, I was asked to say a few words regarding the possibility of more wildernesses in our county. My only thought is "why" the Forest plan is trying to make more wilderness acreage and keeping the forest away from the public and industry. Now, I think I could take most of the arguments for both sides and come up with a plan "for and against" to meet the needs of each side and sound like I know what I am talking about, but I would like to talk about the middle ground between their plans. People would ask what middle ground? The middle ground is the many county tax payers who are caught in this middle between both sides and paying for it out of their hard earn cash with higher property taxes and no future in the area they grew up in as jobs continue to dwindle in the woods and other fields for natural resource counties. They have simple needs such as police, fire, schools, hospital, ambulance districts who have to raise money to fund these districts so that when one person is in need they can be there for that emergency which hits all of us. Our children to be educated with the quality other higher tax base school districts can afford.

Within our borders for Shoshone County, we are at seventy-five percent (75%) federal and state lands. We are caught in the middle between the environmentalist and federal government. Neither groups have come to the middle to see how their side is hurting our way of life and creating economic hardships to the twelve thousand plus who pay for our taxing districts so our old and young can have services provided for them. The seventy five percent lands lays idol with no taxes being charged or any jobs created on them and again I say "why,"? Our county has seen such a hardship since the 1980's but there are still 5 generations here hoping to go back into the mines and woods and you then would ask "why." I would tell you if it wasn't for our forest and mines today, you would not have the luxury of daily life with all of the new gadgets made with the use of minerals and wood products with even a wood house over your family heads.

As county government continues to try to meet the needs here of our local residents I would ask each one of you, "Do we need another catastrophe 1910 fire to come through and loss of lives before we address the issues of these counties who are in the middle. " Our history in Shoshone County has had a mining disaster and the 1910 fire which lost

our love one lives. It was not the ones making the decisions that lost regarding the middle. The federal government acted to make it safer in the middle but due to the changes in policies they are making decisions which could bear lives lost once again. Where does that put the middle county entities? Are the needs in the forest for future generations being met? Is it not healthy to clear the dead out of the forest and prevent build up? My questions is it not our children apart of the future generation?

My fear is we will have another 1910 fire and as our population is getting older; we will not have enough young people working in our middle ground counties to help us. Another fire disaster and our old and young could be caught up in that blaze. Climate is changing. This time who will take on the responsibilities when we loose lives once again?

Disaster from our forest lands is a real threat as fire fuels continues to build. We again will find ourselves scrambling to get our old to safety.

The fuel on the forest floors could be used for bio mass and create new job to keep our young people here. The jobs are dwindling in mining and the woods so our community is ending up with an aging population and families torn apart by miles. Mining and the forest is the heart beat of our community.

Stewardship on a local level then an office person in unknown state who does not understand our way of life nor will they have the persistence do a good job for our community. Our fellow citizens who would enjoy the outdoors in our county continues' to pay for the forest lands with no help from the environmentalist groups or not much help from the federal government by paying their fair share.

In closing, I strongly urge each one of us to sit down and look at all sides and help make a simple solution for the best of the middle counties entities and the way of life we are hoping to regain in a prospers economy.

Sincerely,

Peggy White,
Shoshone County Clerk

Affidavit

I Marc S. Daugherty president of Daugherty Enterprises, Inc. formerly Marc Daugherty Logging. Being first duly sworn on oath, deposes and says

(A)I have personal knowledge, and am over the age of 18 years and competent to testify.

(B)That attached hereto is a true and correct copy of the knowledge and statements (document signed November 24, 2013 by Marc Daugherty)

(C)Said document demonstrates full and complete Statements of fact

I started my career working in the IPNF working with my Father, James Daugherty in the late sixties. I worked for him for twenty years doing all duties for the logging business which included timber felling, skidding, truck driving and mechanic and learning how to bid and manage sales. During this time my Dad bought numerous sales one called Camp 41 where we spent the summer in a logging camp with numerous people and workers. At this time I learned how the logging industry worked and enjoyed being there to experience many stories and how the logging industry worked. As years went by we had several logging camps.

