

Forest Supervisor Chuck Mark  
Salmon-Challis National Forest  
1206 S. Challis Street  
Salmon, ID 83467

September 25, 2020

## **RE: CIPLC Input on the SCNF Plan Review & Evaluation**

Dear Supervisor Mark and the Forest Plan Revision Team,

Thank you for the opportunity to comment on the Salmon-Challis National Forest plan review and evaluation process. The Central Idaho Public Lands Collaborative (CIPLC) is a diverse group of ranchers, recreationists, conservationists, outfitters and guides, business leaders, and private citizens. We have been working together since August 2017 to engage in the planning process and discuss how the Forest Service can best manage lands with sustainable multiple uses in mind. With the planning process on hold for the time being, our collaborative has taken this opportunity to review the existing Salmon and Challis National Forest plans in detail and compare them to the Desired Future Conditions that the CIPLC submitted to the SCNF in April 2019. We request the Forest Service consider this input as it undergoes the process of deciding how to proceed with forest planning efforts on the Salmon-Challis National Forest.

### **Our Process**

In the spring of 2019, the CIPLC developed a set of Desired Future Conditions (DFCs) for the primary topical areas that would be addressed in a new forest plan -- forest and watershed health, grazing, lands and minerals, socioeconomic, and recreation. These DFCs represent the CIPLC's collective vision for how we think the SCNF and its resources should be managed. The collaborative decided to use these DFC vision statements as a point of comparison to evaluate existing plan direction.

Each workgroup within the CIPLC was tasked with three actions: 1) reviewing the existing plans in detail, 2) matching up the relevant direction from those plans with our DFCs, and 3) assessing whether our DFCs were addressed and/or prohibited by existing plan direction. This work is summarized in two Google Sheets, one for the [Salmon plan](#) and one for the [Challis plan](#), with the key takeaways highlighted in this letter.

### **General Takeaways**

Our findings from this collaborative process are summarized in this letter with the intention of providing Salmon-Challis National Forest staff with specific and actionable input as they consider how to proceed with forest planning. We found that certain topical areas in existing plans were

significantly outdated whereas in other areas, implementation issues appeared to be the limiting factor. We identified several general takeaways from comparing our DFC vision for the SCNF to that of existing plans:

1. Both the Challis and Salmon plans share significant issues with respect to their need to be revised. Most of the fundamental issues with the existing plans -- that they are outdated, overly specific in some areas while too vague in others -- are common to both plans.
2. Plan implementation (including the lack of clarity on implementation metrics and results) was the major issue identified with respect to the success of the grazing, recreation, and lands direction in the existing plans.
3. The existing plans are riddled with overly specific metrics in some areas and overly vague direction in other areas, making the plan goals and objectives difficult to achieve and evaluate success.
4. The existing plans are significantly outdated, having been developed over 30 years ago. The best-available science today and current philosophy for ecosystem management, in particular with respect to how to best protect those resources, are far more advanced than when these plans were developed.
5. Climate change is the defining environmental problem of our time with significant implications for the future of the SCNF, but it is not mentioned or addressed in either the existing forest plans nor in the recently released "Current Plan Evaluation Summary."

### **Topic-Specific Takeaways**

#### *Forest & Watershed Health*

We found that the management of forest and watershed health is severely hindered by the outdated and overly specific nature of the existing plans. They are very prescriptive and do not allow for a more adaptive approach to forest management. Our DFCs encompassed a more holistic view of incorporating concepts such as wildlife diversity and migration patterns. The existing plans fail to address key issues such as climate change and the threat of invasive species, both of which have major impacts across the entire forest. Additionally, metrics applied to measure compliance with the plans are outdated and are based on data inputs and baseline conditions that are likely inaccurate now for management purposes. Furthermore, the National Cohesive Wildland Fire Management Strategy (developed in 2011) is not currently incorporated into the existing plans and much of the current fire and fuels management direction conflicts with national fire policy (e.g. blanket full suppression of wildland fire).

#### *Recreation*

With respect to recreation, certain metrics used in the current plans are now out of date. In addition, the existing plans have a lot of site-specific direction with regards to recreation management, but they are lacking in terms of having an overarching philosophy for the management of recreation at the forest-wide level. Back when the existing plans were created in the late 1980s, forest-wide recreation management was less necessary given the low recreational

use numbers at that time. However, we are currently faced with the reality that Idaho is one of the fastest-growing states in the country and the COVID-19 pandemic has led to the skyrocketing popularity of outdoor recreation, including many forms that were not considered when the existing plans were written (e.g. e-bikes, large side-by-sides). Thus, that level of plan direction is becoming increasingly necessary for proper recreation management on the SCNF.

### *Lands*

In regards to land tenure and access issues, our primary takeaway was that while our DFCs reflect a desire for cooperation and coordination amongst different landowners, agencies and other stakeholders, this intent is not clearly expressed in the existing plan direction. Cooperation and coordination are essential components of successful land management, and these values should be thoroughly woven into the forest plan. The concept of shared stewardship is particularly valuable when considering the variety of landownerships and interests on and around the Forest. There has also been a lack of action on realty issues (access, easements, exchanges, etc.) and the need to address those as conflicts increase. The current plans are also lacking the proper metrics to track the implementation of plan direction.

