

SALMON-CHALLIS NATIONAL FOREST

WILDERNESS QUESTIONS & COMMENTS

On December 12 and 13, 2018, the Salmon-Challis National Forest plan revision team hosted public meetings at which staff addressed the Wilderness Inventory and Evaluation Process. During the meetings, stakeholders were asked to write down their questions on index cards. Below are the questions and comments about wilderness we received at those meetings.

QUESTIONS

General

- 1. Where do we get a copy of the Wilderness Act of 1964?**
The full text of The Wilderness Act of 1964, Public Law 88-577, is available online through the Government Printing Office at <http://bit.ly/WildernessActof1964>.
- 2. Is there currently a perpetual mandate for wilderness evaluation? By Congress?**
Yes, but the extent of any future review efforts is unknown. Under the current regulation, 36 CFR 219.7(c)(2), review of lands for wilderness character occurs when developing a proposed new forest plan or when revising an existing plan.
- 3. What are we trying to protect these lands from?**
The Forest Service is not necessarily trying to protect these lands. Rather, our team is following a process outlined in Forest Service Handbook 1909.12, Chapter 70.
- 4. If the Forest Service gets this chunk of forest into wilderness, what is the next area they will go after? They are never satisfied – Frank Church, White Clouds, etc. It never stops.**
The extent of any future review efforts is unknown. Under the current regulation, 36 CFR 219.7(c)(2), review of lands for wilderness character occurs when developing a proposed new forest plan or when revising an existing plan.
- 5. Does the U.S. Forest Service realize that 36 CFR 219.7 (c)(2)(v) does not legally modify the Wilderness Act of 1964?**
Yes. The regulation simply mandates that the responsible official determine whether to recommend lands within the plan area for inclusion in the National Wilderness Preservation System when revising a forest plan.

6. When was public input taken on whether the criteria used was complete and appropriate, as specified by Forest Service Handbook Chapter 70?

We introduced this process to stakeholders in February 2017 and have been accepting feedback since then. We have met the criteria requirements of Forest Service Handbook 1909.12, Chapters 71 and 72, and we continue to seek public input on this process.

7. How do we change the 2012 Planning Rule and Forest Service handbooks to make this the last wilderness study?

To find out how you can participate in the process of developing direction for our agency, visit the Forest Service's Regulations and Policies policy page. <https://www.fs.fed.us/about-agency/regulations-policies>.

8. What can the public do to change the policies?

To find out how you can participate in the process of developing direction for our agency, visit the Forest Service's Regulations and Policies policy page. <https://www.fs.fed.us/about-agency/regulations-policies>.

9. What is the address of the Chief of the Forest Service?

Correspondence for the Chief of the Forest Service can be sent to:
USDA Forest Service
1400 Independence Ave, SW
Washington, DC 20250-1111

10. Please explain what restrictions go with wilderness, such as no wheels, no planned ignitions, and no prescribed fire?

36 CFR 293.6 states, "...there shall be in National Forest Wilderness no commercial enterprises; no temporary or permanent roads; no aircraft landing strips; no heliports or helispots, no use of motor vehicles, motorized equipment, motorboats, or other forms of mechanical transport; no landing of aircraft; no dropping of materials, supplies, or persons from aircraft; no structures or installations; and no cutting of trees for nonwilderness purposes."

11. Why no timber or firewood removal in proposed wilderness?

If an area is recommended for inclusion in the National Wilderness Preservation System, we are required to manage the area to maintain present wilderness characteristics. As detailed in the previous answer, 36 CFR 293.6 does not permit commercial enterprise or cutting of trees for nonwilderness purposes, so we manage recommended wilderness accordingly.

12. What are examples of interim protective management?

Interim protective management prevents specific activities in recommended wilderness, such as timber management through logging or constructing of new roads, except as required by other statutes like the 1872 Minerals Act.

13. What does the Forest Service gain monetarily by creating more wilderness versus just keeping it like it is?

The Forest Service does not gain monetarily when Congress designates wilderness. In many cases, the administration of wilderness can be cost prohibitive.

14. Are lands evaluated over and over again with the intent to eventually get them all classified as wilderness?

No. We are evaluating lands again because regulations require us to do so.

