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Comments: Salmon and Challis Forest Plans Evaluation Summary

Following are my comments on the above plan evaluation. Included in my comments are amendments that should have already completed, because it is a fact that the FS has failed in its responsibility to complete existing SCNF management plan amendments on a regular basis.

Rangelands, Grazing & Noxious Weeds.

It states grazing in the plans aims to improve rangelands, riparian conditions, provide forage to support grazing and habitat improvements, and improve livestock distribution, and states both forest plans include increases in total animal number of units, optimize production and use of forage, improve riparian conditions, with some cultural treatments. Grazing has been affected by biological opinions and PACFISH/INFISH. Concern over invasive species has been expressed by citizens. How can grazing be used to offset growth of invasive species such as cheat grass, or prescribed burns be used? Certainly, prescribed burns would be better than an out of control wildfire. A recent study shows that grazing reduces wildfire spread as well. Why is attention not paid to this? This has always been known by ranchers. Grazing allotments should be increased, not reduced, and procedures to utilize vacant allotments for grazing permittees created.

Timber Resources

This section begins with identifying timber production contributing to the social/economic/ecology of communities. Yet, over the years this resource has been continually removed which secondarily has devastated those communities as well as the forest itself. 32% of forest land is available for timber production with 2 1/3 million board feet as an allowable annual amount. As the forest service has continually reduced the timber amount that could be produced, the chain of activity also suffered with mills being moved farther away, making it cost prohibitive to haul products to them, which secondarily contributes to devastating local economies. Along with the loss of timber production, money was no longer available to support necessary construction to build new roads for more harvesting. Can you not see how this reduction in harvesting contributes to the overall effect of everything? Without logging, forests are overcrowded causing poor forest health, local economies are devastated, and essentially the set up for fires and disease grows. Why are you unable to see this?

Along with contributing factors to this nonsense is the roadless rule. Without road construction for logging, the problem is further exacerbated. You claim "these lands are difficult and costly to access". But that cost is nothing compared to the cost of millions of acres of land lost to fires and disease. That must be your goal.

Recreation

Access to recreation over the years has also been reduced. What exactly is meant by "direction for recreation" and what is meant by confusing/unclear/ vague direction currently? What are the changing conditions and desires that have occurred? Mt biking, motorcycles, side x side and larger rec vehicles are cited as some of the desires. In reality, biking, motorcycles and large rec vehicles have always been part of mountain recreation, as far back as I can remember. What is different now is the restrictions on being able to engage in those activities when I was younger. Before all of these road closures and roadless areas, we would use the logging roads for these activities. But the FS has successfully closed those avenues to recreational use, now creating a supposed new problem of having to find a way to include these "new" recreational activities in the plan. Do you see how FS decisions have done nothing more than create new problems.?

As far as it being "landscape-scale" recreation, why? A forest is not always the same in one area as it is in another. If Owl Creek was an unsuitable area, what does that have to do with another area with water for a boat ramp? Does that unsuitability not become a different problem/solution in another area with water? Or is it that the FS, with its "landscape-scale" ideology, intends to make these forests into one gigantic playground that is mapped out like a state fair, food court in one area, rides in another, games in a third, etc.?

Even more confusing is the statement a couple of paragraphs further down that "Recreation direction that is written with the bigger picture in mind is no longer relevant[...]" . Which is it, land-scape scale or irrelevant bigger picture? That is a dichotomy in thinking.

What is meant by FS staff not being prohibited to do anything? And what is meant they do not provide direction to guide recreation planning? Why is there a focus to accurately reflect a recreation opportunity spectrum? If recreation is to be allowed at all, why does there need to be any restrictions, why can't forest attributes be used to the full extent rather than looking at recreation spectrums that dictate how the forest is used? Seems like this is backwards.

How can assessing scenery resources become obsolete? If no clear indication as to why outfitting and guiding in some management areas was given, then it is the fault of the FS. However, there is no doubt that it is related to NGO activity to ban more types of recreational activity. Ask them.

#### Social & Economic Considerations

As mentioned previously, the reduction in logging has devastated local economies and with less access there has been a negative impact. Citizens are not "customers" of the forest, the forest is not a business. This perspective on forest management have both contributed to the failing of our forests.