One was at Monarch Gulch when we had to recondition roads and do selective logging. I took my family up and we camped for more than a month. We had to fight elements and put up with hauling our own water and trying to make things best to make a living. Another camp called Weyer Too Timber Sale up Steamboat at Black Canyon where we also had to recondition roads and do selective logging. We camped at June creek where my children were very small and they learned how to ruff it! I too had sales where we set up logging camps the last camp was

Road 205 Decks where we spent a month sorting and hauling a right away for the Forest Service.

When my father decided to retire I started my own logging business purchasing my own Timber Sales from Federal and State. I purchased forty five sales from the USDA Forest Service. My first sale was purchased on September 28, 1977, and last purchased on September 29, 2011. (see attached) During this process we raised three children and have six grandchildren where they grew and will teach their children to understand the process of how to respect the National Forest and enjoy the recreation it has to offer. I employed up to ten employees at a time, and during this time we attended training in Idaho Pro Logger on how to manage our sales and learning about our BMPs, which classified us as Certified Loggers for the Sustainable forest program.

As time progressed, the timber sales decreased in volume and were not as plentiful. The increase of fuel prices, cable, tires, etc., and insurance, taxes all went on the rise, putting us down to where we only employ four employees that are currently out of work.

The future today is that the Forest management plan is decreasing the timber to be harvested in our IPNF for the next decade and are not advertising any Timber Sales in the Coeur d'Alene River Ranger District for the next three years due to lack of funds? We are losing more in mortality than they are putting up for sale.

This in turn will force us to lay off workers and puts our forest at a high risk for fires, and losing timber due to no management. It also will affect our local governments and schools with no revenue. Not to mention putting the public's welfare at risk.

There has been incidents in the IPNF where people are being in killed in local campgrounds due to falling trees landing on their tents due to dead trees and a forest with no maintenance.

Our forest roads are deteriorating due to lack of Timber sales where our forest roads are managed through the Timber Sale program, where contractors recondition and manage, which help with erosion and sediment, and washouts, and keep it safe for the public.

I feel it is essential for our forest to be maintained, through salvage Timber Sales, taking diseased and dying timber and managing for our future generations.

Leaving the timber to be left unmanaged is putting OUR forest in danger of losing to wildfire and putting the public in high danger as our population continues to grow in the IPNF.

Not only are our Forests are not being managed it is putting people out of work, which in turn you have higher rate of unemployment and no revenue put back into the system, which in the long run, no one gets paid.

We need an equal Balance.

And We are proud to be an Idaho Logger!

Affidavit

I Marc S. Daugherty being first duly sworn on oath, deposes and says

(A) I have personal knowledge, and am over the age of 18 years and competent to testify.

(B) That attached hereto is a true and correct copy of the knowledge and statements (document signed November 24, 2013 by

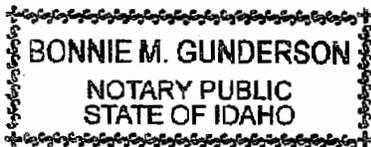
(C) Said document demonstrates full and complete Statement of fact as states (see Attached)