15. If wilderness, or proposed wilderness, has already been evaluated, why do we keep needing to reevaluate it over and over? What will be left for those who just want to enjoy regular forest?

We are evaluating lands again because regulations require us to do so. The responsible official is not under any obligation to recommend wilderness, but our team must objectively follow the process.

16. Why are these areas being reevaluated when all was considered back in the 1988 forest planning documents? Things haven't gotten less developed since 2012.

We are evaluating lands again because the 2012 Planning Rule requires us to do so.

17. Is there an effort to eliminate inholdings via purchase or trade?

No.

18. Why do we need more wilderness in Idaho? It is all land of no use. I'm disabled and cannot use any of this wilderness.

The responsible official is not under any obligation to recommend wilderness, but we must objectively follow the process. Access to wilderness will be considered by the responsible official prior to any proposal in the analysis.

19. Wilderness has no access for seniors or people with disabilities. Why?

Access for mobility-impaired stakeholders will be one of many factors considered when determining if areas should be excluded from analysis and the proposed action.

20. Will new designation of wilderness areas recognize existing rights of way, easements, permitted activities, plans of operations?

These things will be considered as we complete the process outlined in Forest Service Handbook 1909.12, Chapter 70. It is important to note, however, that the responsible official is not designating new wilderness areas. Only Congress can do that.

21. Who in this room wants more wilderness or wild and scenic rivers?

We received this question at our Dec. 13 meeting in Challis. While our team didn't have an opportunity to pose the question, a gentleman in the crowd did. The majority of those present did stand to indicate that they didn't want to see any more designated lands on the Salmon-Challis National Forest.

Existing Wilderness or Recommended Wilderness

- 22. The Salmon-Challis National Forest has a lot of wilderness. What percent? Is this a valid reason not to add more wilderness? We are gradually becoming the Salmon-Challis Wilderness, not forest.**
Thirty percent of the Salmon-Challis is designated wilderness. The forest is not under any obligation to recommend wilderness but must objectively follow the process.
- 23. What percentage of Custer & Lemhi counties are already in wilderness?**
Sixteen percent of Lemhi County is currently designated wilderness. Twenty percent of Custer County is currently designated wilderness.
- 24. Can current recommended wilderness areas be removed from that status during this study?**
Yes. There are areas currently recommended for wilderness inclusion on the Salmon-Challis, and they could be removed from that status.
- 25. Did the Jim McClure-Jerry Peak Wilderness legislation prohibit adjacent wilderness?**
No.
- 26. If Forest Service cannot administer the existing wilderness, how can more wilderness really be administered as the regulations and policy demand?**
With declining budgets, maintaining lands within the wilderness preservation system has become more challenging, but this is not a point of consideration during the inventory and evaluation steps of this process. This will be considered during the analysis step.
- 27. If you can't keep up with trails, how do you propose to keep up with new trails in wilderness?**
Declining budgets have made it challenging for us to properly maintain trails within and outside of the wilderness preservation system. This will be considered by the responsible official during analysis, which will occur prior to the release of any proposal.
- 28. Why do trails disappear due to lack of maintenance after an area is designated wilderness?**
Because regulations typically prevent the use of mechanized equipment in designated wilderness, maintenance is usually done with hand tools, and forest staff can only accomplish this maintenance on foot. Declining budgets have made it challenging for us to properly maintain trails within and outside of the wilderness preservation system.

Process

- 29. How do we access all the information on the current inventory and wilderness process?**
All information regarding this process is available on the forest plan revision website, http://bit.ly/SCNF_Plan_Revision.

30. Which federal statutes govern federal lands management agencies? Do these statutes have precedence over policy, e.g. the 2012 Planning Rule?

There are many, including the Endangered Species Act, 1872 Mining Law, National Environmental Policy Act, etc. The 2012 Planning Rule is U.S. Department of Agriculture regulation is designed to meet requirements of several statutes, as identified in 36 CFR 219.1. In general, one piece of regulation does not have precedent over another, per se. Rather, the regulations are intended to complement each other.

31. Why did you decide to evaluate almost all of Custer and Lemhi counties land?

The Forest Service is following a process outlined in Forest Service Handbook 1909.12, Chapter 70.