The notion that there is "shared stewardship" is offensive. Of all the entities mentioned, some of which are illogical, it does nothing more than categorize groups with specific agendas. Are they not all just citizens? Even worse, many of these groups are also from outside of the area, not even within the same boundaries as the forests. Since when did it become the narrative to invite those groups into a local issue? This type of activity is outrageous and should be stopped. The planning process should include only those within the jurisdictional boundaries of the forest. The way this is written sounds like collectivism and the last time I checked decisions were supposed to be based on law. No Tribes are located within these forests. A government to government relationship with Tribes elevates their influence above citizens which distorts how our government is supposed to operate. Yes, it is in the law, but it doesn't make it right. Same with NGOs, the FS actively uses them in their planning, the relationship between the two is obvious as a conflict of interest, and unethical.

For every "socio-economic" issue in the region, the FS, and their buddy environmental groups, are responsible for the negative impact it has had on local communities. The FS should focus strictly on managing the forest to maintain its health and use rather than interjecting itself into any development of communities. Use the logging, recreation, grazing assets of forests. If the FS focuses on just that, and quits its extended involvement in trying to suit "customer" service, everyone would be a lot better off.

#### Cultural & Tribal Resources

As mentioned previously, although Tribal consultation is unfortunately written into law, it is unfortunate that preferential treatment and consideration is given to a separate group, especially when the two referenced Tribes are so far away and should be considered more as visitors rather than users of these forests. Any cultural aspect of a forest should be respected, not just theirs. Is any consideration given to other cultures, are they given a seat at the table as Tribes are? Where is consideration given to the local community cultures?

## Fire & Fuels

Pretty much everyone knows what the cause of devastating fires has been. The lack of logging, permitted overgrowth of old timber and brush, non-use, designated wilderness areas that just deteriorate and rot, lack of grazing, these are all contributing factors to the devastating fires and these practices have contributed to only growing the necessary fuels to not only start these fires, but to make them more volatile, destructive, and widespread. Wildfires contribute more to carbon loads than any grazing or timber harvest combined. Yet that is ok?

The FS can write all the policies, procedures, strategies they want. It doesn't matter if policies don't align with each other. These policies only speak to managing the destruction and fires, they don't address the essence of the

problem. What good does it do for "multiple federal agencies and stakeholder groups" to work together for policy development when none of those policies address the problem?

Instead of addressing the cause of fires, the FS looks at suppressing fires, integrating ecological/social/economic and social interests when making decisions, managing unplanned ignitions, guiding management response to fire, and writing fire management plans. NONE of this addresses the PROBLEM that causes these fires. If the FS would spend as much time on addressing the issues of what is starting these fires and solve those issues, many problems would be solved, not just the issue of why these fires are being condoned, yes, condoned by the FS.

If the FS wants to address and develop a new fire management framework or strategy it should include managing for resilient species, reducing density through commercial harvest, grazing for reduction of surface fuels, fire suppression until fuels are under control.

The issue is not fire management direction. Is it no wonder "resource specialists" have found current fire management direction as unhelpful? What is so hard to understand about this? Amendments for SCNF fire management should have occurred in 2006 when burned areas exceeded the average by 20-30% after the first 5-year period! There should also be guidelines for post fuels and wildfire reduction projects and monitored to determine if prescribed burns have worked.

The "let burn" policy is unacceptable. Change the focus to preventing fires rather than how to manage them. Even Smokey and GUBERIF understood prevention.

## Riparian Ecosystems

There is nothing wrong with protecting riparian areas, however doing it on a landscape scale is ridiculous. If a riparian area is located within an area of recreation or grazing, then specifically address that. What can be done in those site-specific areas to protect fish and their habitat. In regard to the lack of flexibility for fuels treatment and prescribed burns, do these same individuals not think about the forever elimination of the riparian habitat with a wildfire? Fuel fire loads in riparian areas should be reduced to ensure bank stability and shading are retained in the event of a wildfire. Does that not matter to them? All of these objectives should also support fisheries.

## Wildlife and Terrestrial Threatened & Endangered Species

Without taking care of the problems the FS is contributing to the destruction of our forests, there will be further elimination of our wildlife and endangered species. This is the most confounding issue, it is ok to let our forests burn but it is so important to protect species and habitat. What is the point of focusing on wildlife direction when

you are doing nothing to address the necessary activities to address what is taking away from their survival? While forest wide management is mentioned, if the whole forest were managed correctly, the emphasis on different management prescriptions could be reduced.

Don't toss out prescribed burns as a tool, bring in cattle to graze the area and remove the cheatgrass. This is a well-established practice that works. See link above, better yet just ask any cattle rancher. By your own admission, disease is "largely centered around old growth". If you understand this then why are there no efforts being made to increase logging? Does one logging road result in more damage than a wildfire? And why not keep that road for recreational use rather than tearing up more ground for a trail?