### *Minerals*

In general, we found the mining direction in the existing plans to be adequate and not significantly outdated as it is primarily based on long-standing laws and policies. However, we did identify that the existing Challis plan in particular heavily prioritizes mining, stating the Forest Service must "provide maximum land base for minerals and energy prospecting." The existing forest plans fail to reflect the current reality that the development of mineral resources on the SCNF is highly dependent on global market conditions and thus carries significant volatility. Our vision for the SCNF certainly does not preclude mining, but rather sees it as a use of the land to be properly balanced with a number of other uses -- not prioritized above all else. The current plans also lack guidance for how to deal with geologic hazards, most notably abandoned mine sites, of which there are many on the SCNF.

### *Grazing*

We found that while much of the language in the existing plans matches up well with our DFCs and good range practices, there have been significant implementation issues under the current forest plan that have hindered management effectiveness. The existing plans have an emphasis on valid site-specific management practices but do not address core problems in the grazing program with permittees and members of the public. We recommend that the new plan should make an effort to look at the grazing program holistically in an attempt to resolve chronic conflicts around range issues, rather than continue to focus on site-specific livestock grazing practices which are already widely implemented.

### *Socio-Economic*

Neither plan substantively addresses how the SCNF should manage lands with socio-economic impacts in mind. The relevant direction in the existing plans is limited to direct jobs and job

training through the USFS and does not address communication across all relevant stakeholders. It is also missing the interpretation and education opportunities to introduce land ethics and history of the USFS. Our DFCs are focused on maintaining a healthy forest while actively looking for opportunities to support the surrounding communities economically through the multi-use and recreation aspects of the land in a timely manner. However, it does not seem that these aspects of economics were even considered at the time the existing plans were written.

#### Recommendation on How to Proceed With Planning

The 2012 Planning Rule states that forest plans must be revised every 15 years. Forest plans are intended to have a finite lifespan because they lose their effectiveness over time from a management standpoint due to changing baseline conditions, new science, updated regulations, and other factors. The existing Salmon and Challis plans have been in place since the late 1980s, making them over 30 years old at this point - twice the recommended lifespan for forest plans. Thus, these plans will inevitably need to be updated in the coming years one way or another.

The CIPLC's review of the existing plans have highlighted certain areas that are quite outdated while also identifying other areas where the implementation of plan direction is a bigger issue than what is in the plans themselves. We do find significant enough deficiencies in the existing plans to warrant a full plan revision rather than a piecemeal plan amendment approach. The CIPLC maintains that the most effective path forward for ensuring sustainable ecological management of the forest and supporting the socioeconomic needs of the local communities that depend on it would be a single, revised forest plan that manages the entirety of the Salmon-Challis National Forest under the same set of standards, guidelines, and desired future conditions. As we have identified in our review of the existing forest plans, the lack of a single, unified vision for the forest creates confusion for the communities that rely on the forest while hindering the Forest Service's ability to effectively manage with an appropriate level of consistency.

We concur with the Forest Service's conclusion in the Current Plan Evaluation Summary that the existing plans are "very permissive, much of the direction is outdated and, in many ways, it is like operating without a plan at all and can complicate project level analysis." We encourage both the Forest Service and other stakeholders on the Salmon-Challis National Forest to build upon this evaluation to envision the opportunities that an up-to-date plan could provide for more effective land management, better protection of ecological values, and stronger emphasis on the socioeconomic needs of the local communities.

Again, this letter is intended to be a broad synthesis of our analysis of the existing plans. For more specific details regarding the CIPLC's plan evaluation, please refer to these Google Sheets for the [Salmon plan](#) and the [Challis plan](#). We look forward to continuing to work productively with the Salmon-Challis National Forest on the plan revision process.

Sincerely,

The Central Idaho Public Lands Collaborative

CC:

SCNF Forest Plan Revision Team Lead Josh Milligan

Acting Regional Forester Frank Beum

Deputy Regional Forester Dave Rosenkrance

Regional Planner Chris Moyer

### Central Idaho Public Lands Collaborative Active Members (2020)

Tammy Stringham, Lemhi County Economic Development, Salmon

Ace Hess, Backcountry Hunters and Anglers, Ellis

Jolie Turic, Custer County Economic Development, Challis

Gary Gadwa, Sawtooth Historic Association, Stanley

Merrill Beyeler, Rancher and Grazing Permittee, Leadore

Seth McFarland, Rancher and Lemhi Cattle Growers Association, Salmon

Jim Roscoe, Lemhi Regional Land Trust, Salmon

Rob Thornberry, Theodore Roosevelt Conservation Partnership, Idaho Falls

Louise Bruce, The Wilderness Society, Salmon

Josh Johnson, Idaho Conservation League, Ketchum

Bob Cope, Citizen, Salmon

Tom Page, Pahsimeroi Valley Rancher and Central Idaho Rangeland Network

Cassi Wood, Trout Unlimited, Mackay

Ken Markling, Challis Trail Riders, Clayton

Bob Hays, Western Whitewater Association, Boise

Hannah Rasker, Yellowstone to Yukon Conservation Initiative, Bozeman

Louise Wagenecht, Citizen, Leadore (Working Group Participant)

Gerry Grosenik, Citizen, Salmon (Working Group Participant)

Michael Gibson, Trout Unlimited, Boise (Working Group Participant)