DATED this 24 day of November 2013

Marc S. Daugherty

Marc S Daugherty

Subscribed and Sworn to before me this 24 day of November 2013



Bonnie M Gunderson

Notary Public-State of Idaho

Residing at Kingston

Commission Expires: 04/29/2015

003/003

IPNFSO

1/14/2013 12:36 FAX 2087657307

PURCHASER	SALE NAME	SALE DATE
Donald Daugherty	Timber Sale (no name available)	06/18/1957
JW McClain & James Daugherty	Timber Sale (no name available)	09/16/1957
James Daugherty	Beetle Ridge	11/18/1958
James Daugherty	Timber Sale (no name available)	09/02/1959
James Daugherty	Timber Sale (no name available)	02/03/1960
James Daugherty	Lower Indian Salvage	03/05/1962
James Daugherty	Camp 41	06/04/1963
James Daugherty	Seed Block Salvage	11/14/1963
James Daugherty	Bogel Draw	06/05/1967
James Daugherty	Lone Creek Forty	06/14/1967
James Daugherty	Drew Gulch Burn	10/31/1967
James Daugherty	County Creek Wildlife	12/11/1967
James Daugherty	Felder Creek Blowdown	08/02/1971
James Daugherty	Black Canyon Salvage	09/02/1971
James Daugherty	Comfy Salvage	11/29/1971
James Daugherty	High Autumn Salvage	11/29/1971
James Daugherty	John Creek Burn Salvage	07/31/1972
James Daugherty	Moon Creek Salvage	06/03/1974
James Daugherty	Betty Creek Salvage	07/22/1974
James Daugherty	Bedrock Gulch	07/22/1974
James Daugherty	Autumn Creek Area Salvage	09/30/1974
James Daugherty	Haystack West	11/17/1975
James Daugherty	Bennett Creek Overstory	06/01/1976
James Daugherty	Suburban Red	12/31/1976
James Daugherty	Frontier Silver Salvage	05/26/1977
James Daugherty	Martin Autumn Area Salvage	09/27/1977
Marc Daugherty	Taylor Clearance	09/28/1977
James Daugherty	Teddy Creek	06/19/1978
James Daugherty	Monarch Gulch	05/30/1979
James Daugherty	Cabin Area Salvage	08/21/1979
James Daugherty	Upper Falls Creek BDRS	06/17/1980
Marc Daugherty	Steamboat Camp	10/21/1980
Marc Daugherty	Straw Stack	10/05/1982
Marc Daugherty	Saw Gulch Overburn	10/13/1983
James Daugherty	Kings Pass SPA	02/04/1985
Daugherty Logging	Weyer Too	04/05/1985
Marc Daugherty	Eagle White Rock	04/23/1985
James Daugherty	Martin Cabin	11/14/1985
Marc Daugherty	Eagle Salvage	05/19/1987
Marc Daugherty	Boston Salvage	06/11/1987
Marc Daugherty	Black Canyon O/B	10/06/1987

PURCHASER	SALE NAME	SALE DATE
Marc Daugherty	Long Cabin Clearance	02/10/1988
Marc Daugherty	Black Cougar	08/22/1989
Marc Daugherty	Steamboat Fire	08/22/1989
Marc Daugherty	Burnt Weyer	08/22/1989
Marc Daugherty	Graham Cracker	10/01/1991
Marc Daugherty	Down Flat Salvage	10/24/1991
Marc Daugherty	Labrador Salvage	05/21/1992
Marc Daugherty	Suburban Salvage	09/21/1992
Marc Daugherty	Ski Cinnabar	10/05/1993
Marc Daugherty	Scott Gulch Salvage SSTS	05/10/1994
Marc Daugherty	Kings Ridge Salvage	09/02/1994
Marc Daugherty	Lower Eagle II Salvage	07/25/1995
Marc Daugherty	John's Pipe Salvage	10/29/1995
Marc Daugherty	Capital Salvage	10/16/1996
Marc Daugherty	Alder White Salvage	10/16/1996
Marc Daugherty	WWP Line	10/23/1996
Marc Daugherty	Steamboat Salvage	12/23/1996
Marc Daugherty	Bunco Bypass	10/26/1999
Daugherty Enterprises	Killamey Bug	08/31/2000
Marc Daugherty	Unknown King Bug	01/16/2002
Daugherty Enterprises	Callis Bug Ice	10/18/2002
Daugherty Enterprises	Yon Ferguson	10/22/2003
Daugherty Enterprises	Small Beetle Trails	08/13/2004
Daugherty Enterprises	Road 205 Decks	10/08/2004
Daugherty Enterprises	South Bumblebee	07/21/2005
Daugherty Enterprises	#412 Rd Maintenance	04/19/2007
Daugherty Enterprises	Boneyard Red Fir	05/02/2007
Daugherty Enterprises	Trail Log Deck	05/02/2007
Daugherty Enterprises	South Copper Down	05/15/2007
Daugherty Enterprises	Mason Thin	08/29/2007
Daugherty Enterprises	Easter Lilly Log Deck	10/25/2007
Daugherty Enterprises	Callis Burn Salvage	08/21/2008
Daugherty Enterprises	Carpenter Thin	10/14/2008
Daugherty Enterprises	Ridge Runner Thin	11/01/2010
Daugherty Enterprises	Capital Dudley Salvage	09/29/2011

To: Shoshone County Commissioners and Faye Krueger,
Regional Forester, Northern Region

From: Gregg D. Keller, 11818 N. Guinevere Dr. Spokane
WA99218 and 29 Meadow St. Wallace ID, 83873

Re: IPNF Revised Land Management Plan

Date: 11/25/2013

SWORN AFFIDAVIT OF Gregg D. Keller

Comes now the affiant, Gregg D. Keller, having been duly sworn, say that I am over the age of eighteen and reside in Spokane County and Shoshone County, Idaho.

