



**BACKCOUNTRY  
HUNTERS & ANGLERS**  
IDAHO

September 30, 2025

District Ranger, Chris Waverek  
Salmon-Challis National Forest  
311 N. Hwy 93  
Challis, ID 83226

**RE: Challis Backyard Trails (68598)**

District Ranger Waverek,

Thank you for the opportunity to comment on the proposed Challis Backyard Trails Project.

Backcountry Hunters and Anglers (BHA) is a non-profit conservation group with more than 20,000 members in chapters across forty-eight states, two Canadian provinces and one territory. BHA seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting through education and work on behalf of wild public lands and waters. The Idaho Chapter of Backcountry Hunters & Anglers represents nearly 2,000 members in across the state of Idaho who have a vested interest in how our shared public lands within the Salmon-Challis National Forrest are managed.

After reviewing the proposed plan, the Idaho Chapter of Backcountry Hunters & Anglers feels that the proposed actions should require documentation in an environmental assessment (EA) or environmental impact statement (EIS). The proposed project does not appear to meet the requirements for the use of a categorical exclusion under 7 CFR 1b.4 (d). Our primary concerns include impacts to wildlife habitat and migration, increased need for invasives management across the Challis-Yankee Fork Ranger District, and the ability for the USFS staff to maintain these trails amid sweeping reductions in force across the agency.

Trails, including non-motorized trails, are known to fragment habitat and can disrupt wildlife. Studies from the Starkey Experimental Forest have demonstrated this time and time again. The extent to which new trails would fragment habitat and increase big game disturbance and vulnerability should be analyzed. Furthermore, much of the proposed trail sites, particularly the Big Hill Trails, are located within known elk migration corridors and seasonal stopovers as shown in the attached map from Idaho Fish & Game. Impacts to migration and seasonal habitat would be a direct impact that should be analyzed extensively.

Based on conversations BHA board members have had with IDFG Salmon Region biologists, data shows that these proposed trails also directly overlap with mule deer fawning stop-over habitat. As mule deer numbers decline across the West, any potential impacts to their habitat, especially fawning habitat, should be closely analyzed and/or mitigated.

The Salmon-Challis National Forest currently manages more than 600 miles of non-motorized trails according to the Idaho Trails Map provided by Idaho Parks and Recreation, including over



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70 miles of non-motorized trails within the Challis-Yankee Fork Ranger District. With ongoing reductions in force across the USFS, we are concerned about how the Challis-Yankee Fork Ranger District would manage an approximate 50% increase in non-motorized trails. Additionally, some trails would extend into new previously un-developed areas which would alter some backcountry/primitive recreation experiences.

Trails are known to increase the dispersal of invasive plants and given the challenges with cheatgrass and spotted knapweed in the area, these effects should also be analyzed to ensure that this project does not inadvertently increase fire risks due to an increased spread of cheatgrass, or otherwise degrade wildlife habitat by enabling the spread of invasive species.

Some of the proposed trails are in whitebark pine habitat, which is an ESA Threatened species. Potential effects from trail construction and maintenance and increased recreation in the area should be analyzed.

Lastly, we are concerned about the cumulative impacts of other similar projects occurring in the area. The Challis BLM field office has greatly expanded their motorized and non-motorized trails systems surrounding Challis in the last couple of years. The Salmon-Challis NF has also recently allowed development of groomed cross-country ski trails on Big Hill. This will notably increase human presence in winter range, and further disperse big game species during this sensitive time in their migration. Other trail changes within the Challis-Yankee Fork Ranger District, such as opening up the Keystone/Ramshorn trail from 50" or less to full size vehicles, also contribute to these cumulative wildlife impacts.

