

June 30, 2021

Meryl Harrell  
Deputy Under Secretary for NRE  
US Department of Agriculture  
1400 Independence Ave SW  
Washington, DC 20250

RE: National Forest Planning Priorities

Dear Ms. Harrell:

As hunting, fishing, and wildlife conservation organizations, we are writing to provide our support for the revision of national forest management plans under the direction of the 2012 National Forest Planning Rule. America's 193 million acres of national forests and grasslands are critically important for fish and wildlife habitat and connectivity; outdoor recreation and equitable public access; and sources of clean water, climate resiliency, and carbon storage. Specifically, we offer the below recommendations for your consideration as you determine next steps for 1. ongoing plan revisions, 2. paused planning processes, and 3. new plan revisions under the Planning Rule.

### **Advance Ongoing Plan Revisions**

#### **Region 1**

- **Helena-Lewis and Clark National Forest (Montana)**

*Values:* Rocky Mountain elk, mule deer, moose, bighorn sheep, forest grouse, bull trout, westslope cutthroat trout, and other wild trout populations. One of the better elk hunting areas in Montana, with excellent hunting and fishing access and opportunities for both residents and nonresidents. This forest is also critically important for large carnivore conservation and connectivity between the Crown of the Continent and Greater Yellowstone ecosystems.

*Status:* On May 20, 2020, the draft record of decision for the 2.9 million-acre Helena-Lewis and Clark National Forest Plan was published. The forest is presently completing the objection process, and the public response has largely been positive with no meaningful controversy. The near final plan includes 216,866 acres of new nonmotorized primitive recreation areas that will be managed to protect undeveloped and intact backcountry. These lands provide important habitat security and seasonal ranges for big game and other wildlife. The new plan extends riparian management and watershed conservation to watersheds east of the continental divide. Bull trout and westslope cutthroat trout populations are emphasized for restoration using watershed condition frameworks as well as the Conservation Watershed Network. Four recommended wilderness areas (120,060 acres) added to the plan, bringing the total number of recommended wilderness areas on the forest to seven (153,325 total acres). The prohibition on mechanized travel within these areas helps protect habitat security and summer ranges for big game.

*Recommendation:* Finalize the revised Helena-Lewis and Clark National Forest plan.

- **Custer Gallatin National Forest (Montana)**

*Values:* A stronghold for bighorn sheep, plus Rocky Mountain elk, mule deer, moose, bison, mountain goat, wild turkey, forest grouse, Yellowstone and westslope cutthroat trout, and other wild trout populations. Widely varying landscape from the Beartooth Plateau to rolling ponderosa pine hills in eastern Montana. This forest is also critically important for large carnivore conservation and connectivity between the Crown of the Continent and Greater Yellowstone ecosystems.

*Status:* The Custer Gallatin National Forest plan draft record of decision was published on July 13, 2020, and will direct management on 3.1 million acres in Montana. The forest is presently completing the objection process, and the public response has largely been positive with no meaningful controversy. The near final plan would establish provisions allowing wild bison to utilize year-round forage on the national forest, and it would protect key linkage areas for wildlife connectivity. The inner riparian management zone would be increased to 100 feet for all fish bearing streams and intermittent and perennial non-fishbearing streams. There would also be a riparian management zone on all ponds and wetlands regardless of size. The proposed action would increase recommended wilderness from 34,000 acres to 113,000 acres; establish nine backcountry areas totaling 125,000 acres; and create eight recreation emphasis areas totaling about 177,000 acres. These protected landscapes will safeguard big game winter range, connectivity, intact habitats, and watersheds.

*Recommendation:* Finalize the revised Custer Gallatin National Forest plan.

- **Nez Perce-Clearwater National Forests (Idaho)**

*Values:* These forests represent the vision of ecosystem services in their truest intent by acknowledging the importance of expanding beyond managing for narrow multiple use standards to create value in stewardship of water, wildlife, recreation and the sustainability of “provisioning” services in addition to extractive needs like responsible timber harvest. The lands and waters of the Nez Perce-Clearwater represent a unique cross-section of wildlife species and are connected to an important part of national forest history represented by the *Great Burn*. Abundant wilderness areas, including Gospel Hump and Selway-Bitterroot, roadless areas, prized trout fisheries like Kelly Creek and the anadromous fisheries found throughout the Clearwater basin are not only critical to hunters and anglers, they provide high quality habitat for an impressive range of species. Bighorn sheep, mountain goats, elk, mule deer, white-tailed deer, moose, native Westslope cutthroat trout, bull trout, steelhead trout, and chinook salmon are impressive examples of the wildlife diversity that depend on the intact habitat found in these forests.

