

The Mission of Teton Valley Trails and Pathways is to promote a trails and pathways connected community. Teton Valley Trails and Pathways has worked on trails in Teton Basin for all user groups for almost 25 years. In November of 2021 Trails and Pathways was awarded a Regional Forester Award for the Intermountain Region of the United States Forest Service. We were recognized for the partnership with the USFS and shared stewardship of the National Forest Lands. We look forward to extending that partnership to The Bureau of Land Management. Organizationally, our work focuses on the Teton Valley Basin and our comments will be specific to those zones only. We appreciate the opportunity to comment on the BLM proposed travel management plan for Southeast Idaho.

Overall Comments pertinent to the Travel management plan:

1 -Across Alternatives A, C and D The density of trails proposed is too high. With coordinated route planning, focusing on point-to-point destinations and smaller stacked loops, the density of trails could be reduced and still serve recreation. It will likely also have better wildlife outcomes by having fewer routes segmenting habitat.

2-We support seasonal closures based on Idaho Fish and Game and Wyoming Game and Fish recommendations. Enforcement from Idaho Fish and Game and BLM for those closures will be needed.

3- We believe that designated access points with minor improvements are needed. Game Creek, Mud Lake, The AJ Trail and Fox Creek are logical points in the South section. If there are trails that start/end near the Linn Canyon Ranch, we suggest an access point that is developed for the public. The Coco Belle access north of Spring Creek should be the access point for the northern portion. There are multiple residential areas adjacent to the BLM parcels, some with historical access. Planning and codifying access points in conjunction with Teton County the City of Victor and residents will be critical. It is also important that the burden of recreation management and access not be placed on the County and City.

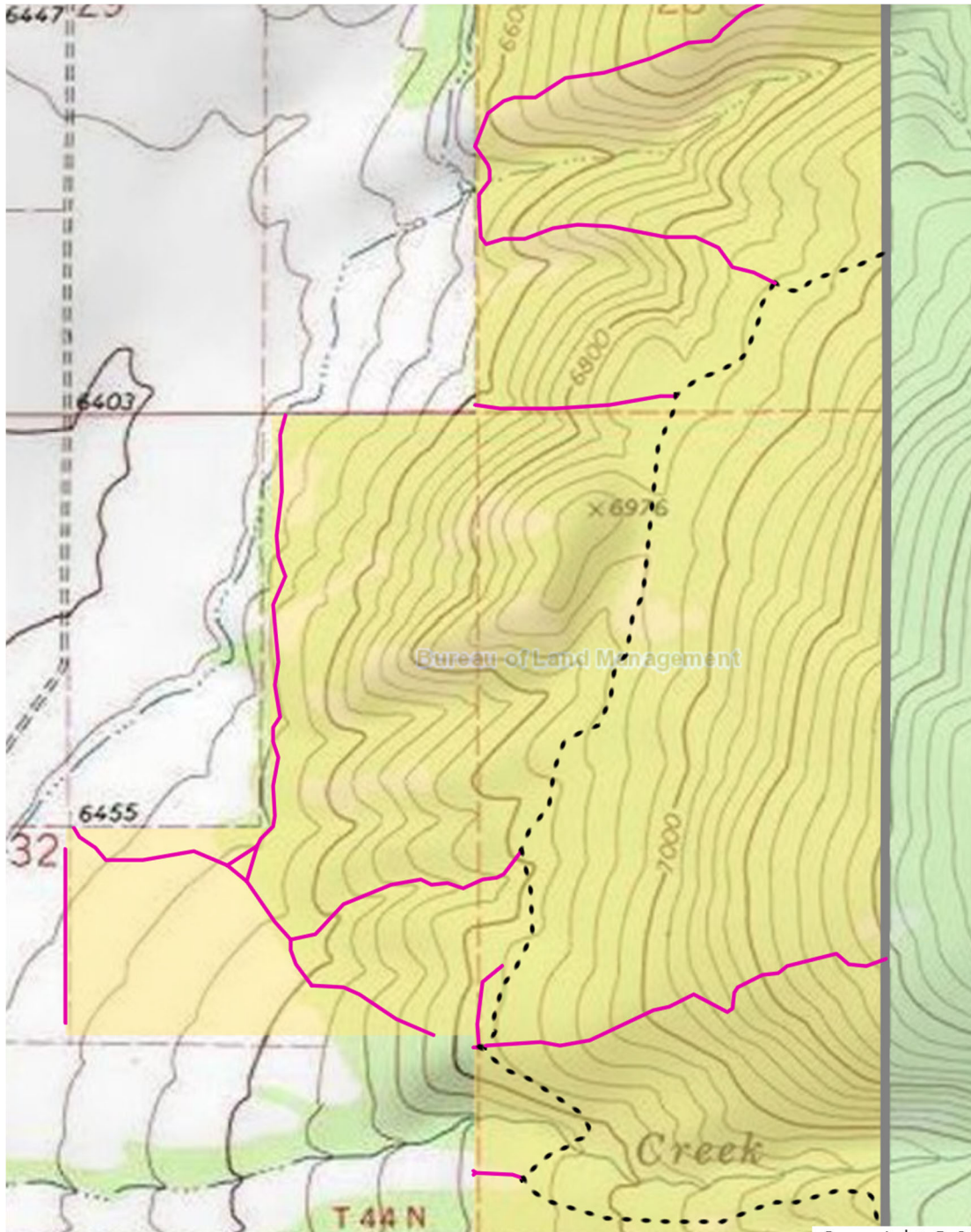
4-The current alignment of trails in the proposals should not be adopted as-is. We ask for latitude in eventual alignment that will allow for trails to be built sustainably as our organization will likely be helping with construction and any future maintenance. Building trails with more sustainability will lead to less maintenance cost and resource destruction over the longer term. Additionally, we request latitude in the travel plan to move trails to locations that are better for Wildlife. For example, closer to the existing development on private properties adjacent to the BLM parcels. We commit to using the handbook created by American Trails [Designing Trails With Wildlife in Mind](#) when considering routes.

