

Data Submitted (UTC 11): 10/5/2020 11:00:00 AM

First name: Evalyn

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Organization:

Title:

Comments: RE: Forest Plans Review

Dear Supervisor Mark:

Thank you for inviting the local public to tell you "what I would decide about the Salmon and Challis Forest Plans if I were Forest Supervisor."

Before making that decision, I would first direct my staff to complete a line by line review of the implementation status of all Forest Plan components contained in the Salmon and Challis Forest Plan "catalogues" that were prepared for public review. An evaluation of the sufficiency of each plan is incomplete without scrutiny of what was done (or not done) and why, and how well it worked (or didn't work) and why. For example, the Salmon Forest Plan timber management quantity was absolutely not met for the second and third decades (p. III-1). And the transportation network desired future condition was not met during the first 10 years, as per Salmon Forest Plan direction on page IV-93. Had the ASQ and transportation DFC been met, the community and Forest would now have the infrastructure to access the suitable timber base and produce the annual sale quantity to support local mills, there would be road and fuel breaks in and adjacent to the WUI, those areas would not have been designated as roadless areas in 2001, and tens of thousands of acres might have remained unburned or burned at low fire severity. The agency's failure to implement all aspects of the Forest plans (multiple use) has had HUGE adverse impacts on the local communities and Forest resources.

I would also direct my staff to add Forest Plan page number references for the assertions in the 14-page summary, so the public knows exactly what plan components pertain to each opinion offered about the two Forest Plans. The Salmon and Challis Forest Plans Review summary is inadequate because it, like the incomplete Plan Revision Assessment and "Needs for Change," has no page number references to specific areas of the plans and no evaluation of plan implementation status: what has been accomplished, what has not been done yet, what has or has not been beneficial, and why? It was pre-mature to ask for public comment before this information was described in the plan "catalogues" and summary. The review components tables and 14-page summary documents should also list the "authors" and their resource specialties, so the public knows which Forest staff to contact about various topics.

I would also acknowledge that it is impossible to hit the "moving target" of changing law, regulation, and policy with any plan. As soon as you begin to finalize an amendment or revision, something else will change. That is why the Forest is also required to comply with current law, regulation, and policy in activity and project planning. It is understood that current direction in conflict with a Forest plan supersedes earlier approved management components. Your staff picked four directives to examine in the catalogues; there are many more that are applicable yet were not chosen for evaluation (e.g., recent Presidential E.O. on fuels reduction and FS Chief's directive on maintaining motorized access). Please consider whether these and other directives which are very important to the Salmon and Challis Forests' public use and resource conditions should also be evaluated for whether current Forest Plan components do or not comply. [It should be noted that if the Plans are silent on a topic that doesn't mean revision or amendment is necessary. In that case the most current non-Plan direction (law, regulation, policy) would apply.]

I would also acknowledge that the Forest has a backlog of plan amendments that should have been done years (if not decades) ago. (This backlog is identified in the plan review summary and commented on further below.) There is no excuse for failing to complete these amendments in a timely manner.

I would also recognize that the 1987 and 1988 Forest Plans are signed contracts with Forest users and a previously approved commitment that needs to be honored. The plans are an obligation to a past and current generation of Forest users to achieve the desired future conditions approved 30 years ago. While waiting for my plan review staff to complete a thorough review of plan implementation status and page number references to support their opinions, I would focus the time and resources of other Forest staff on the Forest Plan direction that has not yet been fully implemented. For example, do all allotments have AMPs and the range improvements identified to optimize management and healthy Forest resources? Is the Forest offering the AUMs authorized or are allotments vacant? Are suitable timber acres roaded via a transportation network as directed and is the annual sale quantity at Forest-plan projected levels?

I would also remember that a joint plans revision is not an option because there is no combined-Forests SCNF plan to revise (see my plan revision comment letter dated April 14, 2018). The agency already wasted three years of planning effort and an estimated several millions of dollars on an invalid planning process! In addition, NONE of the written products of that process was satisfactory (wilderness evaluation, draft WSR eligibility report, Assessment and Needs for Change). It is obviously time to try a different approach.

I would wait to make my decision until the promised series of public meetings on plan review takes place. It is a gross breach of trust to assemble dozens of highly involved citizens in March 2020 to get our input on the content and format of public meetings relating to plan review, and then decide to cancel those public meetings in August 2020 (claiming an alternate plan engagement process would be used) without any further conferring with those government and Forest user representatives. The modified plan engagement actions (on-line comments, webinar) were expected all along; but the crux of ESSENTIAL input is open public meetings where Q and A and discussion can occur.

In sum, at the present time I would continue to gather information about the plan implementation status and seek local public opinion. If I had to make a decision without further information, I would diligently implement the existing plans while beginning to complete the known backlog list of Forest Plan amendments and other planning actions (see below).

