



October 6, 2020

Chuck Mark, Supervisor  
Salmon Challis National Forest  
1206 South Challis St.  
Salmon, Idaho 83467

Re: Comments Forest Plan Evaluation Summary

Dear Chuck Mark:

This letter presents the recommendations and concerns of the Idaho Outfitters and Guides Association (IOGA), the Middle Fork Outfitters Association (MFOA) and the Salmon River Outfitters Association (SROA) regarding the review of the existing Salmon and Challis National Forest plans and to your associated, forthcoming decision as Forest Supervisor of what to do- or not do- with that review and those plans.

Both the existing Salmon and Challis National Forest Plans contain significant direction for recreation. However, this direction is often confusing, does not clearly distinguish between outfitted and non-outfitted recreation particularly in recognizing the economic contribution of either segment. The current plans cause confusion by mixing plan components such as standards, guidelines, desired future conditions and objectives leading to confusion among Forest staff that plan and implement projects. Due to changing demand and desired experiences some of these specific projects don't make sense to carry out into the future. Changed conditions including new patterns of use during the past 30 years necessitate a new look to help insure a coherent set of actions that are consistent with other resource values and priorities, including adapting the Recreation Opportunity Spectrum to account for newer activities that have evolved since the late 1980s, both summer and winter.

The IOGA, MFOA and SROA advise that the SCNF move in the direction of revising the current plans rather than amend or take no action. Our comments below on the various sections of the recent draft assessment report spell out our interests in our recommendation to you to revise the existing Forest plans.

#### The Commenters

The IOGA represents approximately 78 (80%) of the 98 outfitter businesses who are special use permitted by the Salmon Challis National Forest to provide services to thousands of forest visitors annually year through facilitating their recreation experiences, use and enjoyment of the recreation resources and opportunities provided and managed by the Salmon Challis National Forest. The MFOA currently represents 26 of the 27 special use permitted Middle Fork outfitters. The SROA represents 24 of the 29 Main Salmon float outfitters.

We thus have a deep interest in and are affected directly by the Forest Planning process overall, and are interested, among other things, in the Forest Plan Evaluation and consequent decision(s) about it— as whatever is decided will necessarily and directly affect outfitters and guides, our ability and viability to provide services to the public who desire a guided visit and vacation on lands and waters managed by the SCNF. We view the final Forest Plan documents as providing not only a history of the changes which have taken place on the Forest(s) but also providing direction to subsequent SCNF supervisors, line officers, supervisory and field staff and permit administrator.

#### Rangelands, Grazing and Noxious Weeds

We concur with this statement in the current plan evaluation summary:

*"Both plans also recognize the importance of controlling noxious weeds, but only minimally so. Concern about the expansion of invasive species on the Salmon-Challis, particularly after fires, was a major concern raised by stakeholders during the Assessment Phase of forest plan revision."*

The industry is aware of and concerned with the proliferation of noxious weeds and other invasive species, particularly in the river corridors, around frequented recreation facilities and trail/access sites.

- The presence and impacts has been increasing.
- This represents an increased threat to native plants as well as to the overall ecology of both forests. Mitigation projects and attendant funding of them remain a concern that we urge be addressed in the revised plans.
- Some recreation fee revenue has been used in the past to support specific mitigation abatement projects, particularly in the river corridors in partnership with other government agencies and non-governmental organizations.
- As an industry we have been directly involved in weed advisory and mitigation activities particularly with the four forests who manage the Frank Church Wilderness.
- There is an opportunity to increase job opportunities among outfitters, guides and other users relative through contracting to help find, map and manage invasive species in conjunction with using programs like those identified at [www.spotter.org](http://www.spotter.org)

#### Minerals and Energy Resources

On the whole, we agree with this statement in the current plan evaluation: "... "...current management direction has been adequate to reduce the potential for large-scale unacceptable resource effects while providing mineral resource opportunities."

#### Recreation

- The Salmon and Challis National Forests special use permit at least 98 outfitter businesses, more than any other forest in Idaho. Despite this fact the Outfitters' overall role, purpose, economic contribution and need were not included in this current plan evaluation summary.
- Due to changed conditions revise the Challis National Forest Plan to eliminate the prohibition of the issuance of outfitter/guide permits for certain types of hunting in management areas 17, 19 and 21. There is no documentation of why hunt outfitted services are not allowed in those areas or parts of those areas on national forests lands. The Idaho Fish and Game Department presently provides hunting opportunity for the public including coveted once-in-a-lifetime tags for bighorn sheep, pronghorn antelope and a specific allocation of bull and cow elk tags to eligible outfitters. It is important to note that the length of hunting seasons has been

increased substantially by the IDFG since the late 1980s. It is incongruous that adjacent lands managed by the Bureau of Land Management are available for the outfitted public yet the 1988 Challis plan forbids outfitted hunts in management areas 17, 19 and 21.

