



Idaho Farm Bureau Federation

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Submitted via email: scnf_plan_rev@fs.fed.us

Salmon-Challis National Forest
ATTN: Josh Milligan, and Nick Schade
1206 S. Challis St.
Salmon, Idaho 83467

RE: Revision of the Regions of Comparison for the WSR Eligibility Study – IFBF Support

To Whom It May Concern:

On behalf of the more than 80,000 member-families of the Idaho Farm Bureau Federation, I offer these comments in support of the Lemhi-Custer Grassroots Advisory (LCGA)'s recommendations for revisions to the regions of comparison (ROC) for the Wild and Scenic River (WSR) Eligibility Study on the Salmon-Challis National Forest (SCNF). We have reviewed and examined LCGA's proposed amendments that were submitted to the SCNF on November 28, 2018 and feel that such revisions are completely appropriate and necessary. We recommend and respectfully request the SCNF apply the proposed ROC revisions.

The Forest Service's own handbook states that "*[t]o be identified as outstandingly remarkable, a river-related value must be a unique, rare, or exemplary feature that is significant when compared with similar values from other rivers at a regional or national scale.*"ⁱ The currently used ROC for fish, recreation and scenic Outstandingly Remarkable Values (ORV) completely ignore this guidance and are far too localized and site-specific. LCGA's recommendations more appropriately represent ROC that depict, at a minimum, a regional scale.

Farm Bureau is currently in the process of gathering comments and field review reports from many of our members who know the identified stream segments in the Draft Eligibility Report. Our members have responsibly utilized these forest lands and resources for many years spanning multiple generations. Their knowledge of, and experience with, these waterways and their adjacent lands is irreplaceable and matchless. Nevertheless, with such technical and small ROC, our members get frustrated by not being able to simply use the entire forest as a reference as they comment on the waterways and the identified ORVs.

Our original understanding of the ORVs and their ROC was that they were at least the size of the Forest itself, if not much larger. However, after utilizing the interactive map and other resources provided by the Forest, we came to realize that some of the ROCs were very localized, and geographically only covered single watersheds/basins. This fact makes no sense to individuals as

they attempt to supply meaningful comments on individual stream segments. To tell someone that for certain ORVs you would utilize a ROC that may only include a small basin, while other ORVs will have a ROC that may include approximately half or more of the Forest is absurd and completely discourages meaningful public comment. Our members do not believe this approach meets the Forest Service's own standards and guidance.

The Farm Bureau applauds the LCGA for their effort to identify ROC that are fair and properly apply Forest Service instruction and guidance. We respectfully request that SCNF accept LCGA's recommendations and apply the adjusted ROC to the Eligibility Study. 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. 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 FSH 1909.12 – Land Management Planning Handbook Chapter 80 – Wild and Scenic Rivers – Outstandingly Remarkable Values (82.73)