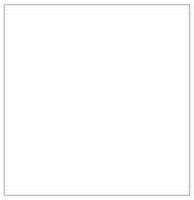
Outlook

Fwd: Public Comment in Support of the A.J. Trail Easement Agreement

From Chris Brule [redacted]g>
Date Tue 8/11/2026 2:40 PM
To Michelle Smith <michelles@victoridaho.gov>

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.



Chris Brule | ***Executive Director***
Mountain Bike the Tetons
[address redacted], [address redacted]
[phone redacted]
Email
Donate

Forwarded message
From: **Scott Fitzgerald** <s[redacted]>
Date: Tue, Aug 11, 2026 at 1:37 PM
Subject: Public Comment in Support of the A.J. Trail Easement Agreement
To: <suem@victoridaho.gov>, <stacyh@victoridaho.gov>, <emilys@victoridaho.gov>, <amyr@victoridaho.gov>, Jeremy Besbris <jeremyb@victoridaho.gov>

Dear Mayor and City Council Members,

I am writing to express my strong support for the proposed easement agreement that will secure public access to the nearby Bureau of Land Management land via the A.J. Trail.

Having previously served as mayor, I had the privilege of helping coordinate the original effort to secure an easement for this trail. Seeing the immense health, recreational, and community benefits that effort provided makes me incredibly proud of what we accomplished together.

I want to highlight that this success is also a testament to the outstanding partnership between the city, private landowners, and the nonprofit organization Mountain Bike the Tetons, whose efforts have been pivotal in this project.

None of this would be possible without the incredible generosity of the landowners who are willing to grant this easement, and I am deeply grateful for their commitment to our community's future.

Thank you for your dedication to Victor's future and for considering my input on this important project.

I strongly encourage you to vote in favor of granting and securing the A.J. Trail easement.

Sincerely,

Scott Fitzgerald
[redacted]
Victor, ID

Outlook

Public Comment — AJ Trail Easements & MOU

From Peter Carman <[redacted]>
Date Tue 8/11/2026 9:36 AM
To Michelle Smith <michelles@victoridaho.gov>
Cc Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Emily S <emilys@victoridaho.gov>

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

To the Council:
Don't accept the easements or sign the MOU until MBT, TVTAP, and BLM commit to a full Environmental Assessment — done in consultation with Idaho Fish and Game and the U.S. Fish and Wildlife Service.

This isn't anti trail. It's pro process. Get it right the first time, or we're stuck living with it.

Peter Carman

[redacted]

Outlook

Trail system in the Victor hills.

From piper H W C <[redacted]>
Date Tue 8/11/2026 11:30 AM
To Michelle Smith <michelles@victoridaho.gov>

This is the first time you received an email from this sender [redacted]). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear Michelle,

My name is Piper Wright Clark, and my family owns the Triangle Q Ranch, which holds the grazing permit up the hillside to Mud Lake in the BLM forest. I am writing to express my strong concerns regarding the proposed new trail system.

First, I am concerned that the trail will force wildlife either higher into the hills or down into my pastures. Local ranchers already face inadequate compensation for livestock losses from predators, wolves kill my calves, sheep ,dogs, and resource competition, my hay in winter, from elk, which also pose a risk of spreading brucellosis to cattle my herds. Furthermore, cattle will not respect trail priority signs and will naturally walk along and shit on the trail system. Additionally, if natural game trails are bulldozed, wildlife will simply create new paths.

I am also deeply concerned that introducing eight miles of wide trails will cause a significant spike in recreational motor vehicle use. Given that our area is bordered by national and state parks, as well as numerous existing roads for recreational vehicles, this project seems unnecessary. It is unclear who this trail serves, particularly when considering the long term residents and ranchers of Victor compared to newer, seasonal residents or developers.

Finally, the infrastructure impacts have not been adequately addressed. Where will visitors park? If new parking is not provided, vehicles parked on narrow streets will obstruct tractors and ranch equipment. The potential for increased litter and garbage further outweighs the benefits. With Victor already facing infrastructure challenges, such as sewage management, allocating resources to this trail project appears to be a misinterpretation of community priorities.

I urge you to reconsider this project and look forward to your response regarding these concerns.

Sincerely,

Piper Wright Clark

Response to Bureau of Land Management Request for Draft EA Comments:

Upper Snake Field Office; Bureau of Land Management
Upper Snake East Travel Management Plan Draft Environmental Assessment

Prepared by:
Idaho Department of Fish and Game

Submitted to:
Idaho Office of Species Conservation

June 30, 2023

Introduction

The Idaho Department of Fish and Game's (IDFG) mission is to preserve, protect, perpetuate, and manage fish and wildlife for the public interest (Idaho Code 36-103(a)). Accordingly, IDFG has reviewed the Bureau of Land Management's (BLM) proposed Upper Snake East Travel Management Plan Draft Environmental Assessment (DEA). The DEA's purpose is to develop a plan for managing travel and transportation within the designated Travel Management Area (TMA) within the Upper Snake Field Office (USFO). The proposed Travel Management Plan (TMP) includes 761.2 miles of evaluated travel routes on BLM-managed lands within a 126,378-acre TMA in Southeastern Idaho.

IDFG supports the development of a TMP on BLM lands that provides well-conceived access infrastructure to public lands that strikes a balance between access for resource management and recreation, and perpetuation of quality fish and wildlife habitats. Ideally the balance should be measured at a landscape level and include some areas where recreational infrastructure is a priority and other areas where less infrastructure is desirable to maintain important natural resources and ecological functions.

In reviewing the DEA and Draft TMP, we examined all routes identified by the BLM to comment on a route's relative value and potential impacts. These comments are focused on either individual routes, or within a travel unit encompassing multiple routes, identified in the Draft TMP. As a preface to our specific comments, we offer the following key underlying themes that guided our input.

User-Created Roads and Trail Adoption

Many of the routes in the TMP were created by users rather than engineers in consultation with natural resource professionals. According to the DEA pg. 8, under 1.3 Purpose and Need, "Currently, in most of the TMA, motorized and non-motorized route use is limited to existing routes; however, these existing routes have not been evaluated by USFO resource specialists to determine their long-term purpose and need as part of an overall comprehensive travel management network, and their potential effects on the area's natural and human environment." Formal adoption of user-created roads/trails may perpetuate ongoing resource damage created by poorly conceived routes. The BLM should not preserve routes in their TMP that compromise

protection of important natural resources such as those that may alter natural stream flows, impact water quality, or perpetuate excessive fragmentation of important wildlife habitats.

Wildlife Resources

Fish and wildlife are an important part of Idaho's culture and are valued by our citizens. As identified in the DEA (Pg. 9), "The TMA provides valuable habitat for several special status plant species, including Ute ladies'- tresses (Spiranthes diluvialis), false mountain willow (Salix pseudomonticola), rush aster or boreal aster (Symphyotrichum boreale), and white spruce (Picea glauca). It also provides valuable habitat for special status wildlife species, including bald eagle (Haliaeetus leucocephalus), Canada lynx (Lynx canadensis), Columbian sharp-tailed grouse (Tympanuchus passionless columbianus), ferruginous hawk (Buteo regalis), Greater sage-grouse, hereafter GRSG (Centrocercus urophasianus), grizzly bear (Ursus arctos horribilis), and yellow-billed cuckoo (Coccyzus americanus occidentalis). The sagebrush communities in the TMA provide habitat for GRSG and wintering big game species. The TMA also provides habitat for Yellowstone cutthroat trout (Oncorhynchus clarkii bouvieri), which occur in numerous perennial streams and some lakes and reservoirs."

IDFG's input focuses on key areas/issues of high importance to fish and wildlife. Some of the travel units that IDFG evaluated have importance beyond parcel boundaries or BLM ownership. IDFG Wildlife Management Areas (WMAs) are one example of vital habitats with large landscape significance. Tex Creek Wildlife Management Area (TCWMA) and a portion of the Sand Creek Wildlife Management Area (SCWMA) are subject to cooperative agreements under the Sikes Act between the BLM, IDFG and other entities. Other priority areas include river corridors and important wetland areas, big game winter range and transitional habitats, and habitats important to listed species and Idaho Species of Greatest Conservation Need (SGCN). IDFG also focused our review on potential impacts to species of special significance within the TMA including grizzly bear, selected big game (elk, deer, moose) and GRSG.

Grizzly Bear-

Portions of the TMA are within the Greater Yellowstone Ecosystem (GYE) grizzly bear Demographic Monitoring Area (DMA; Figure 1). The primary threat facing grizzly bears in the GYE is human-caused mortality which is related to 1) the amount of secure habitat within a bear's home range and 2) road densities outside of secure habitat (Schwartz et al. 2010). The DEA recognizes this impact: Pg. 52; 4.1.3 Wildlife: Special Status Species, "Fragmentation from roads, logging, OHV use, and surrounding recreational development reduce quality habitat (BLM 2009, IGBC 2016). IGBC identifies managing motorized access to meet the objectives of minimizing human interaction and potential grizzly bear mortality; minimizing displacement from important habitats; minimizing habituation to humans; and providing relatively secure habitat where energetic requirements can be met. IGBC also states that "the management of human use levels through access route management is one of the most powerful tools available to balance the needs of grizzly bears with the needs and activities of humans" (2016)."

An increase in recreational routes, motorized and non-motorized, within the GYE grizzly bear DMA will likely increase human-grizzly bear interaction and decrease security habitat. The BLM

should scrutinize formal adoption of any routes, motorized or non-motorized, that lead to increased human recreation in the GYE grizzly bear DMA.

Big Game –

Idaho's big game are a cherished cultural, recreation and economic resource and BLM lands in the Upper Snake East TMP are vital to their long-term persistence in eastern Idaho. The TMA consists of areas identified as big game (primarily deer, elk, and moose) habitat. Proposed routes, motorized and non-motorized, are within big game winter range, migration habitat, parturition habitat, and summer habitat. Densities of routes per square mile can indicate when human recreation will most likely impact big game habitat and behavior causing disturbance, displacement, and habitat loss.

Elk are valuable indicators of general habitat effectiveness (i.e., the degree to which a population is able to use habitat for a specific function), particularly with rega tat and roads/trails. Lyons (1983) found that as road densities increased above [address redacted] mile in elk habitat, habitat effectiveness (% of expected use) declined rapidly. L e DEA supports this research; Pg. 70, 4.1.4.2 Environmental Effects, "Recreational disturbance from motorized and non-motorized activities (e.g., mountain bike, horse, foot) affects big game behavior by increasing travel time and decreasing feeding and resting time (Naylor et al. 2009). Avoidance of human disturbance can also cause indirect habitat loss and impair forage availability (Dwinnell et al. 2019). Species avoidance is strongest for mountain biking and motorized vehicles (Naidoo and Burton 2020)." Decommissioning and rehabilitating unnecessary pioneered routes, thereby reducing route densities, would likewise reduce adverse impacts to wildlife from disturbance, displacement, and habitat fragmentation and loss.

Lands owned by the BLM are incorporated into two IDFG wildlife management areas (WMA's) and one wildlife mitigation unit (WMU) within the TMA. These areas are managed in cooperation with the BLM and the WMA's (Tex Creek WMA and Sand Creek WMA) are guided by cooperative agreements under the Sikes Act protecting big game winter range and crucial habitat. Proposed recreational routes identified on BLM lands within WMA boundaries need to be coordinated under the agreements to reduce or minimize impacts to the overall management goal of IDFG.

Greater sage-grouse –

Greater sage-grouse are designated as a sensitive species by the BLM and a Species of Greatest Conservation Need (SGCN) by IDFG. Many BLM lands in the TMA are in GRSG Habitat Management Areas (PHMA) and Important Habitat Management Areas (IHMA) located in the Idaho Mountain Valleys conservation area and General Habitat Management Areas (GHMA) in the East Idaho Uplands conservation area. According to the DEA pg. 8, under 1.3 Purpose and Need, "the 2015 Idaho and Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment (2015 GRSG ARMPA) mandates that travel management plans be developed for the USFO as described in the BLM Travel Management Handbook 8342.1, and according to the travel management planning guidelines provided in Appendix L of the FEIS (MD TTM 3, Page 2-33). This Amendment was issued to address threats to the conservation of Greater

Sage-Grouse (GRSG) for the Great Basin Region (including the GRSG sub-region of Idaho), and it amended the 1985 Medicine Lodge Resource Management Plan (1985 Medicine Lodge RMP)."

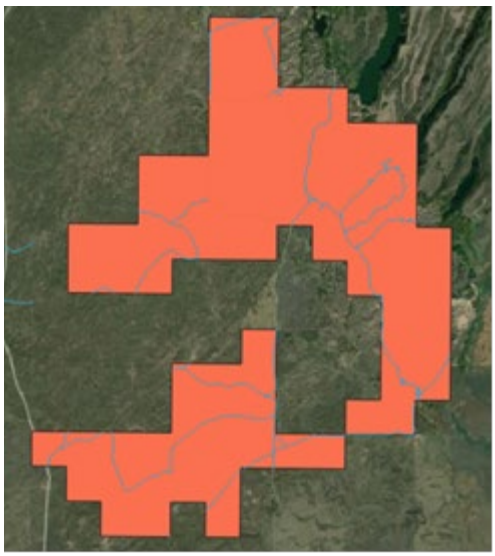
We recommend following guidelines from the State of Idaho (2022), 2021 Policy for Greater Sage-Grouse Management in Idaho for avoiding, minimizing and mitigating impacts to GRSG habitat within the TMA. The DEA (Pg. 57) states a buffer of ¼ mile for GRSG leks was used in the analysis. We encourage the use of the state recommendation in the Idaho Sage Grouse plan for routes that are located within PHMA (pg. 38), which requires a buffer of 3.1 miles for major linear features (e.g., major haul roads, highways, etc.) and 1.2 miles from minor linear features (e.g., minor roads and routes). In addition, routes in IHMA (Pg. 44) require a buffer of 2 miles for major linear features (e.g., major haul roads, highways, etc.) and 0.8 miles from minor linear features (e.g., minor roads and routes). Applying these recommendations to the analysis and closing pioneered routes within these buffers will minimize disturbance and have a positive effect on GRSG habitat and populations.

Specific areas of focus: If route densities are shown, they are calculated from Alternative C

Kepps crossing; 5.5 miles of routes/square mile.
This section of BLM is under an MOU with IDFG as part of the Tex Creek WMA (Figure 5). It is crucial big game winter range. The MOU gives IDFG management authority on specific BLM parcels. Management focus is for wintering big game. IDFG recommends no designation of the trail system proposed in Alternative C to ensure compliance with the MOU and adequate protection of sensitive wildlife habitats.

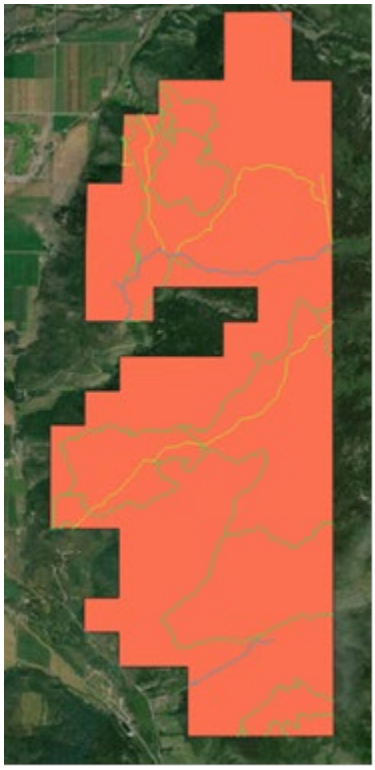


Lower Acadia; 3.7 miles of routes/square mile.



Located next to the Sand Creek WMA and Arcadia reservoirs. This BLM managed land is big game migration and winter habitat (Figure 2 & 3), priority GRSG habitat (Figure 4), Columbian sharp-tailed grouse habitat, and is identified as St. Anthony sand dune tiger beetle habitat (Idaho State Conservation Effort, 1996). IDFG encourages BLM to develop further analysis of route designations to evaluate density of routes per square mile for a new alternative that incorporates wildlife habitat continuity, protection, and reduction of vegetative degradation while providing a diversity of associated hunting access options and experiences (i.e., motorized, mechanized non-motorized, and non-motorized). Routes along the WMA boundary (SC2064, SC2100, SC2103, and SC133), IDFG would like these specific routes to be closed or only open to administrative use.

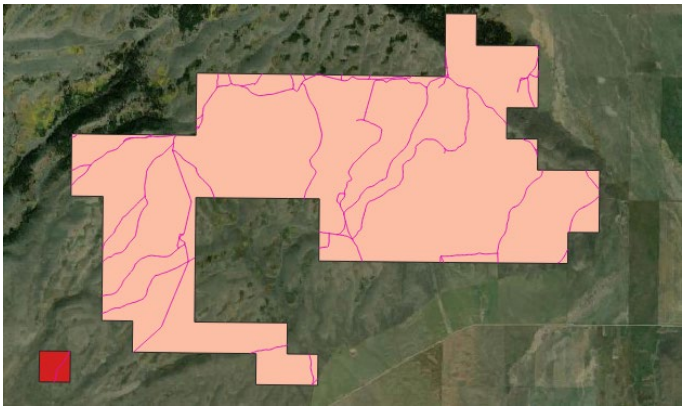
Victor front; 3.9 miles of route/square mile.



These 5,000 acres of continuous BLM lands are crucial year-round big game habitat and are within the grizzly bear DMA (Figure 1). Most of the recreational routes in this area have been pioneered by user groups and have not been evaluated by the USFO staff. IDFG recommends BLM reevaluate this site as an area where management priority is focused on maintaining landscape-scale habitat benefits to big game, grizzly bear, and other wildlife.

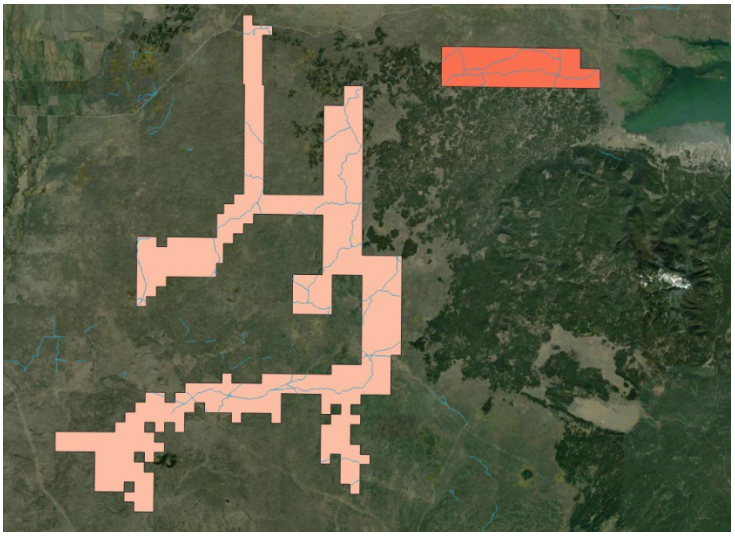
Kilgore Face

This 3,700 acre section of BLM lands is valuable big game parturition and summer habitat, and is identified as important GRSG habitat. IDFG would encourage BLM to evaluate the high density of routes and excessive pioneered routes in this area to minimize impacts to wildlife and natural resources. Unnecessary routes increase the probability of human caused wildfire, fragmentation of wildlife habitat, and the spread of noxious weeds impacting the natural resources and wildlife habitat of the area.