- The unique relationship between the Salmon and Challis forests with the Idaho Outfitters and Guides Licensing Board (IOGLB) has been recognized on a continuous basis through a Memorandum of Understanding since the late 1980s is missing and should be formally recognized in both revised plans. This interagency MOU includes a process for dealing with vacated outfitter areas and the Salmon National Forest needs to move expeditiously to cooperate fully with the IOGLB to fill a nearly 10 year old vacated hunting area on the North Fork Ranger District. It is our collective experience that traditional outfitted areas that are vacated for extended periods of time become a magnet for illegal activities.
- We agree with the following statement in the Plan Evaluation Summary:

*"The recreation opportunity spectrum, a system for categorizing and managing recreation opportunities on a forest, in the current plans is outdated. Current plan direction also lacks winter recreation opportunity spectrum direction, which would help inform winter travel planning."*

- Both plans should recognize with an active management strategy regarding known changing patterns of recreation use since the late 1980s with a stated process that would allow for specific changes to be evaluated. A notable example is the demand for outfitted public use during the non-control season portion of September. Outfitters need certainty through the installation of a fair allocation of the September 4-30 launch schedule. The present October 1 rec.gov system of parceling out September launch dates based upon such factors as who have the best and fastest bandwidth does not recognize the previously mentioned change of pattern of use. We urge you to step outside the box with an active management solution.

#### Social and Economic Considerations

- We think it important in the plan revisions to strongly mention and support efforts to improve and continue to reach out on a consistent basis to the various constituencies mentioned in this Plan Evaluation Summary statement:

*"The current forest plans are mostly silent when it comes to shared stewardship or relationships with county commissioners, state government, tribes, permittees, nonprofit organizations, schools, businesses, neighboring landowners, rural fire departments, forest visitors, and public land management partners, like the Bureau of Land Management and neighboring national forests."*

- Regarding this statement in the Plan Evaluation Summary, "Plan direction related to socioeconomics is neither opportunistic, visionary or prohibitive", the revised Forest Plan(s) should better identify and address how outfitter and guide activities contribute to the local social and economic vitality, and sustainability of recreation by responding to the needs of visitors, experienced and inexperienced, creating connections between people and nature, promoting long-term physical and mental health, instilling a culture of stewardship and appreciation for the national forests and public lands, and serving youth and underserved populations.

The role of outfitting and guiding needs a deeper explanation as plan revision moves forward.

- We have commented several times throughout this revision process that the SCNF needs to identify and more accurately express the economic contribution of the

diversity of the 98 special use permitted outfitter businesses to the local economy. This can be easily be accomplished in that the SCNF routinely identifies annual Recreation Fee Revenue generated by ranger district on the Salmon and Challis National Forests respectively along with river daily use and camping /cabin rental fees which in 2019 was estimated to be \$1,127,576.

We encourage that the revised plans calculate and/or mention the considerable economic impact generated on local economies by using the 3% outfitter fees to extrapolate the gross amount of outfitter economic activity and using commonly accepted economic multipliers. The national Forest Service IMPLAN economic instrument is a one size fits all that does not automatically include either commercial or non-commercial boating in its calculations. We have been led to believe that there is discretion at the local forest level to modify IMPLAN to account for the economic contributions of recreation activities not presently included in the model is doable. Indeed, The University of Montana has as recently as 2018 conducted analysis of the economic contribution of the outfitting industry on Montana by combining the total trips estimated by all outfitters and the stated expenditures by utilizing IMPLAN's input-output Model.<sup>1</sup>

- Regarding the recent SCNF contracted University of Idaho Study entitled "Community Prosperity in Salmon and Challis National Forests—Social Assessment in the Forest Plan Revision", it is unfortunate that this analysis and subsequent report did not directly include reaching out to Stanley residents/businesses, a tourism industry magnet for Custer County.
- MFOA remains concerned with future float boat access to the Middle Fork during the month of August 15 to September 15 beyond 2021 due to uncertainty with potential new federal government float boat restrictions due to spawning Endangered Species Act listed Chinook salmon even though the Middle Fork of the Salmon and tributaries constitute the best habitat for these fish within the entire Columbia River Basin. The Stanley economy would diminish exponentially during this period of summer recreation without Middle Fork floating.