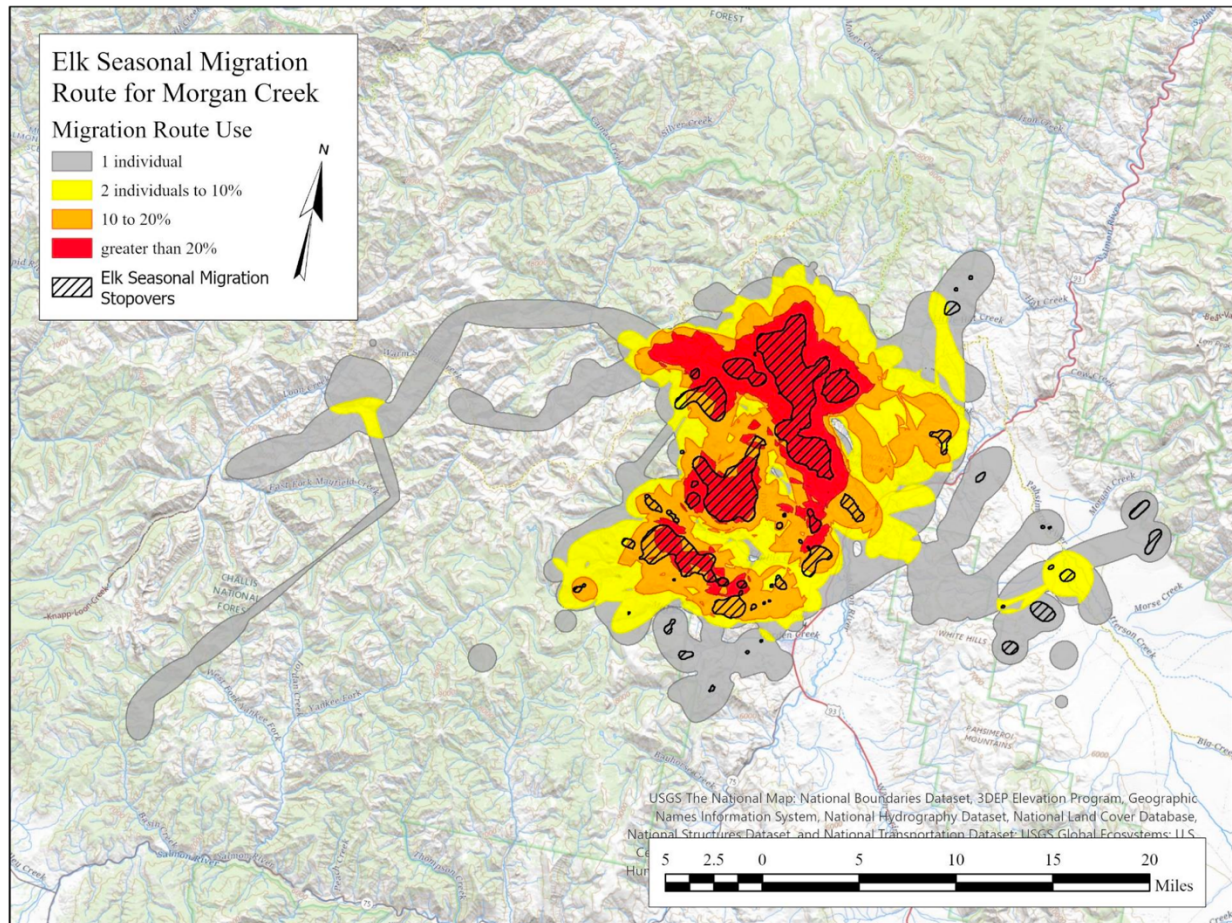
If this project does move forward, we propose that actions are taken to reduce impacts to wildlife:

- Prioritize habitat projects such as removing unnecessary fences, modifying fences to make them wildlife friendly, manage invasive species, expand native habitat, etc.
- Consider seasonal closures on the trails to mitigate impacts to migration during times of peak wildlife use

Sincerely,

Dre Arman  
Regional Stewardship & Habitat Connectivity Manager  
Backcountry Hunters & Anglers





<https://www.fs.usda.gov/pnw/science/scifi219.pdf>

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