

Data Submitted (UTC 11): 1/12/2019 5:07:02 PM

First name: Daniel

Last name: Schuler

Organization:

Title:

Comments: I would like to submit feedback regarding proposed Wilderness Designation for Evaluation Focal Area #16, Stein Mountain, in the Salmon Challis National Forest.

This evaluation area was part of the 2017 Aerial Detection Survey by the USFS and Idaho Department of Lands to identify the health of Idaho's Forest Resources. Please refer to the 2017 Forest Health Highlights document which can be located at:

[https://www.idl.idaho.gov/forestry/forest-health/highlights/Forest-Health-Highlights-2017\\_Final.pdf](https://www.idl.idaho.gov/forestry/forest-health/highlights/Forest-Health-Highlights-2017_Final.pdf)

Specifically, the survey identified significant areas of Forest Damage Agents within the Evaluation Area consisting of Douglas Fir Beetle, Major Defoliators, Mountain Pine Beetle and various Root Diseases. Thousands of acres of damage were identified, even though the full extent of most diseases are not entirely mapped using aerial surveys for a number of reasons, including the fact that trees attacked by bark beetles and other diseases do not change color until the following year; meaning that the damage visually seen from the air in 2017 is a result of infection in 2016. Current damage, therefore, is actually much larger and will not be seen in an aerial detection until 2019.

While aerial detection does not entirely represent a diseased area, there are visual cues on trees that may be observed from the ground level that identify early stages of disease and infestation. Again, these can't be seen from the air. As a resident that lives within the Stein Mountain Evaluation Focal Area, I can tell you that the Damage Agents are much more widespread than the aerial detection results indicate. I urge anyone on the USFS Forest Plan Revision Team to take a drive through The Fourth of July Creek area to the lookout on Stein Mountain and see the damage first-hand (please utilize a four-wheel drive vehicle, as the USFS has neglected all road maintenance on this important artery into the forest that services the Fire Lookout, the Stein Mountain Public Safety Repeater network, and some of the best outdoor recreation areas in the Salmon Challis National Forest.)

The thousands of acres of dead, dying, and soon to be dead forest detract from the wilderness character of the focal area. Not only does it detract from the wilderness character in a visual/scenic point of view, but also from a manageability standpoint. The Idaho Department of Lands Forest Pest Fact Sheet (which cites the USFS Management Guide as a source) lists key management strategies for the Mountain Pine Beetle, Western Pine Beetle, Pine Engraver, Douglas Fir Beetle and Fir Engraver.

The only strategy listed for the Mountain Pine and Western Pine Beetle is "Manage Dense Stands and Older Stands through Thinning."

The only strategy listed for the Douglas Fir Beetle is "Remove green blowdown, Thin dense stands."

The USFS agrees that Beetle Infested trees cannot be treated. They must be removed to protect other trees from attack.

If the Stein Mountain evaluation focal area, or any focal area for this matter, is recommended for Inclusion in the National Wilderness Preservation System and declared a Wilderness Area or managed as a Wilderness Area until Congress designates it as such, the USFS will not be able to manage the current and growing damage agent infestation of the forest. Chainsaws, motor-vehicles, landing of aircraft, dropping and picking up of any material, supplies, or person by aircraft, including by helicopter, even using or mere possession of a bicycle,

wagon, cart or other vehicle are prohibited in a Wilderness area. How will hundreds of thousands of board feet of beetle infested trees be removed without using anything that has a wheel, let alone without using a chainsaw? What good or to what purpose does a Wilderness block of completely dead forest serve?

In short, the USFS will not be able to manage the health of any infested or diseased forest area within the Stein Mountain focal area. The USFS Forest Plan Revision Team has not considered the impact of Wilderness designation with regard to increased disease and infestation of the forest nor have they considered the 2nd and 3rd Order Effects of the decline in Forest Health, the most important of which is an increase in likelihood of a catastrophic fire outbreak among the thousands of dead trees.

Fire-fighters, USFS foresters, and environmentalists have pointed to the bark beetle as one of the leading causes of the last two years of California wildfire disasters that last year alone caused \$13.2 Billion in damages and killed 43. At one of the public meetings held at the Salmon Public Lands Office, USFS employees confirmed that there is no Fire Fighting within a Wilderness Area. The official strategy is to let the fire burn. What will happen if a fire breaks out in the wilderness area full of bark beetle killed trees that haven't been removed?

How many killed and how much destruction is the USFS willing to trade off for another Wilderness area?

Residents that live near Gibbonsville in the forest already can't get fire insurance for their homes because of the USFS's inability to fight fires. The insurance companies have no faith that these people's homes won't burn so they won't risk insuring them. If the Stein Mountain area is declared a wilderness area, the effect will be the same for the hundreds of residents that live within or on the periphery of this focal area, including myself and my family.

To sum it up: I, and every single resident I have talked to that lives in or near this focal area is strongly opposed to the Stein Mountain focal area being designated a wilderness area. The USFS must consider the forest health as it detracts from wilderness character and manageability, especially as it relates to fire-fighting, insurance, insurance rates, and the likely loss of life and property from unchecked wildfire.