5-We support access to public lands that balances preservation, recreation, and historical use. The BLM parcels in the Teton Basin have all three of these elements and we support a balanced approach that takes elements from Alternatives B, C and D.

Comments to specific routes proposed on the [BLM Planning Map](#).

In the northern zone the access point at Coco Belle is managed by Wyoming Game and Fish. There is also a canal/water delivery system at the access that should be considered in planning. For this zone, we support a low volume of trails that will allow non-motorized users access to the Dead Cow Trail to the north and to Spring Creek/Aspen Trail to the South. There is historical use of both motorcycles and ATV's

in this area and if multi-use trails are adopted, the routes should connect to other existing multi-use routes on USFS land.



Specific Route Considerations:

UE 1458-This route exists as a multi-use two track route, runs adjacent to sections of a canal and is immediately adjacent to private property. This route should remain open as an access point for whatever uses the BLM deems appropriate.

UE 1459-This route is not in good shape and should be either closed and routed to UE 1458 OR rerouted and close UE 1458 to have a singular north/south connector.

UE 1453-This north south connector trail makes sense for the point-to-point trail alignment. One consideration would be to move trail alignment to the west and closer to the private parcels so it does not split habitat. For example, can the trail traverse closer to the 6800 Foot Contour Index line on the map.

UE 1400-This route should be closed as there is no access to the west from the Wyoming Game and Fish Parcel.

UE 1468-This route is historically multi-use but travels straight up the fall line and is in very poor shape. It should be closed OR if adopted for use, major re-routing will be needed to bring the tread to a more sustainable grade.

UE 1451-This route is also historically a multi-use two track and is in very poor shape. If it is adopted as non-motorized or multi-use, it will need significant re-routes to make a more sustainable trail.

UE 1470-Close this route as it has no public access point.