My name is Gregg Keller, my wife Fran and I have a house in Shoshone County, Wallace Idaho 29 Meadow St. I was raised in a Military family living all over the US and England. I lived in Alaska for 5 years, Washington for over 25 years. I was in the Marine Corps for 3 years from 1973 - 1976 and with the BNSF Railroad for 39 years the last five years as the Manager of Quality Assurance where I traveled extensively all 38 states the BNSF runs in. Five years ago I was looking to purchase a home where I could retire and have unlimited recreation activities out my back door and had decided on the Colville, Lake Thomas and Gillete area in Washington but it was becoming more and more restrictive. I heard about Shoshone County and went exploring with my family on Mountain Bikes, Motorcycles and ATV and immediately fell in love with the area and the acceptance of all forms of recreation not only in the forests but in the towns. After looking for over two years we purchased a home in Wallace Idaho and have retired and continue to love being in the area. I have family and friends
(PAGE 1 of 2)

from Texas and Montana who regularly come to this area to enjoy what is available and the welcoming communities. With this said let it be known I will be the first to sell my house in Wallace and move to an area that is as Shoshone County was when I discovered it not with the restrictions being discussed on the table.

Further, the affiant saith not.

DATED this 25th day of November, 2013

Greg D. Keller

[Signature]

State of Washington

S.S.

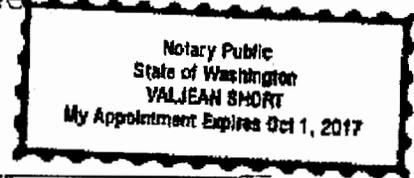
County of Spokane

On this 25 day of November, in the year 2013, before me Valjean Short, personally appeared Greg D. Keller, proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument, and acknowledged the he/she executed the same

SEAL:

Notary Public

Valjean Short



My Commission Expires on Oct 01, 2017

Page (2 of 2)

TO: Faye Krueger, USFS Regional 1 Forester
FROM: C.B. Reitz, City of Mullan Idaho, Councilman... Secretary/Treasurer
Board of Commissioners, South Fork of the Coeur d' Alene River Sewer
District.

SUBJ: Results of past and proposed changes in the Economic Outlook
for the Silver Valley as a result of the Forest Services actions.

In the time frame of 1995 to 1997, another Councilman and myself, visited the Fernan Ranger District in Coeur d' Alene Idaho. While waiting for the appearance of the Director, my attention was drawn to a map resting upon an easel in the office. On it was a map showing projected closing of roads and trails directly south of US 95 and opposite the small town of Mullan Idaho. My initial imaginings were question and confusion for this was the purpose of our visit, to discuss how we as a City, known as the "Town of Trails", could assist the Forest Service with identification signs, upkeep of the trails and any thing else to improve the access to the trails and forest. After all, a good portion of our tourist dollars came from the users of those trails.

After his arrival and when questioned about the map showing proposed considerable closings, the director cover the map with a drop cloth and dismissed our concerns with some comment about it being a far reaching scenario that we really didn't need to be concerned about. Turns out we did need to be concerned about those closings and many more. The closings did occur over the next few years. Access was and is denied to ATV,s, to loggers, to hikers, hunters, berry pickers, fishermen. The loss to our community was tremendous when combined with the unwarranted attacks by the alphabet agencies of the Federal government. We have lost over 200 souls in population, houses sitting vacant, 9 business closings, the school attendance down to where we are graduating 5 to 6 seniors a year, logging jobs lost,tax revenue down, trained volunteers both EMT,s and fire personal...gone with no one to replace them. In addition we lost our volunteer ambulance service, one that did not cost the city inhabitants one red cent...gone...replaced with a county wide service that costs and increases response time double. This is what your last closings did... wrecked havoc on our small town and the surrounding Silver Valley.

