

Date submitted (UTC-11): 2/28/2019 12:00:00 AM

First name: Sandy

Last name: Thomas

Organization:

Title:

Official Representative/Member Indicator:

Address1: 1200 Sleeping Deer Road

Address2:

City: Challis

State: ID

Province/Region:

Zip/Postal Code: 83226

Country: United States

Email: sjthomas@custertel.net

Phone: 2088794480

Comments:

Thank you for the opportunity to comment on the Salmon-Challis National Forest Wilderness Evaluation Process /WSR Eligibility and Revised Forest Plan and for taking my comments into consideration.

The revised forest plan, including the assessment report, should take into account the principles of multiple uses and sustained yield as congressionally mandated by the Multiple-Use and Sustained Yield Act of 1960 (16 U.S.C. 528-531) and further codified by the

National Forest Management Act of 1976 (16 U.S.C. 1601-1614).

Continued access within the Salmon-Challis National Forest and use of public lands are vital in contributing to local, state, and national economies.

I do not support additional wilderness designations, wilderness status or WSR for the SCNF.

In the SCNF The Frank Church Wilderness Area already consumes over 2.37 million acres of Idaho. An addition to this is the Jim McClure-Jerry Peak Wilderness is 117,000 acres, the White Clouds wilderness is 91,000 acres and the Hemingway-Boulders Wilderness is 88,000 acres.

The percent of Total Wilderness Acres in Idaho is 4,796,521 for 8.96% and if you add in a whopping approximately 9,000,000 acres of inventoried roadless areas, and if this is also made into the wilderness it would equal over 25% of the total Idaho acreage. Idaho would become second only to Alaska in terms of wilderness area. Enough already! To put that into perspective that is FIFTEEN WILDERNESS areas in Idaho.

I think it would be inappropriate and undemocratic to eliminate current freedoms to those people whose only ability to enjoy areas that are now open to motorized travel in the SCNF would be taken away. Isolating the forest from a public majority of which includes the elderly and handicap that cannot hike or ride a horse, they also have the right to enjoy the mountains, streams, and lakes as much as the younger generation. This is not the "governments land" this is the land of the people. We are the government. Some of the last Forest Plans were not followed, one being the lack of Forest's transportation management of new road construction and road reconstruction and lack of annual maintenance. This seems to be a deliberate plan since the Challis National Forest road crew was eliminated and sent to Salmon when the two forests merged in the late nineties. One has to wonder if the excuse to exclude road maintenance in the Challis National Forest was another way to lock up of the forest for Wilderness designation.

Eliminating access to the forest creates more fire danger, hinders range projects, timber, mining, recreation, and hurts the environment the economy and health and well being of its people. Several of the proposed wilderness areas in the Challis National Forest have already burned and have lost precious resources, including wildlife, fish and watershed habitat. Case in point is the Lodgepole Fire five years ago. After this fire, the following year, this area had two major water events and due to the lack of vegetation from the fire, most of the Bear Creek, Challis Creek, and White Valley watersheds were destroyed killing fish and riparian habitat and cost several thousand dollars to repair an irrigation headgate and ditch. This fire could have been prevented or at the very least reduced in size if logging would have been allowed as suggested by FS personal in prior years. There are many roads in the Lodgepole area, which were constructed for wood gatherers, but it was

decided that it would be detrimental to the wolverine and lynx to log this area. Since that time the pine beetle killed many of the trees and thus it created a perfect firestorm and destroyed the entire habitat that was to be saved for the wolverine and lynx. So much for environmental protection.

The predicted rise of more frequent and intense wildfires and smoke, will come at a price for the local economy, all of Idaho, and the surrounding states. Strategies should be developed that allow plans to achieve multiple management objectives while simultaneously considering the effects on local wellbeing. [ldquo]Forest managers[rdquo] ideology has changed, they are not making decisions to better the land or the habitat; they are making political decisions, which are consistent with their beliefs. Forest management used to be for management of the forest not for political agendas. Recreation, grazing, mining, and timber activities on National Forest System lands are vital contributions to the area[rsquo]s rural, struggling economies and it appears that these concepts are not in step with current management. Years past, Idaho had a thriving timber industry but due to the environmental agenda it was destroyed!

