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Comments: Substantive Comment on Wilderness Areas Proposal by S-CNF

The Interagency Wilderness Policy Council (IWPC) who's purpose is to support interagency strategic planning of wilderness management within the context of large landscapes to ensure the protection and integrity of natural biological processes, revised the 1995 Interagency Wilderness Strategic Plan after being informed by the National Wilderness Manager Survey 2014 Analysis Report and planning strategies from all four participating agencies.

Two of the highest ranking threats perceived by the agencies was "adjacent land use and management" and the "very high risk of wildfire damage (outside wilderness) originating in Wilderness" which has been predicted for the next 20 years. The greatest risk to the Frank Church River of No Return Wilderness is definitely the adjacent land use and management in the Salmon-Challis National Forest. Deliberate negligence by the S-CFS to engage in any type of forest health maintenance has left the forest overgrown, full of mixed-conifer insect infestations, plant-borne diseases, out of control invasive/noxious weeds and unnatural fire fuel build-up. The 2012 Mustang Complex Wildfire is a perfect example of damage being done by a fire originating close to/adjacent to the wilderness - 347,000 acres burned, nearly 300,000 of that was in the Salmon-Challis NF and 41 million dollars were spent trying to stop it.

And from the same survey, the second greatest need for science-based information was "public attitudes toward ecological restoration activities". The U.S. PUBLIC (including me) listed wilderness contributions to air quality, contributions to water quality, having wilderness for future generations, protection of wildlife habitat, and preserving unique wild plants and animals as their top choices. In Lemhi County, the residents would wholeheartedly embrace ecological restoration activities. The town of Salmon, Idaho flourished by means of natural resource extraction and since the mid-1990s has suffered greatly at the hand of the US Government, namely the Forest Service who has incrementally restricted forest use to the point of near economic destruction. When it comes to clean air, the toxic effects of wildfire smoke when chokingly thick can cause serious health risks and even death. Post fire water run-off from both snowmelt and thunderstorms causes erosion, often to the point of landslides forcing streams and rivers to reroute and sometimes fanning out causing multiple small tributaries that restrict or even eliminate the flow that previously reached a larger body. The habitat for fish and mammals is compromised for decades. There is far more at stake here than just "land use and management", as landscape scale forest restoration is the imperative intervention which is required to reverse the ecological degradation that has been both allowed and caused by the US Forest Service.

Since the Great Fire of 1910, fire suppression was overused and in combination with a cool, wet-cycle between 1940 and 1980 that encouraged growth, we have been put in the explosively dangerous situation we are in today. Fire needs to be restored to its natural role in the ecosystem but until aggressive forest restoration and responsible, sustainable resource management is utilized to renew forest health, MegaFires will continue playing an UNNATURAL role. The results may well leave us with wide areas of mineralized soil that won't revegetate for generations if ever.

Of the areas being proposed for wilderness designation, the only area I believe should be studied further and given any consideration is the North Slope Pioneers. A cohesive and coordinated approach to selecting and designating wilderness is important, but the S-CNF has failed miserably in its forest management role and intends to cover-up their essentially universal failure in ecosystem management by designating 1.3 million acres of that failure as "Wilderness" and simply walk away from the ecological disaster they helped to create. I hereby object. Until the S-CNF rehabilitates the lands that were placed in their hands for supposedly responsible stewardship, not a single acre of it except for perhaps the Pioneer Mountains should be considered for additional "Wilderness". What they have proposed is a recipe for Forest-wide habitat and community disaster that could well reach catastrophic levels.

Again, I hereby object to any addition of Wilderness acreage to the S-CNF outside the single exception I made above.

Pam Molloy