32. Why Idaho? Why wilderness? Who decides?

The Forest Service is following a process outlined in Forest Service Handbook 1909.12, Chapter 70. The responsible official who recommends wilderness is the forest supervisor of the Salmon-Challis. Only Congress can designate any lands as wilderness.

33. Is there a reason to have more wilderness in Idaho?

The forest is not under any obligation to recommend wilderness but must objectively follow the process outlined in Forest Service Handbook 1909.12, Chapter 70.

34. Why not leave it alone?

The Forest Service is following a process outlined in Forest Service Handbook 1909.12, Chapter 70.

35. Why more wilderness?

The forest is not under any obligation to recommend wilderness but must objectively follow the process outlined in Forest Service Handbook 1909.12, Chapter 70..

36. Why do you want more wilderness when the wilderness we already have isn't taken care of?

The forest is not under any obligation to recommend wilderness but must objectively follow the process.

37. How do you justify more wilderness when we already have plenty?

This is not a consideration during the inventory and evaluation parts of this process. However, the responsible official will consider this in the analysis phase of this process.

38. We already have a significant amount of wilderness. What about future use of our public land that would be prohibited by wilderness designation?

This will be considered by the responsible official in the analysis phase of this process.

- 39. Why even consider more wilderness when our current wilderness is burning up – wasting timber and other resources – and trails are not being cleared? The public can't enjoy "solitude" if they can't get there.**

The forest is not under any obligation to recommend wilderness but must objectively follow the process. The responsible official will consider access to wilderness in the analysis phase of this process.

- 40. Up to this point, in U.S. court system, you are innocent until proven guilty. The burden of proof is on attorneys to prove the person guilty. So, the Forest Service has the opposite. Everyone is evaluation as wilderness. Prove what is not. Draw roads, etc. It should be look at everything and say "is there anything that meets Wilderness Act of 1964?" The burden of proof is on Forest Service to prove! Not burden of proof on public to prove all doesn't meet the requirements.**

Our team has to follow the process outlined in Forest Service Handbook 1909.12, Chapter 70.

- 41. Why do we have to justify why we take lands out of consideration instead of justifying why the area is being considered?**

Forest Service Handbook 1909.12 Chapter 73 states, "For each evaluated area or portions thereof that are not included in an alternative in the applicable National Environmental Policy Act analysis, the Responsible Official shall document the reason for excluding it from further analysis."

- 42. Are you hiding behind the fact that Congress has to decide? Your input is very important, and you know what the public wants.**

No. Our team is following a process outlined in Forest Service Handbook 1909.12, Chapter 70. The responsible official will be considering many factors when determining what areas should be excluded from analysis.

- 43. Are our comments going to even matter?**

Yes. Comments will be used to adjust the catalog of attributes that contribute to or detract from wilderness characteristics. Additionally, public comments will be used to help determine if any areas should be excluded from analysis.

- 44. How do we submit comments?**

Feedback can be submitted a number of ways. Stakeholders can:

- Submit an e-mail to scnf_plan_rev@fs.fed.us;
- Post a letter to Salmon-Challis National Forest, ATTN: FPR/Wilderness, 1206 S. Challis Street, Salmon, ID 83467; or
- Comment online through our [comment tool](#) or [Wilderness StoryMap](#).

Feedback is most helpful if received by Feb. 28, 2019.

- 45. Are the local taxpayers' views prioritized?**

No. The responsible official must consider all feedback and cannot prioritize a particular view.

- 46. Frank Church Wilderness not big enough for you? Have you cooperated with Idaho Department of Fish and Game to discuss lost revenue due to lack of access?**

The forest is not under any obligation to recommend wilderness but must objectively follow the process.

Idaho Department of Fish and Game is one of our cooperating agencies, and we regularly communicate with our counterparts in the state agency.

- 47. How do you get lands release from the wilderness process? One hundred, thirty-seven thousand acres should be removed. It should not be forever. Planning rule is not law.**

All previously recommended wilderness is up for consideration in this process. The next phase of this process is the analysis, when the responsible official will determine if areas should be excluded and why. Public participation is especially important in this phase.