PLANNING THE FOREST SHOULD HAVE ALREADY ADDRESSED

The SCNF has been focused on "Plan Revision" as the cure to what ails the Forest, while never acknowledging that some problems exist because the agency has not implemented existing management or regularly amended the Salmon and Challis plans. The following is a list of amendments the Forest should have ALREADY completed:

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Travel plan review with public input - Required annually but not done since 2009. Need to assess road infrastructure adequacy for public use (e.g., summer season motorized recreation use and firewood retrieval), administrative use, and public safety (fire suppression and evacuation egress). Consider opening seasonally closed routes for public use during at least July and August of each year.

* Fire management - Amend fire management direction for the Salmon and Challis National Forests acreage both within and outside the Frank Church Wilderness (should have occurred in 2006 after the first 5-year period where burned acres exceeded the average by 20-30% - see plan review summary page 7). Establish and implement guidelines for post-fuels reduction project implementation and post-wildfire monitoring of resource impacts. Conduct post-burn monitoring to see if planned prescribed fires and prescribed-natural fire ignitions ("let burn for resource benefit" fires) have accomplished desired resource objectives.

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Suitability study of eligible WSR segments - Required by 1988/1989 settlement agreements with American Rivers; numerous subsequent planning efforts have occurred when this could and should have been done. The

Forest can use the 2019 field data to verify eligibility and outstandingly remarkable (OR) values. NOTE: Panther Creek had no listed (named by category or otherwise described) OR value in 1988 and is NOT an eligible river. Some eligible river segments may have disqualifying characteristics that were never looked at in the SCNF's contracted 2017 draft eligibility report (such as Camas Creek B).

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Replace PACFISH/INFISH 18-month interim direction with Forest-appropriate planning guidance and/or protocols agreed to via MOUs with NOAA Fisheries and USFWS. This should have been done in 1997 and 1999. Consider standards that are consistent with what has worked locally for BLM-managed lands. Adopt standards that reduce fuel loads in riparian areas to what is sufficient for bank stability and stream shading. Modify grazing standards (reduce the severity of restrictions) to a level that maintains areas in good condition where objectives have been attained. Develop consultation protocol that support fisheries objectives while not precluding other resource management objectives such as motorized recreation and access to timber lands.

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Amend visual resource management classifications and resource evaluation processes to comply with new National Forest standards adopted in 1995 (see plan review summary, page 4) and facilitate public health and safety, and management of other Forest resources such as motorized recreation, fuels reduction, riparian restoration, range improvements, and mining. [Note: the public has NEVER been told what the new visual resource protocol is - this seems HIGHLY relevant to address since it is a factor that often affects site-specific project planning.]

The following is additional planning implied by the Forest plan or subsequent approved direction:

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Complete range improvement project planning to fully implement approved AMPs. Develop activity plans for allotments still without an AMP.

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Accurately map and define management for categories of roadless areas that allows timber harvest/fuels reduction and associated temp road construction to benefit numerous resources and the WUI (about 85% of the Forests' roadless areas and 42% of the Forest acreage!) This activity has been allowed with Regional Forester approval since the Idaho Roadless Rule was approved in 2008!!!

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Additional potential planning priorities include the following:

- * Review Research Natural Areas (RNAs) to determine if the criteria for which they were designated still exist and the areas are necessary and utilized research facilities; or, decide that each RNA's acreage is satisfactorily "protected" for future research through other means and could be released back to multiple uses.
- * Conduct an analysis to potentially remove Mount Borah from recommended wilderness status (in conjunction with another proposed amendment process).
- * Review and potentially amend Recreation Opportunity Spectrum allocations.
- * Establish procedures for grazing permittees to utilize vacant allotments.
- * Amend direction requiring new road construction to be paid for by timber sale receipts (what is the page reference for that action referred to in the plan review summary, page 2?)

The Forest's focus since 1995 has been inventory, monitoring, and habitat restoration related to fisheries T/E species and aspen/big game habitat, essentially ignoring other important aspects of Forest management and resulting in one-third of the Forest's acres burned, often with catastrophic resource impacts. What, exactly, has been the benefit to fisheries and big game of that single-resource focus (fisheries and big game resources have

both plummeted)? And how has that focus benefited the health, safety, and economy of local communities -- other than the handful of NGOs who benefit from "sustainability and shared stewardship" projects?

It is unfair to give members of the public a five week comment period on "plan review" while your staff has been working on this for almost a year behind closed doors (Thanksgiving/Christmas break and then COVID). The public hasn't been given public meetings to ask questions and understand what the documents even mean, and the agency failed to disclose the Forest Plans' implementation status in either the Assessment phase or during this plan review.

How can we trust that a revised Forest Plan will be any better than the current plans, if the agency's failure to implement the current plans has resulted in mill closures, extensive loss of motorized public access, reduced AUMs and vacant allotments, and hundreds of thousands of acres of catastrophic resource impacts from the wildfire "let burn" policy?

The plans are not the problem. Selective implementation of parts of the plans while ignoring other management direction has yielded adverse resource consequences. This imbalance can be corrected by fully implementing the plans under the guidelines of the Multiple Use Sustained Yield Act.

Sincerely,

Evalyn Bennett