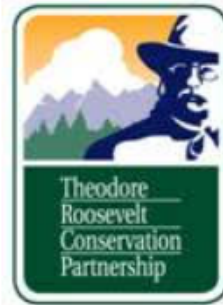


Joshua M. Travers, Field Manager  
Bureau of Land Management  
Challis Field Office  
721 E. Main Ave. Suite 8  
P.O. Box 817



August 15th, 2023

Dear Mr. Travers,

Backcountry Hunters and Anglers (BHA) is a non-profit conservation group with 40,000 members in chapters across 48 states, two Canadian provinces and one territory. We seek to ensure North America's outdoor heritage of hunting and fishing in a natural setting through education and work on behalf of fish, wildlife and wild places. The Idaho chapter has nearly 2,000 dedicated public landowners as members.

The Theodore Roosevelt Conservation Partnership (TRCP) is a national nonprofit conservation organization working to guarantee all Americans quality places to hunt and fish. In addition to its 60 formal partner groups, the TRCP represents more than 140,000 individual members across the United States and 3,500 in Idaho.

Idaho Wildlife Federation (IWF) is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, IWF represents a nonpartisan voice of 28 affiliate organizations and 45,000 affiliate members and supporters in Idaho.

Idaho Department of Fish and Game's mission is to protect, preserve, perpetuate and manage Idaho's wildlife resources. The Idaho Mule Deer Initiative (MDI) was created in 2004 and is a statewide effort; the MDI has three basic goals: protect and improve habitat, improve mule deer numbers, and increase hunter satisfaction.

In December of 2021, a scoping letter was sent from the BLM Challis Field Office (CFO) to BHA, TRCP, IWF, IDFG and MDI for the Elkhorn Riparian Exclosure Fences project. The project proposal includes construction of exclosure fences to protect two primary riparian areas, including spring complexes, a pond, and an aspen stand on the Pines-Elkhorn allotment in the

Pahsimeroi Valley. The purpose of the proposed action is to move riparian communities towards desired condition, and the need for the proposed action is to relieve grazing pressure on riparian communities to progress towards standards established for riparian management in the Challis Resource Management Plan (RMP) and the Final Biological Assessment for Ongoing Grazing Actions in the Pahsimeroi River Section 7 Subwatershed.

All of these organizations responded to the scoping letter and noted the importance of this project for protecting and improving critical riparian habitat in the Donkey Hills of the Pahsimeroi Valley.

In their letter, TRCP stated: "The TRCP is supportive of the proposed project, echoing the scoping document's statement that the area is important for elk and deer winter range, elk calving and priority habitat for sage grouse. In addition to those big game species, Idaho Department of Fish and Game data shows the project area has value for mule deer fawns and pronghorns, especially during the dry summer months."

IWF stated: "IWF commends the BLM for approaching this project in a collaborative manner and for taking steps to improve the landscape conditions so they aligned with objectives in the Challis Resource Management Plan (RMP). As the scoping document states, this area is designated in the RMP as crucial elk habitat, elk and mule deer winter range, and elk calving grounds. In addition, the area serves as functional habitat for other species such as pronghorn and moose. Finally, the project area is identified as Priority Greater Sage Grouse habitat- a designation for only the most valuable and productive habitat for the iconic, but imperiled, Western bird species. Given this area's tremendous wildlife value, we offer our support for the project as well as a couple of recommendations to consider for project design."

In their letter, IDFG stated "We commend the BLM for taking a collaborative approach to this project. We are very familiar with the fish and wildlife resources found within and adjacent to the Project Area...IDFG supports the efforts of the Challis Field Office to improve these very important riparian areas and aspen stands. As the scoping letter states, the area is important elk and mule deer winter range, elk calving area, and Priority Greater Sage Grouse habitat. Some recent work on mule deer fawning habitat delineation indicates that these limited riparian areas are important as fawning areas throughout the Pahsimeroi Valley. In addition, recent radio-collaring and summer monitoring of pronghorn revealed that the upper ends of Elkhorn Creek and Donkey Creek are vitally important pronghorn summer range, particularly during dry summers. Protection of these areas would also benefit a host of non-game species including amphibians, migratory birds, and pollinators."

We have noted that the project has not been updated on ePlanning since November 16th, 2021. Recent conversations with BLM staff have indicated that the project has not made much progress in the last two years, and that the size of the exclosures may have been reduced from what was originally proposed.

We are writing to you to ask for an update on the project, and clarification on the status and plans for the project. We encourage the CFO to not abandon this opportunity for a project that

was based on a collaborative approach to managing and improving critical habitat and natural resources that are highly valued from a wildlife and ecological standpoint. The Mule Deer Initiative, through Idaho Department of Fish and Game, contributed a significant amount of funding for this project, which may be pulled if action isn't taken in a timely manner.

The BLM's stated mission is to "sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations." Implementation of the Elkhorn Riparian Exclosure Fences project is critical to sustain the health, diversity and productivity of the incredibly valuable habitat identified in the Project Area.

The BLM's stated priorities include:

"Restoration: Nature is our planet's best engineer. As the effects of climate change increase, we will restore our lands and waters to create healthy, resilient landscapes and to allow nature to better store carbon.

Conservation: As part of our multiple use and sustained yield mandate, we will address climate change and conservation in all we do."

The Elkhorn Riparian Exclosures Fences project perfectly aligns with these priorities. Failing to follow through with implementation of this project would be a failure to follow your agency's own priorities.

We encourage the BLM to make this project a priority, sign the NEPA document, and begin project implementation as soon as possible.

Thank you for reviewing these concerns and considerations from our organizations. We look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dre Arman', with a stylized, cursive script.

Dre Arman

Idaho and Nevada Chapter Coordinator

Backcountry Hunters and Anglers

Rob Thornberry,  
Idaho Field Representative  
Theodore Roosevelt Conservation Partnership

Garrett Visser,  
Conservation Program Coordination  
Idaho Wildlife Federation

Brett Stansbury,  
Wildlife Biologist  
Idaho Department of Fish and Game

Jeff Richards  
Staff Biologist  
Idaho Department of Fish and Game