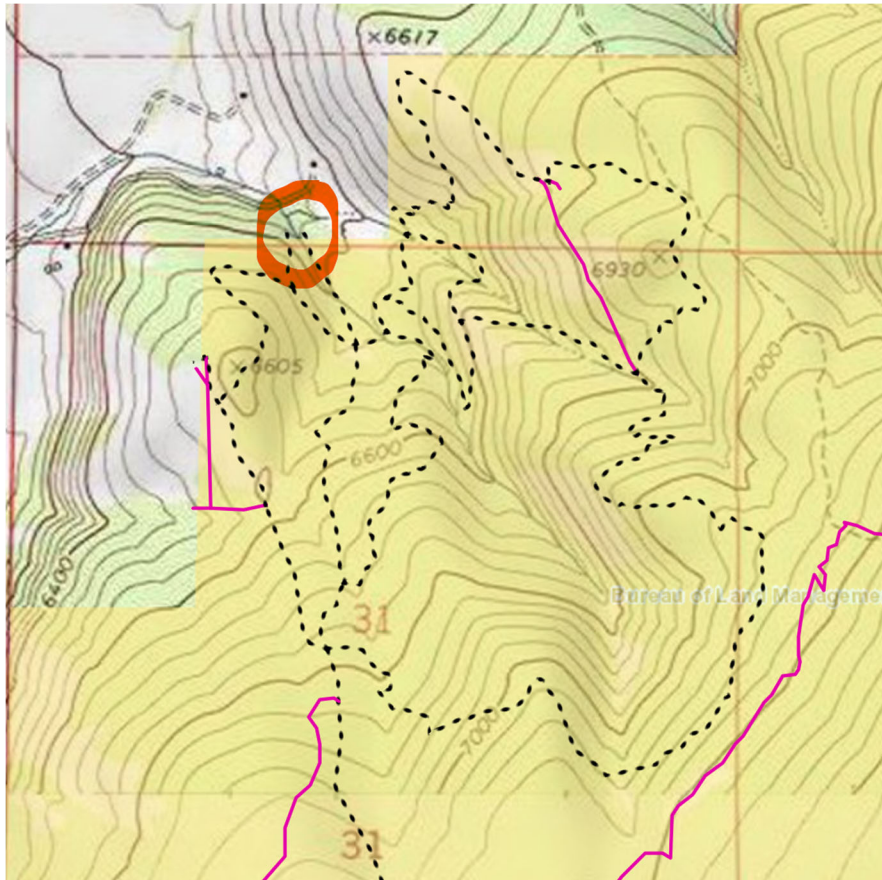
UE 1460-Close this route as it has no connectivity on USFS land.

UE 1492-This route should be adopted as a north/south route.

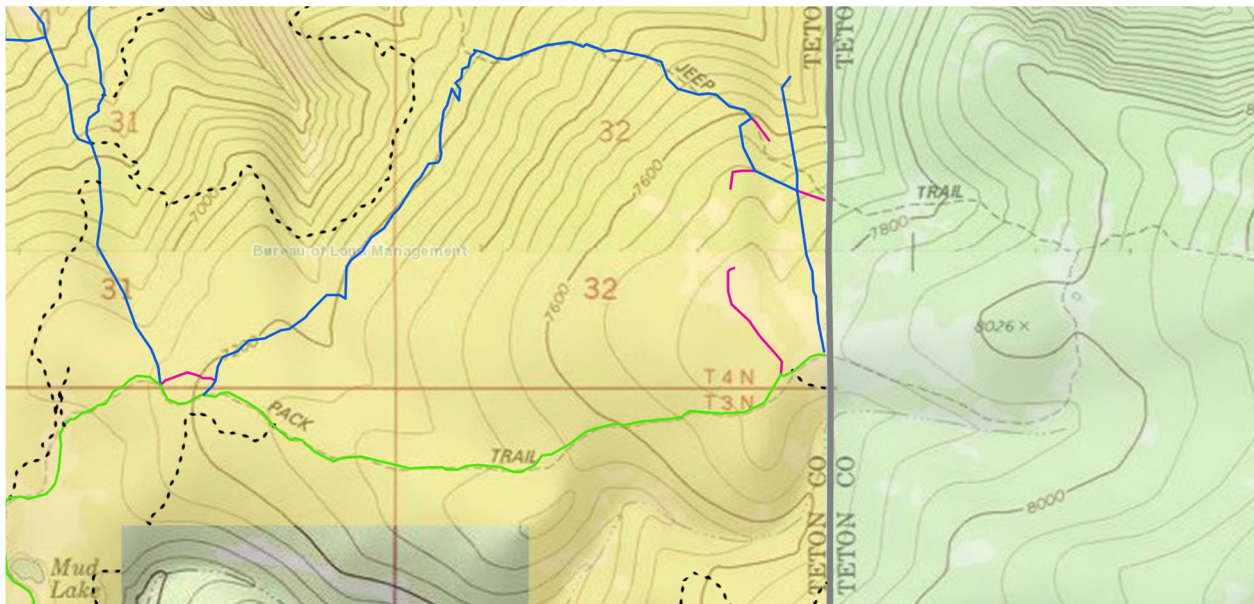
In summary for this zone, we feel it's appropriate to prioritize N/S connections to existing trails, potentially a loop off the main route. It will be critical to have closures in the winter and spring based on WY Game and Fish recommendations. Lastly, our organization is interested in the approximately 40 acres to the SE of elevation point 6445 as a potential area to groom winter trails for XC skiing. We have already discussed grooming in the area with the golf course owners and request that be considered if it does not adversely affect wildlife.