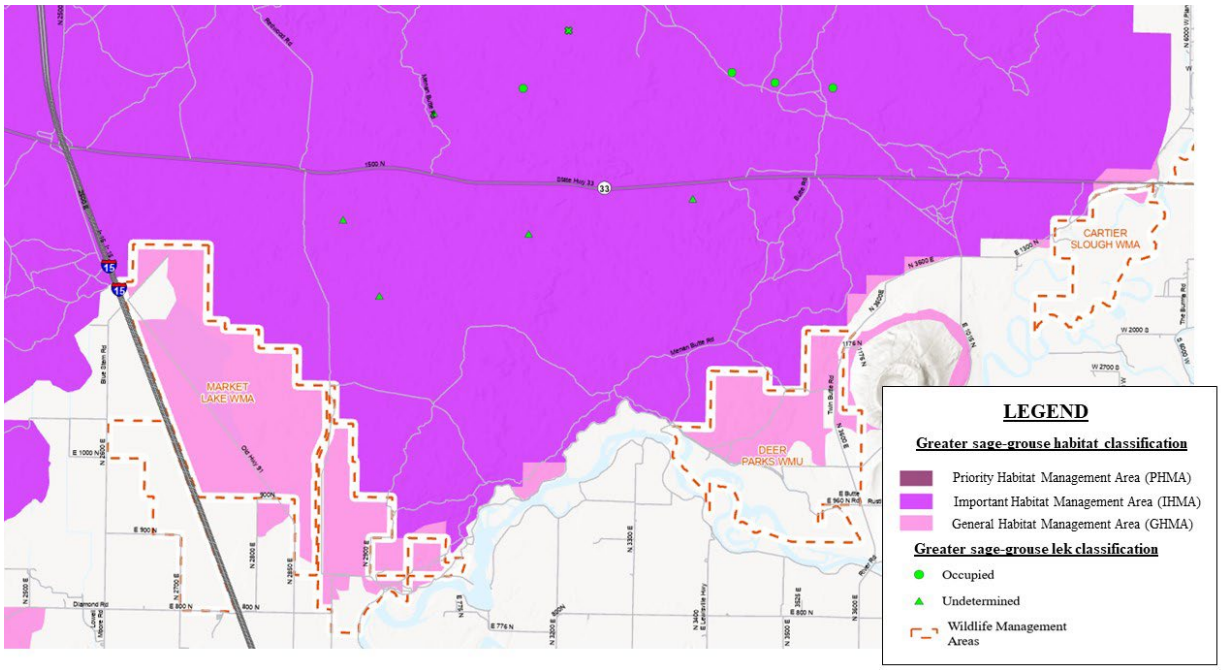
Sand Creek uplands & Shotgun Valley

The Sand Creek uplands and Shotgun Valley are important year-round big game habitat, valuable GRSG breeding, nesting, and brood rearing habitat, and portions of BLM lands are in the grizzly bear DMA (Figure 1). Currently the GRSG habitat designation is being reviewed and edited due to landscape impacts and collar data. Portions of this area are being reclassified from Important to Priority habitat. IDFG would encourage the BLM to evaluate the density of routes and excessive pioneered routes in this area to minimize impacts to wildlife and natural. Unnecessary routes increase the probability of human caused wildfire, fragmentation of wildlife habitat, and the spread of noxious weeds impacting the natural resources and wildlife habitat of the area.



Hwy 33 and Market Lake WMA

BLM parcels south of State HWY 33 and east of I-15 to Menan butte (Figure 6 & 7) are highly fragmented by routes and recreation. This area is crucial habitat for big game and GRSG as winter range, nesting, and early brood rearing. During times of difficult winter conditions, big game move



from their traditional wintering area westward to lands dominated by private lands. Concerns by residents and IDFG of disease, depredation, and wildlife vehicle collisions are increased. For GRSG, the area is recognized as a IHMA with four leks classified with unknown status. Additionally, there are four active leks north of the TMA boundary where nesting and brood rearing habitat lie within the TMA. We suggest mitigating for fragmentation and loss of wildlife habitat by developing an area with no routes, motorized and/or non-motorized. Specifically, we recommend Alternative B for routes west of the railroad tracks with further closures to routes UE2002, 2004, and 2207. This would provide connectivity of crucial unfragmented wildlife habitat on BLM parcels to Market Lake WMA, Deer Parks Wildlife Mitigation Unit (WMU) and the Snake River ACEC.

Recommendations:

- Develop further analysis of route designations to evaluate density of routes per square mile for a new route alternative that incorporates wildlife habitat continuity, and protection. Include seasonal closures and use restrictions to maintain quality wildlife habitat (e.g., security, nesting, winter, parturition habitat) while providing a diversity of associated hunting access options and experiences (i.e., motorized, mechanized non-motorized, and non-motorized).
- Incorporate a comprehensive evaluation and strategy to address existing pioneered routes (e.g., route closures, decommissioning, restoration, etc.). Include in the analysis

impacts of pioneered routes and season of use within identified crucial wildlife habitat (winter range, movement corridors, nesting, and parturition) with mitigation actions.

- Include plans, measures, staffing, and resources that will ensure adequate comprehensive effectiveness monitoring, enforcement, and adaptive management of design features necessary to avoid, minimize, and mitigate adverse recreation impacts to wildlife (e.g., enforcement of the travel management plan, decommissioning and rehabilitation of unnecessary and unauthorized routes, treatment of weed infestations, etc.).

Specific route recommendations are included in the table below.

Route Summary Table

The following table summarizes IDFG's recommendation on specific routes in USFO's Upper Snake East Travel Management Plan.

Geographic Reference	Route Name/Travel Unit	Recommendation	Notes
Snake River ACEC	95-acre Parcel east of Irwin Idaho	Seasonal human entry closure Dec. 1 – May 1	Improve big game survival and protect big game winter range
	Pine Creek Bench UE1818 UE1821	Alternative B; close specific routes	Improve big game and upland bird year-round habitat
	Stinking Springs	Alternative B; maintaining existing seasonal closure	Big game winter range and migratory habitat
	Crest Creek Trail UE1712	Redundant routes	Improve big game habitat
	East of Menan Buttes - SR4119	remove and relocate northern SR4119 trail and dike to the western side of the BLM parcel.	Allows natural river function to expand and enhance key riparian habitat for Yellow-Billed Cuckoo and other riparian-dependent wildlife.
	UE2002, UE2004, and UE 2207	Close routes	Reduce wildlife habitat fragmentation and provide a migration route to MLWMA and Snake River ACEC for big game during difficult winters.
	Gem State Wildlife Habitat Area SR2043 SR2044	Close routes within the Snake River ACEC	Improve Yellow-billed cuckoo habitat
	Gem State Wildlife Habitat Area SR4045	Maintain administrative access for agency and canal maintenance.	Reduces type of use to mitigate for improving yellow-billed cuckoo habitat

Deer Parks Wildlife Mitigation Unit	All routes within the WMU that are designated *Limited to non-motorized* use	Change these route designations to Limited to *Authorized/closed to public* for management purposes	Allows Department staff to improve wildlife survival by managing human access
Cartier Slough Wildlife Management Area	UE1218	Close route except for route to headgate and private (see Fig. 2) parcel on west side of WMA.	Improve wildlife security and public safety.
	UE1201, UE1260, UE1229, UE1216, UE1249 & UE1219	Redundant routes	Improve wildlife habitat for grizzly bear, GRSG, moose, mule deer, elk and pronghorn
Sand Creek Wildlife Management Area	SC2064, SC2100, SC2103, and SC133	Close routes or make administrative use only	Improve wildlife habitat for mule deer, elk, moose, GRSG, and other wildlife species in the area
Antelope Ridge	UE1141 & UE1108	Alternative B; close specific routes	Improve wildlife habitat for grizzly bear, GRSG, moose, mule deer, elk and pronghorn
Henrys Lake	UE1026	Alternative B	Improve recreation access and improve big game & grizzly bear habitat
Bitch Creek Slide	UE1484	open	Important recreational access for Teton river canyon area.
Teton County	UE1406	Alternative B	Improve wildlife habitat for grizzly bear, GRSG, moose, mule deer, and elk

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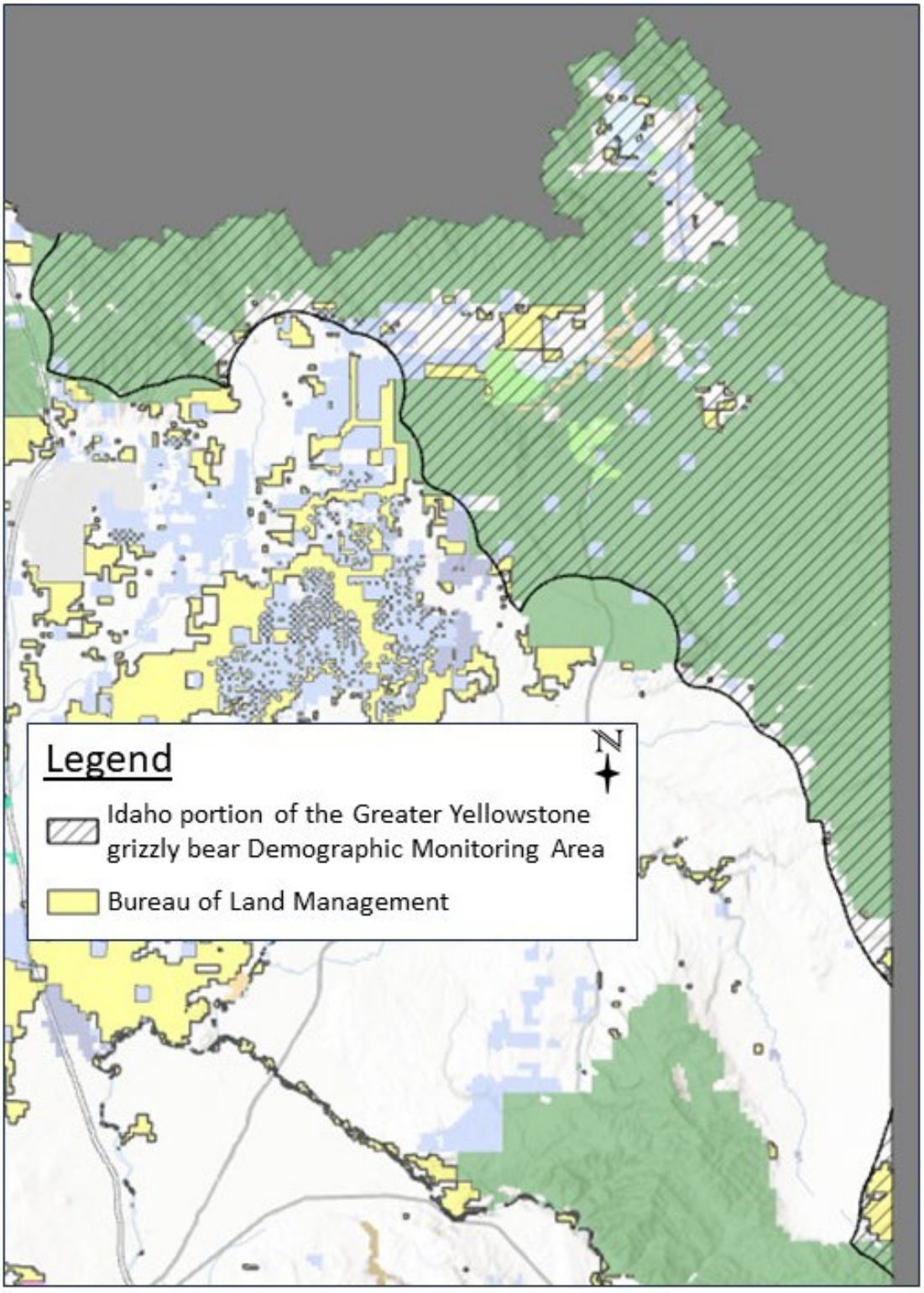


Figure 1. Greater Yellowstone grizzly bear demographic monitoring boundary within the state of Idaho with associated land ownership.

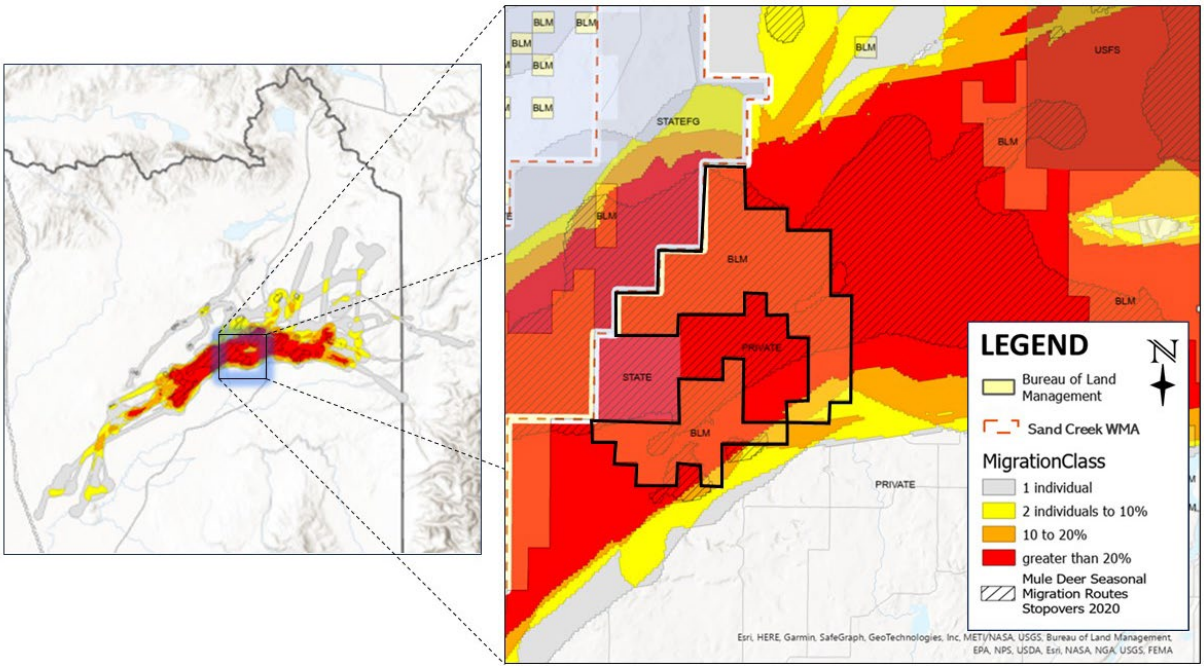


Figure 2. Sand Creek mule deer migration with Arcadia BLM highlighted section.

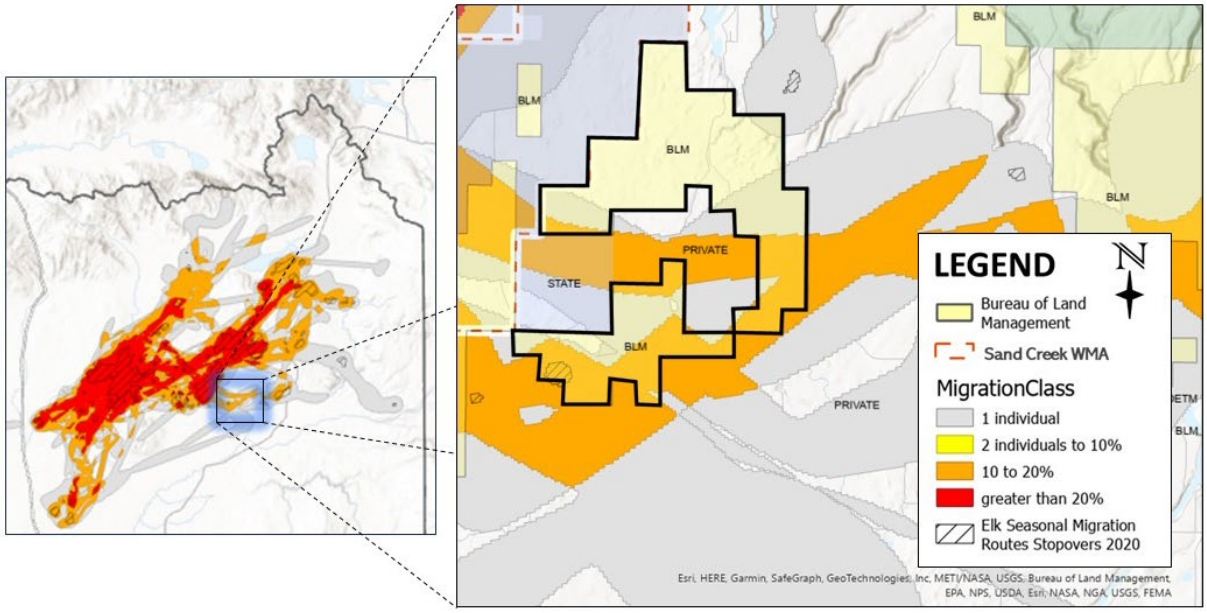


Figure 3. Sand Creek elk migration with Arcadia BLM highlighted section.

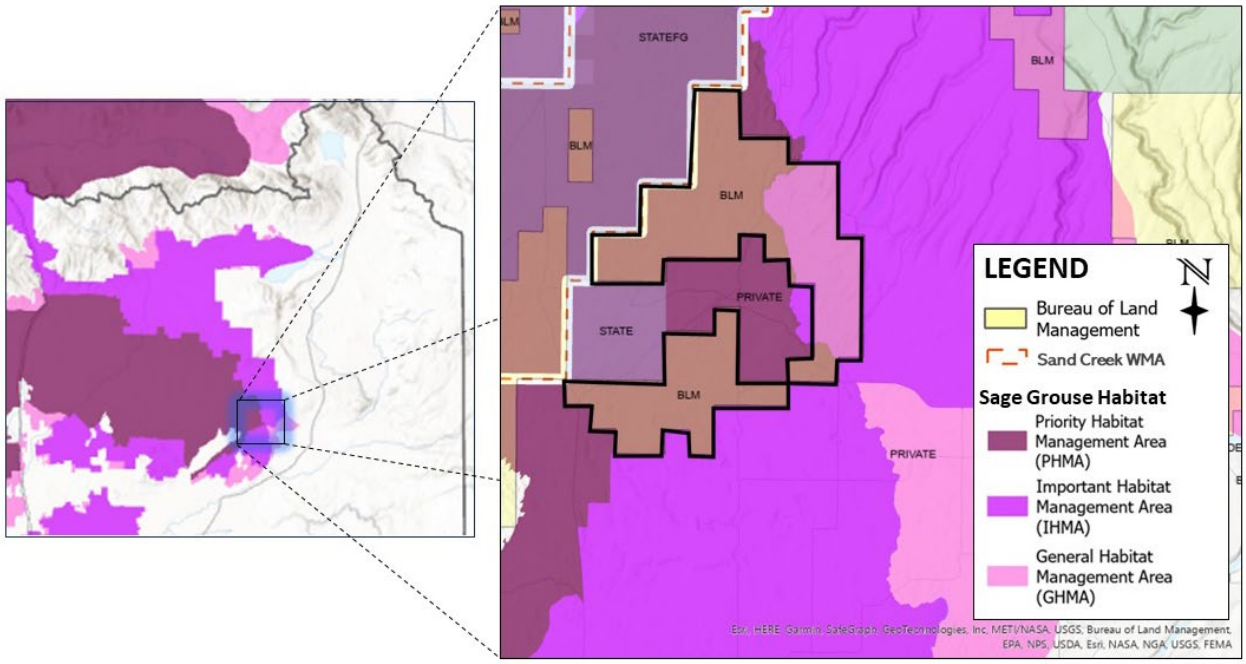


Figure 4. Greater sage-grouse habitat with Arcadia BLM highlighted section.