Now I continue, in hope that someone reads and understands what your actions do both in the short term and the projected long term. I say in hope because I believe that no one ever reads or considers these musings of these "poor ignorant rubes" out here that can't understand the "real" problems faced by our overworked public servants and the bureaucrats that will rule our lives if we allow them to.

I also am an elected official of both the East Shoshone Hospital District and the South Fork of the Cd'A Sewer District. It is as an official of the Sewer District that I feel further comments concerning the plans of the Regional District Forest Service are needed.

We have lost over the past 20 years, because of closing of logging concerns, connected businesses, mills and supporting roles over 10,000 in population. Today we have 5400 active sewer account with 523 bond accounts only and 590 completely closed accounts. Services must be maintained, upgrades completed, unfounded and unfunded mandates by the EPA must be obeyed. The monies required keep increasing but the fee base keeps falling resulting in a larger per capita outlay. Increasing fees result in less money available for other items needed by residents in the system. Older folks just barely survive. When we receive letters commenting on the hardships imposed on them by increasing rates by just one single dollar, a month, you began to realize how much the actions of hundreds of unseen bureaucrats affect them.

In closing, let me say, that as a recreational user of "my" forests, at least in my younger days, I appreciated the role the forest service did in contributing to my enjoyment of the outdoors, hunting, fishing, backpacking. At that time the USFS's role was a lot less and not as intrusive as it has become. Now I attend meetings and all the conversation seems to stem around "How nice and neat the trees can be sculptured " instead of how we can get income out of them. People east of the Mississippi River very seldom, if ever, visit ours State's forest, so the need for more wilderness certainly cannot be justified. I would venture to say that less than 1 % of the occupants of this Nation have ever set foot in a forest. Therefore they wouldn't know a wilderness area from the regular "run of the mill" woods.

There are people from cities that if they step off a sidewalk, they are in a wilderness area.

We do not need further acreage placed in wilderness, we have enough now, in fact, too much.

If indeed this message is read, please understand my concerns are not personal, they are an appeal for the use of common sense in the realization that most of the time, let things be. The letting of trees die and lie there creating fire hazards when by realizing that every living thing has a life span, and that by utilizing the resource instead of "protecting" it, you have a much healthier forest.

Thank you, I remain,

**C.B. (Chuck) Reitz
521 River St
P.O. Box 151
Mullan, Id 83846
208 744 1412**

To: Faye Krueger, Regional Forester, Northern Region
From: Don R. Capparelli, PO Box 143, Smelterville, ID 83868
Re: IPNF Revised Land Management Plan

Date: November 25, 2013

SWORN AFFIDAVIT OF Don R. Capparelli

Comes now the affiant, Don R. Capparelli, having been duly sworn, say that I am over the age of eighteen and reside in Shoshone County, Idaho.

I started hunting and riding trail bikes in the late 1960's and at that time there were many trails to ride. We kept our trails open and rode most of the summer. In 1968 my first child was born and it wasn't long before I took him with me. He would sit in front of me and hold on to the handle bars and he loved to go. In 1972 my wife and I had another boy and he would also ride with me. As my boys got older they had their own trail bikes and we would ride together. Many of the trails we used for access to hunt started to become closed by the Forest Service for whatever reason, pressure from other users mostly I assumed. Also in the late 60's and early 70's there was a lot of road building going on, logging and assessment work by mining companies. As a result we lost many miles of our trail systems in the CDA and St. Joe. In the late 70's I started to get involved in how our forest and trail systems were being managed. One particular ranger on the St. Joe wanted to close all the trails from Slate Creek all the way up the St. Joe and as a result we formed a group called North Idaho Trail Riders Organization (NITRO). Through hard work, many meetings, and our elected officials we were able to keep our trails open. I am still involved with the process, and my wife and I were on the focus group that helped with the St. Joe travel plan.