Comments to specific routes in the **Southern Zone**.

In this first screenshot of this area which is the far northern part, the orange circle indicated where several trails begin/end. If there is no area for the public to access the trails, we ask that a consideration be made to allow a non-motorized route to loop back south from trail UE 1409. We understand most of the trails in this area are outfitter trails and support the non-mechanized designation for almost all these trails. A return route along 1419 and 1416 that is non-motorized would allow users a loop from the Mud Lake area. If the outfitter ceases to exist in the future, and we hope they do not, adoption of a small fraction of these trails for public use should be considered.



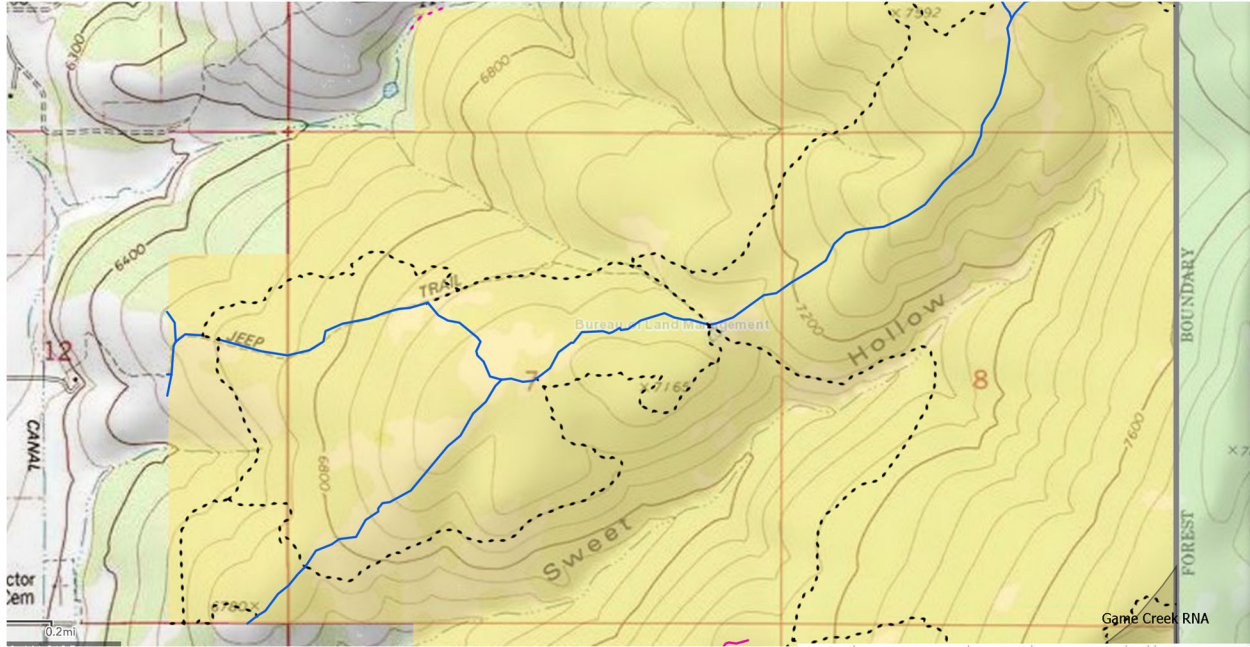
Mud Lake Zone



Historically, multi-use trails anchor this area. If trails are adopted for multi-use, we encourage planning a singular loop route using UE 1408 and UE 1411. Additionally, we encourage planning a non-motorized

