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October 2, 2020

Forest Supervisor Chuck Mark
USDA Forest Service
1206 S. Challis St.
Salmon, ID 83467

Re: Salmon-Challis NF Current Plan Evaluation Summary

Dear Supervisor Mark:

Thank you for the opportunity to comment on the Current Plan Evaluation Summary released on August 20, 2020. The following points are in addition to the comments submitted by our collective organizations on August 4, 2020 (see Attachment #1). In general, we support the evaluation summary's final list of opportunities to modernize the plans, as the points are all valuable reasons for the planning team to implement a full-revision process.

The Current Plan Evaluation Summary document identifies significant deficiencies in the existing plans that we interpret as justifying the need for a full plan revision on both forests. These deficiencies include:

- With both plans being amended 19 and 10 times respectively, and recognizing that each of those processes consume staff time and resources, and it would be more effective and efficient for management purposes if the plans were to be revised.
- The lack of direction with noxious weed management highlights the need for revisions, especially with the increased concern of forest fires.
- The review highlights that sections of each plan pertaining to recreation management are no longer relevant, and need to be updated. We consider this a serious gap in the current plans and meriting a revision process, especially with the increased use Covid-19 has brought to the region. Additionally, with Travel Management processes succeeding forest planning, the Forest Service would be tied to piecemeal, site specific, management recommendations when the forest needs an inclusive forest-wide approach to recreation management.
- It is very concerning that the current plans conflict with national fire policy. An amendment approach to alleviating this gap would be extensive, as fuels management affects multiple areas of the plans, and a revision process would enable this policy conflict to be alleviated.

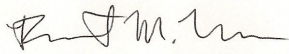
Additionally, there are gaps in the current plans that the Evaluation Summary failed to identify and include. They are detailed in our previous letter (see Attachment #1), but include significant elements of current land management practices that generally were not considered in any land management plans in the 1980s. These elements should be identified as deficiencies as well, and include:

- Climate change;
- Forest-wide habitat connectivity; and
- Species migration

Please do not hesitate to reach out to us regarding these recommendations. We look forward to continuing to work collaboratively with you and the diverse array of stakeholders on the forest to ensure that the distinctive values that exist on the Salmon-Challis National Forest are stewarded to ensure that they endure for future generations.

Sincerely,

Rob Mason
Central Idaho Representative, The Wilderness Society



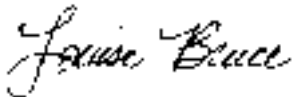
Josh Johnson
Conservation Associate, Idaho Conservation League



Hannah Rasker
Conservation Associate, Yellowstone to Yukon Conservation Initiative



Louise Bruce
Idaho High Divide Community Organizer, The Wilderness Society



CC:
Acting Regional Forester Frank Beum
Deputy Regional Forester Dave Rosenkrance
Regional Planner Chris Moyer
Capitol City Coordinator Andy Brunelle
Forest Plan Team Lead Josh Milligan

ATTACHMENT #1



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August 4, 2020

Forest Supervisor Chuck Mark
USDA Forest Service
1206 S. Challis St.
Salmon, ID 83467

Re: Next Steps for Salmon National Forest and Challis National Forest Plan Revision Processes

Dear Supervisor Mark:

In the coming months we anticipate that the Salmon-Challis National Forest will have some challenging decisions to make regarding the future of the forest planning efforts on both the Salmon National Forest and the Challis National Forest. Our organizations would like to recommend several steps that we believe would set up the planning processes best for not only community support but also management of our public lands on the two forests.

Our organizations represent tens of thousands of members who care deeply about conservation issues on public lands in Idaho and throughout the West. We have been engaged with the Salmon-Challis National Forest as stakeholders for many years and have worked for collaborative solutions to forest management decisions. We are also active participants in the Central Idaho Public Lands Collaborative (CIPLC), which is dedicated to partnering with the Salmon-Challis National Forest to provide consensus recommendations and input to forest plan revision processes.

Gaps in Current Management Plan

As you know, the High Divide landscape is one of the most unique landscapes in all of North America. Its anadromous fisheries, wildlife migration corridors, intact roadless landscapes and rural economy are cherished by Idahoans and Americans alike. This is a landscape that serves to connect two of the largest blocks of wildlands remaining in the United States: the Greater Yellowstone Ecosystem and central Idaho's wilderness complex. It is truly one of America's crown jewels.

The current land management plans for the Salmon and Challis National Forests do not provide adequate management guidance to conserve those critical values. Specifically:

- There is no management direction for the conservation of wildlife migration and movement corridors. The conservation of wildlife migration and movement corridors is critical to the long-term sustainability of biodiversity and big game species.