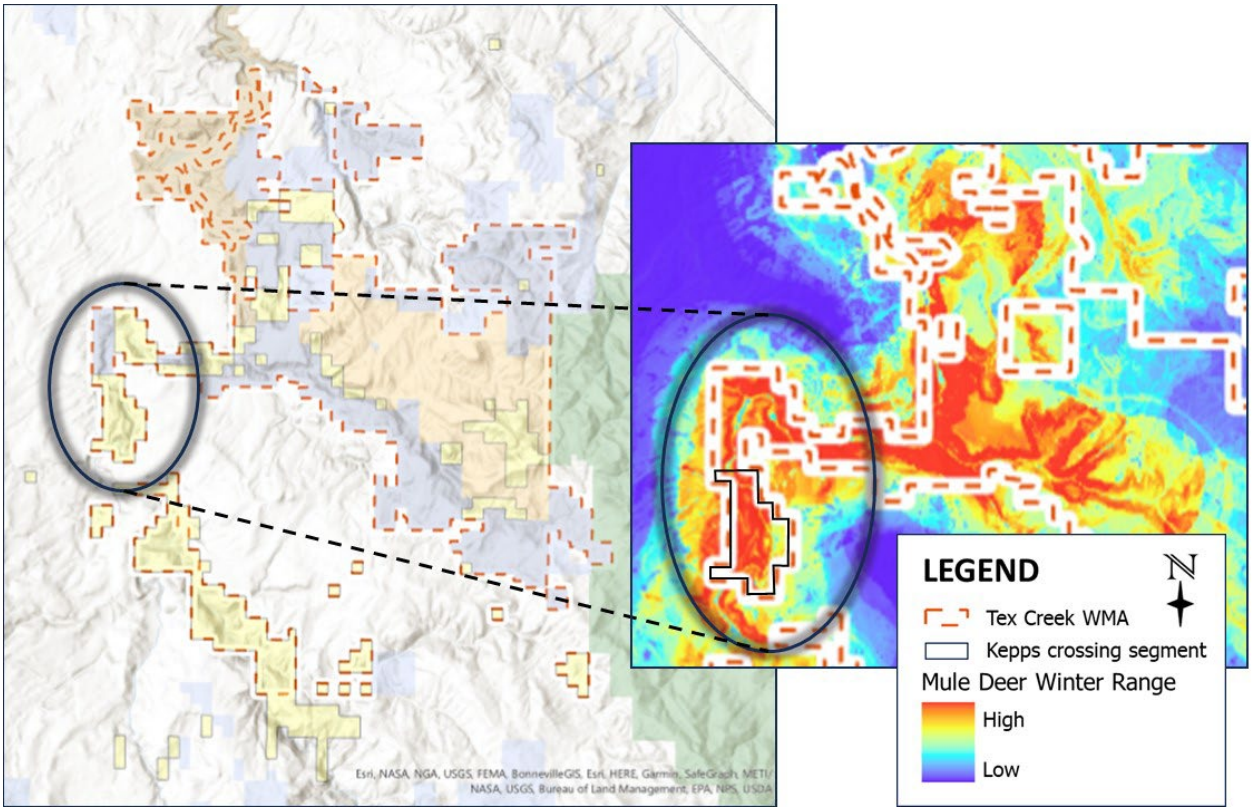


Figure 5. Kepps crossing BLM segment on Tex Creek WMA.

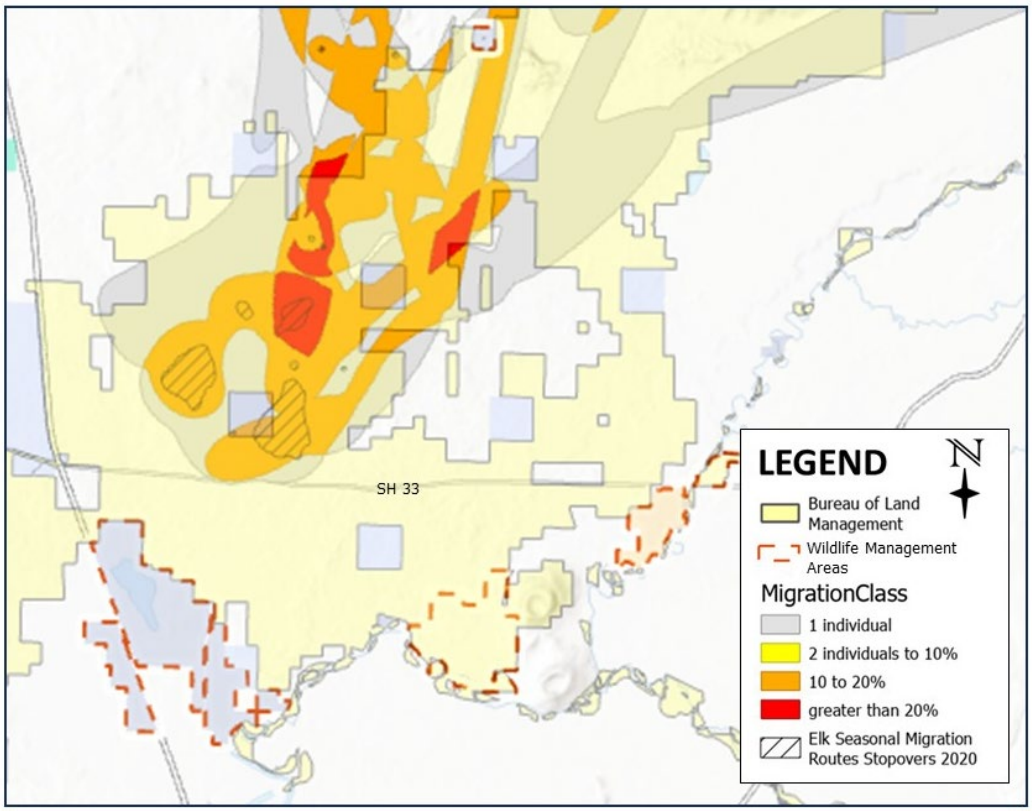


Figure 6. BLM properties south of State Highway 33. On heavy winters, big game will cross SH 33 to access WMA's for winter security.

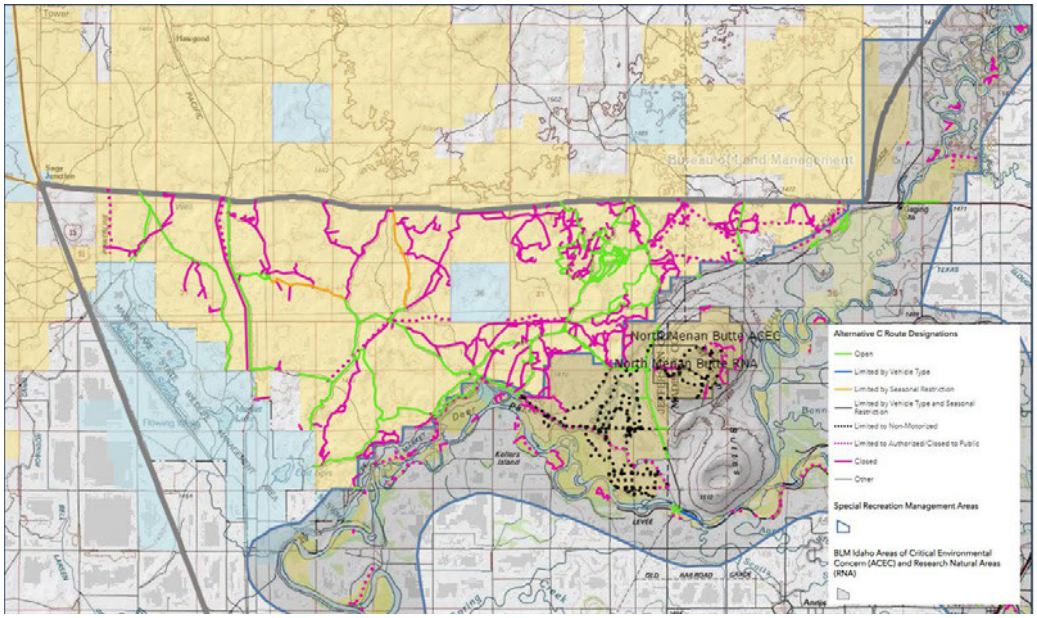


Figure 7. BLM Alternative C for area south of SH33 near the Menan Buttes and the Snake River ACEC. State managed Market Lake WMA and Deer Parke WMU are also located in this area.

Outlook

Public Comment on the AJ Trail Easements

From dirk kramer <[redacted]>
Date Tue 8/11/2026 9:42 AM
To Michelle Smith <michelles@victoridaho.gov>

This is the first time you received an email from this sender[redacted]). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

I strongly encourage the Victor City Council to NOT approve the proposed AJ bike trail municipal easements and MOU with TVTAP and MBT.

I think the Victor City Council has an obligation to require a comprehensive Environmental Assessment with close consultation from Idaho Department of Fish and Game before any approval of the easements or the MOU.

I am in support of mountain biking trails in Teton Valley but only after careful consideration of the full impact on wildlife and the community. Please make these decisions with a commitment to following the priorities clearly laid out in the ReEnvision Victor Comprehensive Plan.

Sincerely, Dirk Kramer - Victor Resident

Outlook

Public Comment on the AJ Trail Easements

From dirk kramer <[redacted]
Date Tue 8/11/2026 9:42 AM
To Michelle Smith <michelles@victoridaho.gov>

This is the first time you received an email from this sender ([redacted]). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

I strongly encourage the Victor City Council to NOT approve the proposed AJ bike trail municipal easements and MOU with TVTAP and MBT.

I think the Victor City Council has an obligation to require a comprehensive Environmental Assessment with close consultation from Idaho Department of Fish and Game before any approval of the easements or the MOU.

I am in support of mountain biking trails in Teton Valley but only after careful consideration of the full impact on wildlife and the community. Please make these decisions with a commitment to following the priorities clearly laid out in the ReEnvision Victor Comprehensive Plan.

Sincerely, Dirk Kramer - Victor Resident

August 11, 2026
City of Victor

Re: Public Comment - Acceptance of Two Corner Crossing Access Easements at the Top of the AJ Trail and Approval of MOU with TVTAP and MBT

Mountain Bike the Tetons' (MBT) mission is to preserve and advance trails and mountain bike resources in the Teton Region through stewardship, community engagement, and advocacy. Our vision is a region where sustainable, accessible trails connect the landscape and our community. On behalf of the organization, I'm commenting in support of accepting the access easements and approval of the MOU with TVTAP and MBT.

The intent of the AJ Linnell Memorial Trail is to provide the community public access to federally managed public lands *and* honor a deeply respected member of the community, AJ Linnell. I'd like to recognize the generous formal easement held between Mountain Side Village and the City of Victor, signed in 2016 and recognize the generosity and willingness of adjacent landowners Dave and Holly Bender and Yara Thomas to also hold separate, formal easements for public access, voluntarily signed and committed on August 3rd, 2026.

MBT's engagement with the AJ Linnell Memorial Trail and planned trail system includes, but is not limited to, trail construction and maintenance, infrastructure improvements, stakeholder relations, fundraising, and advocating for permanent access. Throughout this work, MBT has communicated that the trail serves as the primary access point for a broader vision to connect a network of multi-use singletrack trails to the adjacent Bureau of Land Management (BLM) parcel. To help realize this vision, MBT has worked closely with BLM staff, Teton Valley Trails and Pathways, Trust for Public Land, the City of Victor, and the grantors throughout the revised travel management planning processes initiated in 2016 and then again in 2023, providing ample opportunity for public engagement, comments, and objections.

Between the BLM's efforts, and those of MBT and TVTAP, community engagement efforts have been strongly represented. Plans for the BLM trail project have been communicated through organizational newsletters and social media dating back to June 2016 encouraging the public to attend public information meetings facilitated by the BLM on June 23rd, 2016 and May 31st, 2023. Newsletters encouraging the public to comment on the Travel Management Plan alternatives can be referenced from June 20th, 2023. Additionally, since 2023, MBT has facilitated a community trails forum with representatives from each regional partner trail organization to openly discuss current and future projects and trail initiatives.

To date, the AJ Linnell Memorial Trail Fund has raised and committed over $120,000 through 425 contributions for this project and engaged 120 volunteers in 2015 to assist in construction of the AJ Trail. Additionally, MBT has been awarded $31,000 in regional and state funding, and TVTAP has been awarded $117,500 in state funding. This project offers nearly $250,000 to invest into sustainable community recreation opportunities on public lands supported by the acting federal land manager and several regional and national organizations who have submitted formal letters of support. Including:

-Bureau of land Management Upper Snake East Office (** reference the staff report for the full letter of support from the Upper Snake East BLM Office Field Manager for this project.)*
-Teton Valley Trails and Pathways (TVTAP)
-Trust for Public Land (TPL)
-Adocates for Multi-use of Public Lands (AMPL)
-Caribou-Targhee National Forest
-City of Victor
-Outdoor Alliance (OA)
-International Mountain Bicycling Association (IMBA)
-Teton Valley Composite (TVC)

The following statement can be found on the Upper Snake East Travel Management Plan landing page:

"The USFO originally released maps of the inventoried routes within the Upper Snake East TMA in 2016. Open houses were held in June 2016 to provide local input and expertise into the TTMP. Comments on the inventoried routes were gathered through October 14, 2016.

The USFO sought additional public comments with the release of the draft environmental assessment and potential route alternatives in March of 2023 with public review through July 10, 2023, allowing ample time for the public to review routes on the ground during the summer of 2023. Three open houses were conducted in Idaho Falls, Driggs, and Ashton during this period. Comments received during the public review were analyzed and helped inform the preferred alternative and changes to the environmental assessment. The BLM has released a final environmental assessment for the Upper Snake East TTMP. Appeal period ended 6/31/2024."

We are uniquely positioned to work thoughtfully and collaboratively to plan, fund, and develop trails on BLM public lands immediately accessible from the City of Victor. Without proper infrastructure and management, this area will continue to experience a proliferation of unsanctioned trails, access points, and uses that would further degrade natural resources, creating unsustainable and unsafe conditions. Well designed trail infrastructure and management will protect natural resources and wildlife, reduce unmanaged uses, improve access and the quality of life and health of our community members, while contributing to local economic sustainability.

Attached are references of current recorded use and public engagement and outreach efforts.

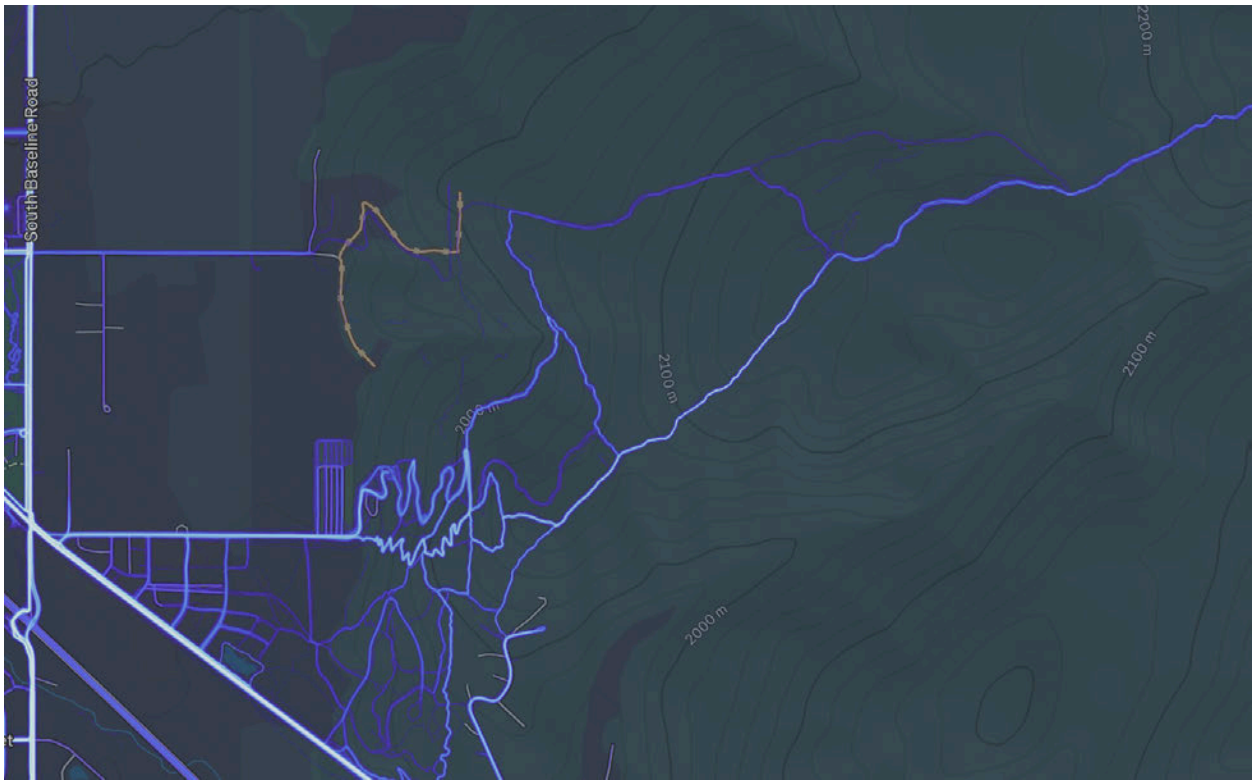
Thank you council and mayor for your consideration in this matter.

Sincerely,

Chris Brule
Executive Director, Mountain Bike the Tetons
[email redacted]

Strava Heat Map

Map shows consistent use, proliferation of unmanaged/undesignated trails, and a demand for access in the area.



Public Outreach Records

06/13/2016

https://us7.campaign-archive.com/?u=32f4d9e7a6d4f7f31945109fc&id=0049d6e84b

06/22/2016

https://us7.campaign-archive.com/?u=32f4d9e7a6d4f7f31945109fc&id=8960072c13

June 23, 2016

-BLM Public Open House - Driggs

10/11/2016

https://us7.campaign-archive.com/?u=32f4d9e7a6d4f7f31945109fc&id=2987ca219b

5/2023

https://mailchi.mp/mountainbiketetons/your-trails-need-you-14590676

5/2023

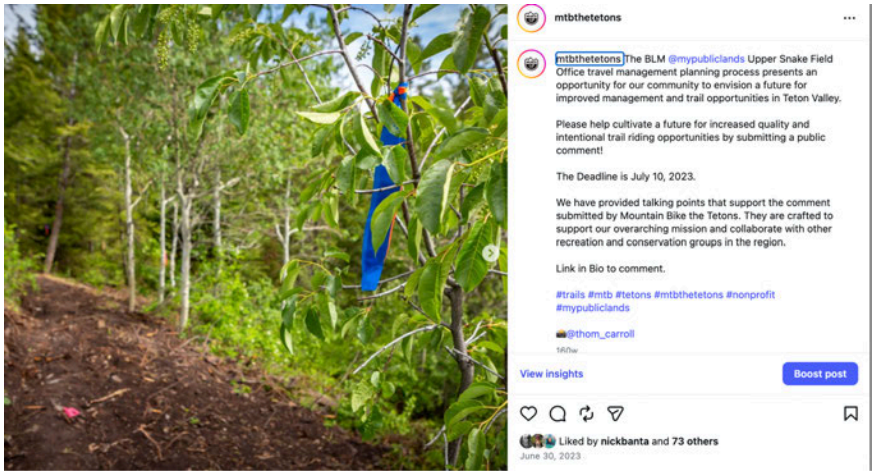
https://mailchi.mp/mountainbiketetons/your-trails-need-you-14592204

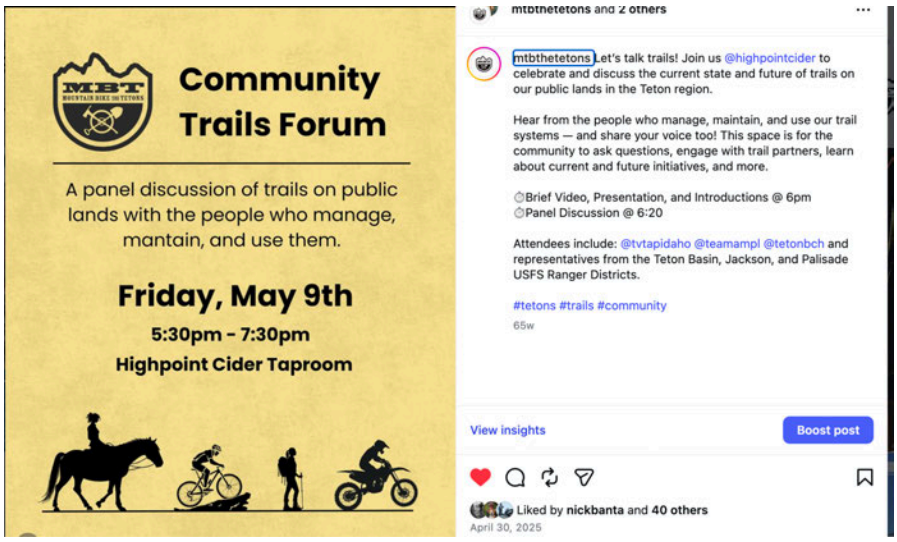
5/31/2023

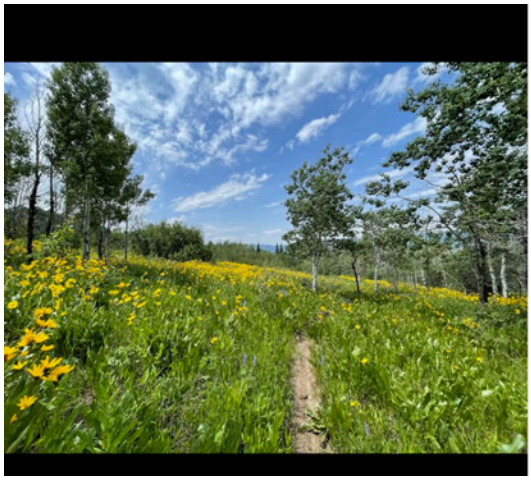
-BLM Public Open House - Driggs

06/30/2023

https://mailchi.mp/mountainbiketetons/your-trails-need-you-14595876







mtbthetetons

mtbthetetons Enjoy one of the several mountain meadow views from the future BLM Trails site in Victor, ID.

