



**Western
Watersheds
Project**

Working to protect and restore Western Watersheds and Wildlife

Attn: Chuck Mark
Salmon-Challis National Forest
Supervisor's Office
1206 S. Challis St.
Salmon, Idaho 83467

October 4th, 2020

Dear Supervisor Mark,

Thank you for accepting these comments on behalf of Western Watersheds Project ("WWP") concerning the Current Plan Evaluation Summary for the Salmon-Challis National Forest ("S-C" or "Forest"). WWP staff and members have an interest in the ecological and biological health of our national forests throughout Idaho and across the West. The S-C is of particular interest to WWP because it represents a wide diversity of ecosystems, ESA listed species, Species of Conservation Concern, sensitive fish species and holds great potential for the reestablishment of viable populations of predators like the grizzly bear and wolf.

The current S-C Forest Plan, written using the 1982 guidelines, is outdated and a new plan (or plans) should be written that follows the guidance of the 2012 Planning Rule. The S-C is past due for a revision. The FS now has guidance, if not a mandate, to look at the forests they manage as not merely a commodity to be extracted, but as a larger ecosystem to be cared for. Climate change, landscape-restoration, biodiversity and ecosystems services are a few of the components that must now be considered under the new planning rule. Science-based decision making and management are also core components of the 2012 guidance.

Much has changed since the original S-C Forest Plan was written. Within the S-C, large-scale timber extraction has ceased and sawmills have closed. Recreationists are flocking to the Forest in high numbers, mirroring trends that have been accelerating across the West and with it, causing enormous impacts to wilderness and wildlife. [Climate change](#), [biodiversity loss](#) and [extinction](#) are accelerating across the globe. These challenges and perils to our environment

should be the focus of future planning and management on the S-C. We are in an unprecedented [ecological crisis](#) and the S-C should use this opportunity to revise the Forest Plan (or plans) in such a way that reflects and attempts to address the dire situation that we find ourselves in.

While overarching regulations like the Wilderness Act, Endangered Species Act and the Roadless Rule dictate management in certain areas on the Forest, Forest Plans written under the 2012 rule provide an important framework to guide project implementation and decision making where “every project and activity must be consistent with the applicable plan components” (36 CFR §219.15[b]). By revising the old Forest Plan under the 2012 rule, the S-C can help ensure future management objectives are more properly implemented by placing sideboards on projects to help ensure they are in line with broader goals across the Forest.

When considering whether to abandon the process, amend certain areas or revise the plan(s), you have asked that the public conduct a thought experiment. “If you were Supervisor Mark, what would you do?” I would revise the plan(s) and manage the Forest for its ecosystem services, wildlife, biodiversity, ecology, resiliency and the ability to sequester carbon. The restoration of public lands to help meet these needs should be one of our greatest national callings. Indeed, we are [facing many aspects of environmental collapse](#) and our public land managers should do everything in their power to take action. We must act with urgency to protect species and biodiversity.

Below, I have briefly highlighted some areas that I, as the hypothetical Forest Supervisor would take into consideration when revising the plan(s).. Please find attached WWP’s previous comments on the Forest Plan revision as they go into greater detail.

Roadless Areas, Wilderness & Climate Change

I would urgently put forward all roadless areas as Recommended Wilderness in the plan(s) revision across the entire forest. In the meantime, logging (including any “forest health” projects) would cease in roadless areas to protect their wild character and the wildlife therein. Wilderness designation is the best tool we have to [protect against biodiversity loss and extinction](#) on large scales. By creating connected “islands” of habitat, we can provide greater refuge for predators and protect habitat for the return of the grizzly bear.

Wilderness designation protects old growth and allows second growth forests to develop into mature forests. An area that has been previously logged should not disqualify it from becoming wilderness. In considering carbon sequestration and storage, contrary to popular belief, [older forests sequester more carbon than younger forests](#). By protecting old growth and second growth forests, we are doing the greatest good for the climate.

Wildlife Resources

The S-C National Forest has a wide range of species, including Endangered Species and Species of Conservation Concern that deserve greater protections. If I were the Forest Supervisor, I would abandon or amend every project that falls within the habitat of Endangered

Species and Species of Conservation Concern to see that they are protected to the best of my ability.

To support wildlife populations, I would include or consider the following in the Forest Plan:

- Using the precautionary principle, cast a wide net that lists as many Species of Conservation Concern that the best available science supports.
- Development of landscape-scale restoration projects that benefit migrating species like bighorn sheep, elk, antelope and sage grouse that remove unused fencing and retrofit fences that are in use to be more wildlife friendly.
- Carefully manage projects that fall within sage grouse habitat and leave their habitat as undisturbed as possible because they are especially sensitive to human activities.
- Close off streams to livestock that contain threatened bull trout and endangered salmon and steelhead, reconnect streams and springs and work with Idaho Fish and Game to do habitat restoration projects.
- Write a plan component that seeks to protect, reconnect and restore grizzly bear populations.
- Adopt a wolf management component that protects their habitat, accepts livestock depredation as the “price of doing business” and opposes Wildlife Services killings.
- Close more roads to motorized travel that fall within key habitat areas and breeding grounds.