I was very pleased with this approach to the travel plan and hope their approach can be used in other districts. The only problem we had was the wild and scenic river (we lost Rail 50) and the proposed wilderness. Pioneer area has protected the Mallards for years so let's go this route instead of wilderness as it makes more sense and keeps the cost to maintain the trail systems down so that we can access grant money and volunteers to work with our land managers. A win-win.

Through the years we have lost hundreds of miles of motorized trails and continue to do so as I write. I would hope that everyone could understand that we have been riding these trails for 50+ years and really haven't hurt anything. We only ride the high country for 3 to 4 months out of the years. Our sticker money goes to help maintain motorized and non-motorized roads. I am on the grant committee and also do a cost share volunteer program with our land managers doing trail maintenance. Have volunteered to clean non-motorized in the upper Joe this coming summer, my wife and I are very excited and looking forward to this. Trail 50 down the little north fork of the Clearwater is a good example, as we have been riding trail bikes down this trail many years and it has still retained its wild and scenic characteristics.

I told about my two sons and me riding our trail bikes years ago. We used to ride into mountain lakes and fish and camp. Well my oldest son at the age of 21 got into a car accident. He was not driving, but he got hit in the head and suffered a serious head injury. In a coma for a few days and 1 year in the hospital and home care in a group home. After a while my son was allowed to come home on weekends. His memory was lost so he had to learn to walk, eat and do other simple tasks. He had

surgery and lost part of his brain. But he started to recover and could go places with his mother and me but he could not remember his friend he went to school with. On one of my sons weekend stays he and I decided to go for a ride up in the hills in my pickup. As we were going up the road my son started looking very hard at the hillsides and up ahead in the road. He then asked me if there was a trail up ahead, and I said yes. He then asked me "Dad is this one of the trails we used to ride out to a lake to catch fish when I was a kid." It seemed odd that he could not remember his best friend but he remembered the trail rides when he was a kid. There is more value to our freedoms than we realize. I have been back to this trail in the last couple of years and it looks the same as it did 35 years ago. You can't tell we were there, but my son does. He can no longer ride.

We live in an area where there are no malls, movie theaters, no pro sports teams to go watch in large stadiums. We use our public lands to recreate; this is a huge part of our culture. Even though my son can no longer ride because of his injury, it is still part of him as he grew up being in the woods.

Recreation is becoming an economic value to our county with the loss of our logging industry, bringing money in from outside is important to us as we are struggling to survive. Keeping our public lands under multiple use management is vital to customs and culture and our economy. As we work on the forest plan I am looking forward to helping our land managers create new opportunities and to educate users so we can protect our public lands.

Further, the affiant saith not.

DATED this 11-25-13 day of November, 2013

Don Capporelli

 [Signature]

State of Idaho)

S.S.

County of Shoshone)

On this 25th day of November, in the year 2013, before me Marlene R Martin, personally appeared Don Capporelli, proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument, and acknowledged the he/she executed the same.

S
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Marlene R Martin

 Notary Public

My Commission Expires on 10-7-16

To: Faye Krueger, Regional Forester, Northern Region
From: Edward F. Anderson
PO Box 327, Kingston, ID 83839
Re: IPNF Revised Land Management Plan

Date: November 21, 2013

SWORN AFFIDAVIT OF EDWARD F. ANDERSON

Comes now the affiant, Edward F. Anderson, having been duly sworn, say that I am over the age of eighteen and reside in Shoshone County, Idaho.

Fact #1. Due to logging restrictions, our forests have become overgrown, this will first result in disease and then fires of greater intensity until a 1910 fire happens. There has been an "over kill" by regulators against the logging industry. The Forest Service should have the logging industry involved with their decisions more.

Fact #2. It appears to the outsider that the government is attempting to restrict access to more and more federal land, and that the government wants to capitalize on the use of the land for wilderness use which makes access by our normal means against the law. This is wrong.

Fact #3. The federal land within a county in Idaho does not pay property taxes. In the past the timber harvest revenue helped the counties, however this revenue has dwindled to nearly nothing. There needs to be a law or constitutional amendment requiring the Federal Lands to pay a property tax to the counties.