The planning rule is regulation. The final recommendation for wilderness inclusion may include some, none, all, or portions of the inventoried areas. If not recommended, the area is guided by other forest plan components that are being developed as part of the revision.

- 48. What are the criteria used to determine if land is appropriate for wilderness designation?**

There are three areas to consider:

- apparent naturalness, which we acknowledge is subjective;
- existence of opportunities for solitude or primitive and unconfined recreation; and
- size of the area, which must be at least 5,000 acres or of sufficient size to maintain characteristics in unimpaired condition.

A fourth, optional area of consideration is the existence of ecological, geological or other features of scientific, educational, scenic and historical value.

- 49. How does Forest Service plan to maintain an “unimpaired” condition?**

Our team will consider plan components, topography, proximity to access, and proximity to other protected areas.

- 50. Who determines what is considered unconfined recreation?**

The responsible official determines this based upon input from public. Forest Service Handbook 1909.12 Chapter 72.1 defines unconfined recreation as activities that lead to a visitor’s ability to feel a part of nature.

- 51. What are real wilderness characteristics? Some people think a city park is wilderness, whereas those of us in this part of the country have a totally different concept.**

Naturalness is in the eyes of the beholder, and one piece of ground may appear natural to one person and altered to another. The responsible official

must consider all input and determine if lands appear to be affected primarily by the forces of nature.

52. Are the current criteria legally authorized by Congress

The current criteria are based on direction contained in Forest Service Handbook 1909.12. The handbook is designed to comply with 36 CFR 219, the purpose of which is, in part, to meet requirements of the Wilderness Act (36 CFR 219.1).

53. Is the Forest Service handbook authorized by Congress?

Forest Service handbooks, which provide specific guidance and instruction for carrying out internal and external directives, are published by our agency headquarters.

54. Why would Forest Service policy disregard the actual law?

The Forest Service has not disregarded any law. We are following the process outlined in Forest Service Handbook 1909.12. The handbook is designed to comply with 36 CFR 219, the purpose of which is, in part, to meet requirements of the Wilderness Act (36 CFR 219.1).

55. Do burned over areas influence wilderness consideration?

No. Burning is a natural process, even if intense. Infrastructure, such as dozer lines, would detract from an area's natural appearance.

56. The majority of the 16 areas, as noted by Forest Service, do not meet wilderness criteria. Will this reduce those areas?

The majority of the areas likely do meet wilderness criteria. Any area going into the next step of analysis will be looked at for manageability and adjusted accordingly.

The responsible official has not made any decision on a proposal for analysis. When developing the proposed action for analysis the responsible official will take a hard look at these areas and consider if they have wilderness characteristics and manageability; but, other considerations that may be cause for excluding them from analysis.

57. On the wilderness evaluation, there isn't any evaluation areas that meet the 1964 act. Revised Statute 2477's? Custer County land management plan? Memorandum 103 or Memorandum #14?

Our team is following a process outlined in Forest Service Handbook 1909.12, Chapter 70, which provides specific guidance and instructions to meet requirements of The Wilderness Act. The responsible official will determine if any lands should be recommended wilderness. Congress ultimately decides on the appropriateness.

Our team is not aware of any formal Revised Statute 2477 assertions in these areas. Some of these areas could, and likely do, have roads or trails that predate the forest reserve. However, this is not the only test. There is currently no regulatory mechanism by which the Forest Service may authoritatively recognize public roads under that statute. The burden to assert rights falls to other parties. Documented evidence clearly supporting assertions should include a construction date prior to reservation of the

National Forest and proof of continuous use by the public over the entire time without abandonment.

The Custer County land management plan is clear that wilderness is not supported by that entity.

58. Why would you put this map out when you haven't mapped Revised Statute 2477 roads or trails? Too premature on putting out a map before it's been ground-truthed.

Our team is not aware of any formal Revised Statute 2477 assertions in these areas.

The process outlined in Forest Service Handbook 1909.12, Chapter 70 provides the basis for the maps we have published so far.

59. Are there any Revised Statute 2477 roads or trails included in any of this study/inventory?

Our team is not aware of any formal Revised Statute 2477 assertions in these areas.