- Current management direction does not address the threat of climate change to the flora and fauna of the Salmon-Challis National Forest, such as whitebark pines, wolverines, and other climate-sensitive species.
- There is no management direction for the conservation of cold water refugia, i.e. the headwaters of streams and rivers that provide cold, clean water for spawning salmonids. In the face of climate change, the management direction specifically targeted at the conservation of these cold water headwaters is particularly important.
- The Salmon-Challis National Forest is the single wildest national forest in the lower 48 states based on metrics such as solitude, remoteness, and ecosystem intactness. Even its non-wilderness lands have been assessed to be the wildest non-wilderness lands left on any national forest in the lower 48 states. This is a unique niche that this forest fulfills and the high wildland value and national significance of the Salmon-Challis National Forest's wildlands should weigh heavily in management decisions. Limiting the threats on these remaining wildlands from development, unsustainable resource extraction, and increasing recreation pressures is a critical conservation strategy to maintain strong biodiversity and ecological function. We do not believe that the existing forest plan goes far enough in conserving these nationally important wildlands and the biodiversity and ecological functions that go along with them.
- The long-term economic viability of the rural communities adjacent to the Salmon-Challis National Forest are tied to the public lands that surround those communities. There is currently little management direction that provides for public lands to support increasingly diverse and sustainable economic activity in rural communities. The wildlands of this forest need to be considered for their intrinsic value in supporting the economic and well-being of local communities.

We also recognize that there are additional important management areas where existing management direction is insufficient to meet current management challenges, and we support other stakeholders who are bringing forward the gaps that they have identified as well.

Recommendations for Forest Plan Revision Processes

Collectively, the gaps in management direction that exist in the current land management plans for the Salmon and Challis National Forests are significant and serve as major barriers to meeting the management challenges of the current era. The existing plans were finalized nearly 40 years ago when forest management challenges differed from those that exist today and when the science of wildlife migration, climate change and biodiversity conservation were still in their infancy. Significant new management direction is needed to address today's management challenges. **We maintain that a single, unified forest plan for the Salmon-Challis NF would be by far the best option from an ecological and resource management perspective.** We do not believe that a two-plan approach or isolated plan amendments will be sufficient to address the wide array of management gaps that exist in the current plans and provide adequate consistency for future management.

While we strongly recommend a unified full management plan revision for both forests, if plan amendments are being considered we recommend that they only be considered on the Challis National Forest and that the Salmon National Forest continue to move forward with a full plan revision in all circumstances. While major gaps in management direction exist on both forests, we feel that the gaps in the existing Salmon National Forest land management plan are even greater than those on the Challis National Forest. While plan amendments on the Challis National Forest would not be sufficient to address the full array of gaps that exist in current management direction, it could be possible to put

forward plan amendments on the Challis National Forest so long as those amendments specifically address the management of wildlife migration corridors and cold water refugia.

If the Forest Service does decide to proceed with separate Salmon and Challis forest plans, we advocate that the entirety of the Lemhi Range be administratively managed entirely by the Salmon NF and its revised forest plan. The Lemhis are one of the most ecologically important areas on the Salmon-Challis NF due to their large, unroaded areas and excellent wildlife habitat. Currently, the administrative boundary between the Salmon NF and Challis NF bisects the range in half along the range crest. If the two forests were to have different plan direction, that could cause significant management challenges in this area. Given that the forest boundary is merely an administrative boundary within an already combined national forest, we strongly recommend that the Lemhi Range be managed under a consistent set of standards and guidelines.

Transparency and the 2012 Planning Rule

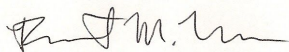
As the Salmon-Challis National Forest considers the next steps in forest plan revision, we also feel it is critical that the forest continue to move forward in a transparent and collaborative way with stakeholders. We value the policies outlined by the 2012 Planning Rule and urge the agency to continue to be guided by the collaborative, transparent and scientific guidance provided by the rule. By doing so, we feel that all stakeholders will have the opportunity to be heard and have a clear understanding of the principles and direction that the agency is using to make decisions about future management direction on the forests.

Our groups have been working in partnership with each other, other diverse stakeholders and the Forest Service for years in an effort to reach consensus on planning issues on the Salmon-Challis National Forest. We urge you to continue forward with a single, unified plan revision on the Salmon-Challis National Forest.

Please do not hesitate to reach out to us regarding these recommendations. We look forward to continuing to work collaboratively with you and the diverse array of stakeholders on the forest to ensure that the distinctive values that exist on the Salmon-Challis National Forest are stewarded to ensure that they endure for future generations.

Sincerely,

Rob Mason
Central Idaho Representative, The Wilderness Society



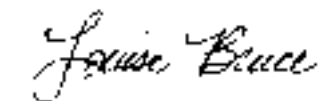
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