



Charles Mark
Forest Supervisor
Salmon Challis National Forest
1206 South Challis Street
Salmon, ID 83467

Via email: SM.FS.SCNF-PlanRev@usda.gov

October 4, 2020

RE: Trout Unlimited's Comments on the Review of the Salmon-Challis National Forest Existing Forest Plan

Supervisor Mark,

Please accept the following comments from Trout Unlimited regarding a review of the existing Salmon and Challis Forest plans.

Trout Unlimited is the nation's oldest and largest non-profit coldwater conservation organization with over 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU staff and volunteers have worked toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges. Additionally, we recognize the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes that the actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

In Idaho, TU plays a critical role in watershed conservation, restoration, and rehabilitation on public lands. Nine chapters with 2,500 members statewide actively participate in projects with the Forest Service, local communities, and private landowners in order to maintain the larger landscape that is so vital to the social and economic well-being of communities in Idaho. Trout Unlimited's Idaho chapters and staff have long-term relationships with the USFS and partnerships with many stakeholders to develop mutually beneficial solutions to land management problems.

The Salmon-Challis forest provides important habitat for salmon and trout species native to Idaho. From the pristine river systems of the Frank Church-River of No Return Wilderness to high mountain peaks in the Lemhi Range and everywhere in between, forest watersheds produce cold, clean water that help salmon, bull trout, cutthroat and other important aquatic species survive. The Salmon-Challis Forest has long been a focal point for the work of TU staff and volunteers because of its importance to salmon and trout.

Currently, the Salmon-Challis Forest works under two different forest plans that are now over 30 years old. The Salmon Forest Plan (1988) and the Challis Forest Plan (1987) were written before the two forests were unified as the Salmon-Challis Forest in 1998. Uses on the forest have drastically changed over the last 30 years and both plans have served their reasonable relevance.

The purpose of the Forest Service's 2012 planning rule is to design forest plans that "promote the ecological integrity of national forests" and "guide management of NFS lands so that they are ecologically sustainable and contribute to social and economic sustainability" (36 CFR 219.1(c)).

Examples of changing conditions on the ground and shortcomings in the current plans would include:

- Climate Change
- Anadromous Fish Recovery
- Habitat Connectivity/Migration Corridors
- Critical Minerals

In the 30 years since these two plans were written, our understanding of climate change and its impacts has progressed a great deal. The Agencies own efforts (i.e. ClimateShield) have pinpointed important watersheds that can resist climate change and provide quality coldwater habitat into the future. When the current plans were written, stocks of Snake River salmon and steelhead had not yet been listed as threatened. While patches were made to existing plans via INFISH/PACFISH, better and more adaptive grazing management are in dire need of updating. Our understanding of habitat connectivity and large ungulate migration has progressed immensely in the last three decades. Lastly, changing world politics and socioeconomic conditions have put a greater demand on critical minerals that are found on the forest.

For these reasons, Trout Unlimited would urge the Salmon-Challis National Forest to undertake a complete update and consolidation of these plans. The best path to the future of these lands cannot be realized through targeted amendments and a full revision of these plans is the only path to achieving the full potential of these valuable public lands in Central Idaho.

Trout Unlimited looks forward to working collaboratively with the Forest and all stakeholders during this process so that the Salmon-Challis Forest Plan works for Idahoans, and all Americans, and ensures productive and reasonable use of our public lands while protecting important habitat so that fish, wildlife and people benefit.

Thank you for the opportunity to comment.

Sincerely,

Michael Gibson

A handwritten signature in black ink that reads "Michael T. Gibson". The signature is written in a cursive style with a large, looped initial "M" and a distinct "T".

Idaho Field Coordinator
Trout Unlimited