

February 6, 2006

NEPA Draft Report Comments
C/o NEPA Task Force
Committee on Resources
1324 Longworth House Office Building
Washington, DC 20515

Via Electronic Mail nepataskforce@mail.house.gov

Dear NEPA Task Force:

Please enter the following comments into the record on the staff report for Improving the National Environmental Policy Act and Updating the Act.

Idaho Forest Owners Association (IFOA) represents family forest owners statewide. IFOA is an association dedicated to the management, use, and protection of private forest resources in Idaho. We are very interested in the economy of Idaho as well as maintaining a healthy forest products industry. IFOA notes that the act became law on January 1, 1970; and there were few problems with NEPA when the act became law. However, since 1970 NEPA in conjunction with several other acts and regulations have resulted in a serious negative impact upon the forest products industry in Idaho. In 1970, the Idaho forest products industry was a very important part of the Idaho economy with several mills throughout the state. Illustrating the impact of NEPA and subsequent legislation, the employment of the forest products industry in 1980 was 25,000 persons; employment had dropped to 15,000 by 2005. Starting about 1985, the federal forests in Idaho became gridlocked. The gridlock was caused by litigation associated with the NEPA act. Timber harvest from federal lands decreased by about 90% starting in 1993. The impact has been greatest south of the Salmon River where most of the timbered lands are in federal ownership. At this time only one small sawmill remains south of the Salmon River. The forest industry north of the Salmon River has been less impacted due to state and private timbered lands; however, several mills were forced out of business over the years and another one in 2005. In summary, the forest industry in Idaho has changed dramatically since 1970.

IFOA congratulates the Committee for the detailed study, and we are impressed with the Task Force report. We can agree with most of the recommendations. If the recommendations are implemented, IFOA hopes the original purpose of the Act to "encourage productive and enjoyable harmony between man and his environment" can be restored. We recognize that most of the problems associated with NEPA relate to litigation. The environmental documents have become lengthy in an attempt to avoid and prepare for the likelihood of costly litigation. Persons or groups should be required to follow clear guidelines proving they have standing in the litigation; therefore, we support Recommendation 4.1.

We strongly agree with recommendation 2.1 because public participation has become a very costly and sometimes a futile activity. Persons or groups that have little or no knowledge of an activity should not have equal consideration with local interests.

We agree with these recommendations that will improve the timelines for completion of NEPA documents. Delays have become a serious NEPA problem. It is not uncommon to see salvage of fire-killed timber delayed beyond the time when timber can be economically salvaged.

Since NEPA requires analysis of alternatives to a proposed activity, there can be an almost infinite number of alternatives. We strongly agree with Recommendation 5.1, limiting the definition of "reasonable alternatives" to those that are economically and technically feasible.

I FOA thanks the NEPA Task Force for this opportunity to comment.

Sincerely,

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