The reality is that the current system encourages conflict with the public, not peaceful negotiation. Public land use decisions are more likely to be settled by politics or litigation today rather than by mutual cooperation or direct exchange between the public and the Forest Service. [ldquo]Buyout[rdquo] of ranchers[rsquo] grazing permits happens because of environmental restrictions that make it so difficult for ranchers to operate their businesses, that they are forced to cut back on livestock or sell out, hurting the local economy and only benefiting one species, usually fish. The result of systems of federal land management use is strangling freedom by more litigation and regulation and which usually is driven by environmental bias.

Because of environmental policies, ranchers have been gradually losing grazing privileges as federal land policies have shifted toward more wilderness, conservation and recreation instead of grazing, timber harvesting, and mining & energy development.

Another issue that has come to light is the Bitterroot grizzly bear recovery plan that has been secretly incorporated into the revised portion of the SCNF Forest Plan. In the last Challis Forest plan, it was stated that there would be no grizzly bear or wolf transplants planned for the Challis National Forest. Since then that plan has been broken regarding the wolf introduction, and is planned to be broken again concerning the grizzly bear.

Grizzly bear introduction into the SCNF will have a serious adverse impact on the endangered fish populations, big game, livestock, and the safety of its residents who use the SCNF. Years ago this same proposal was vehemently opposed and the introduction of the grizzly bear was defeated. All SCNF and region personnel who are members of the Interagency Grizzly Bear Committee should recuse themselves from participation in the revision plan due to bias and their conflicts of interest.

It has been stated that at a recent IGBC meeting the SCNF staff officer Kimberly Nelson had said, [ldquo]remote cameras and hair samples hopefully will confirm grizzlies are within the recovery area.[rdquo] She was also quoted as saying, [ldquo]data could be incorporated into upcoming travel plan revisions in some of the national forests in the ecosystem.[rdquo] It was implied, but not stated, that [ldquo]travel plan revisions[rdquo] could occur as a result of wilderness recommendations made during Forest Plan revision, which would mean, additional road closures. This hidden plan to introduce grizzlies into the SCNF is another reason why there is such a lack of public confidence in current forest management.

Some examples of why not to designate more wilderness are that wilderness recreation visits account for only 3% of the forest use and multiple-use accounts for 97% of the visits. The management of the forest must reflect the use of the visitors and meet their needs. Wilderness currently is managed poorly (fire, lack of trail management and lack of money), and creating more will only compound this problem. Lightning-caused fires in the wilderness are mostly not managed and permitted to play, as nearly as possible, for their natural ecological role. A sizeable amount of the Frank Church Wilderness has burned over the years, which has helped to spread noxious weeds. There is nothing about a burnt forest that is pristine! More fires will only impact watersheds, wildlife, grazing, recreation, mining, economic losses, and health issues and create more noxious weeds.

Lack of road maintenance causes the closing of motorized access and thus motorized recreation on lands designated for multiple-use. This is another deceptive process to add more wildernesses.

Adding more wilderness areas will only cause more of a decline in recreation, grazing, mining, and timber activities on National Forest lands that are vital contributions to the area's rural, struggling economies. For example, one of the proposed wilderness focal areas (West Fork Morgan Plus) has been used for multiple uses such as logging, grazing allotments, wood gathering, and has roads throughout and is adjacent to private properties. Part of the area has burned in recent wildfires and cheatgrass has taken over where these fires have burned. There is nothing-pristine left after a fire consumes the land. With respect to the "wilderness experience" giving one a feeling of "quiet solitude" in the SCNF, it couldn't be more absurd since there are numerous aircraft that continually fly over the area due to the many landing strips in the wilderness. Other proposed wilderness areas in the SCNF also have roads throughout, communication towers, grazing allotments, mining, logging, and has been used for wood gathering and thus should be excluded as having any wilderness characteristics.

