



2005 Market Street, Suite 1700  
Philadelphia, PA 19103-7077

215.575.9050 Phone  
215.575.4939 Fax

901 E Street NW, 10th Floor  
Washington, DC 20004  
[www.pewtrusts.org](http://www.pewtrusts.org)

202.552.2000 Phone  
202.552.2299 Fax

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

*Submitted electronically via CARA to: <https://cara.ecosystem-management.org/Public/CommentInput?Project=49464>*

**RE: The Pew Charitable Trusts' Comments on the U.S. Forest Service's Review of the Existing Salmon and Challis Forest Plans**

The Pew Charitable Trusts respectfully submits for your consideration the following comments on the U.S. Forest Service's "Salmon-Challis National Forest: Current Plan Evaluation Summary," released August 20, 2020. We appreciate this opportunity to present our recommendations at this stage of the planning process. The Pew Charitable Trusts works closely with governments at the local, state, national, and international levels on a wide array of issues, including public health, budget management, and the environment. Pew's U.S. Public Lands and Rivers Conservation project works to conserve and connect areas of biodiversity critical to species survival by identifying and preserving ecologically significant lands and rivers throughout the American West.

Consistent with this objective, Pew has an interest in the lands and rivers of central Idaho's national forests and the Forest Service's management of them through revised and amended forest plans. 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)). As such, we offer the following comments and suggestions for your consideration regarding the ongoing Salmon-Challis forest planning effort.

**Existing Forest Plans are Outdated**

The Salmon-Challis National Forest is currently managed under separate forest plans for the Challis and Salmon National Forests, which date to 1987 and 1988, respectively. In the more than 30 years that have elapsed since these plans were adopted, significant ecological and

socioeconomic changes have occurred. These changes have created gaps in management direction that can best be filled through the planning process. Select examples of these changes and gaps include:

- Altered temperature and precipitation patterns due to climate change, an important ecosystem driver, are affecting the forest's lands, waters, and wildlife (*see* Salmon-Challis National Forest Assessment Report (July 2018)). Management direction is needed to maintain the diversity of climate-sensitive species on the forest, such as wolverines and whitebark pine, as well as for conserving cold water refugia for salmonids and other fish species.
- Advances in scientific understanding have increasingly underscored the importance of ecological connectivity for the free movement of animals across the landscape in order to complete their life cycles, such as ungulates' seasonal migrations between summer and winter range. Identification and protection of movement corridors are one avenue for maintaining connectivity. In response to the U.S. Department of the Interior's Secretarial Order No. 3362, the Idaho Department of Fish and Game has established Priority Areas based on the presence of key big game populations, locations of corresponding winter ranges and migration routes, and the potential risks and threats to populations. Secretarial Order No. 3362 has spurred a wealth of new research on wildlife movement patterns in Idaho, including recommendations on actionable efforts to address risks and threats to populations, and manage big game winter ranges and movement routes. This data and these recommendations are not considered by Forest Service in the existing Challis and Salmon plans.
- Today's socioeconomic opportunities and challenges in the region differ from those of the late-1980s. The Forest Service can better respond to these changing dynamics, both for the benefit of local communities and the health of the forest, through management direction that acknowledges these modern realities.

These gaps and others were identified in the agency's review of the existing Challis and Salmon forest plans.

In addition, the Forest Service updated its approach to forest planning through its adoption of the 2012 planning rule, which replaced the 1982 planning rule under which the existing plans were developed. The 2012 rule provides a modern approach to the forest management needs of today by explicitly requiring science-based plans that provide for social, economic, and ecological sustainability. Because the existing Challis and Salmon plans were developed under the prior regulations, they do not account for all the requirements of or considerations in the new planning rule, such as changes in the application and definition of plan components, requirement to maintain viable populations of each species of conservation concern, and additional considerations for ecological integrity, connectivity, and riparian areas.

Last, the National Forest Management Act requires that forest plans "be revised...at least every fifteen years" (16 USC 1604(f)(5)). The Challis and Salmon plans, dating from the late-1980s, have far exceeded this congressional directive to the agency.

### **Need for a Unified Plan Revision**

Due to the outdated nature of the existing Challis and Salmon forest plans, the Salmon-Challis National Forest should undertake a comprehensive revision of both plans. The full revision process, as opposed to targeted amendments, that leverages the findings in the Forest Service's own plan evaluation summary and those identified by stakeholders will provide the agency the best opportunity to develop a cohesive vision for the forest's management in accordance with the 2012 planning rule.

Further, the revision should occur in a unified manner with one final plan for the entire Salmon-Challis National Forest. The Basin and Range geography of central Idaho, where both forests are located, is wholly connected in ecological terms, offering little if any naturally defined contrast between the forests that would support bifurcating the forest plan revision process. Therefore, a unified approach will best meet the landscape-level ecological, social, and economic needs of the region in a consistent and integrated manner. A unified plan revision will also provide efficiency for taxpayers by completing the planning process through one combined effort with the planning team staff and other resources that are in place.

### **Conclusion**

Pew believes a unified plan revision process for the Salmon-Challis National Forest is the best path forward for achieving the purposes of the agency's 2012 planning rule and for addressing the management gaps in the existing forest plans. We look forward to continuing our engagement on this important planning effort with you. If you have any questions about these comments, please feel free to contact Nic Callero at [REDACTED] or [REDACTED].