**From:** Aaron Lieberman
**To:** FS-Salmon-Challis Plan Rev
**Subject:** Comment on SCNF Wilderness Evaluation
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(Apologies for not getting this in before the deadline. I found it in my 'Drafts' folder this AM. Please let me know if this precludes its inclusion.)

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Comment on SCNF Wilderness Evaluation Areas/Process

Having guided in the Salmon-Challis National Forest for over 11-years, not to mention exploring it privately in between and now representing outfitters and guides operating and around this Forest, I have strong personal and professional ties and a sense of responsibility for its future.

On a personal level, I have a deep and abiding reverence for wilderness and all that it accompanies and allows. This appreciation translates professionally, as a former guide and manager of a rafting outfitter operating within the SCNF as well as in my current position as Executive Director of the Idaho Outfitters and Guides Association (IOGA). Outfitter members of the IOGA hold special-use authorizations to provide outfitting and guiding services on the Salmon Challis National Forest National Forest, including Frank Church River of No Return Wilderness, Main Salmon River and Middle Fork of the Salmon River. As part of these activities, we provide services to 1,000's of forest visitors a year, facilitating their recreational experiences and use and enjoyment of the recreation resources and opportunities provided by the Salmon Challis National Forest.

Yet, both as a private citizen of Idaho and the Executive Director of the Idaho Outfitters and Guides Association, there are objective and practical concerns associated with the creation of new wilderness areas within the Salmon-Challis National Forest. First, on a *global* scale of analysis, 61.7% of the State of Idaho is already under some flavor of Federal management, with more designated wilderness than any other State in the continental U.S. The Frank Church—the largest single wilderness area in the lower-48 is itself within SCNF. Moreover, Lemhi County has 8 percent private land while Custer County has only 5 percent (according to the 2011 study done by the Idaho Association of Counties). <u>The point being that relative abundance of existent wilderness as compared to private land in-and-of-itself places paramount importance on the maintenance of multiple use designated lands, for the outfitters and guides—not least the rural communities—whose livelihoods depend on them.</u>

Many resident of Lemhi and Custer County with property abutting the evaluation areas rely on being able to harvest firewood with them, have business who support visitors who come to recreate with the areas (in forms that wilderness would not afford, from ATV'ing to Paragliding, mountain biking, etc.); many have homes and cabins within the evaluation areas.

With particular regard to the IOGA Members I represent, there is established, permitted use by

land-based outfitted operations in **all** of the Evaluation Focal Areas (purple) **and** [general] Evaluation areas (yellow). We serve both experienced and inexperienced clients and our services need to have some flexibility. These operations (these businesses) would be threatened by the restriction of access [to them] for their outfitted clients (including in a number of cases physically disabled clients and many older clients who could not heed the call of these areas with restricted access imposed). Land based outfitter necessities in or out of wilderness include assigned campsites, potable water availability for humans and livestock, tent-frames that don't have to be dismantled because they are not permanent, temporary or permanent corrals. These operations would be further hampered or hamstrung entirely by the imposition of additional restrictions that accompany wilderness designation.

It is unfortunate that these issues so often tend to end up being framed as emotive binaries: you are for wilderness or you are against it. That is simply not the case. Broad brushes paint poorly. Wilderness is important; Idaho as a whole and the SCNF perhaps in particular is that appreciation made manifest. However, this value must be kept in perspective and considered against the backdrop of existent infrastructure, established modes of living and essential, local economic dynamics. The evaluation areas identified in this inventory may well have once or by some other metic have been candidate for wilderness designation. But history and industry and happenstance intervened somewhere in between. What we now have is an emotive push informed by—albeit well meaning--disconnected principle to designate these areas—lump sum—as wilderness on the one hand versus a very real and immediate reliance on these areas by those who work within and live near them, for their communities and way of life, that is largely—if not necessarily in each case—incompatible with such wilderness designation on the other,

I therefore urge collaboration with Idaho outfitters and guides, to preserving means of income and way of life, is paramount throughout this process. Any efforts to make sure outfitters and guides can continue their operations in these areas will not help sustain the local economies, but build rapport and preserve intangibles that make Idaho, *Idaho*.

Thank for taking the time to consider my comments and the concerns of IOGA's members. If you have further questions please do not hesitate to reach out to me by phone at 208.342.1438 or but email at aaron@ioga.org.

All the best,

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