

Oct. 4, 2020

Josh Milligan

Forest planner

Salmon-Challis National Forest

1206 S. Challis St.

Salmon, Idaho 83467

Re: Comments from the Theodore Roosevelt Conservation Partnership on the SCNF Current Plan Evaluation Summary

Mr. Milligan,

The Theodore Roosevelt Conservation Partnership (TRCP) writes today to thank the Salmon-Challis National Forest (SCNF) of the U.S. Forest Service (USFS) for the opportunity to comment on the forest's current plan evaluation summary.

The TRCP is a national non-profit conservation organization working to guarantee all Americans quality places to hunt and fish. In addition to its 61 formal partner groups, the TRCP represents more than 100,000 individual members across the United States and 3,500 in Idaho. In cooperation with other sporting and conservation organizations, we work to ensure quality access to public lands while at the same time working through federal land use planning to make sure big game animals – such as deer, elk, bighorn sheep, and pronghorn – have room to thrive.

The TRCP appreciates the USFS's appraisal of its current plans. This effort is particularly warranted given that the current plans were last revised in 1988. Since that time, new information has become available to inform USFS management of the forest. At the same time, on-the-ground realities, such as the huge growth in motorized use and the loss of the logging infrastructure in Salmon and Challis, have largely left the old plans wanting.

After review of your evaluation summary, the TRCP recommends the USFS restart the planning process immediately. The evaluation summary itself provides a compelling case for updating both plans by identifying numerous areas where the current plans fail to sufficiently address important resources and forest uses. Examples from the report include:

- Page 2 on grazing and noxious weeds: "Both plans also recognize the importance of controlling noxious weeds, but only minimally so."
- Page 3 on minerals: "The plans also lack direction for geologic hazards such as hazardous minerals, mass wasting, radon, and abandoned mine sites."
- Page 4 on recreation: "Both the current Salmon and Challis forest plans contain a significant amount of direction for recreation. However, current direction can be confusing, unclear, and either too vague to be useful or too specific to allow for the flexibility needed to adapt to changing conditions or desires over time."

- Page 4 on social and economic considerations: “The current forest plans are mostly silent when it comes to shared stewardship with county commissioners, state government, tribes, permittees, non-profit organizations, schools, businesses, neighboring landowners, rural fire departments, forest visitors, and public land agencies, like the Bureau of Land Management and neighboring forests.”
- Page 6 on fire and fuels: “... current plan direction does not account for fire management techniques addressed within it. In fact, much of current fire and fuels management direction conflicts with national fire policy.”
- Page 7 on fire and fuels: “Overall, resource specialists have found current fire management direction unhelpful in both forest plans.”
- Page 8 on riparian ecosystems: “... lack of clarity in the direction makes it difficult to implement.”
- Page 13 on key findings: “However, the current plans are very permissive, much of the direction is outdated and, in many ways, it is like operating without a plan at all and can complicate project level analysis.”

It is the TRCP’s belief the ecological health of the forest – and the socio-economic needs of the communities that benefit from the forest – is best managed from a plan that strategically sees the forest as a partner in the communities through shared stewardship. It is adaptive and quantifiable. We believe the SCNF and its stakeholders can work together to help nearby communities flourish while also addressing the forest’s challenges.

Thank you for the opportunity to comment. If you need assistance, please reach out.

Sincerely,



Rob Thornberry

Idaho Field Representative

**Theodore Roosevelt Conservation Partnership**



