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First name: Donald

Last name: Smith

Organization: Gibbonsville Improvement Association

Title: Chairman

Comments: Dear Supervisor Mark,

The Gibbonsville Improvement Association hereby express their concerns regarding the proposed Wilderness areas that were first presented to the public on 11/1/18 in Salmon, Idaho by the Salmon-Challis National Forest(S-C NF).

The communities of Lemhi and Custer counties along with other private land holdings as well as Forests, Rangelands, and the complex biota that utilize these habitats are in danger from catastrophic wildfire. <https://www.fs.fed.us/research/people/profile.php?alias=phessburg> and "Era of mega fires <https://www.north40productions.com/eom-home>

The causes of such fires are over-grown unhealthy forests caused by mixed conifer insect infestations, plant-born diseases and unnatural fuels build-up in our national forests. This combination of forces has resulted in a pandemic of wildfires which are larger, more destructive and more frequent than at any time in recorded history.

Wilderness Focal Evaluation area 16 (Stein Mountain) abuts against the 93 corridor on the east side, that border of area 16 impacts 40% of our fire district. On the north and west side District are roadless areas or areas of multiple use management that are diseased; ridden, dead and dying with heavy concentrations of fuels adjoining private land. This highly flammable biotic disaster, now commonly referred as the Wildland-Urban Interface, (W.U.I.) has been essentially devoid of sound forest management, for decades, and is cursed with a history of large and destructive wildland fire. This conglomeration characterizes what surrounds our community.

The solution to this crisis is not to declare the untended, mismanaged million acres or more the S-CNF is proposing as "Wilderness." Clearly, the S-CNF is choosing to walk away from a disaster they've helped to create, the areas so designated being effectively nothing but a time-bomb waiting to explode in an enormous pyro-cumulus event whose column will be seen ascending 40,000 feet into the atmosphere.

No. The proper solution is as follows:

"The Forest Service must remove all of this excess biomass as fast as possible to preserve what forest we have left. To facilitate restoration and removal of excess bio-mass We need to utilize revenues from the sale to sawmills of the bi-product logs and biomass that are removed from the treatments and reinvest those revenues into more acres restored. However, without local sawmills, the potential revenues are being spent on long distance hauling of these logs to distant mills". See (Lloyd%20McGee_%20Washington's%20National%20Forests%20-%20East%20of%20the%20Cascades...A%20Pathway6/420Forward%20-%20Evergreen%20Magazine.html

The Knutson-Vandenberg (K-V) Act of 1930 explicitly provided for the establishment of forest tree nurseries and also authorized the Secretary to require timber sale purchasers to make deposits to cover the cost of reforestation and related work within timber sale boundaries. The K[shy] V Act continues to be a primary means for ensuring our reforestation treatment needs are met within timber sale areas.

The "Act" also authorized 20% of gross timber sale and range receipts to go into trust funds for schools, roads and bridge funds. Those receipt payments to the respective counties are now gone. The comparatively worthless "payment in lieu of taxes" monies have disappeared. What formerly was a significant wealth generator in Lemhi and Custer Counties, i.e., those based on extractive resources is essentially gone. Under the new "Wilderness

Area" proposal the S-CNF is effectively completing the destruction of the local economies they began in earnest two decades ago, leaving a tangle of untended, fire-prone biomass to threaten and eventually destroy both the forest and the private property of those who remain in their wake.

A local mill and/or a co-gen plant should be built locally. The S-NF spent 41 million dollars on the Mustang fire and 30 million dollars on the Halsted fire. Why can't the Forest spend such monies on buying a mill and set it up locally, and running it until such time that the S-C Forest is fire resistant. Instead you want another 1.3 million acres of wilderness which guarantees catastrophic fire events similar to that which resulted in the Paradise California disaster of 2018.

"563 people were reported to be missing. The town of Paradise has been wiped off the map; almost 20,000 structures including 14,000 homes have been destroyed".(Michael Rains letter to the President,2018)

The Forest Service argues that The proposed Stein Mountain Wilderness Area(evaluation focal area 16) is supposed to protect this area and the watersheds in it from further development. I take exception to that premise. History shows that after significant fire events wilderness and roadless areas, are essentially turned into erosive moonscapes with noxious weeds being the first plants to colonize the burnt area in the aftermath.