60. How well have you reviewed past studies? They obviously determine the study areas of the map with roads, trails, buildings, mines, etc. These areas have already been deemed not meeting wilderness criteria.

Past studies noted that many of these areas had wilderness characteristics, but, ultimately, the responsible official at the time chose to remove them from consideration. Similar to the analysis portion of the process outlined in Forest Service Handbook 1909.12 Chapter 73, areas were excluded for a variety of reasons.

61. Who did inventory? Was public involved? Who cataloged attributes?

Forest Service staff did the inventory after we introduced the Wilderness Inventory and Evaluation Process during our first round of forest plan revision public meetings in February 2017. We have been collecting feedback since that time. Many Forest Service disciplines aided in the catalog of evaluation attributes, and the public, through feedback, can help identify more.

62. When does U.S. Forest Service intend to correct the inaccuracy of 2.79 million acres inventoried to rightfully remove those from that currently or further evaluated?

We believe we have correctly identified inventory areas and evaluated them, following the process outlined in Forest Service Handbook 1909.12, Chapter 70.

63. How does this map get put out to the public without being properly vetted? Investors of mining projects in hundreds of millions of dollars are reacting internationally. Take the map back and start over!

The inventory map was posted on the forest plan revision website in June 2017 and was available for review at public meetings that followed. The

evaluation map was first presented at the November 2018 Plan Initiation Workshops held throughout the planning area and has been available for public review online and in district offices since.

The responsible official has eliminated the Blackbird Mountain and Leacock Point inventory and evaluation areas from consideration in the proposed action. Forest Service Handbook 1909.12, 70.3 requires the responsible official to document the reasons for excluding any area from further analysis. Rationale for this action is posted online at:

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd606601.pdf

64. Where is the complete list of criteria used to create these polygons made available?

The polygons were created during the inventory phase. The inventory process is detailed online at:

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd601989.pdf

65. Define all criteria used to determine this should be wilderness?

Criteria used during the various steps of our process can be found online at <http://bit.ly/SCNFWildernessStoryMap>.

66. Did you know mines in this area are losing big dollars in investments with potential jobs and revenue business while you play “look and see?”

The responsible official has eliminated the Blackbird Mountain and Leacock Point inventory and evaluation areas from consideration in the proposed action. Forest Service Handbook 1909.12, 70.3 requires the responsible official to document the reasons for excluding any area from further analysis. Rationale for this action is posted online at:

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd606601.pdf

67. How many lost jobs are acceptable to place how many acres into wilderness?

The Forest Service has made no proposal to date. The socioeconomic impacts of any proposed wilderness will be considered during the analysis phase. A final proposal will be documented in the record of decision, which will be published at the end of the forest plan revision process.

68. Does the U.S. Forest Service realize a map with such a broad reach and glaring inaccuracies creates immediate, far reaching, long-lasting loss of capital investment dollars in an economically-depressed county? Will the U.S. Forest Service correct the inaccuracies and print a retraction?

The Forest Service is following the process outlined in Forest Service Handbook 1909.12, Chapter 70. As a direct result of public involvement in December 2018, the responsible official has eliminated the Blackbird Mountain and Leacock Point inventory and evaluation areas from consideration in the proposed action. Forest Service Handbook 1909.12, 70.3 requires the responsible official to document the reasons for excluding any

area from further analysis. Rationale for this action is posted online at:
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd606601.pdf

69. Does the U.S. Forest Service believe a map is adequate documentation as required by Forest Service Handbook Chapter 70.60?

No. Forest Service Handbook Chapter 70.60 describes the entire process. This involves four steps, data assembly, decisions, many maps, public interaction, interactions with cooperating agencies, and analysis to arrive at a final recommendation.

70. Have you read the Wilderness Act of 1964? Most areas in your map do not meet the requirements.

Yes. The Salmon-Challis is following the policy contained in Forest Service Handbook 1909.12, Chapter 70. The handbook is designed to comply with 36 CFR 219, the purpose of which is, in part, to meet requirements of the Wilderness Act (36 CFR 219.1).

71. What percentage of existing Salmon-Challis National Forest does studied areas represent?

Sixty-two percent of the forest is in wilderness evaluation areas.