We continue to be encouraged that our MFOA Redd Alert volunteer program initiated in 2017 and supported by the SCNF will continue to yield positive benefits regarding augmenting forest efforts to preserve and avoid identified Chinook redds during the August 15 to September Chinook spawning season.

### Cultural and Tribal Resources

We urge incorporation by way of formal citation in both revised Forest plans the 2016 Frank Church-River of No Return Wilderness (FC-RONRW) Historic Preservation Plan (HPP) required as a result of the passage of the Central Idaho Wilderness Act of 1980. The HPP serves as guidance for managing archeological and historic resources in the FC-RONRW.

Of particular interest to us is the HPP Monitoring implementation task (Page 35 of HPP) of developing "a *partnership agreement with the IOGA, MFOA, (or other appropriate organizations) and affected federally recognized Tribes to assist with site steward program. Utilize the Heritage Action Team (HAT) to assist in implementing monitoring activities*".

---

<sup>1</sup> Sage, Jeremy L.; Bermingham, Carter; and Nickerson, Norma P., "Montana's Outfitting Industry - 2017 Economic Contribution and Industry-Client Analysis" (2018). Institute for Tourism and Recreation Research Publications. 376. [https://scholarworks.umt.edu/itrr\\_pubs/376](https://scholarworks.umt.edu/itrr_pubs/376)

Objective number 3 on Page 43 of the HPP further identifies the following: *Develop a Heritage Action Team (HAT) comprised of agency representatives, outfitters, tribal members and public users to assist in developing and implementing aspects of the HPP. This team will meet on a regular basis to discuss the most efficient ways to carrying out actions specified in the plan.*

The HAT is an innovative concept for preserving river corridor cultural resources while maintaining critical campsite capacity. The HAT needs rejuvenation now that another round of forest reorganization has been recently completed regarding the Yankee Fork/Challis and Middle Fork ranger districts.

### Fire & Fuels

The Plan Evaluation Summary recognizes that *"much of the current fire and fuels management direction conflicts with national fire policy",* that the current policy *"calls for land managers to use fire management activities to achieve to help achieve ecosystem sustainability and to integrate ecological, economic, and social interests when making decisions about wildfire"* and that the *"lack of consistency with national fire policy means that fire incident management teams and forest leadership are left to independently identify and prioritize social, economic and resource values under significant time constraints without much, if any, stakeholder input."*

We are cognizant of the many variables that fire managers weigh with each wildfire ignition and urge that both plan revisions recognize the potential impacts to campsites in river corridors and elsewhere on the landscape, impacts that could affect launch sites and take-outs, road access and egress, particularly dangerous road and river conditions and impacts from smoke. Both MFOA and SROA appreciate the Fire Communication Protocols with the SCNF that have been recognized through respective MOU's.

Timely communication between the Salmon and Challis south and north zones with outfitter industry representatives is extremely important to our operations. Assignment of resource advisors to specific fires who are thoroughly cognizant of recreation values is critical as is SCNF forest coordination and communication with neighboring forest relative to fire potential impacts on SCNF recreation resources. The industry has endured partial or full closures to river corridors and surrounding lands three times in the 21<sup>st</sup> century.

### Roads, Trails and Airstrips

Any revised plan(s) should include appropriate recognition and provisions to facilitate increased cooperation and partnership between the forest and permittees, not least the implementation of the Trails Stewardship Act, such that trail maintenance and improvement is augmented and permittees compensated in kind, or through other approved provisions of the 2017 Trails Act, for their ongoing activities and contributions toward reducing the deficit relative to trail maintenance on both forests.

Roads are vital to providing recreational access to both forests. We urge that both plan revisions support ongoing road maintenance that recognizes that some roads are more important than others. Case-in-point is the Salmon River Road and Boundary Creek road complex. We are very encouraged by SCNF recent funding proposals or significant road and other related improvements through the Great American Outdoors Act of 2020.

Airstrips provide important access and are used regularly to access the Wilderness. Maintenance of airstrips has and can continue to be enhanced by recognition of the

Idaho Airstrip Network (IAN) in plan revisions. The IAN includes state, federal and non-government cooperation and coordination to bolster ongoing airstrip maintenance.

In summary, we very much appreciate our collaborative relationship with the Salmon Challis National Forest. Please do not hesitate to reach out to us regarding our recommendations.

Sincerely,

*Aaron Lieberman*

Aaron Lieberman, Executive Director  
Idaho Outfitters & Guides Association

*Grant Simonds*

Grant Simonds, Executive Director  
Middle Fork Outfitters Association  
Government Affairs  
Salmon River Outfitters  
Association