

Charles A. Mark, Forest Supervisor
Attn: Forest Plan Revision Team
1206 S. Challis Street
Salmon, ID 83467

January 24, 2018

RE: Challis-Salmon NF Assessment and Need for Change Comments
<https://cara.ecosystem-management.org/Public/CommentInput?Project=49464>
Your letter ID is 49464-2226-23.

Dear Mr. Mark,

I appreciate this opportunity to comment on the Draft Assessment and Draft Need for Change reports. The following recommendations supplement initial assessment comments that I submitted on March 15, 2017. In addition, the attached Continental Divide National Scenic Trail (CDNST) Planning Handbook provides additional planning guidance.

National Scenic and Historic Trails

The Draft Assessment states, “*The Salmon-Challis has two National Historic Trails and one National Scenic Trail within its borders (Figure 53).*”

National Historic Trails are designated to protect the significant overland or water routes that reflect the history of the nation. Approximately 14 miles of the Lewis and Clark National Historic Trail and 3 miles the Nez Perce National Historic (Nee-Me-Poo) trail pass through the Forest.

The Lewis and Clark National Historic Trail is approximately 3,700 miles long, extending from Wood River, Illinois, to the mouth of the Columbia River, near present day Astoria, Oregon. The trails was established in 1978 as part of the National Trails System. The current Salmon National Forest Plan was amended in 2002 to include specific management direction for the trail in order to preserve the historic resource while providing for interpretation and the recreational needs of the public.

The Nez Perce (Nee-Me-Poo) National Historic Trail stretches from Wallowa Lake, Oregon, to the Bear Paw Battlefield near Chinook, Montana. The trail was added to the National Trail System by Congress in 1986 and does not have specific management direction in the current Salmon National Forest Plan.

National Scenic Trail is a designation for protected trails with particular natural beauty. Approximately 50 miles of the Continental Divide National Scenic Trail lies within the Salmon-Challis.

The Continental Divide National Scenic Trail was established in 1978, and the trail extends 3,100 miles through the Rockies from Canada to Mexico. The current Salmon National Forest Plan does not contain specific management direction for the trail, but it is managed in accordance with the 1985 comprehensive trail plan. Forest Service Manual 2353.44b requires the Forest to establish a management area and specific plan direction for the Continental Divide National Scenic Trail. Direction must be broad enough to protect the trail's natural, scenic, historic, and cultural features. The Forest must also establish a monitoring program to evaluate the trail's condition.” (Page 142)

The Draft Needs for Change report is silent on the need to change management direction for National Scenic and Historic Trails.

It is unfortunate the CDNST continues to be managed based on the 1985 CDNST Comprehensive Plan direction, which was rescinded in 2009. Conversely, I appreciate the recognition of the guidance that is found FSM 2353.44b. The forest should cease potentially incompatible management activities within the CDNST high potential route corridor (see Appendix A) until the current Forest Plan is amended or revised to address the requirements of the National Trails System Act as implemented through the 2009 CDNST Comprehensive Plan, FSM 2353.4, FSH 1909.12, and the Federal Register Notice dated October 5, 2009 (74 FR 51116).

I recommend that the planning team review and utilize the guidance in FSH 1909.12 part 14 – Assessing Designated Areas and the attached CDNST Planning Handbook, and then reissue for public review and comment the National Scenic and Historic Trails section of the assessment and need for change reports.

The year 2018 is the 50th Anniversary of the National Trails System Act and the 40th Anniversary of the establishment and designation of the Continental Divide National Scenic Trail. The revised Challis-Salmon National Forest Plan may establish a new standard for the management of National Scenic and Historic Trails on NFS lands, so 2018 will be a good time to reflect on past and current National Trail management practices and to establish appropriate forest plan direction for the future.

Thank you for considering these comments.

/s/ **Greg Warren**

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Attachment: Challis-Salmon National Forest - CDNST Planning Handbook v.01242018

Appendix A – CDNST Management Area