Fact #5. The mining industry has been ham strung by unnecessary and burdensome regulations. Yes there were bad conservation habits in the early 1900's and mid 1900's and these problems are being attended to. We to let up a little on the mining industry and let them get more minerals available for the country and world.

Fact #6. All laws and resulting regulations enacted by the federal government which affect federal lands should be coordinated with each respective county commission and state legislature and not put into effect until all parties agree. The ultimate goal of federal land management should be to: First, have

each respective state manage the lands, and Second, to ultimately get the lands into 100% state and/or private ownership to enhance the productivity of said lands.

Fact #7 There are too many wolves in our forests. The result has been a large reduction in the wild game population. There will be a point where the wild game population will not adequately feed the wolf packs and then you will see pets, livestock and humans become their food supply. I think that our fore fathers had it right when they attempted to completely eliminate the wolf population. If you look back in history, you will find that if a traveler in Europe had an accident or delay and could not make it to a village before dark that both the people and their team of horses would be killed by the wolves.

Further, the affiant saith not.

DATED this 21st day of November, 2013

Edward F. Anderson

[Signature]

State of Idaho)

S.S.

County of Shoshone

On this 21st day of November, in the year 2013, before me *Neil M. Haynes* personally appeared Edward F. Anderson, proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument, and acknowledged the he/she executed the same.

S
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L



Neil M. Haynes
Notary Public
Residing at Kenjaton, Idaho
My Commission Expires on *8-15-2015*

To: Faye Krueger, Regional Forester, Northern Region
From: Donna J. Smith, PO Box 733, Pinehurst, ID 83850
Re: IPNF Revised Land Management Plan

Date: November 26, 2013

SWORN AFFIDAVIT OF Donna J. Smith

Comes now the affiant, Donna J. Smith, having been duly sworn, say that I am over the age of eighteen and reside in Shoshone County, Idaho.

National, State and BLM land is really the public's forest. The opposition the county has for the new forest plan is because most of the information is false.

To best analyze the need for even one more acre of additional wilderness in Idaho one should take a hard look at all the existing wilderness and primitive areas in the State. Human use is almost nonexistent. Idaho has more wilderness already than most of the USA combined.

Since approximately 80% of all land in Shoshone County is government or "public" land the county suffers with loss of taxes on that land. Shoshone County and its citizens should have a greater say on what takes place on those lands. We would like to see fewer restrictions on our roads and lands. Hunting, fishing, recreation, timber harvest and mining are the cornerstone of our heritage, customs, culture and economics of Shoshone County.

The US Forest Service has an obligation to the people of our county and country to have a balanced management program "without wilderness." There are truly enough roadless and primitive areas in the Coeur d'Alene and St. Joe drainages. If you want to study wilderness areas study the already existing millions of acres.

We see where the university researchers got ten million dollars to study 42 million acres of beetle killed timber throughout the US to possibly turn the wood into carbon neutral fuels. The county did a ten dollar study that shows the major cause of large forest fires in recent years was because the trees were not harvested and turned into lumber and paper.

Science and common sense tell us that most bark beetle species find the best conditions for development in over mature timber. Harvesting older timber would go a long way toward permanently decreasing the ravages of the conifer timber.

Shoshone County did a study that shows between 20 and 30 million board feet of timber should and could be harvested from both the Coeur d'Alene and St. Joe River drainages annually every year forever.

The forest service needs to quit spending money on studies and overhead.

One study also shows that it will be impossible to maintain a healthy population of all other wildlife with the introduction of wolves.

Further, the affiant saith not.

DATED this 26 day of November, 2013

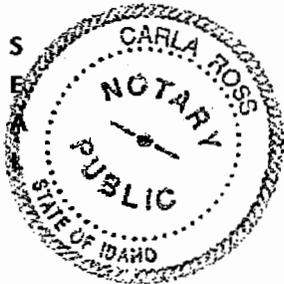
Donna J. Smith
[Signature]

State of Idaho)

S.S.

County of Shoshone)

On this 26 day of November, in the year 2013, before me Carla Ross, personally appeared Donna J. Smith, proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument, and acknowledged the he/she executed the same.



Carla Ross

Notary Public

My Commission Expires on 8/26/2016