

June 20, 2018

Mary Friberg
1206 So. Challis Street
Salmon, ID 83467
208-756-5560
mfriberg@fs.fed.us

RE: SCNF Species of Conservation Concern

Dear Ms. Friberg,

Thank you for the opportunity to comment on the Salmon-Challis National Forest (SCNF) Species of Conservation Concern. The Theodore Roosevelt Conservation Partnership (TRCP) hopes these comments will help focus efforts to conserve and restore important fish and wildlife habitats and promote and expand the forest's abundant and sustainable recreation opportunities.

The TRCP is a national non-profit conservation organization working to guarantee all Americans quality places to hunt and fish. The TRCP works with our 55 formal partners and represents more than 80,000 individual members nationally and more than 3,500 Idaho members. As a sporting group, the TRCP views the SCNF as an outstanding resource for hunters and anglers, and it is among our highest goals to participate in all facets of SCNF planning as the voice of hunters and anglers.

TRCP requests the management priorities presented in the plan revision reflect the importance of the outdoor recreation industry that thrives because of the Salmon-Challis forest's wildlife, plants, vistas and remote nature. That approach will safeguard high-quality habitats, maintain existing public access and allow for active management to benefit habitat, wildlife, and the area's thriving hunting and fishing economy.

With hunting in mind, the TRCP asks the SCNF to include Rocky Mountain bighorn sheep and mountain goats on the forest's list of Species of Conservation Concern. Half of Idaho's mountain goat hunting tags and 73 percent of its Rocky Mountain bighorn sheep hunting tags are located in Idaho Department of Fish and Game management units within the planning area, a measure of the importance of the SCNF to both species.

In the case of bighorn sheep, the TRCP is concerned with the continued transmission of bacterial pneumonia between wild sheep and domestic sheep and goats. The planning area has Idaho's largest sheep population, including nine distinct sheep populations. These animals represent an irreplaceable genetic resource. The loss of any one of these herds could affect bighorn populations across their historic range.

Direction from the forest's planning rules and regional forester support this conclusion.

The 2012 Forest Service Planning Rule directs the regional forester to identify those species for which “the best available scientific information indicates substantial concern about the species’ capability to persist over the long-term in the plan area.”

If the persistence of these species cannot be maintained through the application of general standards and guidelines relating to ecosystem diversity and integrity, “then additional, species-specific plan components, including standards or guidelines, must be included in the plan to provide such ecological conditions in the plan area” (36 CFR 219.9).

Bighorn sheep were designated as a USFS Sensitive Species in Region 4 nearly 10 years ago. As such, bighorn sheep are subject to agency management direction to ensure that actions by the Forest Service do not contribute to bighorns declines and do not lead to listing under the Endangered Species Act.

The facts and science that supported Sensitive Species designation have not changed. Bighorn populations continue to struggle in Idaho, largely due to diseases contracted from domestic sheep and goats.

In the case of mountain goats, the TRCP sees threats to mountain goats from fire, human disturbance, and forest succession brought on by climate change. The forest’s goat populations has declined by 27 percent in the past three decades, according to IDFG aerial survey data, and the TRCP is concerned about further declines.

The SCNF is a gem, a distinct forest that hosts thousands and thousands of hunters, anglers, rafters, backpackers, horse-packers and wildlife watchers annually. It can be a working forest that adds to the vibrant nature of the nearby communities of Salmon, Challis, Mackay, Arco, and Leadore. The TRCP believes responsibly managing high-quality habitats, species of conservation concern, and existing public access will help outdoor-based recreation thrive in central Idaho.

Thank you for your consideration of our comments.



Rob Thornberry
Idaho Field Representative
Theodore Roosevelt Conservation Partnership
590 Sycamore Circle
Idaho Falls, Idaho 83402
(208) 569-8032
www.trcp.org