Mountain Bike the Tetons will submit a grant application for the @idparksandrec MTB Program Fund for $20,000 to support the construction of this new BLM Trail System in Victor, ID.

Created in 2011, the intent of the fund is exclusively for the preservation, maintenance, and expansion of recreational trails within the state of Idaho and on which mountain biking is permitted.

If you have questions or comments, please contact MBT by January 5th. info@mountainbiketetons.org.

December 22nd, 2025.
#mtb #tetons #trails
31w

3 comments from Facebook

View insights | Boost post

Liked by devinj1424 and 76 others
December 22, 2025



77
3

Views

Views	4,543
Followers	97.1%
Non-followers	2.9%
From Home	1,311
From Profile	79
From Other	5
Viewers	1

Interactions

Interactions	54
Followers	91.2%

Community Trails Forum

A panel discussion of trails on public lands with the people who manage, maintain, build, and use them.

Friday, April 10th

5:30pm - 7:30pm

Highpoint Cider Taproom

Following the Hops Bike Swap @ The Wildwood

mtbthetetons and 3 others

mtbthetetons Our 2026 Community Trails Forum is coming up in less than two weeks! Come join MBT and other local trail organizations at @highpointcidertaproom to chat about all things trails in Teton Valley.

Hear from the people who manage, maintain, and use our trail systems—and share your voice too! This is a space for community members to ask questions, engage with trail partners, learn about current and future initiatives, and more.

This event will follow directly after the @hopscyclery bike swap at @wildwood.music next door. Cruise on over once you've picked up your new rig for the season!

⏱Brief video, presentation, and introductions at 6pm
⏱Panel discussion at 6:20pm

Attendees include @tvtapidaho, @teamampl, @valleyadaptivesports, @tetonbackcountryhorsemen, @grandtargheeresort, and local representatives from the US Forest Service
17w

View insights | Boost post

Liked by cbrule12 and 49 others
March 29

Outlook

FW: Ensuring Wildlife Considerations Inform the BLM Trails Project Easement Decision

From Sue Muncaster <suem@victoridaho.gov>
Date Mon 8/10/2026 4:37 PM
To Amy R <amyr@victoridaho.gov>; Emily S <emilys@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Michelle Smith <michelles@victoridaho.gov>

1 attachment (2 MB)
FINAL TMP comments July2023.docx;

Michelle,

Please add this to the public comment for AJ Trail, including the Final TMP Comment Letter Attached.

From: Pieron,Matt <[redacted]>
Date: Monday, August 10, 2026 at 4:06 PM
To: Dan Verbeten <[email redacted]>
Cc: Sue Muncaster <suem@victoridaho.gov>; Jeremy Besbris <jeremyb@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Proett,Matt <[redacted]>
Subject: RE: Ensuring Wildlife Considerations Inform the BLM Trails Project Easement Decision

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Also, I just noted Mayor Muncaster's e-mail further down the chain. I wanted to respond specifically to her inquiry.

IDFG does not have the regulatory authority to approve/oppose BLM's project. We did, however, provide significant comment related to the draft travel plan. There are significant wildlife resources in the area that stand to be impacted by further recreational development. In June of 2023, in coordination with other Idaho Executive agencies, IDFG developed comments related to the Upper Snake East Travel Management Plan Draft Environmental Assessment. That July, the Governor's Office of Species Conservation delivered our combined comments to the BLM. I have attached that letter here. In addition to detailed comment on wildlife resources and user-created trails in the analysis area, you'll note the specific callout on page 5 to the Victor project area currently in question. I am also pasting that below:

Victor front; 3.9 miles of route/square mile.
These 5,000 acres of continuous BLM lands are crucial year-round big game habitat and are within the grizzly bear DMA (Figure 1). Most of the recreational routes in this area have been pioneered by user groups and have not been evaluated by the USFO staff. IDFG recommends BLM reevaluate this site as an area where management priority is focused on maintaining landscape -scale habitat benefits to big game, grizzly bear, and other wildlife.



Please let us know if there are questions. We will be unable to be there on Wednesday, but we could attend a subsequent meeting with a little more notice.

Thanks,
Matt

Matt Pieron
Regional Supervisor – Upper Snake Region
Idaho Department of Fish and Game
[address redacted]
[address redacted]
[redacted]

From: Pieron,Matt
Sent: Monday, August 10, 2026 3:32 PM

To: Dan Verbeten <[redacted]>
Cc: Sue Muncaster <suem@victoridaho.gov>; Jeremy Besbris <jeremyb@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Proett,Matt <[redacted]>
Subject: RE: Ensuring Wildlife Considerations Inform the BLM Trails Project Easement Decision

Thanks, Dan

I am cc'ing Matt Proett here, my technical assistance Manager. I am also cc'ing Amy Ross, as she also reached out via e-mail on Friday. Matt reached out to her today, but hasn't yet been able to connect.

We would be happy to provide input/technical assistance related to wildlife resources in the vicinity of the proposed easements. However, we need more than a couple of days' notice. As Matt noted in his correspondence;

In order to more effectively respond to your inquiry, it would help us to be able to see/review some sort of actual written proposal. I have seen a basic map with trail lines on the MBT website, which may or may not be the project you reference. I just sent an email to BLM to see if they had anything they could share with IDFG at this point. Do you have any more specific documents or maps that you could share with IDFG regarding this project and the proposed easement?

You mentioned the Council Meeting on 8/12. We would need more time to review proposals, maps, etc…in order provide any comments at the time of this meeting. Unfortunately, I don't think we can comment by that date.

We do have knowledge of important wildlife and habitat on the BLM parcel east of Victor and we can share information related to potential recreational effects on those species/habitats. We just need to make sure we know what is actually being proposed so we can comment effectively.

We look forward to helping with the decision process by providing data/technical expertise, but we won't be able to do so with 2 days notice.

Respectfully,
matt

Matt Pieron
Regional Supervisor – Upper Snake Region
Idaho Department of Fish and Game
[address redacted]
[address redacted]
[redacted]

From: Dan Verbeten <[redacted]>
Sent: Monday, August 10, 2026 2:42 PM
To: Pieron,Matt <matt.pieron@idfg.idaho.gov>
Cc: Sue Muncaster <suem@victoridaho.gov>; Jeremy Besbris <jeremyb@victoridaho.gov>
Subject: Fw: Ensuring Wildlife Considerations Inform the BLM Trails Project Easement Decision

CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Hi Matt,

I hope you are well/staying cool this summer.

The City of Victor has been granted easements by private land holders adjacent to the BLM lands in Victor associated with the AJ Linnell trail. This is not a new access point and was considered during the Travel Planning process. It strengthens the access moving forward. Please see the screenshot below and the trail for location. The trail numbers for the easement access are UE 1440 and UE 1445 if you want to look at the GIS map from the BLM Ease Region Public Scoping page.

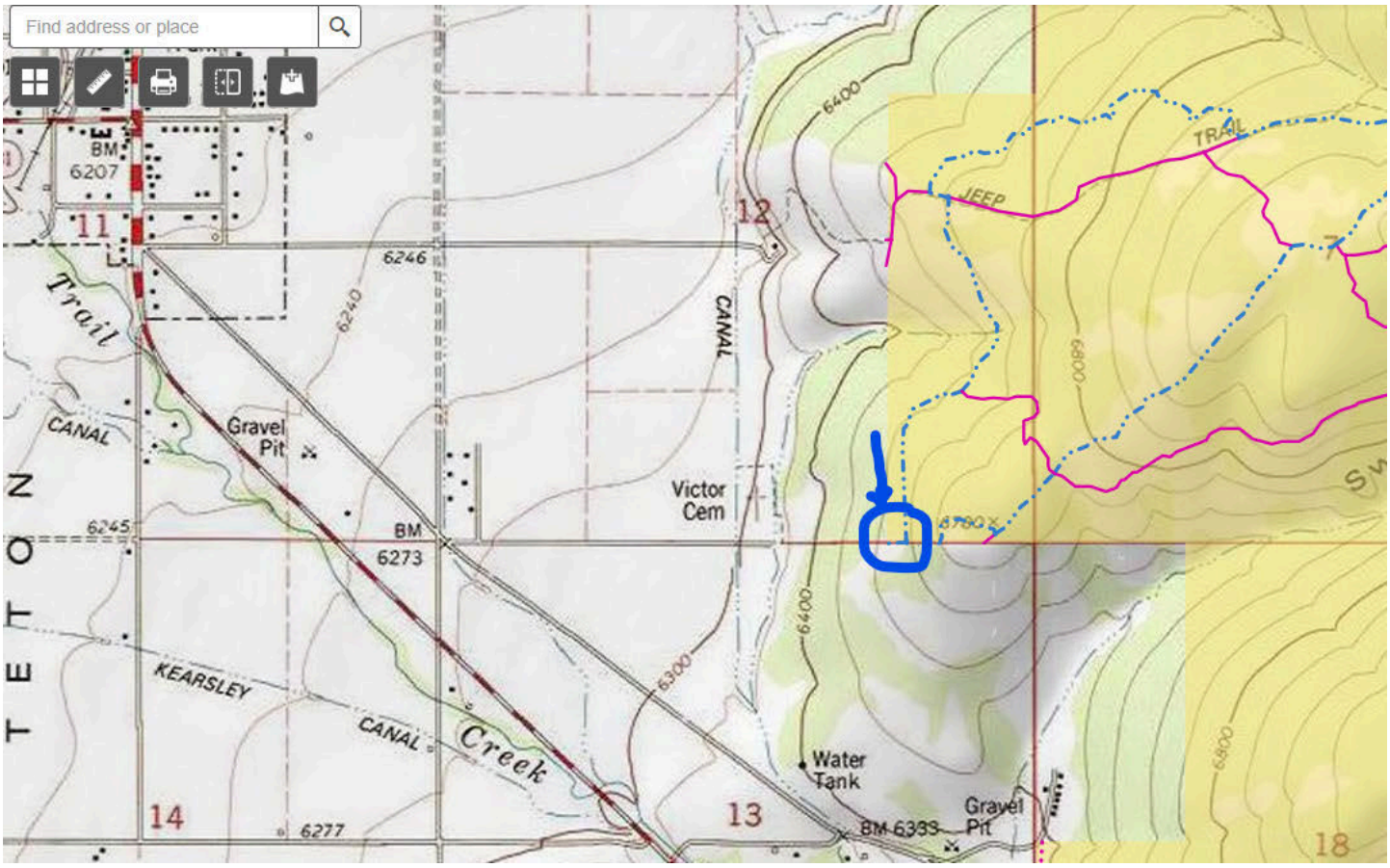
On Wednesday, the city council and mayor will vote on accepting the easements, and the mayor has asked that IDFG has an opportunity to comment. You can see the email thread below if you'd like more information.

With thanks,
Dan Verbeten

Executive Director

Teton Valley Trails and Pathways

www.tvtap.org
[redacted]



From: Sue Muncaster <suem@victoridaho.gov>
Sent: Sunday, August 9, 2026 12:45
To: Jeremy Besbris <jeremyb@victoridaho.gov>; [redacted] [email redacted] ; Dan Verbeten <D[redacted]>
Subject: FW: Ensuring Wildlife Considerations Inform the BLM Trails

Hi there,

I assume IDFG commented and approved of BLM project. Could we get a quick letter or comment from them? LMK and I will reply to Amy. Thanks. Sue

---

From: Amy McCarthy [redacted]>
Date: Wednesday, August 5, 2026 at 3:43 PM
To: Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Emily S <emilys@victoridaho.gov>
Cc: Forrest G McCarthy <[redacted]>; Michelle Smith <michelles@victoridaho.gov>
Subject: Ensuring Wildlife Considerations Inform the BLM Trails Project Easement Decision

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

August 5, 2026

City of Victor Mayor and Council
Victor, ID 83455

Delivered via e-mail

Dear Mayor and Members of the City Council,

We are writing to encourage the City Council to engage Idaho Fish and Game (IDFG) as a technical resource before making any final decisions regarding the proposed easements related to the BLM Trails Project and associated recreation development on the Teton Front.

An easement is a long-term community asset — but it is also a long-term stewardship decision. The question before the City is not only how this land may serve current recreational needs, but how it aligns with the values and responsibilities the City has already identified for the future.

The City's own Comprehensive Plan, *ReEnvision Victor*, adopted in 2021, establishes a goal to **"preserve open space, wildlife, and native vegetation for future generations,"** with specific objectives to maintain and protect wildlife migration corridors. The plan recognizes that the lands surrounding Victor provide important habitat and movement corridors for wildlife, including migratory animals and birds. The City has already affirmed that the community it stewards includes both its residents and the natural systems that sustain this place.

The Upper Snake River Region office of Idaho Fish and Game maintains current scientific data and technical expertise regarding wildlife habitat, migration corridors, and species considerations across this landscape. Their perspective would provide important context as the City evaluates whether a proposed easement and future recreational uses align with the goals established in its Comprehensive Plan.

We respectfully ask the City Council to engage Idaho Fish and Game and seek their technical input before making a final easement decision. This simple, no-cost step demonstrates due diligence, strengthens the public record, and ensures the Council's decision is informed by the best available science and expertise.

Thank you for your thoughtful consideration and for your continued commitment to responsible stewardship of the lands and resources that make Victor such a special place.

Amy & Forrest McCarthy [redacted] Idaho 83455

--



Amy Brennan McCarthy

A [redacted] Victor, Idaho 83455
M [redacted]-

August 10, 2026

Victor City Council
City of Victor
[address redacted]
[address redacted]

Re: Acceptance of Two Corner Crossing Access Easements (Top of AJ Trail) and Approval of MOU with TVTAP and MBT Pending NEPA Review

Dear Mayor and Members of the City Council,

Thank you for the opportunity to provide public comment regarding these access easements and the proposed Memorandum of Understanding (MOU) with Mountain Bike the Tetons (MBT) and Teton Valley Trails and Pathways (TVTAP). This formal process is the only opportunity our local community has had to comment on what is currently proposed.

We are strong advocates for public access to public lands and deeply appreciate the City's ongoing dedication to this effort. We equally advocate for meaningful public involvement in how our public lands are managed. Responsible access requires a thoughtful, inclusive process that balances recreation with respect for local wildlife, traditional uses, our agricultural heritage, and historic community spaces — including the Victor Cemetery. These values align directly with the 2021 ReEnvision Victor Comprehensive Plan, which directs the Council to protect our wildlife, agricultural lands, and historic places.

We respectfully urge the Victor City Council to withhold or strictly condition the execution of any municipal easements and the MOU until MBT, TVTAP, and the Bureau of Land Management (BLM) commit to evaluating the full scope of this project under a comprehensive Environmental Assessment (EA).

Key Concerns Regarding the Proposed Trail Network

1. Fundamental Deviations from the 2024 Upper Snake River East Travel Plan

What is currently proposed differs significantly from what was previously approved under the 2024 Upper Snake River East Travel Plan. While proponents may suggest environmental review for this area is complete, the 2024 plan failed to evaluate:

- 8 miles of machine-built trails. The previous plan did not analyze high-speed, heavily engineered, machine-built mountain bike infrastructure that fundamentally alters soil profiles, natural drainage, and user speeds compared to traditional singletrack.
- Victor Cemetery trailhead. It omitted any evaluation of placing a trailhead capable of handling high-volume regional vehicle staging, trailers, and intense daily traffic adjacent to the quiet, 135-year-old historic Victor Cemetery.

- Cumulative impacts of the 12-mile Fox Creek connection. While the Fox Creek connection (Phases 3 and 4) will require a separate EA, the current proposal fails to consider the cumulative social, environmental, and wildlife impacts of both projects combined.

2. Illegality of Using a Categorical Exclusion (CX)

The BLM's reliance on a Categorical Exclusion for Phase 1 and Phase 2 approvals is legally flawed. Given the project's overall size, footprint, and scale, proceeding under a CX raises clear violations of federal environmental law:

- National Environmental Policy Act (NEPA): Unlawful project segmentation and unanalyzed impacts to crucial big game habitat.
- Endangered Species Act (ESA): Bypassing mandatory Section 7 consultations regarding threatened species, including the grizzly bear and North American wolverine.
- National Historic Preservation Act (NHPA): Failing to protect the cultural and historic integrity of the historic Victor Cemetery.

3. Protection of the Victor Cemetery and Historic Character

Transforming a sacred, quiet space dedicated to honoring local families into a high-density destination trailhead raises critical public safety, parking, noise, and land-use concerns that require rigorous, formal evaluation before permanent access or easements are granted.

In Chapter 3, ReEnvision Victor explicitly mandates a focus on the "preservation of historic buildings" and development that respects the scale and character of our history. While the Cemetery is technically a monument rather than a building, this distinction does not lessen the Council's responsibility toward its preservation.

The City also has a formal land-use duty to maintain the Edge Neighborhood / Open Space character of Victor Cemetery Road, redirecting high-impact regional recreational staging away from sensitive historic and residential zones and toward designated commercial or employment corridors. Turning the historic 135-year-old Victor Cemetery and its surroundings into a high-intensity regional recreation zone runs directly counter to these adopted land-use classifications and historic preservation directives.

4. Agricultural Impact: Wildlife Displacement and Economic Hardship

Increased recreational activity along the Victor Front creates a proven human disturbance footprint that alters wildlife behavior:

- Displacement onto private farmland. High-speed trail traffic pushes elk, deer, and other wildlife out of foothill habitats and down onto adjacent low-elevation farmlands and ranches.

- Economic damage. This displacement causes direct financial hardship for local agricultural operators through crop and forage depredation, damaged boundary fencing, and competition with livestock.
- Operational conflicts. High-volume trail traffic across active grazing allotments leads to open gates, startled livestock, and cattle dispersal.

ReEnvision Victor explicitly anchors Victor's identity in its ranching and farming heritage, noting that agricultural lands act as essential buffers against unmanaged sprawl and support open space preservation. The Comprehensive Plan directs the City to maintain agriculture at its fringes and preserve prime agricultural soils and working landscapes. Pushing wildlife onto working ranches through an unanalyzed recreation network expansion directly undermines the City's explicit goal to support and maintain local agriculture.

5. Disruption to Traditional Land Uses and Wildlife Corridors

The Victor Front has long sustained a working landscape and a multi-use recreational tradition that risks being displaced:

- Traditional non-motorized users. Machine-built, bike-optimized designs elevate user speeds, creating safety hazards and crowding out hikers, runners, and equestrian users.
- Hunting heritage. Increased recreational activity alters wildlife movement and disrupts historical hunting access relied upon by local families for generations.

Under the Resilient Environment theme, ReEnvision Victor sets a clear mandate to "preserve open space, wildlife, and native vegetation for future generations," with specific goals to maintain and protect wildlife migration corridors and mitigate the negative impacts of development on the natural environment.

