

Data Submitted (UTC 11): 10/7/2020 3:47:53 AM

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Comments: 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

Dear Mr. Milligan,

Thank you for the opportunity to provide comments on the Salmon Challis National Forest (SCNF) Existing Forest Plan Evaluation Summary. Idaho Wildlife Federation (IWF) appreciates the time that agency staff put forth throughout the planning processes and appraisal of such plans that will guide management decisions over the next several decades.

Idaho Wildlife Federation and Background

Idaho Wildlife Federation (IWF) is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 29 affiliate organizations and 45,000 affiliate members and supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

Our affiliates, affiliate members, and supporters come from every county in Idaho. Analysis of our demographics shows that our individual supporters are equally distributed throughout Idaho, including the communities near the SCNF. As well, IWF supporters across the state choose to hunt, fish, and recreate on the SCNF because of its outstanding fish and wildlife resources. The contributions of sportsmen to local, rural economies near the SCNF is substantial. As such, IWF offers the the following comments for your consideration regarding the Salmon-Challis planning effort.

Current Forest Plans are Outdated

The current plans were written in the 1980's. In over 30 years, significant ecologic, socioeconomic, and recreational changes have occurred. These changes over time have created a lack of direction for the USFS to take regarding present-day issues that can only be rectified through a new planning process. Further, the existing forest plans were developed under the 1982 planning rule. The USFS has since updated its procedures with the 2012 planning rule, which considers a broader range of forest values to adhere to the three pillars of sustainability: ecological integrity, social acceptability, and economic viability. As well, the USFS should consider how the 2008 Idaho Roadless Rule could impact forest management.

Examples of changes in the last 30 years currently unaccounted for in the existing forest plans include, but are not limited to:

-Understanding of climate change and its impacts to aquatic and terrestrial species, growth of and harvest of commercial timber, changes to fire regimes and hydrologic cycles, exacerbation of invasive species proliferation, etc.

-Significant changes to types of recreation and amount of people recreating. Advancements in OHVs, the invention of E-bikes, and the general increase in mechanized equipment users at once recognizes the need for well-maintained infrastructure, while at the same time necessitates the protection of sensitive ecological areas from heavy human traffic to sustain the wildlife resource.

-Several anadromous fish species have become ESA listed since the existing plans were drafted. Though patches have been incorporated, the science of anadromous fish recovery advances every year. Better and adaptive management directives are needed.

-Identification of migration pathways of big game species and management that prioritizes their free movement and the ecological recovery of habitats within these corridors. Recent advancements of geospatial technology in radio collars applied to temporal vegetative analysis have emphasized the critical importance of ecological connectivity for sustaining big game species. Idaho attracts many resident and non-resident big game hunters. Prioritizing active management in such corridors will ensure the ecological, cultural, and economic significance of the forests' big game.

Current Forest Plans Lack Specificity

While there are some instances in the current plans that provide general management direction, there is a need for more specific site-specific management applications. For example, grazing practices should be updated to buffer critical ESA listed anadromous fish habitat, and active management, including mechanized allowances in some cases, could be used to more efficiently and effectively recover degraded habitats. This need for substantial site-specific changes is echoed by sentiment from state agencies. IWF believes such substantial changes can only come from entirely new forest plans.

Conclusion

The issues mentioned above, and many more, were identified in the Forest Service's own review of the existing forest plans. The conflicts, inconsistencies, and vague directives were so numerous that a complete revision of both plans is not only compelling, but IWF believes it would be a disservice to the neighboring communities and general public that benefit from the forest resources, as well as the USFS staff who must implement such plans, not to initiate a full revision of both plans immediately. Additionally, the National Forest Management Act requires forest plans be revised at least every 15 years. Existing plans are over 30 years old.

Lastly, IWF believes the two forest plan revisions should take place simultaneously and harmoniously, if not as a single effort or as a single plan. Creating a single process that tackles both forests will be a more efficient use of taxpayer dollars and the human resources. Many forests have broader diversities of resources and do not require bisection and respective forest plans. The Salmon and Challis forests share such similar ecological, social, and economic resources that a single plan could offer management efficiency and consistency across borders. To summarize: The Idaho Wildlife Federation urges the Salmon-Challis National Forest to initiate a complete revision of the two plans, and even consider combining the revisions into one plan.

Thank you for the opportunity to comment.

Brian Brooks
Executive Director