72. Is the Salmon-Challis National Forest going to do a thorough socio-economic impact study?

Yes, the National Environmental Policy Act process documented in the Environmental Impact Statement will include a socio-economic analysis.

73. Has the timing of initiation of the public comment period through the holidays been an intentional act to limit public input (i.e. weaponized holiday season and the associated distractions as a disingenuous attempt to satisfy requirement for public input)?

No.

74. Is this the same process as was used in the early 1970's in the Frank Church?

No. This process is part of the 2012 Planning Rule (36 CFR 219) and chapter 70 for wilderness and land management planning which was effective in 2015.

75. Are there any public people involved in the decision making process?

Yes. We introduced the Wilderness Inventory and Evaluation Process during our first round of forest plan revision public meetings in February 2017 and have been collecting feedback at public meetings and through e-mail and online comments. We are also working with several cooperating agencies.

76. Is all public comment available for review to the public?

Feedback submitted to us is posted to our online public reading room:
http://bit.ly/SCNF_FPR_PublicReadingRoom.

Feedback submitted through our online commenting tool, which can be found online at <http://bit.ly/SCNFFPRCommentTool>, usually appears a short time

after it is submitted. Feedback submitted by mail or e-mail is posted to the public reading room as soon as possible after it is received.

77. Can we get a worded descriptions of the proposed areas to be able to see more clearly the proposed areas?

The Forest Service has made no proposal to date. At this time, GIS layers considered during the process are available for inventoried and evaluated areas in our online data gallery, which can be found online at <http://bit.ly/SCNFPlanRevisionData>. They are also available for review in the Salmon-Challis Wilderness StoryMap, which can be found at <http://bit.ly/SCNFWildernessStoryMap>.

78. You have not managed our forests to date. Now you say you are going to manage as a wilderness. What is your plan? Let it burn?

The Forest Service has made no proposal to date. It is true that wilderness would allow natural fires to burn when possible.

79. Will lightning fires be controlled in a wilderness area?

In wilderness, fire is allowed to play its natural role, if possible. Each fire is evaluated to determine if suppression tactics are needed.

80. How would the Forest Service possibly manage more wilderness when they can't or won't manage the wilderness that exists?

This is another consideration that will be addressed when determining which, if any, areas to bring into analysis.

81. What does President Trump and his staff think?

The recommendation phase of the process includes review at many levels and may include the President.

82. What is the status of areas that are not considered for inventory consideration? Wilderness study status?

There is no status for these areas with regard to the Forest Service Handbook 1909.12, Chapter 70.

83. Why didn't you take "yellow" shaded areas out of the evaluation map?

While the evaluation does allow the responsible official to group and to vary the scope, the responsible official is required to evaluate all the lands that were inventoried.

84. How far from an existing road is qualified for wilderness?

There is no set distance of setback outside of adjusting the boundary for manageability. Lower grade roads, such as small two-tracks, can be within wilderness, but we can't use them for motorized purpose. Another example are roads with a full cut and fill slope on steep side slopes.

85. Did you assess an impact zone around major improvement in inventory?

The impact zones vary by improvement, but, in all cases, the buffer is fairly small to meet the inventory direction.

- 86. If it has been logged then is it out of the inventory?**
No. Some logged areas are in the inventory. Areas are then evaluated for whether that activity detracts from naturalness or manageability of the area.
- 87. Where does multiple use come in to play?**
Multiple use is looked at across the forest as a whole. When looking at the entire Salmon-Challis, the responsible official will evaluate whether or not management allows for multiple uses. Multiple use is not evaluated on an acre-by-acre basis.
- 88. Since the Forest Service is supposed to manage for multiple use for Idaho, why do you feel more wilderness is necessary?**
The forest is not under any obligation to recommend wilderness but must objectively follow the process.
- 89. Back in the early 1900's, when the Forest Service was being established, we were promised access, use and the taking care of rangeland and forests. Now it's all going to wilderness. Where is the use for the people?**
Multiple use is not evaluated on an acre-by-acre basis but across the forest as a whole. The forest is not under any obligation to recommend wilderness but must objectively follow the process.
- 90. Is the Multiple Use Sustained Yield Act part of the analysis consideration?**
Yes. However, multiple use is not evaluated on an acre-by-acre basis but across the forest as a whole.
- 91. What about grazing?**
The extent to which grazing is impacted in designated wilderness depends on the legislation passed by Congress. While a recommended wilderness waits for Congressional action, grazing is authorized, but, depending on the protections put in place in the forest plan, access and infrastructure – new or maintained – could be affected.
- 92. Is there any reason for areas with grazing allotment to be on maps or lists to be evaluated for wilderness characteristics described in the Wilderness Act of 1964?**
Yes. Our team has to look at all lands in the inventory. Once included in an inventory, our team has to evaluate the area.
- 93. If a rancher's water right starts on wilderness, how do they maintain their ditches, headgates, etc., when they use equipment?**
Nothing proposed or recommended would affect any water right. Activities, such as maintenance and use of equipment, can be problematic in wilderness. How Congress actually drafts any bill can affect the degree, but, generally, any action within wilderness would have to be designed to minimize impacts to wilderness character.