The City's Role, Obligation, and Leverage

The City's own Comprehensive Plan, ReEnvision Victor, adopted in 2021, acknowledges that Victor's identity and high quality of life depend on the preservation of the surrounding ecosystem. The plan explicitly notes that our valley provides habitat and migration corridors for large groups of migratory animals and birds, affirming that the community the City stewards includes both its human residents and the natural systems that sustain this valley.

We are living in a period where federal agencies like the BLM cannot always be relied upon to uphold federal law or protect local community interests. The Victor City Council therefore has both a moral and a policy obligation to enforce its own comprehensive plans and ensure federal standards are met locally.

Developing a large, complex trail network involves multi-jurisdictional issues that the City of Victor lacks the internal capacity to navigate alone. However, through these requested easements and the MOU, the City holds critical leverage — leverage that allows the Council to

ensure a transparent, legal, and inclusive process that aligns with ReEnvision Victor and serves the entire diversity of our local community, not just the desires of a single user group.

Requested Council Action

We urge the City Council to protect Victor's residents, sacred historic spaces, working lands, and wildlife by taking the following action:

> Condition the acceptance of the easements and the MOU on a durable and legally binding commitment from Mountain Bike the Tetons and Teton Valley Trails and Pathways to halt Categorical Exclusion proceedings, stop illegal project segmentation, and complete a full, comprehensive Environmental Assessment (EA) in formal consultation with the Idaho Department of Fish and Game, the U.S. Fish and Wildlife Service, and the Board of the Victor Cemetery.

Taking a measured, conditional stance ensures that recreational infrastructure develops legally and responsibly, without sacrificing wildlife, public safety, historic spaces, or our valley's agricultural economy.

Attachments included:

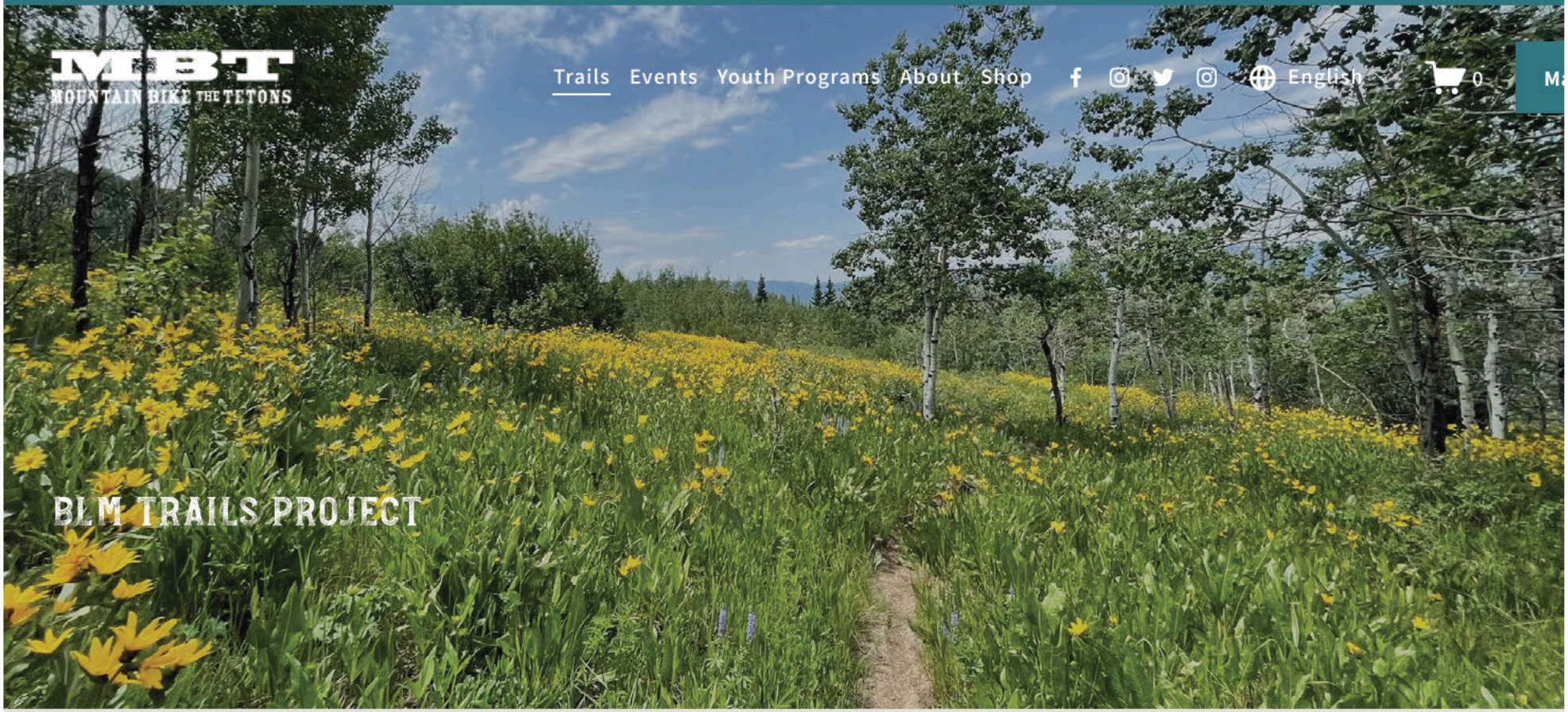
1. MBT's full proposal (inclusive of all four phases)
2. 2023 comment letter from Idaho's Office of Species Conservation, in which IDFG recommends that "the BLM reevaluate this site [the Victor front and project area] as an area where management priority is focused on maintaining landscape-scale habitat benefits to big game, grizzly bear, and other wildlife"

Thank you for your dedicated service to the City of Victor and for considering this critical matter.

Sincerely,

Forrest and Amy McCarthy
[redacted]
Victor, ID 83455
[redacted]

SUPPORT TRAILS & WIN - The [address redacted] Fund Campaign and Raffle is LIVE



Through partnership, this community-centered BLM Trails Project will strengthen the health, connectivity, and outdoor culture of the Teton Region while providing access for mountain bikers, hikers, and equestrians, while safeguarding access to public lands and open spaces. Guided by contemporary trail design and directional management practices, this project will create an engaging, fun, sustainable trail system in Teton Valley, Idaho.

In 2015, inspired by the prospect of a revised BLM Travel Management Plan, MBT built the AJ Linnell Memorial Trail to secure meaningful public access to BLM lands through two private easements gifted by The Bender Family and Mountain Side Village, minutes from downtown Victor, Idaho. **Finally approved in 2024**, the Upper Snake East BLM Travel Management Plan designated more than seven miles of trail routes in this area as 'non-motorized and open to e-bikes', accessed via the AJ Linnell Memorial Trail. With strong

momentum behind the project, a 10-acre parcel of land was secured by Trust for Public Lands in Fox Creek, providing a future access point and unlocking up to [address redacted]

Delivering new trail projects like this requires years of persistence, consistent partnership, demonstrated community support, and the trust built through showing up and doing the work alongside our agency partners.

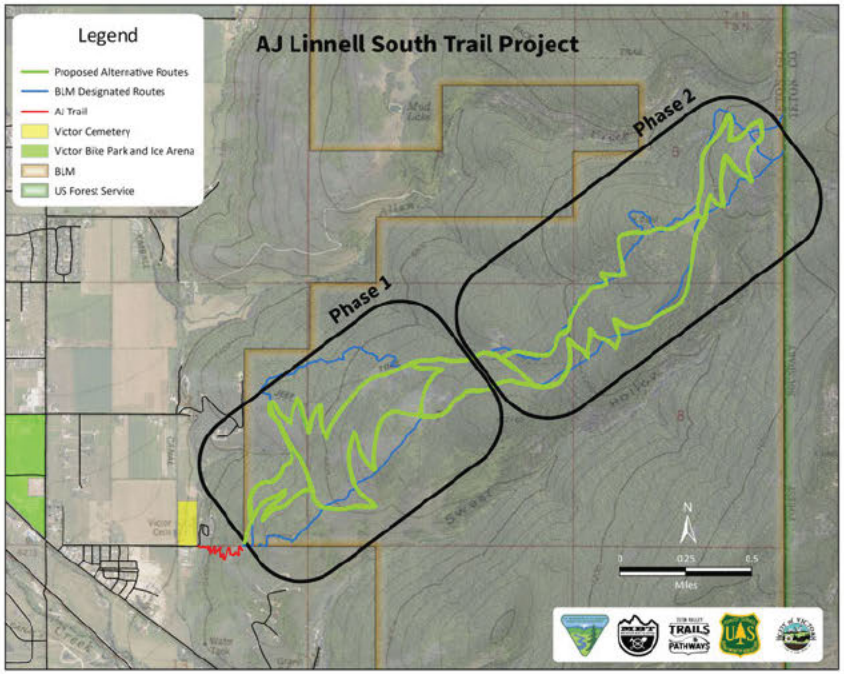


Next steps:

- BLM Approval of new trail alignments (2026)
- Finalize MOU agreements with the BLM (2026)
- Begin work on Phase 1 (2026)
- Secure additional funding for Phase 1-4 (2026+)







Thanks to the AJ Linnell Trail Fund and Family for supporting this project.



Response to Bureau of Land Management Request for Draft EA Comments:

Upper Snake Field Office; Bureau of Land Management
Upper Snake East Travel Management Plan Draft Environmental Assessment

Prepared by:
Idaho Department of Fish and Game

Submitted to:
Idaho Office of Species Conservation

June 30, 2023

Introduction

The Idaho Department of Fish and Game's (IDFG) mission is to preserve, protect, perpetuate, and manage fish and wildlife for the public interest (Idaho Code 36-103(a)). Accordingly, IDFG has reviewed the Bureau of Land Management's (BLM) proposed Upper Snake East Travel Management Plan Draft Environmental Assessment (DEA). The DEA's purpose is to develop a plan for managing travel and transportation within the designated Travel Management Area (TMA) within the Upper Snake Field Office (USFO). The proposed Travel Management Plan (TMP) includes 761.2 miles of evaluated travel routes on BLM-managed lands within a 126,378-acre TMA in Southeastern Idaho.

IDFG supports the development of a TMP on BLM lands that provides well-conceived access infrastructure to public lands that strikes a balance between access for resource management and recreation, and perpetuation of quality fish and wildlife habitats. Ideally the balance should be measured at a landscape level and include some areas where recreational infrastructure is a priority and other areas where less infrastructure is desirable to maintain important natural resources and ecological functions.

In reviewing the DEA and Draft TMP, we examined all routes identified by the BLM to comment on a route's relative value and potential impacts. These comments are focused on either individual routes, or within a travel unit encompassing multiple routes, identified in the Draft TMP. As a preface to our specific comments, we offer the following key underlying themes that guided our input.

User-Created Roads and Trail Adoption

Many of the routes in the TMP were created by users rather than engineers in consultation with natural resource professionals. According to the DEA pg. 8, under 1.3 Purpose and Need, "Currently, in most of the TMA, motorized and non-motorized route use is limited to existing routes; however, these existing routes have not been evaluated by USFO resource specialists to determine their long-term purpose and need as part of an overall comprehensive travel management network, and their potential effects on the area's natural and human environment." Formal adoption of user-created roads/trails may perpetuate ongoing resource damage created by

poorly conceived routes. The BLM should not preserve routes in their TMP that compromise protection of important natural resources such as those that may alter natural stream flows, impact water quality, or perpetuate excessive fragmentation of important wildlife habitats.

Wildlife Resources

Fish and wildlife are an important part of Idaho's culture and are valued by our citizens. As identified in the DEA (Pg. 9), "The TMA provides valuable habitat for several special status plant species, including Ute ladies'- tresses (Spiranthes diluvialis), false mountain willow (Salix pseudomonticola), rush aster or boreal aster (Symphyotrichum boreale), and white spruce (Picea glauca). It also provides valuable habitat for special status wildlife species, including bald eagle (Haliaeetus leucocephalus), Canada lynx (Lynx canadensis), Columbian sharp-tailed grouse (Tympanuchus passionless columbianus), ferruginous hawk (Buteo regalis), Greater sage-grouse, hereafter GRSG (Centrocercus urophasianus), grizzly bear (Ursus arctos horribilis), and yellow-billed cuckoo (Coccyzus americanus occidentalis). The sagebrush communities in the TMA provide habitat for GRSG and wintering big game species. The TMA also provides habitat for Yellowstone cutthroat trout (Oncorhynchus clarkii bouvieri), which occur in numerous perennial streams and some lakes and reservoirs."

IDFG's input focuses on key areas/issues of high importance to fish and wildlife. Some of the travel units that IDFG evaluated have importance beyond parcel boundaries or BLM ownership. IDFG Wildlife Management Areas (WMAs) are one example of vital habitats with large landscape significance. Tex Creek Wildlife Management Area (TCWMA) and a portion of the Sand Creek Wildlife Management Area (SCWMA) are subject to cooperative agreements under the Sikes Act between the BLM, IDFG and other entities. Other priority areas include river corridors and important wetland areas, big game winter range and transitional habitats, and habitats important to listed species and Idaho Species of Greatest Conservation Need (SGCN). IDFG also focused our review on potential impacts to species of special significance within the TMA including grizzly bear, selected big game (elk, deer, moose) and GRSG.

Grizzly Bear-

Portions of the TMA are within the Greater Yellowstone Ecosystem (GYE) grizzly bear Demographic Monitoring Area (DMA; Figure 1). The primary threat facing grizzly bears in the GYE is human-caused mortality which is related to 1) the amount of secure habitat within a bear's home range and 2) road densities outside of secure habitat (Schwartz et al. 2010). The DEA recognizes this impact: Pg. 52; 4.1.3 Wildlife: Special Status Species, "Fragmentation from roads, logging, OHV use, and surrounding recreational development reduce quality habitat (BLM 2009, IGBC 2016). IGBC identifies managing motorized access to meet the objectives of minimizing human interaction and potential grizzly bear mortality; minimizing displacement from important habitats; minimizing habituation to humans; and providing relatively secure habitat where energetic requirements can be met. IGBC also states that "the management of human use levels through access route management is one of the most powerful tools available to balance the needs of grizzly bears with the needs and activities of humans" (2016)."

An increase in recreational routes, motorized and non-motorized, within the GYE grizzly bear DMA will likely increase human-grizzly bear interaction and decrease security habitat. The BLM should scrutinize formal adoption of any routes, motorized or non-motorized, that lead to increased human recreation in the GYE grizzly bear DMA.

Big Game –

Idaho's big game are a cherished cultural, recreation and economic resource and BLM lands in the Upper Snake East TMP are vital to their long-term persistence in eastern Idaho. The TMA consists of areas identified as big game (primarily deer, elk, and moose) habitat. Proposed routes, motorized and non-motorized, are within big game winter range, migration habitat, parturition habitat, and summer habitat. Densities of routes per square mile can indicate when human recreation will most likely impact big game habitat and behavior causing disturbance, displacement, and habitat loss.

Elk are valuable indicators of general habitat effectiveness (i.e., the degree to which a population is able to use habitat for a specific function), particularly with regards to security habitat and roads/trails. Lyons (1983) found that as road densities increased above [address redacted] mile in elk habitat, habitat effectiveness (% of expected use) declined rapidly. Language found in the DEA supports this research; Pg. 70, 4.1.4.2 Environmental Effects, "Recreational disturbance from motorized and non-motorized activities (e.g., mountain bike, horse, foot) affects big game behavior by increasing travel time and decreasing feeding and resting time (Naylor et al. 2009). Avoidance of human disturbance can also cause indirect habitat loss and impair forage availability (Dwinnell et al. 2019). Species avoidance is strongest for mountain biking and motorized vehicles (Naidoo and Burton 2020)." Decommissioning and rehabilitating unnecessary pioneered routes, thereby reducing route densities, would likewise reduce adverse impacts to wildlife from disturbance, displacement, and habitat fragmentation and loss.

Lands owned by the BLM are incorporated into two IDFG wildlife management areas (WMA's) and one wildlife mitigation unit (WMU) within the TMA. These areas are managed in cooperation with the BLM and the WMA's (Tex Creek WMA and Sand Creek WMA) are guided by cooperative agreements under the Sikes Act protecting big game winter range and crucial habitat. Proposed recreational routes identified on BLM lands within WMA boundaries need to be coordinated under the agreements to reduce or minimize impacts to the overall management goal of IDFG.

Greater sage-grouse –

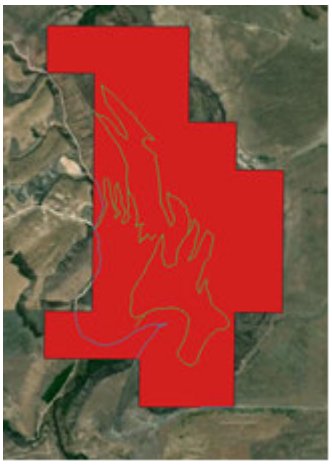
Greater sage-grouse are designated as a sensitive species by the BLM and a Species of Greatest Conservation Need (SGCN) by IDFG. Many BLM lands in the TMA are in GRSG Habitat Management Areas (PHMA) and Important Habitat Management Areas (IHMA) located in the Idaho Mountain Valleys conservation area and General Habitat Management Areas (GHMA) in the East Idaho Uplands conservation area. According to the DEA pg. 8, under 1.3 Purpose and Need, "the 2015 Idaho and Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment (2015 GRSG ARMPA) mandates that travel management plans be developed for the USFO as described in the BLM Travel Management Handbook 8342.1, and

according to the travel management planning guidelines provided in Appendix L of the FEIS (MD TTM 3, Page 2-33). This Amendment was issued to address threats to the conservation of Greater Sage-Grouse (GRSG) for the Great Basin Region (including the GRSG sub-region of Idaho), and it amended the 1985 Medicine Lodge Resource Management Plan (1985 Medicine Lodge RMP)."

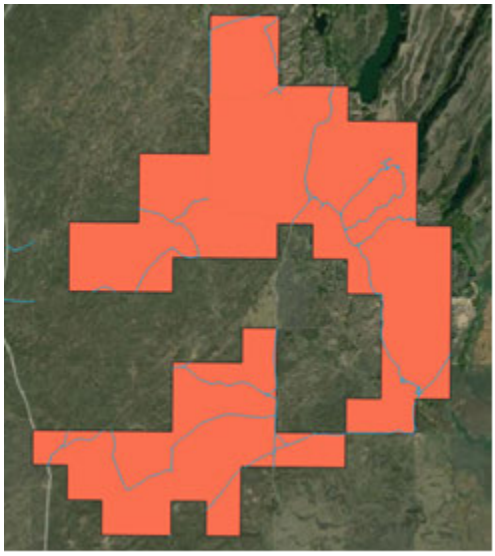
We recommend following guidelines from the State of Idaho (2022), 2021 Policy for Greater Sage-Grouse Management in Idaho for avoiding, minimizing and mitigating impacts to GRSG habitat within the TMA. The DEA (Pg. 57) states a buffer of ¼ mile for GRSG leks was used in the analysis. We encourage the use of the state recommendation in the Idaho Sage Grouse plan for routes that are located within PHMA (pg. 38), which requires a buffer of 3.1 miles for major linear features (e.g., major haul roads, highways, etc.) and 1.2 miles from minor linear features (e.g., minor roads and routes). In addition, routes in IHMA (Pg. 44) require a buffer of 2 miles for major linear features (e.g., major haul roads, highways, etc.) and 0.8 miles from minor linear features (e.g., minor roads and routes). Applying these recommendations to the analysis and closing pioneered routes within these buffers will minimize disturbance and have a positive effect on GRSG habitat and populations.

Specific areas of focus: If route densities are shown, they are calculated from Alternative C

Kepps crossing; 5.5 miles of routes/square mile.
This section of BLM is under an MOU with IDFG as part of the Tex Creek WMA (Figure 5). It is crucial big game winter range. The MOU gives IDFG management authority on specific BLM parcels. Management focus is for wintering big game. IDFG recommends no designation of the trail system proposed in Alternative C to ensure compliance with the MOU and adequate protection of sensitive wildlife habitats.