I am also opposed to the inclusion of any more of the SCNF streams into the Wild and Scenic Rivers system. How many times will different personnel of the SCNF keep trying to create more Wild and Scenic Rivers? Forest Service personnel who review what determines a stream to meet the ORV criteria can differ greatly. So over the years, many different people who have studied these streams have left and new people have taken over the task of determining Outstandingly Remarkable Value streams. There are several examples of what the eye of the beholder views a stream for eligibility, and shows that to be true with the following reports and conclusions throughout the years.

"The US Department of Interior study, A Report on Natural and Free-Flowing Rivers in the Northwestern United States of 1980 did not identify any additional rivers on the Challis National Forest with potential for classification as wild, scenic, or recreational. Using the revised guidelines for Eligibility, classification, and management of river areas. An Interdisciplinary team made a review of rivers and streams on the Forest but did not identify any candidates."

"The conclusion of the 1989 evaluation found eight of thirteen segments eligible for study as potential additions to the National Wild and Scenic Rivers System. These stream segments totaled 50.5 miles of stream length."

"The 1990/1991 analyses were initially completed in May 1991. These initial analyses indicated 17 streams as eligible. Then new information on five streams was uncovered after the initial analysis and 5 more streams were added."

One has to ask just how many WSR does the SCNF need? It would appear as many as you can get, and which appears to be an environmental land grab to tie up more land and take away multiple uses on the SCNF.

It should be noted that on the FS allotment map, you have left out a horse allotment that is in the focal area West Fork Morgan Plus. This allotment takes in part of Bear Creek and White Valley drainages.

It is mentioned numerous times that suitable cold-water habitat for juvenile cutthroat or bull trout by the year 2040, with a 90% occupancy probability is used to evaluate a stream into inclusion. A 20-year projection should not be used as an inclusion into the system. A stream should only be evaluated in the present time. Since climate change is mentioned throughout the Forest Plan and it is believed that the planet is getting warmer by the year, this would make one believe that water temperature would become unsuitable for the fish by 2040.

Some of the proposed streams that are eligible for inclusion I believe need to be eliminated due to grazing allotments that encompass the surrounding areas. The East Fork Pahsimeroi River is a stream that has a grazing allotment and also has a section of the stream where there are several roads adjacent to it, and people use several camp sites along the stream.

The Pahsimeroi River Confluence of East and West Forks starts at private property and is within a grazing allotment, it has roads and several camping sites and a road crossing on the West Fork.

The Mill Creek 3 runs thru private property on the lower end of the stream between the Forest Boundary and BLM. Water is diverted for irrigation and there also is a grazing allotment adjacent to the Stream. Several off-road camping sites, wood-gathering sites are used along the stream.

The Long lost Creek is part of a vacant Grazing Allotment (Non-Use) and a road parallels part of the stream.

The Lower Cedar Creek has a road parallel to the stream on the lower section and has several ditches adjacent to the stream.

The Pahsimeroi River from the mouth to the forest is dewatered at the Summer Crossing on BLM to Flying Joseph Ranch during the summer months. The river starts again from springs at Flying Joseph Ranch and runs thru private BLM and State all the way to the Salmon River. Above the Summer Crossing is a Diversion that feeds the Cross Valley Ditches. There is an Enclosure on both sides of the River that separates two pastures for the Upper Pahsimeroi Allotment.

The Patterson Creek 1 has two mines, one on the lower part of the stream above the Lemhi county road. Another mine is just below Inyo Creek. Below the Lemhi road, Patterson Creek is diverted into an irrigation ditch and is dewatered during the summer months.

According to the Technical Report of the Interagency Wild and Scenic Rivers Coordinating Council, [ldquo]If grazing practices are determined to be inconsistent with WSR management objectives, then changes in grazing practices may be required. Administering agencies authority to adjust or eliminate livestock grazing, or any other commercial use, if doing so is necessary to meet the protection and enhancement standard.[rdquo]

This would be problematic for Permittees that rely upon their livelihoods to use Federal land for grazing livestock adjacent to WSR. Of course, many of the problems could be solved if water projects weren[rsquo]t so difficult to develop. But then again, it is another way to help remove livestock from the forest, which is the environmentalist[rsquo]s objective all along.