*Status:* Evaluations for Wild and Scenic Rivers and Recommended Wilderness remain in process and the Final Environmental Impact Statement has yet to be released along with any changes from the Draft EIS. Running concurrently with the plan revision is also the Restoration Action Strategy (RAS) that will guide management until implementation of the forest plan revision.

*Recommendation:* Finalize the Nez Perce-Clearwater National Forests Plan and establish strong management objectives and resource implementation priorities under the RAS. The FEIS should include elevated considerations for migration corridors and big game winter range, timber management directives to return forest stands to desired conditions, identification of conservation designation and other management policies that enhance habitat for wildlife and fisheries, address invasive species and expand wilderness values.

## Region 2

- **Grand Mesa Uncompahgre and Gunnison National Forests (Colorado)**

*Values:* Located in western Colorado, Grand Mesa Uncompahgre and Gunnison (GMUG) National Forest is nearly 3 million acres of public lands home to mule deer, elk, Shiras moose, Rocky Mountain bighorn sheep, desert bighorn sheep, mountain goats, Gunnison sage-grouse, Merriam's wild turkey and numerous non-game species. The Gunnison, Taylor, Uncompahgre, and San Miguel Rivers, and their tributaries also supports strongholds of wild trout include native Colorado River cutthroat. Moreover, a growing population and increased recreational users has stressed habitat security for wildlife and highlights the establish management direction that help minimize user and resource conflicts.

*Status:* The forest began revising the GMUG forest plan in 2017 and has made significant process, releasing a working draft for public review in July 2019. The forest has continued work on the draft plan and draft alternative but constrains of the COVID-19 pandemic have slowed down the process. While the plan is expected to be completed in 2023, continued support and resources will be necessary to adhere to this timeline.

*Recommendation:* Direct funding to complete the GMUG National Forest plan revision, with the Draft Plan and DEIS released in 2021. The DEIS should address recreational and development conflicts with fish and wildlife habitat. The lands and waters within and adjacent to the GMUG provide an essential role in maintaining large, uninterrupted blocks of connected habitat and stream networks that are crucial to perpetuating robust populations of wildlife and fish. However, the increasing trend in recreational development and use on the GMUG and BLM public lands is cumulatively impacting wildlife habitat integrity and connectivity and contributing to declines in big game populations. This same trend in recreational development is having significant impacts upon the ability to sustain other wildlife-dependent recreation opportunities, such as hunting, and the economic benefits to our local communities.

## Region 3

- **Gila National Forest (New Mexico)**

*Values:* Home to the first federally recognized wilderness area in the United States, the Gila National Forest has a long history of conservation and a deep connection to Aldo Leopold, who many recognize as the father of wildlife ecology. The 3.3-million-acre national forest is a mosaic of forested hills, mountains and range land, supporting robust population of big game and game birds. The forest is prized by hunters and limited entry elk hunts attract hunters from around the country who travel to the Gila National Forest to hunt large, mature bull elk. Additionally, the Gila National Forest contains nearly the entirety of habitat for Gila trout, one of the rarest native trout in North America.

*Status:* The Gila National Forest began their plan revision in 2015 released its draft plan in December 2019. Currently the forest is expected to complete the final revised forest plan in 2021.

*Recommendation:* Publish a draft Record of Decision that emphasizes restoration of native Gila trout habitat, protecting coldwater fisheries, recreational fishing, big game habitat, and responsible off-highway-vehicle use. Additionally, two additional areas with exceptional backcountry sporting

opportunities should be recommended for wilderness designation: Mineral Creek and the lower reaches of Whitewater Creek. Both of these areas would also protect habitat in the historic range of native Gila trout, the rarest native trout in New Mexico.

#### **Region 4**

- **Ashley National Forest (Utah/Wyoming)**

*Values:* Encompassing nearly 1.4 million acres of northern Utah and southern Wyoming. Features of the Forest include a diverse range of activities and uses, including backcountry hunting and fishing in the 276,175 acres of the High Uintas Wilderness, to boating and fishing within the Flaming Gorge National Recreation Area, to world renown trout fishing on the Green River. Big Game are plentiful and in Utah, the areas is in a general hunting unit meaning that anyone with a license can hunt elk, making the area extremely popular with resident and nonresident hunters alike. Moreover, the Flaming Gorge National Recreation Area east of the reservoir encompasses part of hunting unit 102 in Wyoming, a limited entry hunting area for mule deer where hunters often wait several years for their chance to hunt.

*Status:* Alternatives have been developed and draft EIS is expected in spring 2021.

