



Idaho Farm Bureau Federation

500 West Washington Street
Boise, Idaho 83702
(208) 342-2688 Fax (208) 342-8585

July 13, 2018

Submitted via email: scnf_plan_rev@fs.fed.us

Salmon-Challis National Forest
ATTN: Forest Plan Revision
1206 S. Challis Street
Salmon, ID 83467

RE: Wild and Scenic Rivers Eligibility Study and Report

To Whom It May Concern:

On behalf of the more than 78,000 member-families of the Idaho Farm Bureau Federation, I offer these comments for the Eligibility Study of the Wild & Scenic River (WSR) system in the Salmon-Challis National Forest (NF). For more than 75 years, the Idaho Farm Bureau has been recognized as the leading advocate for property rights and prosperity, which comes through the wise and responsible use of our natural resources. We thank the Forest Service for this opportunity to provide our insight and perspective.

Our members use the forests and rangelands in the state to graze livestock, harvest timber, mine, hunt, fish, recreate and sustain their livelihoods. They are responsible stewards of the land and water, and many have used these resources for multiple generations. Our members take great interest when government agencies propose significant changes to the management of natural resources and are concerned with proposed designations that would limit or restrict their use and future development in any way.

Our principle concern with any WSR designation is the obstacle it creates in maintaining working rivers and waterways in the state to meet Idaho's many water needs. With an annual average precipitation of less than 12 inches in the state, every water source needs to be carefully managed and maintained. Adequate storage, flow, power, and delivery systems are key aspects of water management. In the arid US West, we need to be looking at more of these water management possibilities, certainly not less.

There are numerous examples of WSR designations eliminating viable water storage options for western statesⁱ. In recent years, many of these states have experienced extreme weather events such as drought and flooding. Additional water storage options would have proven beneficial to mitigate devastating impacts to the landscape, wildlife, communities and industries.

Another concern with WSR designations is possible restrictions to access waterways and limitations to adjacent land use. Grazing, woodcutting/timber harvest, and mining are activities that affect our

members' operations and businesses. Though the Forest Service has stated these activities are not prohibited within designated WSR corridors, they may certainly be limited or eliminated altogether if it is perceived that they threaten the river's "outstanding values." Many of these activities have existed for decades, while the waterways still maintain their original characteristics without a WSR designation.

Congress has mandated that federally managed public lands are to be managed under the principle of multiple-use. Designations that prohibit or restrict activity, access and use, do not adhere to this principle. Our members have been severely impacted by the drastic reduction in AUMs on their grazing allotments, and the problem will only increase with any WSR designation. Numerous legal claims have been brought up on this topic in the past ⁱⁱ ⁱⁱⁱ. Timber harvest has also seen a dramatic decrease over the years, and further designations in the forest will further inhibit proper forest management and timber harvest.

The Idaho Legislature has opposed federal government designations in the state that have not been formally approved or accepted by the legislature. The current White House Administration has repeatedly stated their support of the principle of federalism and individual state sovereignty. Similar to other designations, WSR status limits what the state is able to do with resources located within its own borders. Consideration and evaluation of additional designations within the state should only take place upon request of the state via its legislature. During the 2018 general session, the Idaho Legislature passed a joint memorial opposing federal government designations without the approval of Congress and the Idaho Legislature. The State has not requested additional designations by the federal government, and it would be prudent to seek formal state input on the matter prior to proceeding.

An additional concern is the Forest Service's limited resources to manage the national forests. With more studies and analysis of potential designations, less resources are available to be used implementing current forest management plans. From past studies, reports, and management plans there are over 220 miles currently designated as Wild and Scenic Rivers in the Salmon-Challis NF, and more than 280 miles have previously been determined to be eligible for such status. Our forest's lack of management will only become more exacerbated by pouring more resources into plan development instead of actual "boots on the ground/hands on the shovel"-management. We ask the Forest Service to focus their resources more on actual implementation of management practices and less on further evaluations and studies.

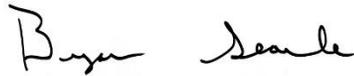
We request the Forest Service contact all individuals with eligible designations (e.g. Panther Creek) within their mining claims, grazing allotments, and/or private land, who may be affected by these designations. In addition, we ask that these individuals be informed of the WSR analysis criteria (e.g. unique, rare, and exemplary), and the type of input the Forest Service is seeking from public comment. Our members have years of experience and knowledge that needs to be considered and utilized in the analysis process. Several of our members have eligible designations on their grazing allotments and are seeking assistance in providing input.

We are aware local citizens have researched this issue and have facilitated public meetings with the Forest Service present to answer questions. We ask the Forest Service to take the next step and ensure all affected users are aware of these designations and potential impacts. Additionally, we request the Forest Service meet with local groups from Lemhi and Custer Counties to discuss the issues and concerns with the WSR analysis, and to share how this process plays into the Forest Management Plan revision.

We also request that field reviews take place on all potentially designated waterways during the suitability phase of this process. These field reviews are crucial for any accurate designation to take place, particularly considering the ramifications WSR designations have on future resource use and development. Considering there are more than 300,000 acres that would be affected by the potential designations, a pretext of limited resources inhibiting complete and thorough field review is not acceptable. We oppose designation of any waterways that have not received a full field review.

On behalf of the entire membership at the Idaho Farm Bureau, I thank you for your consideration of these comments and we look forward to our further involvement in this process. We reserve the right to provide additional comments during the subsequent steps in the WSR analysis process. We again ask the Forest Service to use an abundance of caution and prudence prior to classifying any more stretches of rivers and waterways as “wild and scenic.” Please contact Braden Jensen at 208-342-2688 if you have any questions regarding this topic.

Sincerely,



Bryan Searle, President
Idaho Farm Bureau Federation

ⁱ “Impacts of Wild and Scenic River Designation”, Utah State University Study
http://publiclands.utah.gov/wp-content/uploads/2013/08/WS_Final_Report_804.pdf

ⁱⁱ Donner und Blitzen Case in the US District Court for the District of Oregon
<https://law.justia.com/cases/federal/district-courts/FSupp/953/1133/1746830/>

ⁱⁱⁱ Owyhee River Case in the US District Court for the District of Oregon
<https://law.justia.com/cases/federal/district-courts/FSupp2/75/1139/2369603/>