#### Land Status

This section is the most disheartening. On the one hand it is mentioned the forests produce goods and services which is then followed by obtaining more land acquisition for protection. You cannot have it both ways. Efforts to consolidate forest land is the focus, for what? More control over protections with increasing regulated and non-use?

Lack of access is noted, however it is suggested that easements are needed to solve this problem, why? Why are easements the only solution? What would be a secondary solution if no landowner agreed to an easement? Is achieving an "optimum land ownership pattern" for resource use part of the overall plan to design these forests as one huge park like playground? Is that the goal?

#### Facilities

While proper facilities are needed for the FS staff to do their work, money from the recent American Outdoors Act will surely be provided to accomplish this and development of recreational facilities.

#### Roads & Trails

So, the intent is to "design" the system of roads and trails. If there is a roadless rule, and diminished creation of roads because of the lack of logging, what is meant by objectives for "annual road construction"? Are roads being built for a specific purpose? Instead of "closing roads not needed" why not transform them into roads for some recreational or purpose, whether it be biking or motorized vehicle use? Is this not a necessity for both recreation and timber harvesting, and more importantly for fire suppression? It is obvious the "travel management planning process" is not meeting public needs. How can road construction proceed when a "minimum road system" is mandated? How can existing roads be used where feasible when shutting down roads is the goal? There does not seem to be any indication about adequate road infrastructure for public recreation use, administrative use, or public safety such as for fire suppression and evacuations. Will any consideration be given to these issues? A review of travel plans, with public input is required annually but no review has been completed since 2009!

This road construction should also include mapping and management that allows logging and fuel reduction. Certainly, this is a higher priority, and dollars better spent, instead of wasting it on contracting with a local NGO for a bogus collaborative process.

#### Designated Areas

No further designated areas should be allocated. Why are recreation "trails" continually emphasized? And what is meant by that, for biking, motorcycle, ATV use? Roadless acres comprise 50% of non-wilderness acres, and wilderness is another 25-30%, making roadless areas huge. Although 85% of those roadless areas allow road construction and timber harvest and fuels actions, surely this percentage of roadless areas in 2.3 million acres and can be reduced and opened to more use, including all uses.

For all the key findings identified, it is the very thing that the FS has taken away that has caused the problems. Reduced logging, designated areas for non-use, roadless areas, and reduction in cattle grazing are the problems created by the FS that now bring the unresolvable problems to the forefront. Unless action is taken to bring logging, grazing, and use back to the forests none of these problems will be solved.

As a side note, the Panther Creek had no listed or outstanding remarkable value in 1988 which makes it ineligible as a WSR river. Also, some rivers that were eligible may have had characteristics that disqualified them, and were never reviewed in the SCNF 2017 draft eligibility report.

Also, an analysis to remove Mt. Borah should be done to remove it from a recommended wilderness status.

## Summary

One would think that individuals who devote their lives to the outdoors would be the biggest advocates for bringing back the very activities that support their livelihood. Instead, they are faced with an endless barrage of laws, EOs, regulations, and mandates that do nothing more than convolute the ability to take any constructive action.

The FS has been grotesquely negligent in its responsibility in performing the necessary reviews, engaging full public participation, or following forest management practices that protect the forest.

Since 1995 the FS has primarily put their focus on restoration, but has ignored the larger picture of protecting the forest that supports all aspects such as wildlife and habitat. If the forest is allowed to rot and burn, what is the purpose of restoration? This alone has had devastating effects on local community economies.

A 5-week comment period is inadequate, especially with no public meetings to offer the opportunity to ask questions to determine what the documents mean, along with not disclosing the implementation status.

Because of the FS failing in its responsibility for regular review of these plans, the whole process has ended up in an overwhelming, too large to address, mess. There are too many issues at hand to lump them all together for solutions. Each issue should be broken down and addressed one at a time. The nightmare of conflicting requirements makes the whole process difficult. Why is it ok to tear up the land for technological equipment, and unsightly towers but not allow citizens to use the forest? The webinar does not adequately cover all aspects, it was just a reading of the plan, and the FS employee couldn't even answer questions adequately.

An adequate, detailed description of plan implementation has not been provided which makes public input impossible. The summary also has no page number associated with the specific plan content which makes understanding the management direction impossible. The implementation of the management direction status is essential to provide any meaningful input. The way in which everything is worded almost gives the appearance that decisions have already been pre-determined. If that is the case you are not listening to citizens who hold the right to provide the direction in management of our forests. Given how the forests have been managed by the FS maybe it is time you start listening to citizens.