*Recommendation:* Direct funding to complete the Ashley National Forest plan revision, with the Draft Plan and DEIS released in 2021. The DEIS should identify priority watersheds for restoration and changes in management direction, as well as a Conservation Watershed Network for Native Fish that will assist the Forest in meeting its commitments under the Conservation Agreement and Strategy for Colorado River Cutthroat Trout. This is also an important opportunity to determine if oil and gas leasing decisions (i.e. Western Uinta Basin Oil and Gas Leasing EIS, 1997) remain valid on the Forest given new information and changed circumstance over the past quarter century. Additionally, the plan should support the critical economic values of the Green River and Flaming Gorge Reservoir for angling, hunting and outdoor recreation.

#### **Region 5**

- **Sequoia and Sierra National Forest Plans (California)**

*Values:* The Sierra and Sequoia National Forests cover nearly 2.5 million acres in south-central California, ranging from high alpine meadows and lakes to old-growth sequoia groves, offering a varied mix of habitats. With almost half of the state's population living within a four-hour drive, these forests experience high levels of visitor use. Hunting and fishing opportunities include hunting for wild turkey and California mule deer, one of six subspecies found in California, as well as angling opportunities on over 400 lakes and countless streams. Additionally, Lahontan cutthroat trout, Piute cutthroat trout, Kern River rainbow trout, California golden trout and Little Kern golden trout inhabit streams here, making the national forests crucial for sustaining diversity of native trout species in the state.

*Status:* Currently the forests are developing the final forest plan and FEIS based on changed conditions from the historic 2020 fire season. Completion of the plans is expected in 2022.

*Recommendation:* Direct funding in the FY22 budget toward the Sierra and Sequoia National Forest plan revision to address changed conditions and to ensure timely completion of these plans. As one

of the “early adopters” of the 2012 Planning Rule, it is critical that the final plan include consideration of Conservation Watersheds and robust standards and guidelines to ensure that these watersheds are managed to maintain and improve water quality and provide high quality functioning habitat for aquatic species of conservation concern.

## **Restart Paused Planning Processes**

### **Region 4**

- **Salmon-Challis National Forest (Idaho)**

*Values:* In the heart of the High Divide, this landscape is critical in connecting the Greater Yellowstone Ecosystem to the Selway-Bitterroot Ecosystem, and it is one of the more important planning areas in the West. Numerous big game migration corridors, Rocky Mountain elk, mule deer, moose, bighorn sheep, mountain goat, forest grouse, salmon, steelhead, cutthroat trout, and other wild trout populations. This planning area is critical for connecting the Selway-Bitterroot and Greater Yellowstone ecosystems.

*Status:* The forest began revising the grossly outdated (Challis from 1987 and Salmon in 1988) forest plans in 2017. The planning area covers 4.23 million acres. Prior to publishing a draft forest plan, the revision process was put on hold in 2019. While there was a fairly robust collaborative process working to find common ground on the forest, hard-lined decisionmakers from Custer County refused to participate and circumvented the process to convince political leaders inside USDA to pause the plan revision. The forest supervisor is presently looking at how to restart the plan.

*Recommendation:* Creating a steering committee to address the concerns of Custer County and reinstate the plan revision process.

### **Region 6**

- **Blue Mountains Forest Plan (Oregon/Washington)**

*Values:* Hunting is the primary activity of user groups in the Blue Mountains National Forests and is probably the most important area in the state of Oregon for public land big game hunting. Migration corridors, Rocky Mountain elk, mule deer, bighorn sheep, turkey, forest grouse, salmon, steelhead, redband trout, and other wild trout populations.

*Status:* In 2019, after 15 years of preparation, the U.S. Forest Service was ready to complete the revision process for three national forests covering 5.5 million acres in the Blue Mountains of Eastern Oregon and southeast Washington. Then in March of 2019, the agency withdrew the draft record of decision, reverting management to plans dating back to 1990. Quite simply, nobody was happy with the revised plan and the forest was sent back to the drawing board. In November of 2019, the agency formed the Blues Intergovernmental Council, which includes county commissioners, ODFW, USFS, and tribal representatives, but not the public. The goal of the council is to develop consensus-based desired conditions that can be included within an alternative of a future plan.

*Recommendation:* Conclude the Blues Intergovernmental Council process when the desired conditions have been developed, welcome additional stakeholders into the process, and move forward with the plan revision process.

