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Substantive comment to the S-CNF regarding "Wilderness Proposals"

Bluntly stated, the Salmon-Challis National Forest owes an apology to the late Senator Frank Church as well as all the other well-intended, hard-working people who worked to create the "Wilderness Act" of 1964 and provide permanent protections to the area formerly known as the "Idaho Primitive Area" as well as others in similar condition at the time.

The effort was literally years in the making, it perhaps the first actual collaboration between outdoor-minded groups with widely varied interests and concerns that yielded an end product that, to quote S-CNF Forest Plan Revision Team Leader Josh Milligan, "we could all be proud of".

Quite to the contrary, both the quality of the proposed Wilderness Areas presented on November 1, 2018 by the S-CNF and the lack of effort prior to the public presentation of their scheme by the S-CNF to engage the public outside of national and state N.G.O.'s is not just an outright embarrassment; it's a disgrace and the word "proud" shouldn't even be part of the discussion.

To put matters in historical perspective, the "Idaho Primitive Area" was just that, and in general one could quite properly characterize it as rare, unique and exemplary. The forests that graced its slopes were in what then appeared to be good health, the area devoid of roads, its rivers pristine. It was everything an actual "wilderness" should be. As understood at the time, it's then "present condition" was about as natural as nature afforded.

"As understood".

Life is a learning process, or at least it should be. Unknown then but certainly known now is the fact that during the now 100 year-long present warming cycle (it being one of eight which have occurred during the Holocene and statistically speaking - comparatively insignificant) there was a forty year cooling trend that was also characterized by increased moisture levels between 1940 and 1980.

The biomass effects which began in the S-CNF and other western forests during that forty year period were levels of seed germination and subsequent growth of tree species at rates 300%-500% of the known historic norm. That phenomenon, combined with ever-growing capabilities to combat forest fires along with a sea-change in forest management philosophy around 1990 (hands-off; monitor) has left western forests in the worst condition in centuries, if not longer.

The S-CNF isn't an exception. In fact, it's in such horrible condition it is the benchmark for setting the new standards on how not to manage a forest.

The S-CNF solution(s) to the abysmal failure of their stewardship model?

Take a minimum of 1.3 million more acres out of so-called "active management" and put in into "wilderness" classification. Their "dream plan"? Take another 1.5 million acres of the Forest out of "active management" (their

version, i/e - stare at it) and add it to the other 1.3 million acres for a total 2.7 million acres and while shaking each others hands, simply walk away from their responsibilities and into retirement.

"Nice work if you can get it."

And even more irresponsible that what they haven't done over the last three decades.

The fact is that the most broad-scale trend in all of Idaho's forests and the S-CNF in particular, is increasing tree mortality and declining growth rates in the surviving forest due to overly-dense stands. That's is what the "science" says.

And the S-CNF dares to assume that such conditions qualify as "wilderness"? A forest with 33%-plus of its trees as "dead standing" and almost half that remain under stress? The "stressor" in this forest is the policy of the Salmon-Challis National Forest and the N.G.O.'s.

What is needed in the S-CNF is a massive scale effort to engage in multiple "landscape-scale forest rehabilitation" projects virtually everywhere that terrain and watercourses allow for it, not more "wilderness designations" to cover up past failures. These efforts should continue uninterrupted for decades until the risk to the Forest from insect infestations, disease and fire is at a calculable minimum regardless of the wishes of The Wilderness Society, the Idaho Conservation League and others of that ilk who count success by the ill-managed, un-repaired acre rather than the actual health of the ecosystems they claim to love so much. Their incessant pleas play well to the ignorant, emotional and uninformed, but for those who actually tread upon these grounds and recognize what they see, they are but falsities.

They need the acres for the continuation of their business models. No wins and the donations begin to dry up. No wins and the foundation monies shrink away. No wins and their jobs disappear. They need wins, whatever the cost to the environment. They need wins.

There is nothing sustainable in the areas the S-CNF has suggested to be designated. From the standpoint of ecophysiology, the S-CNF is in critical condition. It is an overloaded, diseased, insect-infested ecological disaster; a tinderbox just waiting to explode and destroy everything in its path.

I cannot allow one other circumstance to pass by without discussion. Recall the description of how the Frank Church River of No Return Wilderness came to be, cited above. It was a long, laborious effort and from the standpoint of discussion, pretty well open to all those interested.

On February 23, 2019 an article was published in the Idaho Falls Post-Register titled, Salmon-Challis National Forest wilderness assessment a call to arms for several groups, authored by reporter Jerry Painter.

The subject of the S-CNF wilderness proposals was discussed and this particular quote caught my attention: "My intent is to have that a compressed timeline because there's so many folks that want to know," Mark said. "I'm going to say probably the end of spring" the forest service will have areas selected for further analysis." "A compressed timeline" regarding the wilderness proposals, according to Forest Supervisor Chuck Mark. That would be less than seven months time from the moment of introduction to selections for further analysis. November 1st to June 21st, a period where much of if not most of the proposed areas are inaccessible due to snow cover, all but eliminating "boots on the ground" to assess with precision the overall ecological health of each area and what forest management activities should have and should take place to return each of these to a healthy, desirable condition.

Seven months is Mr. Mark's time-frame to discuss the future of millions of acres, and both the citizen and scientist is denied the opportunity to actually make an accurate assessment of condition because "so many folks

want to know". Is that any way to establish parameters as to when a decision regarding any subject should be made?

Again, this is both a disgrace as well as an embarrassment to the "process".

I do have a suggestion worth consideration when it comes to designating portions of the S-CNF as "Wilderness", that being all lands beginning at timber-line and extending upwards to the tops of the peaks on all the various mountain ranges of the Forest. Those are the only areas in the Forest that haven't yet been mismanaged into a state of ecological crisis and thus suited for such lofty status.

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