



January 23, 2026

Mr. Chris Waverek
Challis-Yankee Fork District Ranger
Salmon-Challis National Forest
HC 63 Box 1669
Challis, ID 83226
(208) 879-4168

Electronically submitted: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=68598>

RE: Idaho Conservation League's Scoping Comments for the Proposed Challis Backyard Trails Project

Dear Mr. Waverek:

I am writing on behalf of the Idaho Conservation League (ICL) to provide our scoping comments and recommendations for the proposed Challis Backyard Trails project.

Founded in 1973, the mission of ICL is to create a conservation community and pragmatic, enduring solutions that protect and restore the air you breathe, the water you drink, and the land and wildlife you love. ICL's seven strategic initiatives include confronting climate change, recovering Idaho's wild salmon and steelhead, cleaning up the Snake River, protecting public land, restoring abundance and diversity of Idaho's wildlife, safeguarding North Idaho lakes and waters, and reducing pollution. ICL achieves these goals through public outreach and professional advocacy. With offices in Boise, McCall, Ketchum, and Sandpoint, the organization is a consistent, statewide voice for conservation in Idaho and represents more than 30,000 members and supporters. ICL's members and supporters care deeply about protecting and restoring the environment.

ICL submitted comments for this project in September, 2025, and we are sharing those with you once again below. However, it appears that additional information has become available since our original comments as the Forest Service has once again provided a scoping comment period for the project. Our original comments are:

ICL is generally supportive of the proposed project from the local trails collaborative, as it is clear that there is a specific need for additional non-motorized trails in the Challis area. We offer the following recommendations as the SCNF works to hone this proposal through scoping:

- The Forest Service should employ all best management practices (BMPs) applicable to trail and erosion control work, including the storage and transportation of hazardous materials in riparian environments, the reduction and prevention of the spread or introduction of noxious weeds and invasive plants, the prevention of sediment delivery to nearby waterways.
- The Forest Service, in coordination with the Idaho Department of Fish and Game, should review the project proposal to assess whether seasonal closures are warranted for some or all of the planned trails to protect important fish and wildlife values.
- We recommend that the Forest Service consider some form of recreational use monitoring at key locations within the project area. The purpose of this monitoring would be to evaluate the long-term changes to recreational use in this area as a result of these new trails, which could then be used to inform future management decisions.
- The Forest Service should also establish baseline information regarding resource conditions and triggers if the resources are degraded. Potential metrics could include the use of the trails, number and length of new user created routes, and compliance with trail closures. If monitoring shows that established triggers are tripped, the Forest Service will already have a response plan in place that could include public service announcements, reinforcing barricades, and closures of problematic routes.
- We recommend that the Forest Service commit to increased outreach, education, and enforcement efforts as part of this project. We are concerned that the motorized users could either accidentally or intentionally use these new non-motorized trails. The Forest Service should include additional trail signage and kiosks at key locations, as well as physical barriers where appropriate. The Forest Service should also reach out proactively to motorized recreation groups, describe the project proposal, and ask the clubs to educate their membership on the importance of staying on motorized trails. The Forest Service could also work with recreational groups on a trail monitoring and maintenance program.

While we appreciate the Salmon-Challis National Forest proposing to construct 32 miles of new motorized and non-motorized trails on the Challis-Yankee Fork District, creating new recreation opportunities and contributing to increased loop hiking and riding opportunities for the public, we are concerned about the stated intent to analyze and approve the project as a Categorical Exclusion.

The most recent scoping document (released January 16, 2026 via email scoping notice) includes a map that depicts the proposed trail locations and reveals that the Forest Service, “has made a preliminary assessment and concluded that this proposal may fall into categories of actions that may be excluded from documentation in an environmental assessment (EA) or environmental impact statement (EIS),” (p. 2). However, the scoping document fails to identify which Categorical Exclusion (CE) applies to the proposed project. Further, on our review of the

potential applicable CEs, we find that none of the relevant exclusions apply to this project, despite the Forest Service stating that extraordinary circumstances will not preclude the use of a categorical exclusion.

The CE that would potentially apply to the Challis Backyard Trails project is 36 CFR 220.6(e)(1), which reads as follows:

Construction and reconstruction of trails. Examples include, but are not limited to:

- (i) Constructing or reconstructing a trail to a scenic overlook, and (ii)
- Reconstructing an existing trail to allow use by handicapped individuals.

None of the proposed trails in the Challis Backyard Trails project lead either to a scenic overlook, nor will the newly proposed trails allow use by handicapped individuals. If this is not accurate, the Forest Service must clarify these details.

This project is significant in a number of ways: the eventual implementation will have a significant positive impact on recreation opportunities and access on the Challis-Yankee Fork District; trail mileage on the District will significantly increase, and thereby human presence in the trail areas will potentially significantly increase. There will also be an increase in total soil commitment directly related to trail construction. Because the none of the stipulations in 36 CFR 220.6(e)(1) apply to this project, and because there are likely to be significant changes to the natural and human environment of the project area, Categorical Exclusion analysis and approval does not apply to the Challis Backyard Trails project. Therefore, we recommend that the Forest Service complete an Environmental Assessment (EA), and that the Forest Service analyze the full potential impacts of the project on total soil commitment, wildlife, recreation, and other resource conditions so baseline data can inform any potential alternatives or adaptive management decisions.

We appreciate this second opportunity to comment on the Challis Backyard Trails project. Should you have any questions or concerns regarding these comments, please feel free to contact either myself or Josh Johnson, our Central Idaho Director based in our Ketchum office.

Respectfully submitted,



Randy Fox
West Central Idaho Director
Idaho Conservation League
rfox@idahoconservation.org
(208) 345-6933 x 510