## **Initiate Plan Revision Processes**

### **Region 1**

- **Lolo National Forest (Montana)**

*Values:* The Lolo National Forest spans 2.2 million acres in western Montana, providing headwaters for the Blackfoot and Clark Fork Rivers, and habitat for mule deer, white-tailed deer, elk, bighorn sheep, moose, mountain goat, forest grouse, wild turkey, bull trout, westslope cutthroat trout, and prized blue ribbon trout rivers. This planning area is critical for connecting the Selway-Bitterroot and Crown of the Continent ecosystems.

*Status:* The existing Lolo forest plan was finalized in 1986, is grossly outdated, and has long been identified by the agency and public as in need of revision. There is considerable stated interest in initiating a plan revision process, including from Missoula, Mineral and Sanders counties, several local forest collaboratives, and hunting and fishing interests.

*Recommendation:* Direct funding toward the Lolo plan revision processes in the FY22 budget.

### **Region 4**

- **Bridger-Teton National Forest (Wyoming)**

*Values:* The 3.4-million-acre Bridger-Teton National Forest represents some of the finest hunting and fishing country available in Wyoming and the West. Encompassed within the Forest are the Wyoming and Snake River Ranges, plus the Gros Ventres, Wind Rivers, Absarokas, and Tetons. Game species include moose, mule deer, elk, bighorn sheep, mountain goats, bison, forest grouse, three subspecies of cutthroat trout, and other wild trout. In 2019, over 25,000 hunters pursued elk and mule deer on hunt areas that overlap with the Forest and there are 84 hunting outfitters permitted on the Forest that rely on healthy big-game populations.

*Status:* The Bridger-Teton plan revision was scheduled to start in 2019, but was delayed due to shifting USFS priorities. The forest is taking active steps to prepare for the planning process, including evaluating Wild and Scenic Rivers and recreation and wildlife conflict. Additionally, local stakeholders, including hunting and fishing interests are engaging in activities to assess the planning area and identifying conservation and access priorities.

*Recommendation:* Direct funding toward the Bridger-Teton plan revision process in the FY22 budget.

- **Humboldt-Toiyabe National Forest (Nevada/California)**

*Values:* The Forest is located primarily in Nevada with a small portion in California, making this is the largest National Forest in the contiguous United States at 6.3 million acres. The forest is spread out over ten ranger districts through Nevada, covering numerous mountains ranges and ecotypes. This wide diversity of habitat types—from wide open sage steppes to rugged peaks carved by glaciers means equally diverse hunting and fishing opportunities. From Himalayan snowcock and mountain goat hunting in the Ruby Mountains, to mule deer and elk hunting on the White Pine Wilderness, to native Lahontan cutthroat trout in the Forest’s namesake Toiyabe Range, the Humboldt-Toiyabe National Forest is prized by hunters and anglers.

*Status:* Last revised in 1986, the generation-old forest plan is one of most outdated in the entire National Forest System. With the Bridger-Teton forest plan also due for a revision, Region 4 has an opportunity to pool resources to complete both plans simultaneously.

*Recommendation:* Direct funding in the FY23 budget toward Region 4 to initiate a plan revision for the Humboldt-Toiyabe National Forest.

▪ **Manti-La Sal National Forest (Utah)**

*Values:* As the often-photographed backdrop to Moab, the La Sal Mountains are the second highest in the state and contain some of the most remote and rugged high elevation wild lands in the region. The forest spans 1.4 million acres of central and southeastern Utah and extends into western Colorado. The wildlife and cultural resources in the Manti-La Sal have few comparisons in the country. Stone canyon dwellings, petroglyphs, and pictographs give us a unique glimpse into the past and the indigenous communities that relied upon the same abundance of wildlife species hunters and anglers cherish today. Beyond management indicator species like mule deer and elk, the forest supports moose, bighorn sheep, greater sage-grouse, and several species of native cutthroat trout that are either threatened or a species of conservation concern.

*Status:* The terribly outdated 1986 forest plan has already been identified for revision but only an informal pre-scoping process under 36 CFR 219.4(a) has been implemented in 2020 to engage the public in plan development.

*Recommendation:* Initiate the formal forest plan revision process and scoping by publishing the Notice of Intent (NOI) in the Federal Register and directing existing funding to the process so it can begin in FY22.

Sincerely,

Backcountry Hunters & Anglers  
John Gale, Conservation Director  
725 W Alder St. Suite 11  
Missoula, MT 59802

Theodore Roosevelt Conservation Partnership  
Joel Webster, VP of Western Conservation  
725 W Alder St. Suite 1  
Missoula, MT 59802

National Deer Association  
Torin Miller, Director of Policy  
PO Box 160  
Bogart, GA 30622

Trout Unlimited  
Corey Fisher, Public Lands Policy Director  
111 N. Higgins Ave. Suite 500  
Missoula, Montana 59802