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Organization:

Title:

Comments:

Subject: Salmon and Challis National Forest Plan Revisions

Dear Supervisor Mark:

Management gaps

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 landscape 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, quite frankly, one of America's crown jewels.

Currently, land management plans for the Salmon and Challis National Forests do not provide adequate management guidance for the conservation of these critical values.

Also, there is no management direction for the conservation of wildlife migration and movement corridors. I feel strongly that conservation of these migration and movement corridors is essential for the long-term sustainability of biodiversity and our big game species.

Current management direction also does not address the impacts of climate change on the flora and fauna of the Salmon-Challis National Forest, including whitebark pines, wolverines, and other climate-sensitive species. Further, there is no management direction for the conservation of cold water refugia, i.e., headwaters of streams and rivers providing cold, clean water needed for spawning salmonids. In the face of climate change, the management direction specifically targeted at the conservation of these cold water headwaters is of particular importance to aquatic wildlife.

The Salmon-Challis National Forest is the single most wild national forest in the lower 48 states, based on characteristics like solitude, remoteness, and ecosystem intactness. Even its non-wilderness lands have been assessed to be the most wild non-wilderness lands left on any national forest in the lower 48 states. Clearly, this forest occupies a unique niche. The high wildland value and national significance of the Salmon-Challis National Forest's wildlands should weigh heavily in management decisions. Limiting the threats to these remaining wildlands, including development, unsustainable resource extraction, and increasing recreational pressures, is a critical conservation strategy to maintain strong biodiversity and ecological function. I do not believe that the existing forest plan goes far enough in conserving these nationally significant wildlands or the biodiversity and ecological functions connected with them.

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.

I acknowledge that there are additional areas where existing management direction is insufficient to meet current management challenges, and I support other stakeholders who are bringing attention to additional gaps they have identified.

Recommendations

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 almost 40 years ago when forest management challenges differed from those existing today. And at a time when the science of wildlife migration, climate change, and biodiversity conservation were still being developed. Significant new management direction is needed to address today's challenges. I believe that a single, unified forest plan for the Salmon-Challis NF would be the best option from an ecological and resource management perspective. I don't 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 to provide adequate consistency for future forest management.

Although I recommend a unified, full management plan revision for both forests, if plan amendments are being considered, I 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, I 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, I would suggest that the entirety of the Lemhi Range be administratively managed solely 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, roadless 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.

#### 2012 Planning Rule

As the Salmon-Challis National Forest considers the next steps in forest plan revision, I hope the agency will continue to be guided by the collaborative, transparent and scientific guidance provided by the 2012 Planning Rule. By doing so, I hope 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. Diverse stakeholders and the Forest Service have toiled for years to reach a consensus on planning issues on the Salmon-Challis National Forest. I urge the Forest Service to continue forward with a single, unified plan revision on the Salmon-Challis National Forest. I believe that the Forest Service and all the various stakeholders can work together to ensure that the distinctive values existing on the Salmon-Challis Forest endure for future generations.

Thank you for this opportunity to comment.