

6 East Ute Road
Salmon, Idaho

Mr. Charles Mark, Forest Supervisor
Mr. Josh Milligan, Plan Revision Team Lead
Mrs. Gina Knudson, Collaboration Specialist
Salmon-Challis National Forest
1206 South Challis Street
Salmon, Idaho 83467

May 23, 2018

re: [WSR] "Public Participation Strategy" (March 2017)

Dear Supervisor Mark, Mr. Milligan, and Mrs. Knudson:

In the process of reviewing the SCNF/EMPSi document titled "Summary of Public Feedback on Eligibility Study Process and Inventory of Rivers to be Studied" (June 2017), I learned that EMPSi also prepared a "Public Participation Strategy" (Strategy) for the Forest's WSR eligibility study and report. I ask you to please consider and act on my public comments on the Strategy, which states that "input is welcome throughout the eligibility study process." I request an answer to all questions in ***bold italic*** print (numbered for your convenience) prior to May 31, 2018. This information is critical to my review of the Draft WSR Eligibility Report and associated documents.

The Strategy begins with a statement that the eligibility studies and reports will evaluate all Region 4 USGS 7.5-minute quad named "rivers" that were not previously evaluated. Thus begins the first flaw of the process. The SCNF clearly does not have the staff time, funding or expertise to simultaneously implement current plan direction and complete a suitability study of previously inventoried "eligible rivers." The SCNF suitability study has been pending for almost 30 years! Yet the Region is directing the SCNF to initiate a study process of all remaining rivers! Did Region 4 provide extra funding and staff for the SCNF to accomplish this workload? Apparently not; instead they delegated the process to an out-of-state contractor and charged that contractor to complete all aspects of the study, including a "Public Participation Strategy." How can an eligibility study that is completed by persons who have spent no time on the SCNF accurately reflect resource conditions on the landscape? How can a Public Participation Strategy prepared by a contractor that is unconnected to the affected members of the public be effective? (The obvious answer after almost 12 months of this strategy is, "It hasn't been effective.")

EMPSi may have prepared the Strategy, but the SCNF is responsible for public participation implementation. Some aspects of the Strategy have been beneficial, such as public meetings and web site postings. But the Strategy omits key outreach components which need to be addressed during the remainder of the eligibility study (as well as the suitability study).

(1) When (if ever) did the SCNF seek public input on a draft Public Participation Strategy developed by EMPSi? Shouldn't the local citizens who use the Forest and live next to or within its boundaries be asked how they want to be kept informed during the WSR study and Forest Plan Revision processes?

The Strategy lists "nearby private landowners" as a target audience (page 2). ***(2) Did the SCNF send a postal mailing to private property owners within or adjacent to the eligibility study segments, to tell them the WSR eligibility study would be taking place, with follow-up mailings as the study progressed and there were new opportunities for public involvement?*** At a minimum, you should have informed private landowners who have property within or proximate to the river segments with private land sections that were found "eligible" in the Draft WSR Eligibility Report. (I identified about 20 rivers with

a difference between total river miles and SCNF-administered river miles; most, if not all, of these segments presumably have private lands. It is impossible to tell, however, since the Draft Eligibility Report maps do not depict land ownership. Of particular concern are the North Fork Salmon River, Main Salmon River, and Panther Creek segments.) These land owners are not only directly affected by the proposed eligibility findings, they might have resource knowledge to confirm or refute the contractors' assessment of free-flowing character and/or outstandingly remarkable values (ORV). They can also provide public input during the WSR suitability phase.

The Strategy states "Accessibility" is a goal of the public participation strategy (p. 2), but focuses its outreach almost solely on Internet-based strategies, including social media, postings to the SCNF Plan Revision web site, and electronic newsletter distribution. Missing from the Strategy are public service announcements (PSA) on local radio (KSRA), press releases and articles in the two newspapers of record, and direct mailings to Forest stakeholders. I am actively participating in the Forest Plan Revision and WSR study processes, but I don't sit at my computer waiting for the next document to be posted to the web site! If you do post documents to the web site, you should also issue a press release and PSA to tell people they are now available in electronic or printed form. (Not everyone has a computer/printer or access to one!) Similar newspaper and radio outreach should be done to announce public meetings.

The Strategy focuses on "maintaining a master stakeholder list" (p. 2). *(3) I request copies of each list (by date) that was used for public outreach during the draft WSR eligibility process (such as the list for each newsletter issue - names and organizations only), as well as answers to the following questions: (4) How and when was the initial master stakeholder list developed, how many names are on that initial list, and what are the "categories" of persons on that list (e.g., elected officials, environmental organizations, general public)? (5) How was the list added to over time? (6) Was that list solely generated by "sign-in" sheets from Forest Plan Revision public meetings? (7) Did you include known Forest stakeholders such as grazing permittees, firewood permit applicants, outfitters and guides, wood product purchasers, fuels treatment contractors, and special use permit holders? (These "stakeholders" are in addition to the private landowners you should be contacting.)*

I hope you will use my comments to adjust your public participation strategy for the rest of the eligibility study (and the subsequent suitability study). The Strategy (p. 2) recognizes that "public participation is an adaptive process which may be revised to meet evolving needs during the WSR eligibility study process." There are still about 7 weeks before the July 16, 2018 comment deadline for you to diligently seek public comment from the stakeholders and private land owners you have overlooked. *If you can't contact these members of the public by at least June 16, 2018, you should extend the comment period on the Draft WSR Eligibility Study to allow them at least 30 days for comment.*

I look forward to receiving your written responses to my questions **no later than May 31, 2018**. Please call me at (208) 756-3974 when the copies of stakeholder lists are available for me to pick up at the Supervisor's Office. Thank you.

Sincerely,



Evalyn Bennett
5bennetts@custertel.net

cc: Robert Johnson; Rep. Dorothy Moon; Lemhi County Commissioners; Lemhi-Custer Grassroots Advisory; Region 4 Supervisor Nora Rasure