That's Protection?

Events such as these, predicted to be both bigger and more frequent by Dr. Hessburg, will overwhelm the whole of the Lemhi and Custer County's Emergency services organizations; Sheriff's office, Fire-Protection and Emergency Medical Services(E.M.S.).

Tangential to the above discussion demands a simple question to be asked: Why did the S-CNF fail to participate in community outreach to impacted county agencies prior to the issuance of the "Draft Assessment" of 2017, the "Assessment Report" published in July of 2018 as well as the "Wilderness Proposals" first made public on 11/1/18 over these obvious and quite real concerns?

"For the want of a nail, the shoe was cast, the rider thrown, the battle lost. For want of trails the finest white pine forests in the United States were laid waste and scores of lives lost. It is all loss, dead irretrievable loss, due to the pique, the bias, the bullheadedness of a knot of men who have sulked and planted their hulks in the way of appropriations for the protection and improvement of these national forests." (Gifford Pinchot).

This all volunteer North Fork & Gibbonsville Fire District has been tasked to protect approximately 350 homes and perhaps as many 1000 structures over a thirty mile length of the US 93 corridor, including a myriad of houses and structures, up various drainages on lands that have been sub-divided.

From the 1990's on most fire fighting for our District fire-fighters has occurred in the wildland setting rather than structure fires. Has our charge changed? Yes assuredly; it has effectively been changed due to the current "no management policy" adopted by the Forest Service.

Adding insult to injury, the "Wilderness Focal Area Evaluation(s)" will further affect the ability of home owners to insure their property. Evidence both locally and throughout the West has clearly shown that in fire-prone environments property owners have faced increased rates or loss of insurance altogether. That has already happened to several households in the fire district.

"American taxpayers are facing each year in wildfire-related damages to infrastructure, public health, and natural resources - \$70 to \$350 billion." No doubt, the benefits to costs for public aggressive forest management is enormous." (Michael Rains, letter to the President. Evergreen Magazine).

Our Communities of Gibbonsville and North Fork in the shadow of potential Catastrophic Fire. Compare and contrast the 2018 Draft Assessment with the current forest plan. The current plan allows timber harvest going up to 30-35 million board feet. Contrast this to 2018 Assessment Report which provides for 400 acres approved for multiple use, logging, post and pole production and fire-wood, equating to 2 million board feet /yr.

That figure is a drop in the bucket. S-C NF should be removing 30-50 million board feet /year, simply to re-establish forest health and enhance the ecosystems in general.

Dr. Paul Hessburg recommends the need for a broad tool kit to address these problems, including mechanical thinning and prescribed burning, but goes one step further - introducing "managed fire" as a tool policymakers and foresters can much more widely embrace in the race to protect what remains of the Intermountain region's fire-prone forests.

<https://www.fs.fed.us/research/people/profile.php?alias=phessburg>.

Some of the above includes quotes from professors and/or experts in the fields of Silviculture, Forestry or Fire. Their advice, which is factually representative of what is today's "Best Available Science", is being completely ignored by the S-CNF. Nowhere in the 2018 assessment are discussions that analyze actual Forest resilience. Forest resiliency can only be achieved through the re-implementation of the core principals under the sustained multiple use act of 1960 combined with the most current practices of biomass removal via the implementation of active, sustainable and responsible forest management. Designating more "Wilderness Areas" accomplishes the direct opposite of such and is simply wrongheaded.

Supervisor Mark, you are the single signer of any and all documents recommending additional "Wilderness Areas" to the Regional Forester. Your decisions will affect the future of wood, water, forage and recreation opportunities in perpetuity on the Salmon/Challis N.F. Moreover, your decision will directly affect the community in which you currently reside as well as the people in the areas which surround it in every direction. We suggest that you consider your available course of actions with the utmost, deepest reflection prior to making your decision.

Sincerely,

SS Donald Smith Chairman

SS Janet Bloomeke Secretary Treasurer

SS Jim Bigelow Chairman of the Board