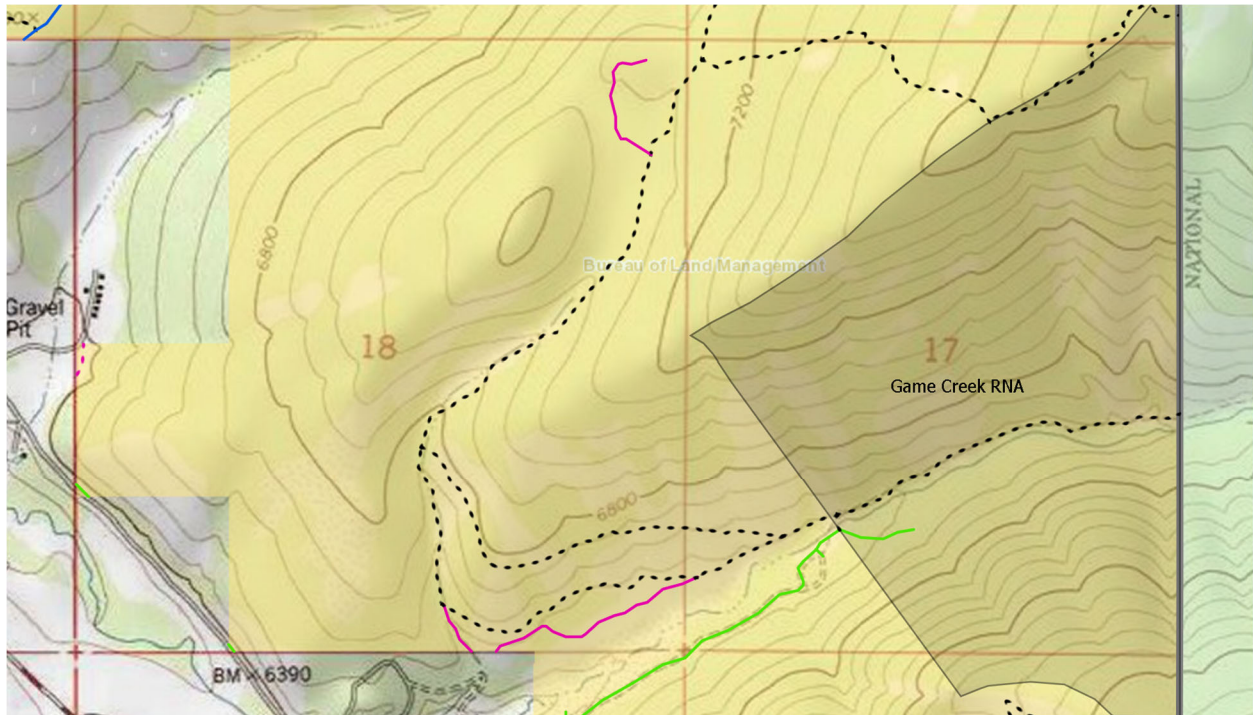
route traveling south with the AJ trail being the southern end of the connection. Seasonal closures should also be enforced in this area.

Victor Zone



This zone has a high density of trails proposed and could be curtailed or planned better. We feel that connectors north to Mud Lake and South to Game Creek should be prioritized. Additionally, any non-motorized trails in this area should be planned to limit habitat segmentation by small loops, potentially closer to areas of impact like the public/private lands interface. If the multi-use route, UE 1429 has contiguous routes on the forest and/or access from another public access then it makes sense to keep open, if it does not have those connections, it does not make sense to open. This area has a lot of potential for high volume use with proximity to Victor and surrounding subdivisions. Directional trails for the loops should be strongly considered.

Game Creek to Victor Zone



The priority for this zone should be as few routes as possible connecting north but with a developed access point. We suggest the access point be developed closer to public/private land interface and the road up canyon from the access point managed for administrative use only. It may be needed for directional trails for northbound and southbound traffic as this could be a popular trailhead. Additionally, the non-mechanized route connecting to the Forest Service trail up Game Creek should be connected to the access area.

UE 1430-Close unless there is an existing or planned connection on the USFS.

UE 1431-Consider connecting this route north to AJ trail.

UE 1450-Consider moving this route to a single connector that will connect from Game Creek Trailhead to Moose Creek Drainage. Otherwise, if there are not planned or existing routes adjacent to these, consider closing.

UE 1220 and UE 1446. Can this connector route be shifted closer to the public/private land interface? Ideally can a route be shifted further West with directional trails and not segment wildlife habitat as much.