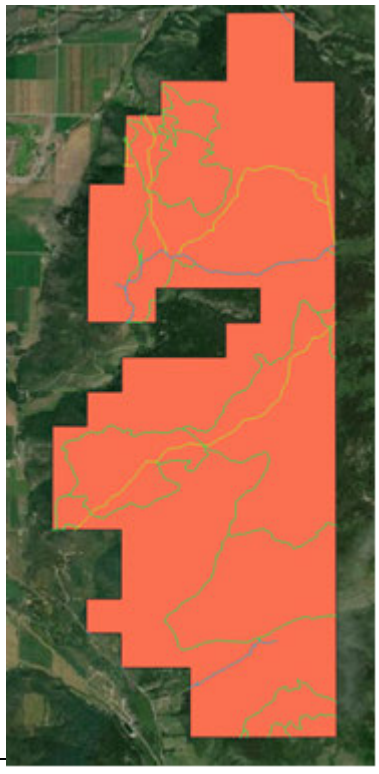


Lower Acadia; 3.7 miles of routes/square mile.



Located next to the Sand Creek WMA and Arcadia reservoirs. This BLM managed land is big game migration and winter habitat (Figure 2 & 3), priority GRSG habitat (Figure 4), Columbian sharp-tailed grouse habitat, and is identified as St. Anthony sand dune tiger beetle habitat (Idaho State Conservation Effort, 1996). IDFG encourages BLM to develop further analysis of route designations to evaluate density of routes per square mile for a new alternative that incorporates wildlife habitat continuity, protection, and reduction of vegetative degradation while providing a diversity of associated hunting access options and experiences (i.e., motorized, mechanized non-motorized, and non-motorized). Routes along the WMA boundary (SC2064, SC2100, SC2103, and SC133), IDFG would like these specific routes to be closed or only open to administrative use.

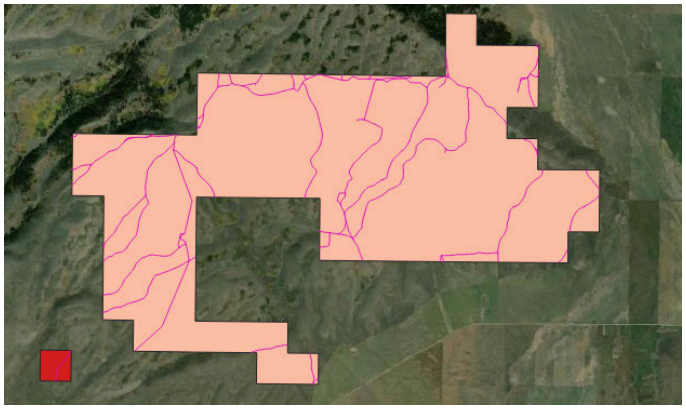
Victor front; 3.9 miles of route/square mile.



These 5,000 acres of continuous BLM lands are crucial year-round big game habitat and are within the grizzly bear DMA (Figure 1). Most of the recreational routes in this area have been pioneered by user groups and have not been evaluated by the USFO staff. IDFG recommends BLM reevaluate this site as an area where management priority is focused on maintaining landscape-scale habitat benefits to big game, grizzly bear, and other wildlife.

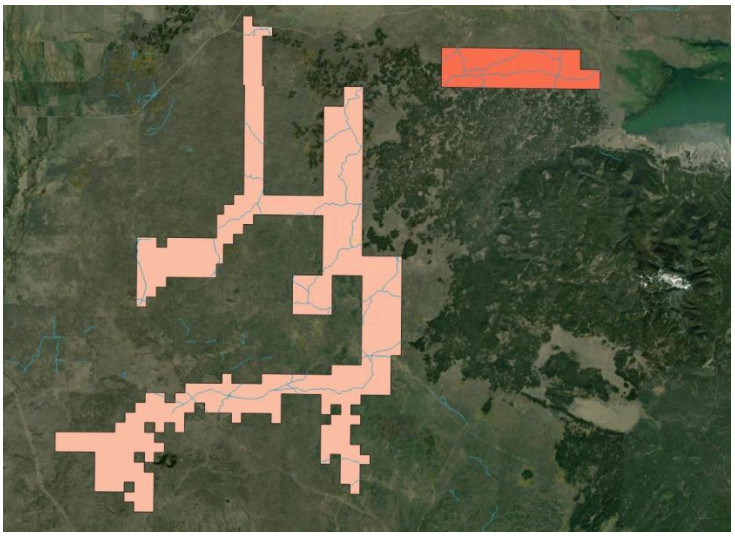
Kilgore Face

This 3,700 acre section of BLM lands is valuable big game parturition and summer habitat, and is identified as important GRSG habitat. IDFG would encourage BLM to evaluate the high density of routes and excessive pioneered routes in this area to minimize impacts to wildlife and natural resources. Unnecessary routes increase the probability of human caused wildfire, fragmentation of wildlife habitat, and the spread of noxious weeds impacting the natural resources and wildlife habitat of the area.



Sand Creek uplands & Shotgun Valley

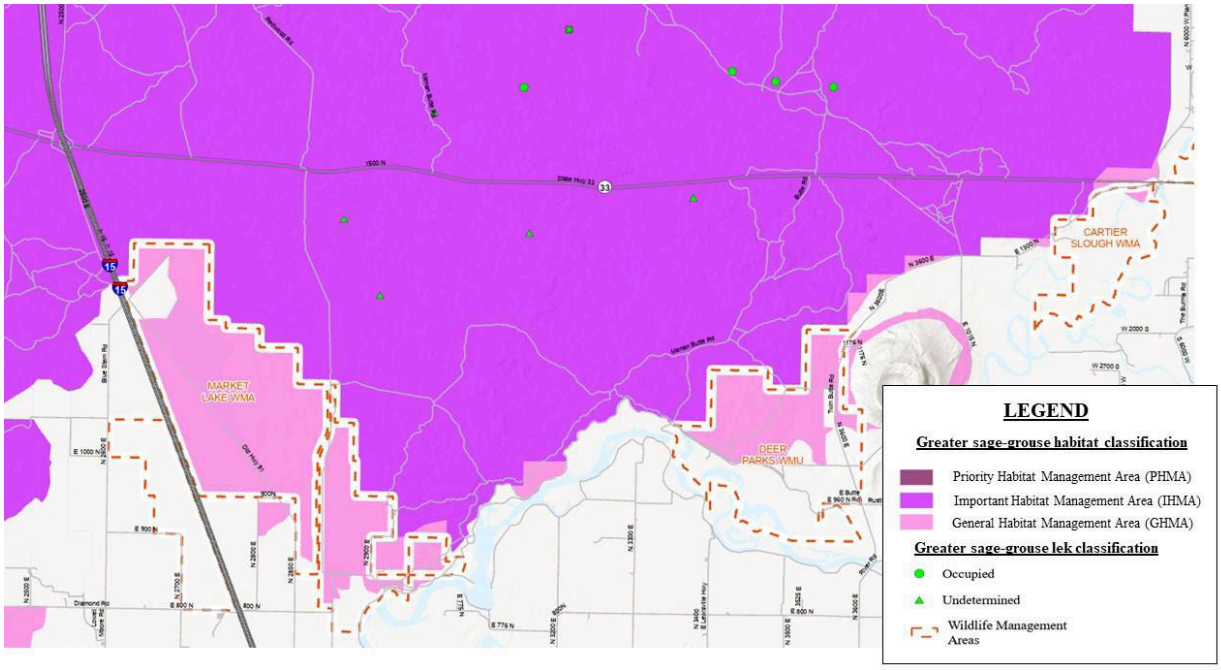
The Sand Creek uplands and Shotgun Valley are important year-round big game habitat, valuable GRSG breeding, nesting, and brood rearing habitat, and portions of BLM lands are in the grizzly bear DMA (Figure 1). Currently the GRSG habitat designation is being reviewed and edited due to landscape impacts and collar data. Portions of this area are being reclassified from Important to Priority habitat. IDFG would encourage the BLM to evaluate the density of routes and excessive pioneered routes in this area to minimize impacts to wildlife and natural. Unnecessary routes increase the probability of human caused



wildfire, fragmentation of wildlife habitat, and the spread of noxious weeds impacting the natural resources and wildlife habitat of the area.

Hwy 33 and Market Lake WMA

BLM parcels south of State HWY 33 and east of I-15 to Menan butte (Figure 6 & 7) are highly fragmented by routes and recreation. This area is crucial habitat for big game and GRSG as winter range, nesting, and early brood rearing. During times of difficult winter conditions, big



game move from their traditional wintering area westward to lands dominated by private lands. Concerns by residents and IDFG of disease, depredation, and wildlife vehicle collisions are increased. For GRSG, the area is recognized as a IHMA with four leks classified with unknown status. Additionally, there are four active leks north of the TMA boundary where nesting and brood rearing habitat lie within the TMA. We suggest mitigating for fragmentation and loss of wildlife habitat by developing an area with no routes, motorized and/or non-motorized. Specifically, we recommend Alternative B for routes west of the railroad tracks with further closures to routes UE2002, 2004, and 2207. This would provide connectivity of crucial unfragmented wildlife habitat on BLM parcels to Market Lake WMA, Deer Parks Wildlife Mitigation Unit (WMU) and the Snake River ACEC.

Recommendations:

- Develop further analysis of route designations to evaluate density of routes per square mile for a new route alternative that incorporates wildlife habitat continuity, and

protection. Include seasonal closures and use restrictions to maintain quality wildlife habitat (e.g., security, nesting, winter, parturition habitat) while providing a diversity of associated hunting access options and experiences (i.e., motorized, mechanized non-motorized, and non-motorized).

- Incorporate a comprehensive evaluation and strategy to address existing pioneered routes (e.g., route closures, decommissioning, restoration, etc.). Include in the analysis impacts of pioneered routes and season of use within identified crucial wildlife habitat (winter range, movement corridors, nesting, and parturition) with mitigation actions.
- Include plans, measures, staffing, and resources that will ensure adequate comprehensive effectiveness monitoring, enforcement, and adaptive management of design features necessary to avoid, minimize, and mitigate adverse recreation impacts to wildlife (e.g., enforcement of the travel management plan, decommissioning and rehabilitation of unnecessary and unauthorized routes, treatment of weed infestations, etc.).

Specific route recommendations are included in the table below.

Route Summary Table

The following table summarizes IDFG's recommendation on specific routes in USFO's Upper Snake East Travel Management Plan.

Geographic Reference	Route Name/Travel Unit	Recommendation	Notes
Snake River ACEC	95-acre Parcel east of Irwin Idaho	Seasonal human entry closure Dec. 1 – May 1	Improve big game survival and protect big game winter range
	Pine Creek Bench UE1818 UE1821	Alternative B; close specific routes	Improve big game and upland bird year-round habitat
	Stinking Springs	Alternative B; maintaining existing seasonal closure	Big game winter range and migratory habitat
	Crest Creek Trail UE1712	Redundant routes	Improve big game habitat
	East of Menan Buttes - SR4119	remove and relocate northern SR4119 trail and dike to the western side of the BLM parcel.	Allows natural river function to expand and enhance key riparian habitat for Yellow-Billed Cuckoo and other riparian-dependent wildlife.
	UE2002, UE2004, and UE 2207	Close routes	Reduce wildlife habitat fragmentation and provide a migration route to MLWMA and Snake River ACEC for big game during difficult winters.
	Gem State Wildlife Habitat Area SR2043 SR2044	Close routes within the Snake River ACEC	Improve Yellow-billed cuckoo habitat

	Gem State Wildlife Habitat Area SR4045	Maintain administrative access for agency and canal maintenance.	Reduces type of use to mitigate for improving yellow-billed cuckoo habitat
Deer Parks Wildlife Mitigation Unit	All routes within the WMU that are designated *Limited to non-motorized* use	Change these route designations to Limited to *Authorized/closed to public* for management purposes	Allows Department staff to improve wildlife survival by managing human access
Cartier Slough Wildlife Management Area	UE1218	Close route except for route to headgate and private (see Fig. 2) parcel on west side of WMA.	Improve wildlife security and public safety.
	UE1201, UE1260, UE1229, UE1216, UE1249 & UE1219	Redundant routes	Improve wildlife habitat for grizzly bear, GRSG, moose, mule deer, elk and pronghorn
Sand Creek Wildlife Management Area	SC2064, SC2100, SC2103, and SC133	Close routes or make administrative use only	Improve wildlife habitat for mule deer, elk, moose, GRSG, and other wildlife species in the area
Antelope Ridge	UE1141 & UE1108	Alternative B; close specific routes	Improve wildlife habitat for grizzly bear, GRSG, moose, mule deer, elk and pronghorn
Henrys Lake	UE1026	Alternative B	Improve recreation access and improve big game & grizzly bear habitat
Bitch Creek Slide	UE1484	open	Important recreational access for Teton river canyon area.
Teton County	UE1406	Alternative B	Improve wildlife habitat for grizzly bear, GRSG, moose, mule deer, and elk

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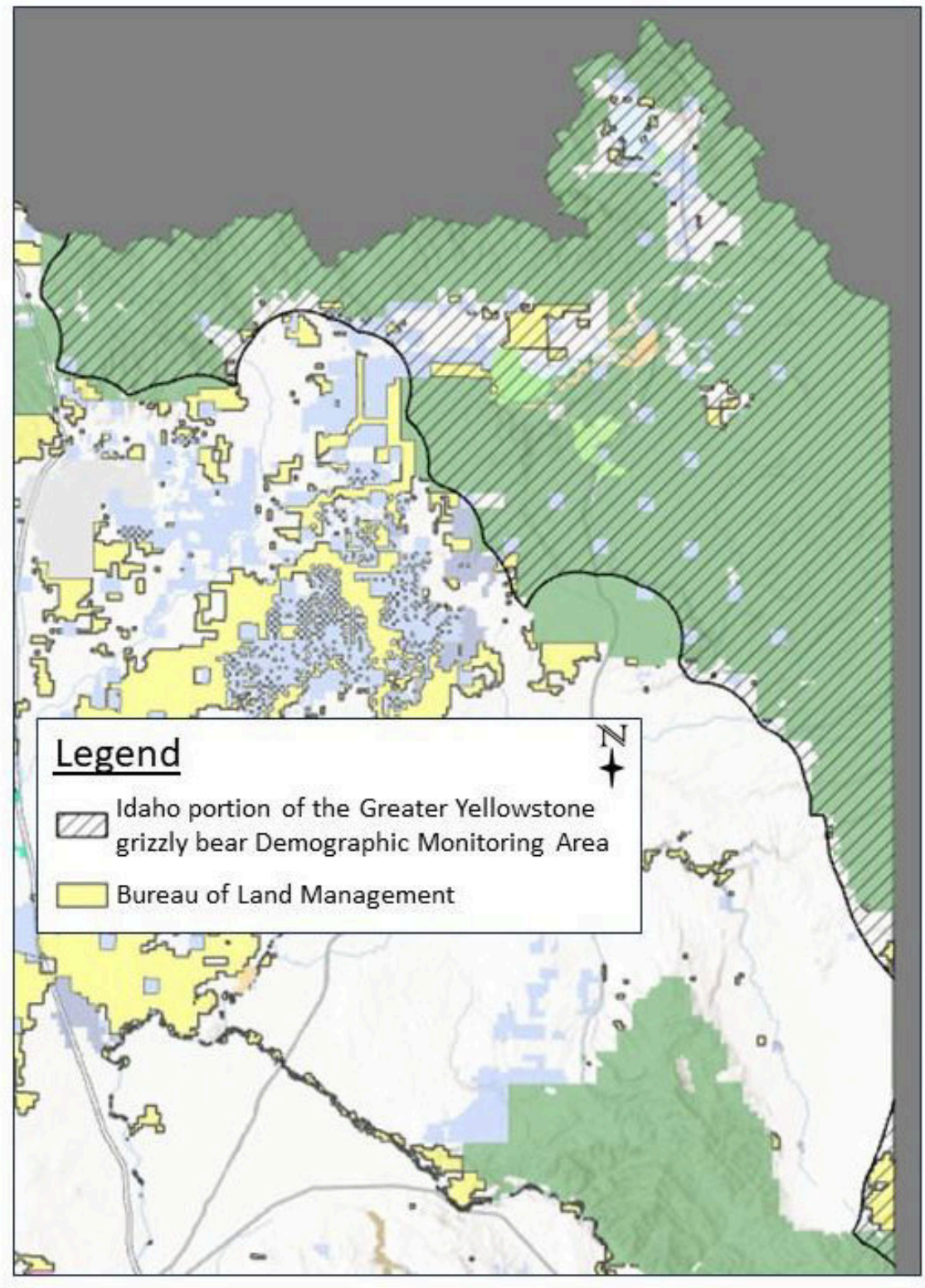


Figure 1. Greater Yellowstone grizzly bear demographic monitoring boundary within the state of Idaho with associated land ownership.

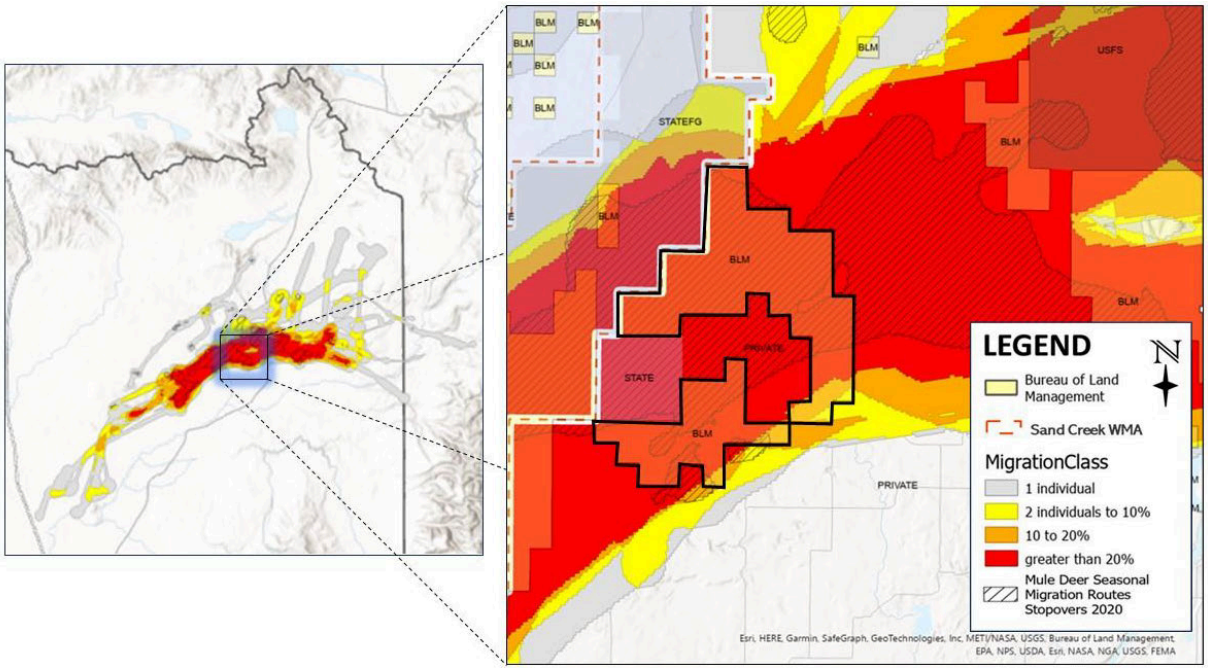


Figure 2. Sand Creek mule deer migration with Arcadia BLM highlighted section.