94. Sitting on areas that meet criteria but Congress chooses not to designate is creating defacto wilderness, is it not?

It is true that those areas must be protected to maintain the characteristics that provide the basis for the wilderness recommendation. While more flexibility may exist over a wilderness designation, most management is limited or restricted.

The Salmon-Challis has not arrived at any proposal at this time. The proposed action, once determined, may contain none, some, all, or portions of the inventoried and evaluated areas.

Custer County would be 56% in combined evaluation areas and existing wilderness and Lemhi County would in 62.5% combined evaluation areas and existing wilderness.

95. What will prevent these areas from being closed as wilderness study areas?

Should any area be recommended for inclusion in the National Wilderness Preservation System, it would not be closed. It is true that those areas must be protected to maintain the characteristics that provide the basis for the wilderness recommendation, and the protections may limit the management options available.

96. If this proposal is approved tell us how this additional expanded wilderness area will benefit the citizens of Custer, Lemhi, and Butte counties?

The National Environmental Policy Act process, documented in the Environmental Impact Statement, will include a socio-economic analysis. The public's concern on this matter will be one of many factors considered when determining if areas should be excluded from analysis and the proposed action.

97. It is my understating that a plan can be written, then sent to the head of the U.S. Forest Service in Washington, D.C. He can then hand this plan to a member of Congress. The congressman can hold this plan and not present it to Congress. The Forest Service can then proceed as though the plan is the law of the land. Comment?

It is true that these recommended wilderness can sit for decades without decision. The areas remaining on the Salmon-Challis have been in place since the late 1980's. The public's concern on this matter will be one of many factors considered when determining if areas should be excluded from analysis and the proposed action.

98. What will prevent wilderness boundaries leading to buffer zones beyond these boundaries?

Planning outside the boundary proceeds as normal, and there is not a process, direction, or preference to buffer. Forest Service Handbook 1909.12, Chapter 70, does look into manageability of an area.

- 99. Doesn't the big map fit well with the Yellowstone to Yukon Conservation Initiative and Migratory High Divide Map?**
The wilderness inventory and evaluation process is independent of any other effort.
- 100. Is all of this part of Agenda 21?**
No.
- 101. Agenda 21? Maybe that is the plan in congress since they tend to listen to the environmentalists.**
The wilderness inventory and evaluation process is independent of any other effort.
- 102. U.S. Forest Service is on record supporting Yellowstone to Yukon wildlife corridor. Is new wilderness plan connected to this project?**
No.
- 103. How much influence does the Wildlands Project and its supporting environment groups have on this process? And if you had to make a graph of that influence, starting with the 80's, what would it look like?**
The wilderness inventory and evaluation process is independent of any other effort. It is true that, over time and on the whole, more acres of national forest have additional regulations or policy placed upon them as compared to the past. Examples of these regulations and policies include roadless rules, the Greater Sage Grouse Amendment, and PACFISH/INFISH.
- 104. You can't manage these areas. What about locking up the unknown minerals?**
Typically, areas not having valid existing claims are withdrawn from mineral entry in wilderness. The responsible official will consider this when determining which, if any, areas to bring into analysis.
- 105. Does short term extractive use make economic sense as opposed to leaving the land for recreational use?**
The responsible official will consider this when determining which, if any, areas to bring into analysis.
- 106. How are the economic values of the Forest Service decided? Is it at the federal level? Historic precedent?**
There is no set level for determining economic values. The National Environmental Policy Act process documented in the Environmental Impact Statement will include a socio-economic analysis. It is required that the forest use best available science for that analysis.
- 107. Were local economics considered in the evaluation process?**
The National Environmental Policy Act process documented in the Environmental Impact Statement will include a socio-economic analysis. It is required that the forest use best available science for that analysis.