Bighorn Sheep

Collar data collected by IDFG demonstrate connectivity among every one of Central Idaho’s bighorn sheep herds, highlighting the risk domestic sheep pathogens from even a single source pose to a large portion of the state’s wild sheep. This high level of connectivity, coupled with the rugged terrain and consequent difficulty monitoring and managing bighorn populations in Central Idaho, demonstrates the need for proactive and coordinated management of potential sources of pathogen exposure.

I would advocate that bighorn sheep be listed as a Species of Conservation Concern on each planning unit, and the Forest Service must initiate cooperative management actions with BLM range specialists and IDFG biologists to address threats to bighorn sheep populations originating on adjacent lands. In addition, the Salmon-Challis National Forest must prohibit the use of domestic sheep and goats for vegetation management purposes, and must regulate or prohibit the use of pack goats on each planning unit. When considering vegetation management activities, including fuels reduction and other timber removal projects, the Forest Service must first analyze the effects of those activities on the permeability of the landscape to bighorn sheep.

Where vegetation management activities are likely to result in a higher probability of bighorn sheep contact with domestic sheep or goats, those proposed projects should be amended or avoided altogether.

Recreational Impacts

As previously mentioned, recreation is a booming business on the S-C and throughout National Forest units across the West. Recreation is the new hot commodity and has largely replaced mining and tree harvesting in stature. The problem with unfettered recreation are the impacts to wilderness and wildlife which is seldom discussed and considered in full detail.

At first glance, recreation appears harmless. There is no direct taking of resources and recreationists often tout that by “having fun” on the landscape they are in turn becoming more conservation-minded because they get to enjoy and fully appreciate public lands. Unfortunately, this thinking is misguided. The sheer number of visitors have cumulative impacts that are meaningful and measurable. As seen in Vail, Colorado, entire [elk herds have been displaced by hikers](#). Wilderness aesthetics and character are being degraded to the point where managers have instated new [limited entry permitting systems](#). [Human feces and garbage](#) from inexperienced visitors have inundated our public lands. And [Ebikes present new threats to wildlife](#).

If I were the Forest Supervisor, I would write a plan component that deals with the impacts of industrial-strength recreation on the S-C Forest and help prepare the Forest for what is around the corner. The trends are clear and human use and visitation are projected to continue to rise. These are the areas that I would develop in my plan:

- Intensive monitoring of visitation numbers and track usage and impacts over time at all trailheads, within wilderness areas, roadless areas and other places that hold sensitive wildlife populations.
- Monitor wildlife behavior, breeding areas and migration patterns to determine trends and be ready to respond.
- Close trails permanently or seasonally in response to deteriorating conditions to wild character and wildlife. Limit improvements to roads and trailhead parking expansions to control crowding.
- Concentrate mountain biking and motorized use by establishing dedicated use areas in low value wildlife habitat. Close motorized and mechanized use on trails through roadless areas.
- Be prepared to initiate limited access permit systems in wilderness areas to control visitation numbers.

Cattle Grazing, Riparian Areas & PACFISH/INFISH

I have combined discussions of cattle grazing and PACFISH/INFISH because cows congregate in riparian areas and they are the greatest threat to stream and fish health on the Forest. As the Forest Supervisor, I would decrease AUMs, not increase them as is being considered. The recent web presentation with Josh Milligan made mention that there is an opportunity to increase AUMs and use adaptive management to ensure that ecological standards are met. On a recent trip to Copper Basin, I found exceptionally poor range conditions, especially in riparian areas and trout streams. I am not convinced that the S-C has a handle on grazing impacts today and I question that they could properly and responsibly manage any future increase in use.

The INFISH amendments are very important and monitoring activities should continue. PIPO teams have done important monitoring work in accordance with Forest Service ID Teams. Continual analyses of fish habitat conditions have shown that many streams were not complying with minimum standards of habitat quality such as temperature, width to depth ratios and sediment loading. NFMA requires that the Forest cannot compromise “species viability” and the monitoring program helps to protect bull trout, cutthroat trout, salmon and steelhead, but only when the Forest takes action to remedy grazing permittee negligence.

As the Forest Supervisor, I would write the following into the Forest Plan:

- Adopt stricter rangeland health standards that flow to grazing AOIs.
- Decrease AUMs across the Forest and not rely on adaptive management. This leaves open too much ambiguity.
- Create a policy for administrative grazing retirement. Grazing permits that are voluntarily waived back to the Forest Service without preference shall be held in non-use.
- Continue PACFISH/INFISH monitoring and set up a database that tracks stream conditions over time. This collection data is not useful when it is simply filed away in a drawer.
- Causes of failures to meet standards must be identified i.e. grazing, or roads. Determinations shall be written within one months’ time with correction to occur the following year if cause is livestock grazing. Permittee action (reduced AUMs and/or shortened season) shall occur if uncorrected for the following year.

Sincerely,

/s/ Adam Bronstein

Adam Bronstein / Idaho Director Western Watersheds Project

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