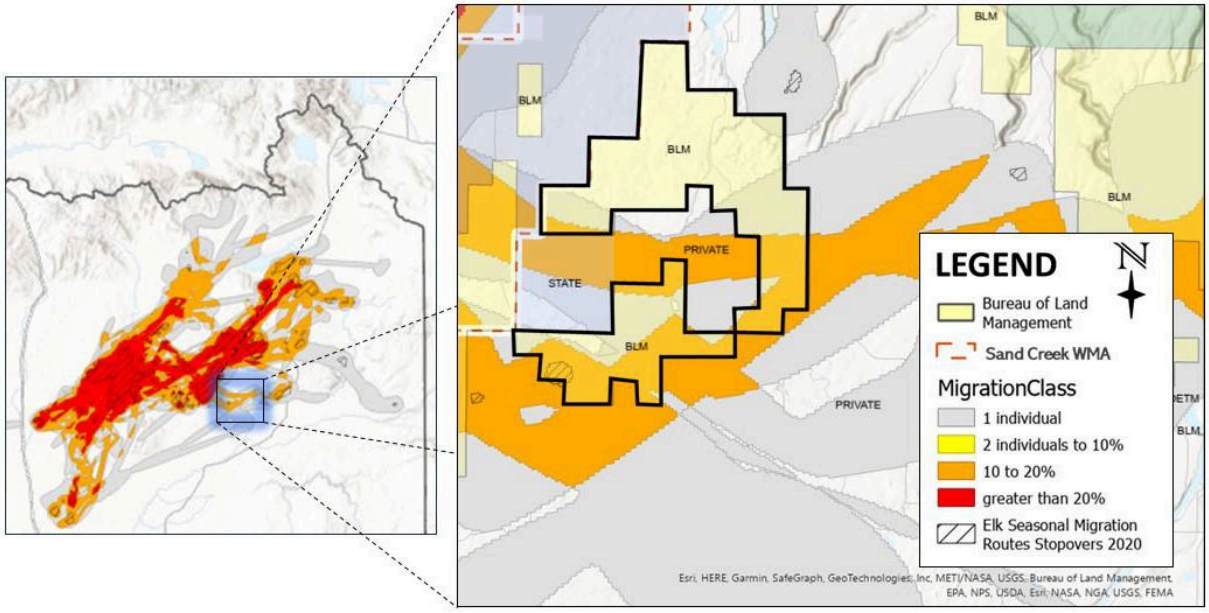


Figure 3. Sand Creek elk migration with Arcadia BLM highlighted section.

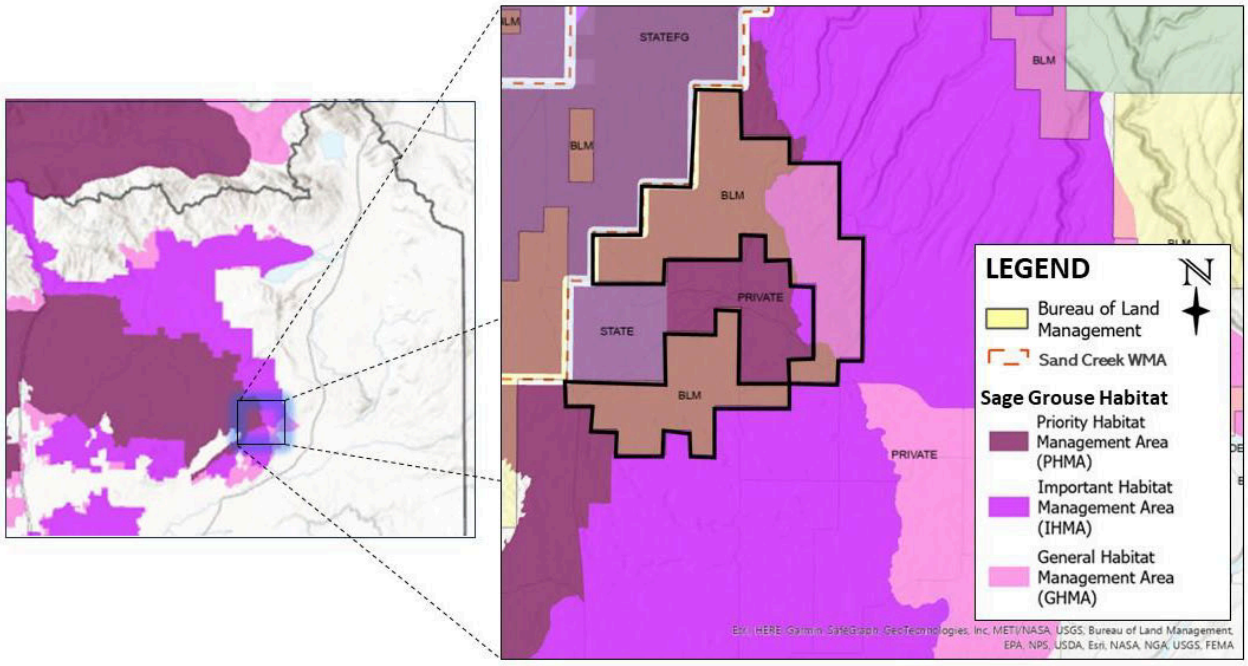


Figure 4. Greater sage-grouse habitat with Arcadia BLM highlighted section.

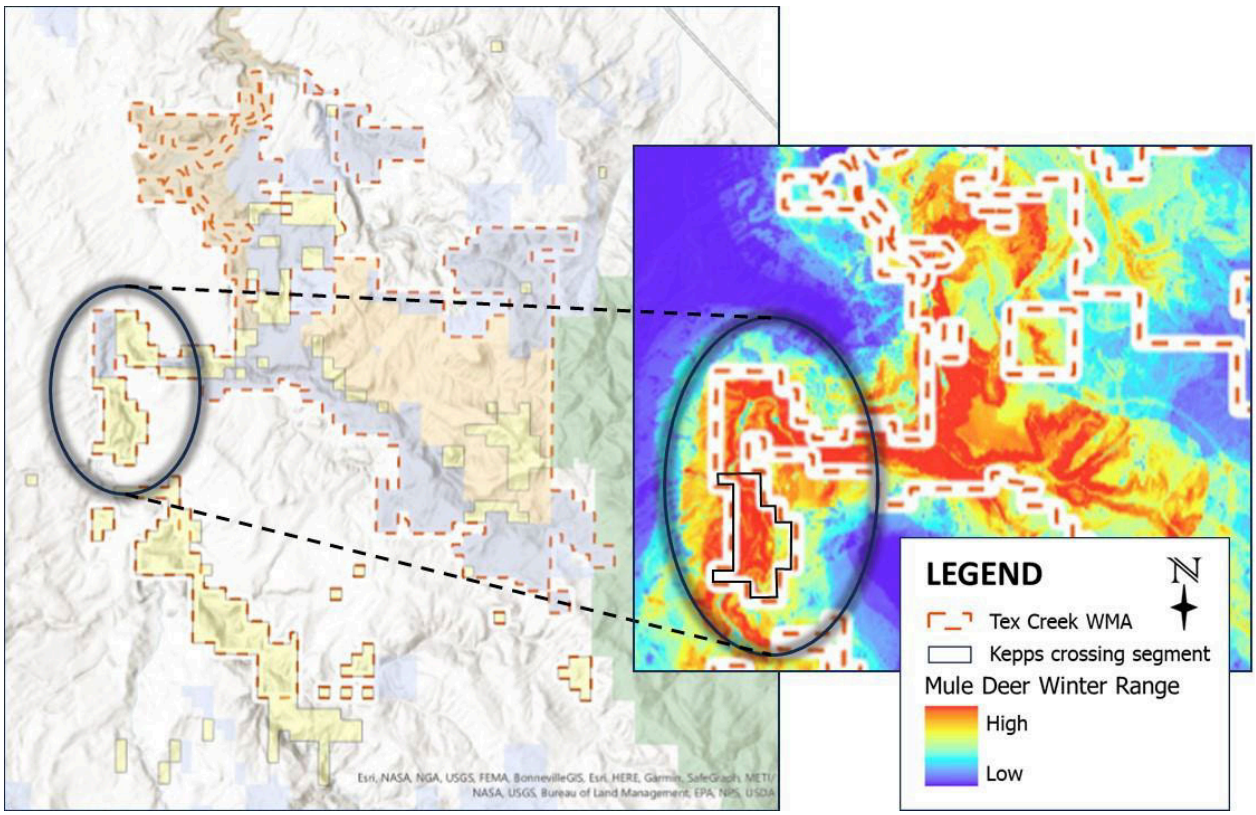


Figure 5. Kepps crossing BLM segment on Tex Creek WMA.

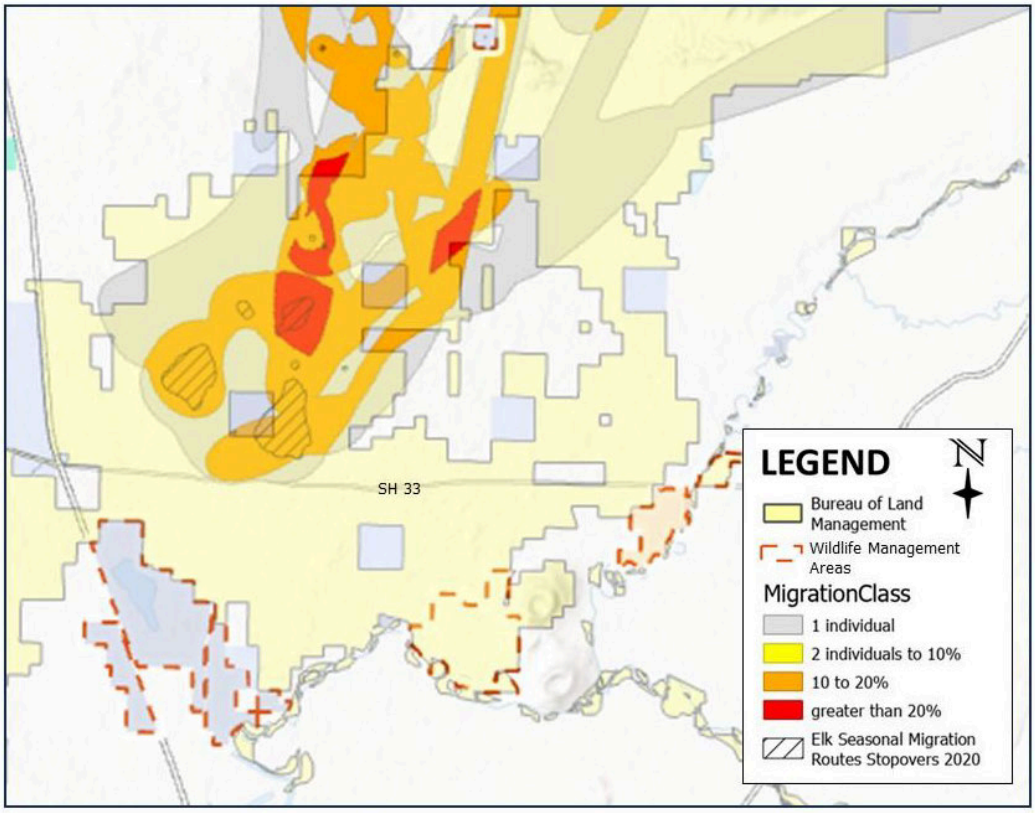


Figure 6. BLM properties south of State Highway 33. On heavy winters, big game will cross SH 33 to access WMA's for winter security.

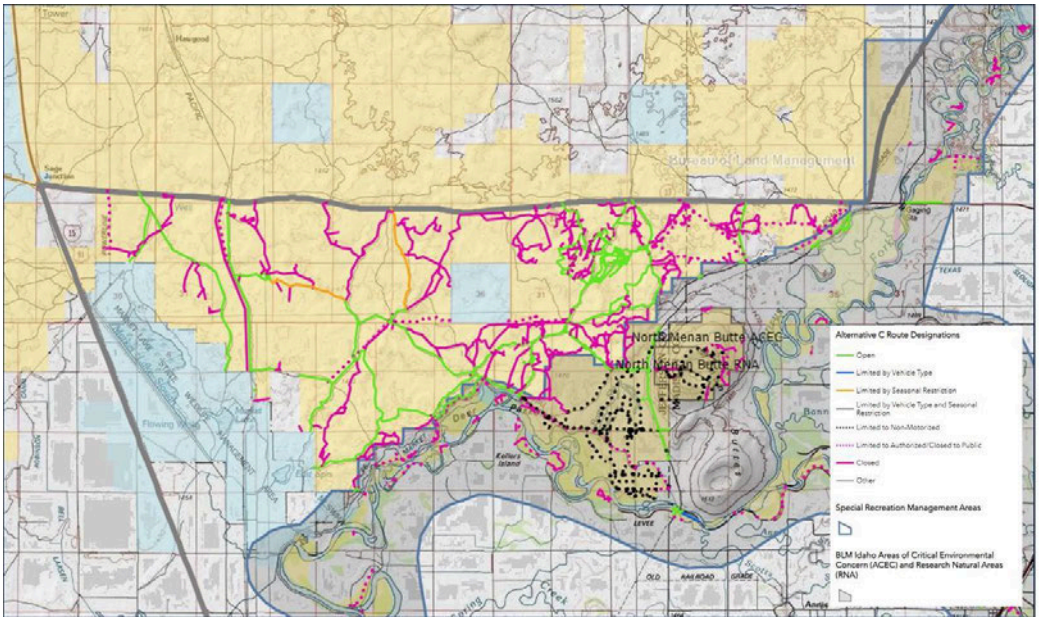


Figure 7. BLM Alternative C for area south of SH33 near the Menan Buttes and the Snake River ACEC. State managed Market Lake WMA and Deer Parke WMU are also located in this area.

Outlook

Public Comment — AJ Trail Easements & MOU

From Suellen Carman <[redacted]>
Date Tue 8/11/2026 10:51 AM
To Michelle Smith <michelles@victoridaho.gov>
Cc Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Emily S <emilys@victoridaho.gov>

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

To the Victor City Council:

I live at Mountainside Village and I am very familiar with the area that is slated for a machine built mountain bike trail. I hike on those trails almost every day. The area is home to many species of the Teton area wildlife that we all hold so dear. I don't always see the wildlife, but I see the tracks and evidence of wildlife being there, such as logs torn up by bears. The bears have been very active this summer and one of our neighbors recently spotted a subadult grizzly bear in this area.

The area is essential for wildlife and is wholly inappropriate for mountain bike trails. Imagine a high speed mountain bike coming upon a grizzly bear, or a black bear, for that matter. It would end badly for both parties.

I am horrified at the thought of this area becoming a high speed amusement park. There are other mountain bike trails in the area Mike Harris and Teton Pass, specifically. Those areas have turned into busy amusement parks. There is no need to create another one.

I urge you to halt this project from going forward without a full environmental review, taking into account wildlife, parking, the impact on the historic Victor Cemetery, and other considerations.

As our elected representatives, it is your responsibility to protect the lands under your purview. Please take it seriously.

Thank you for your time and consideration,
Suellen Carman

Suellen Carman
[redacted]
Victor, ID 83455
[redacted]

August 10, 2026

Mayor and Members of the Victor City Council
City of Victor
Victor, Idaho

Re: Proposed Victor Front Trail Development and Cemetery Road Trailhead

Dear Mayor and Members of the Victor City Council:

I am writing to express my serious concern about the proposed trail development along the Victor Front, and most importantly, the proposal to establish trailhead parking and access at the end of Cemetery Road.

Cemetery Road is a quiet, dead-end residential street that also serves the Victor Cemetery—a place that deserves to remain peaceful, respectful, and accessible to families and funeral processions. For years, people using the existing foot trail have been directed to park at nearby established public parking areas, including the city park and hockey rink, rather than at the trailhead. I strongly believe that approach should continue.

My greatest concern is that a new trailhead parking area would turn Cemetery Road into a recreational traffic corridor. A larger regional trail system will inevitably bring more vehicles, potential overflow parking, and increased traffic to a narrow residential road that was never intended to serve that purpose.

There are reasonable alternatives. The city park and hockey rink already provide established parking, and access from Old Jackson Highway should also be seriously considered. These options could provide recreational access without directing regional trail traffic through a residential neighborhood and past the cemetery.

I am also concerned about the larger scope of the proposed trail system and whether its cumulative impacts have been adequately reviewed. The Victor Front is not simply vacant land waiting to be developed for recreation. It provides important habitat and seasonal range for mule deer, elk, and moose; habitat for species including grizzly bear and wolverine; active grazing lands; and a landscape shared by working farms and ranches, hikers, equestrians, wildlife, and neighboring residents.

With the addition of miles of machine-built trails and increased recreational use, I believe these impacts deserve careful and comprehensive environmental review, including consultation with the Idaho Department of Fish and Game, U.S. Fish and Wildlife Service, and Victor Cemetery Board, before the city makes commitments that may be difficult to reverse.

Regardless of what ultimately happens with the larger trail proposal, I respectfully ask the City Council to make one commitment clear:

Do not establish a trailhead parking lot at the end of Cemetery Road or make Cemetery Road the primary vehicular access point for this regional trail system.

Recreation is an important part of life in Teton Valley, but responsible recreation means putting infrastructure in appropriate places, protecting the landscape that makes this valley special, and respecting the people and community spaces already there.

Thank you for considering these concerns.

Sincerely,

Jessica Travis Ginter

Residents, Cemetery Road, Victor Idaho

August 10, 2026

Mayor and Members of the Victor City Council
City of Victor
Victor, Idaho

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Do not establish a trailhead parking lot at the end of Cemetery Road or make Cemetery Road the primary vehicular access point for this regional trail system.

Recreation is an important part of life in Teton Valley, but responsible recreation means putting infrastructure in appropriate places, protecting the landscape that makes this valley special, and respecting the people and community spaces already there.

Thank you for considering these concerns.

Sincerely,

Jessica Travis Ginter

Residents, Cemetery Road, Victor Idaho

August 10, 2026

Mayor and Members of the Victor City Council
City of Victor
Victor, Idaho

Re: Proposed AJ Trailhead, Cemetery Road Easements, and MOU

Dear Mayor and Members of the Victor City Council:

I am writing as a Victor resident, a mountain biker, and someone who deeply values the outdoor opportunities that make Teton Valley such a remarkable place to live. I support expanding legal public access to our public lands, provided it is done responsibly, transparently, and with appropriate consideration for the communities and landscapes affected. Recreation and stewardship are not competing values - they are both essential to preserving what makes this valley special.

For that reason, I respectfully ask the Council to condition approval of the proposed easements and Memorandum of Understanding associated with the proposed AJ Trailhead on Cemetery Road until the full scope of the project has received a comprehensive environmental review and broader public consideration.

I recognize that the City is not responsible for conducting the federal environmental review. However, the City is being asked to grant easements and enter into agreements that are essential to moving this project forward. Without those easements, Mountain Bike the Tetons (MBT) cannot construct the proposed trail system. That gives the Council meaningful leverage and, I believe, a responsibility to ensure the project has received a level of review commensurate with its scope before committing City assets. Once those easements are granted, much of the City's ability to influence the outcome will be gone.

My concerns are not about whether trails belong in Teton Valley. They are about whether this project has been evaluated in a manner that reflects its true scale and its long-term impacts on our community.

The AJ Trailhead and Cemetery Road

The proposal to establish the AJ Trailhead on Cemetery Road deserves careful reconsideration.

Cemetery Road is a quiet, dead-end residential street that also serves the Victor Cemetery - a place of remembrance that should remain peaceful, respectful, and readily accessible to families and funeral processions. While I understand the proposed parking area would be located across from the cemetery rather than within it, the practical effect would still be to make Cemetery Road the primary vehicular access point for a regional trail system.

My understanding is that when the AJ Trail was originally established, the intent was for users to access the trail from remote public parking rather than creating concentrated parking at Cemetery Road. That approach respected both the neighborhood and the cemetery, and I believe that original understanding should continue to guide future decisions.

Existing parking at the city park, hockey rink, and other locations appears capable of serving this purpose while avoiding the permanent transformation of Cemetery Road into a regional recreation corridor.

The Project Should Be Evaluated as the Project

As I understand it, the proposal before the community extends beyond a local trail improvement. It includes approximately eight miles of new machine-built trails, the proposed AJ Trailhead on Cemetery Road, and an eventual expansion of the system north toward Fox Creek.

These are not isolated projects. They are intended to function as one connected regional trail system. For that reason, I believe the environmental review should evaluate the complete vision and its cumulative impacts rather than considering individual components independently.

Whether the final analysis concludes those impacts are significant or minimal, both the public and decision-makers deserve to understand the complete project before permanent commitments are made.