108. Do you need to re-do the roaded areas analysis to add unauthorized roads and level 1 roads?

The roaded areas analysis did include level 1 roads. Level 1 roads were included because they are purpose-built, administrative roads that access such things as timber sales, mining areas, and grazing infrastructure. Our team will look at unauthorized roads. Unauthorized roads are a mix of roads that range from purpose-built, as described above, to user created. Unauthorized roads are generally less likely to have other infrastructure or management associated with them.

The purpose of the roaded exercise was not to eliminate any areas but to draw attention to other considerations that the public finds important.

109. How much money has the Forest Service spent to date on this process? This proposal?

Specific numbers are not available for each part of the revision effort. It takes millions of dollars in today's regulatory, social, and political environment to develop a revised forest plan. Currently, the Salmon-Challis is investing over \$1 million per year on the revision.

110. How much of our money is being spent to study what we've already paid for several times over?

Specific numbers are not available for each part of the revision effort. It takes millions of dollars in today's regulatory, social, and political environment to develop a revised forest plan. Currently, the Salmon-Challis is investing over \$1 million per year on the revision.

111. Why waste money evaluating more wilderness? Why not use the money to manage current wilderness, i.e. clearing trail?

The wilderness inventory and evaluation process is required by regulation.

112. Who conducts the studies in the field?

Forest Service staff would conduct any necessary field review.

113. What constitutes a final proposal?

The responsible official may recommend none, some, all, or portions of areas inventoried. A final proposal will be documented in the record of decision, which will be published at the end of the forest plan revision process.

114. If an area is proposed as wilderness, will it be put to a public vote?

No. Congress would have the final say.

115. Where do we make an objection so it is noted in writing?

The formal objection process has not begun and will be published as part of the National Environmental Policy Act process and begins in the analysis.

COMMENTS

1. Please post Jeff's PowerPoint on the website. It is very helpful.

The presentation is posted online at <http://bit.ly/12-2018WildernessPresentation>.

2. **It is premature to be at the analysis phase if you are just getting public input on inventory and evaluation today and tomorrow.**
This is not the first time we have addressed this topic at public meetings. We introduced the Wilderness Inventory and Evaluation Process during our first round of forest plan revision public meetings in February 2017 and have been collecting feedback ever since.
3. **Include proposed wilderness areas in the forest plan, especially areas 1, 6 & 12. Maintain current proposed protections and start regulating areas as wilderness.**
Thank you for your feedback.
4. **Don't rely on historical use. Historic use may have had negative impacts. Consider the greater good.**
The forest is following the process outlined in Forest Service Handbook 1909.12, Chapter 70, for wilderness and land management planning.
5. **Define a forest that is not protected.**
We are not aware of any forest in the system of national lands that is not protected by regulations. Levels of protection vary from forest to forest.
6. **It appears that quantitative aspects (i.e. those that are categorized on the map) are given the most weight vs. extremely important qualitative concerns since they are more difficult for the Forest Service to defend. These qualitative items should be given more weight.**
Not necessarily. The first two steps and where we are today do lean heavily to quantitative. The analysis and what is brought forward relies on rationale and qualitative discussions.
7. **The 2012 Rule, 1909.12, is what rules. Forest Service is attempting to go through wilderness evaluation. Congress works on 1964 wilderness act – not Forest Service rules. Two different bars.**
The Forest Service follows policy to aid in meeting the requirements set forth in 36 CFR 219.
8. **Lock up roads and make a wilderness. It will end our way of life. Wilderness needs to go away.**
Our team is following a process outlined in Forest Service Handbook 1909.12, Chapter 70.