Also taken from the Technical Report, [ldquo]In regards to Camping along a WSR, as a condition of use, consistent with river classification and the management objectives for the river area, the managing agency may specify that camping will be permitted only in designated locations. Enforcement of camping restrictions and limitations will be through indirect means (brochures, maps, signs, etc.) and/or direct means (permits, enforcement personnel, etc.)

Any proposed new developments on federal lands must be guided by land use and resource management objectives that are compatible with the river[rsquo]s classification.[rdquo]

Many hunters, fisherman and recreationists camp along these WSR proposed streams. This leaves the door open for abuse from the agency.

This is taken from the WSR Utah Report:

[ldquo]MEASURING THE COSTS OF WILD AND SCENIC RIVER DESIGNATION

In most cases, the measurement of costs can be considerably more straightforward than measuring benefits. The simplest costs to measure are the explicit expenditures that would occur due to restrictions associated with Wild and Scenic River designation. For ranchers grazing cattle within or adjacent to the Wild and Scenic River corridor, these costs could include expenditures for additional fencing, or provision of water gaps or alternative water structures. For owners of private property, costs could be incurred at the time of sale, if Wild and Scenic River designation has had a negative impact on property values.

The Wild and Scenic River designation can result in costs of two different forms. The first type of cost can be termed [ldquo]out-of-pocket[rdquo] costs, that is, costs that are explicit. For example, designation of a Wild and Scenic River may cause increased costs to rancher grazing animals within or near the WSR corridor. If additional fencing is required, or if alternative water sources need to be developed, the rancher may incur all or part of the explicit cost associated with the Wild and Scenic River designation. Similarly, if restrictions on the way in which private property can be used cause a decrease in the value of land located within or adjacent to a WSR corridor, a cost of the designation is incurred at the time of sale.

The second form of costs can be termed [ldquo]opportunity costs[rdquo], or the costs associated with choices that are foreclosed by the Wild and Scenic River designation. For example, suppose construction of a water development project such as a dam is prevented due to the WSR designation of a river. The foregone benefits

of the dam[mdash]more reliable supplies of water for agricultural, municipal, and industrial use and the decreased risk of flooding in downstream regions[mdash]are opportunity costs associated with the WSR designation. Other opportunity costs are those associated with commercial activities that would be restricted or reduced due to the designation, such as those that may affect the timber, agricultural, or mining industries. Impacts identified in the key informant survey included those on water rights, private land uses, and public land uses. The largest issue to date appears to be grazing in riparian areas. Several court cases have determined that grazing fails to maintain the water quality in the designated segments and grazing has been eliminated in those areas. Each stream that is proposed as eligible in each process, the benefits of protecting river values are weighed against other resource values, issues, and alternatives.

Recreational river areas: Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shoreline and that may have undergone some impoundment or diversion in the past.

Note: This classification, however, does not imply that recreation is an ORV or that the segment must be managed or developed for recreational activities.

Scenic easements have been obtained by the managing agency through condemnation of private property, without specific limit in the Act. Agency regulation of activities on those easements has occurred, including limiting both physical and use modifications.

There is some evidence of limited ability to construct flood protection on private property

Some public land uses (Federally permitted uses) have been affected by the designation. At least one placer mining claim has been closed and others have been regulated (particularly gravel operations). [ldquo]

As one SCNF Idaho resident succinctly stated: [ldquo]Oddly enough there are two types of abuse to the land. Firstly doing too much. Secondly doing nothing. Both are equally damaging, due to the fact that you will never eliminate the human impact on the land, whether it is wilderness or not. The problem is once it[rsquo]s wilderness the abuse of doing nothing will forever impact its existence.[rdquo]

Respectfully,

Sandy Thomas