Wildlife, Working Lands, and Community Character

The Victor Front is one of the defining landscapes of our community. It provides important habitat and seasonal movement corridors for wildlife, supports active grazing and working farms, and has long accommodated hikers, equestrians, hunters, mountain bikers, and neighboring residents.

Expanding recreation and protecting these values are not mutually exclusive. However, achieving both requires careful planning and a complete understanding of how increased use may affect wildlife, agriculture, neighboring landowners, and the overall recreational experience.

These questions deserve thoughtful evaluation before the City commits public access that may be difficult to change later.

Community Awareness

This project has the potential to permanently change how a significant portion of the Victor Front is accessed and used.

Yet I do not believe many Victor residents fully understand the scale of what is being proposed or the decisions currently before the Council. A project involving municipal easements, a new regional access point, expanded trail construction, and a future connection toward Fox Creek deserves broader public notice and engagement before irreversible decisions are made.

Taking additional time to ensure residents understand the proposal should not be viewed as delaying progress. It is simply good public process.

A Respectful Request

The Council is not deciding whether mountain biking belongs in Teton Valley. I believe we all agree that recreation is one of this valley's greatest assets.

The question before you is whether the City should commit public easements and municipal support before residents have confidence that the full project has been thoroughly evaluated and the community has had adequate opportunity to understand and comment on its scope.

I respectfully ask the Council to use the leverage it has today.

Please condition approval of the proposed easements and Memorandum of Understanding on completion of a comprehensive review of the entire project, meaningful consultation with the Idaho Department of Fish and Game, the U.S. Fish and Wildlife Service, the Victor Cemetery Board, adjacent landowners, and other affected stakeholders, and broader public engagement regarding the project's full scope.

Teton Valley has earned its reputation by balancing recreation with stewardship. I believe we can continue to expand outdoor opportunities while protecting the neighborhoods, historic places, working lands, wildlife, and community character that make this valley exceptional.

Thank you for your thoughtful consideration and for your service to the residents of Victor.

Respectfully,

Jessica and Gant Ginter
Residents, Cemetery Road
Victor, Idaho

Outlook

Comments re west slope trail, corner crossing agreements, and neighbor hood impacts--8/12 meeting

From Charlie Woodward [redacted]>
Date Tue 8/11/2026 9:42 AM
To Michelle Smith <michelles@victoridaho.gov>
Cc Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Emily S <emilys@victoridaho.gov>

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Comments Re: corner crossing agreements, agreements with TVTAP and MBT:

The west front of the Tetons includes current grazing leases on both BLM and USFS land. It is also prime wildlife habitat for deer and moose, and has occasionally had a significant elk herd of about 150 animals, which seems to be dwindling. This must be taken into account in designing and planning for a trail.
Access: in the Victor area, the historic access to Mud Lake and the grazing leases has been via the Mud Lake road, which crosses not only corners, but the Yaeger's private property. The process must include gaining proper legal access to the trail.
Discussions about the northern terminus of the trail in my neighborhood near 5000S included a large parking area, including horse trailer parking in a residential area where the traffic, flies and odor would create significant problems. This needs to be worked on more to minimize neighborhood impact. Similar impacts can be expected at the Victor end of the trail where do you put the parking? Who maintains it? Perhaps parking should be at Sherman Park, and people walk or ride to the trailhead? How does the trail impact the nearby neighborhood?
TVTAP AND MBT seem very enthusiastic to "develop" the trial, I believe a simple single-track trail for hiking and horse riding and occasional low-speed mountain bike use might be appropriate a good use for this high and sensitive area— but it should not be overbuilt or built for high-speed use. More quiet, low speed trails are needed. The Big Holes are already a sacrifice zone for motorized and high-speed use-do not sacrifice the west slope of the Tetons as well.
Overall, the BLM and USFS need to do a complete EA for the entire project MBT enthusiasm is no excuse to do a partial "fix" which may not be appropriate in the long run, and also damage the nearby neighborhood.
Thank you,
Charlie Woodward

Charles Woodward
Natural Resource Co.
[redacted]ictor,ID 83455
[redacted]

Outlook

AJ TRAIL EASEMENTS & MOU

From SanTheresa BruLerch [redacted] >
Date Tue 8/11/2026 3:08 PM
To Michelle Smith <michelles@victoridaho.gov>; seum@victoridaho.gov <seum@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Emily S <emilys@victoridaho.gov>

Caution: The sender name (SanTheresa BruLerch) is different from their email address ([redacted] which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Dear Council members,
I ask that you "***Vote No***" on the proposal for the "Acceptance of the Two Corner Crossing Access Easements at the top of the AJ Trail."
The reason to ***vote no*** is that your involvement in this is premature and being misguided by special interest groups. The development of another
mountain bike trail system in the East mountain ridge has not been properly assessed for environmental impacts; Idaho Fish and Game has
its own reservations and the current Trail project lacks a full environmental review with both Idaho Fish and Game and the US Fish and Wildlife Service.
The Wright-Clark ranch currently holds grazing leases on the whole east mountain ridge. There has been no assessment of the
impacts on these grazing leases with the development of mountain bike trails, and in influx of people into this sensitive environmental
areas. And lastly ReEnvision Victor 2021 directed the City of Victor to preserve wildlife corridors (ie, the east ridge mountains),
historic places (ie Victor Cemetery) and agricultural buffers (ranching and its leases lands). A yes vote is in direct opposition to what
this community developed and agreed to in the ReEnvision Victor 2021. This is not the time to vote yes. Please vote NO.

Respectfully,

Theresa Lerch

Theresa Lerch
Teton County Resident

JACKSON HOLE WILDLIFE FOUNDATION

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August 11, 2026

Mayor and Members of the City Council

[address redacted]
[address redacted] / [address redacted]

erk Michelle Smith, michelles@victoridaho.gov

Re: **August 12, 2026 agenda item: Acceptance of Two Corner Crossing Access Easements at the Top of the AJ Trail and Approval of MOU with TVTP and MBT**

Dear Mayor and Members of the Council:

The Jackson Hole Wildlife Foundation is a 501c3 nonprofit conservation organization dedicated to wildlife and habitat stewardship across eastern Idaho and western Wyoming, including Teton Valley. We write to respectfully ask that the Council withhold or condition acceptance of the proposed easements and MOU until the full BLM trails project has undergone complete environmental review. Our concern regards approval of permanent municipal commitments before the impacts of the full project have been studied.

The scope of this project extends well beyond what has been publicly reviewed. The 2024 Upper Snake East BLM Travel Management Plan designated just over seven miles of non-motorized routes in this area. The project partners' own materials, however, describe a four-phase network that is substantially larger: Phases 1 and 2 alone comprise approximately 8 [address redacted] development on the AJ Linnell South Trails beginning in 2026, followed by a new North Trailhead, additional North Trails, and a Fox Creek connection described as "unlocking up to twelve additional miles of trail." Those materials also list BLM approval of the new trail alignments as a 2026 next step, meaning the alignments now proposed were not analyzed in the 2024 planning process. We further understand that BLM may intend to proceed under a Categorical Exclusion rather than a new Environmental Assessment. This raises two serious concerns.

First, the Victor Front provides security cover, fawning/calving, transitional habitat, and winter range for mule deer, elk, and moose, and it lies within occupied habitat for two federally listed threatened species, grizzly bears and North American wolverine.[1] A well-documented body of research shows that recreation displaces big game from seasonal habitat and fragments movement corridors.[2] On federal lands, environmental review is required prior to project implementation to evaluate what impacts may occur. This, along with federally listed species' occupancy should preclude the use of a Categorical Exclusion.

Second, evaluating this network one phase at a time understates its true footprint. NEPA requires that connected and cumulative actions be analyzed together rather than segmented into pieces where each appear to have lesser impact in isolation. Easements considered separately from the 8 [address redacted] they serve, and separately from the later phases and the twelve-mile Fox Creek connection already planned, cannot capture the landscape-level effects of the full scope of the project.

Because these easements and the MOU are essential to the project, Victor City Council and Mayor have a responsibility to ensure the review is done properly. Accepting these corner crossing easements now would confirm the City's endorsement of a process that has skipped essential federal review.

We ask that Victor Council condition acceptance of the easements and approval of the MOU on a binding commitment from the project partners and the BLM to complete a comprehensive

[1] Both species respond measurably to trail-based recreation. Grizzly bears alter habitat selection and movement in response to recreation on trails: Ladle, A., T. Avgar, M. Wheatley, G.B. Stenhouse, S.E. Nielsen, and M.S. Boyce. 2019. Grizzly bear response to spatio-temporal variability in human recreational activity. Journal of Applied Ecology 56:375-386. The interagency board of review convened after the 2016 death of a mountain biker who collided with a grizzly bear near Glacier National Park recommended additional safety evaluation before new bike trails are constructed in occupied bear habitat: Servheen, C., T. Manley, D. Mucklow Starling, and A. Jacobs. 2017. Board of Review recommendations related to mountain bike safety in bear habitat based on the fatality of Mr. Brad Treat on June 29, 2016. Wolverine detections decline sharply with even low levels of non-motorized trail use, in both summer and winter: Barrueto, M., A. Forshner, J. Whittington, A.P. Clevenger, and M. Musiani. 2022. Protection status, human disturbance, snow cover and trapping drive density of a declining wolverine population in the Canadian Rocky Mountains. Scientific Reports 12:17412. See also Heinemeyer, K., J. Squires, M. Hebblewhite, J.J. O'Keefe, J.D. Holbrook, and J. Copeland. 2019. Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation. Ecosphere 10(2):e02611 (six-winter study across Idaho, Wyoming, and Montana).

[2] Wisdom, M.J., H.K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, and M.M. Rowland. 2018. Elk responses to trail-based recreation on public forests. Forest Ecology and Management 411:223-233 (experimental work finding elk avoidance of mountain biking second only to avoidance of motorized use). See also Larson, C.L., S.E. Reed, A.M. Merenlender, and K.R. Crooks. 2016. Effects of recreation on animals revealed as widespread through a global systematic review. PLoS ONE 11(12):e0167259 (documenting effects of recreation on wildlife in over 93 percent of 274 reviewed studies, the majority negative, with non-motorized activities implicated more frequently than motorized).

Environmental Assessment covering the full trail system, in consultation with Idaho Department of Fish and Game and U.S. Fish and Wildlife Service.

These actions will help ensure that decisions with permanent consequences for wildlife and habitat are made with complete information and full public participation. We would welcome the opportunity to contribute wildlife expertise to that review.

Thank you for your consideration.

Respectfully,

Renee Seidler
Executive Director
Jackson Hole Wildlife Foundation

Outlook

AJ Trail Easements - Public Comment

From Erin Gibbs <[redacted]>
Date Tue 8/11/2026 4:16 PM
To Michelle Smith <michelles@victoridaho.gov>
Cc Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Emily S <emilys@victoridaho.gov>

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Dear Mayor and Members of the City Council,

First, thank you for providing the opportunity to comment on the proposed development / expansion of the AJ Trail.

Second, I wish to voice my deep concerns with this process. My name is Erin Gibbs and I live in the Mountainside Village neighborhood, which abuts the Cemetery Road access point of the AJ trail. I also am a federal worker and so am familiar with compliance to understand when Categorical Exclusion is appropriate, and when it is not.

In this instance, Categorical Exclusion is absolutely not appropriate for the proposed project. The work involves eight miles of an engineered trail and so requires a real study of the project's impact. I can understand that the BLM is dealing with forces in the current administration that are looking to fast track everything, but what we stand to lose in the process will have lasting consequences we need to slow this down. Not because development is necessarily bad, but because we do not understand the possible repercussions as it currently stands.

Additionally, having a main trailhead at the end of cemetery road is a miscalculation of large proportions. The increased amount of traffic alone needs to be studied and considered. Asking people to park at the ice rink (which now will be parking for the large apartments going up) is not going to work effectively and will not be enforced. The people living in the immediate vicinity will bear the impacts of increased volume both people and vehicles. And at the end of the day, it is unnecessary there are many places to access mountain bike trails in our awesome city and surrounding areas. Adding a large volume trailhead at a dead end road next to a historic cemetery is simply unnecessary, poses too many problems, and is ethically questionable. The cemetery is a place for memory, respect, and quiet not a large trailhead.

The city holds the power here, and I urge you to use it. Your master plan from 2021 mandates the city to preserve wildlife corridors, historic places, and agricultural buffers. Please keep to this obligation until the feds do this correctly.

With respect,

Erin Gibbs

Outlook

Public Comment AJ Trail Easements and MOU

From Jeff Klausmann [redacted]
Date Tue 8/11/2026 4:10 PM
To Michelle Smith <michelles@victoridaho.gov>
Cc Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <[email redacted]>; Amy R <[email redacted]>; Emily S <emilys@victoridaho.gov>; d [redacted] <[redacted]>

This is the first time you received an email from this sender [redacted]. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear Victor City Council-

I am writing to urge you not to sign access easements and the MOU for the AJ Trail. The process for determining impacts has been biased and flawed from the start. The Categorical Exclusion BLM used to approve this project is entirely inappropriate given the proposed impacts and known wildlife resources in this project area. Both Teton County and the City of Victor have recognized the importance of the Victor Front for its wildlife and heritage values. Teton County re wrote zoning regulations in part to protect critical foothills habitats including the Teton Front. Additionally, your own Comprehensive Plan, ReEnvision Victor, further acknowledges the importance of ecosystem preservation. It would be irresponsible to sign the easements and MOU prior to allowing for a thorough environmental review that assesses the impacts of this project phase. If the BLM refuses to complete this review, I **strongly urge** you to seek formal consultation with the Idaho Department of Fish and Game prior to making any binding decisions.

Thank you for your consideration.

Jeffrey Klausmann
Regional Representative
Backcountry Hunters and Anglers

Outlook

AJ Trail Easement & MOU.

From ML intheMTNS [redacted] >
Date Tue 8/11/2026 4:15 PM
To Michelle Smith <michelles@victoridaho.gov>; Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Amy R <amyr@victoridaho.gov>; Emily S <emilys@victoridaho.gov>

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To the mayor and councilors,

It seems prudent that the BLM needs to do a full impact study on the proposed machine made trail of 8 miles in length. For the wildlife's sake, for the vegetations sake due to such a big intrusion.

And also please consider the big impact a trailhead, now highly advertised as access, will be on the residents. There is no parking. There is a cemetary. And I shudder to think of the impact should somehow a parking area be developed there.

Our Victor comprehensive plan " Reinvision Victor" calls for stewardship of the surrounding enviroment. So please do not accept the easements until a full environmental assessment has been completed.

Thank you, Marcia LeMire

Outlook

AJ Trail Easements

From Holly Bender <[redacted]>
Date Tue 8/11/2026 4:29 PM
To Michelle Smith <michelles@victoridaho.gov>
Cc Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Emily S <emilys@victoridaho.gov>; Amy R <amyr@victoridaho.gov>

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Dear City Council Members,

I really appreciate that Mayor Muncaster decided to have the trail easements go before the full council for a vote. I think allowing time for public comment as well on this trail system is extremely beneficial so I thank the Mayor for her decision.

My husband Dave and I signed one of the easements under consideration tonight, and while we are happy that there will now be official public access, we do ask that the council condition their approval of the easements and the MOU's for Mountain Bike the Tetons and Teton Trails and Pathways on a full Environmental Assessment done in consultation with the Idaho Fish and Game and U.S. Fish and Wildlife Service.

During the process of drafting these easements, I had a chance to walk part of the trail with Monica Zimmerman from the BLM. One of the issues that we discussed was why the BLM approved the trail without legal access for the trail already in place. I wanted to find out the answer to that question because the push to get started on trail work was a negative factor in trying to work on the easements. In fact, in the end, it was the key factor as to why we were not able to finish up the negotiations on what was to us the most relevant portion of the easement.

I followed up my conversation with Monica by calling John Reffit, manager of the Upper Snake River Field office of the BLM. He was new to the office and could not answer my question. I asked him if he could look into the issue. After looking into it, he said that the BLM had been told by the other entities involved in the project that all easements were in place, and that the BLM had failed to do due diligence to see if that statement was true. I told John that I knew for a fact that the other entities involved knew the proper easements were not in place, and I told him that I actually had emails that could prove that.

I feel that the fact that the BLM failed to do due diligence to find out if the proper easements were in place, especially since it was easily accessible knowledge, before approving this project is extremely relevant and concerning. It made me question how they managed every other part of this project. It now appears that **much of this project was approved and moved along without the due diligence**

done to make sure the trails that are put in are appropriate in size and placement so as not to displace wildlife; harm farms, ranches and traditional land use; and reduce critical habitat.

We are happy that we could help grant access to the public; however, we would like to make sure the rest of this project happens in a way that won't cause long-term harm. We would very much like to see a full Environmental Assessment completed, and the City of Victor has the ability to see that it gets done.

This trail system will be a wonderful benefit to the City of Victor, and there is definitely pressure to rush the process. However, I think by asking for the Environmental Assessment, the delay could be beneficial to Victor as well. It will show that the city is taking care to make sure that this trail system will be created in such a way to protect this valuable piece of wildlife habitat that Victor is in charge of. It will also show that the ReEnvision Victor goal to protect the wildlife is a value not a slogan for the city government.

Please condition approval on the full Environmental Assessment done in consultation with the Idaho Fish and Game and U.S. Fish and Wildlife Service.

Thank you for taking the time to consider my concerns and requests.

Sincerely,

Holly Bender
[redacted]

Outlook

AJ trail

From Tom Guheen [redacted]
Date Tue 8/11/2026 4:52 PM
To Michelle Smith <michelles@victoridaho.gov>

This is the first time you received an email from this sender ([redacted]). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Hello Victor City Council,

Please do not change anything about access to the AJ trail. No parking area,and no widening of the trail. It is perfect just the way it is.

Tom G. Cemetery Rd.

Outlook

AJ's trail easement

From Christina Riley <[redacted]>
Date Wed 8/12/2026 8:36 AM
To Michelle Smith <michelles@victoridaho.gov>

This is the first time you received an email from this sender ([redacted]). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear Mayor and Members of City Council,
We live in Mountainside Village and have used the nearby trails for years for both biking and hiking. The idea of a more extensive trail system is exciting, but we would strongly urge you to do a full environmental impact assessment before approving any infrastructure.
To save time (mine and yours!), please refer to the McCarthy's letter with a detailed explanation of key concerns.
Thank you for your serious consideration of this request.
Sincerely,
Christina and Adam Riley

Christina Riley, LCSW
[redacted]
[redacted]
insightscounselingandcoaching.com

Outlook

Public Comment — AJ Trail Easements & MOU

From John Sackman <[redacted]>
Date Tue 8/11/2026 4:44 PM
To Michelle Smith <michelles@victoridaho.gov>

This is the first time you received an email from this sender [redacted]). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

I am writing to express concern about this project. I don't think we need any more trails in the Tetons. This project seems focused on human convenience and recreation, with little concern for wildlife and the environment. Please give nature a break! Enough is enough!

Sincerely,
John T. Sackman

Outlook

AJ Trail Discussion Item

From Rachel Bender <[redacted]>
Date Tue 8/11/2026 9:20 PM
To Michelle Smith <michelles@victoridaho.gov>
Cc Sue Muncaster <suem@victoridaho.gov>; Stacy Hulsing <stacyh@victoridaho.gov>; Emily S <emilys@victoridaho.gov>; Amy R <amyr@victoridaho.gov>

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Dear Mayor and City Council Members,

I am writing regarding the Acceptance of Two Corner Crossing Access Easements at the Top of the AJ Trail and the Approval of the MOU with TVTAP and MBT.

I realize that all parties involved are eager to move forward with this project, however, failing to follow proper procedures is irresponsible and undermines public trust. I respectfully request that the council would **condition the approval** of these easements and MOUs on a full, up to date Environmental Assessment and impact study.

Additionally, if the easement agreement is approved and if plans should be made to relocate parking for the AJ Trail at any point, I request that the council would schedule a timely **public meeting** with adequate notice and with opportunity for public comment before moving forward.

Thank you for your time and for your consideration of these requests.

Respectfully,
Rachel Bender