



File Code: 1950-1

Date: March 24, 2014

Mayor Zachary Smith
P.O. Box 122
32 Elm Street
Victor, ID 83455

Dear Mr. Smith,

I have reviewed the proposed Southern Valley Urban Interface Trails Project document with a group of my staff to determine if this document is sufficient to move forward into the National Environmental Policy Act (NEPA) process. The staff and I were encouraged to see the project scaled back to a very manageable size and believe this proposal is a great effort toward meeting the City Council's adopted values of Connected to Nature, Sustainable, Family Friendly and Small Town Feel. This proposal also aligns very well with direction given in A Framework for Sustainable Recreation (United States Forest Service, USDA, June 25, 2010) by developing strategic partners and connecting people with America's great outdoors.

Although your proposal provides some excellent detail in the narrative and the associated map, my staff and I were left with several questions about the proposal. Many of these same questions developed by my staff will undoubtedly need to be understood for public scoping purposes, consultation with United States Fish and Wildlife Services and concurrence with the State Historical Preservation Office. I would like to provide a couple of examples from the city proposal that I have questions about.

Example 1. Parking area and Trailhead

The proposal states that there is "ample existing parking". The Mike Harris area currently has no developed trailhead or parking lot, the parking that is occurring, is in a user created parking area that is expanding and causing resource damage. The city proposal seeks to increase visitation and use of this area and a well designed, developed parking area and trailhead would be appropriate. What size and location would the City of Victor like to consider? Would there be toilet facilities at the trailhead? Restroom facilities at the Mike Harris Campground are under a Concession Special Use Permit and serve campground visitors that have paid a fee. If use of the campground restrooms by non-paying public were to increase due to development of the city's proposal, this will financially impact the concessionaire (vault pumping and cleaning costs will increase) and a claim could be made against the Federal Government. The concessionaire is a long standing partner and permit holder and I do not want to negatively affect our relationship as a result of the city's proposal.

Example 2. Winter Use

The proposal mentions winter use, winter fat-tire bikes, skiers and snowmobilers but there is no specifics about winter use. In my discussions about winter use with various individual members of the Victor Trails Committee, I did not receive a consistent reply on winter use. If winter use is intended, what will be groomed and how wide? This has direct bearing on summer trail construction and associated clearing limits. Will the parking area be plowed in the winter? Will



the bridge over Trail Creek support a snowplow? Would the winter trail system connect to Nordic facilities in Teton Springs? The Mike Harris area is currently open to cross-country snowmobile use under the Caribou-Targhee Winter Travel Plan; to avoid user conflict with the non-motorized winter use would the proposal include restricting the area to snowmobile users?

Example 3. Highway Crossings

The proposal contains two at-grade highway crossings, connectivity to the Sheep Corrals and connecting to the Rush Hour Trail. Has the City of Victor considered the liability exposure associated with the proposal for both the city and Forest Service? I am very concerned about the proposed highway crossings due to a recent lawsuit that the Forest Service lost in Island Park. This particular lawsuit involved an at-grade highway crossing which are inherently dangerous.

In addition, the Interdisciplinary Team's initial review of your proposal resulted in discovery other issues and data gaps that were discussed by staff members and are as follows:

ATV trail construction – project map does not show the proposed ATV route.

Trail tread width – will be dependent on types of use and season of use.

Trail clearing limits – in many cases will be determined by winter use associated with grooming.

Dog Policy – dogs in heavily used recreation areas have potential to create user conflict.

Winter parking area – Would it be the same size and location as the summer parking lot?

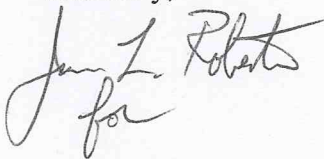
Winter grooming – what grooming implement will be used and what is its width?

Horses – Will this non-motorized use be allowed?

I would like to encourage the City of Victor to hold a public meeting and except comments on the proposal prior to the Forest Service starting the NEPA process, to ensure that no critical issues have been omitted from the final proposal. This is a far more efficient strategy to move this project forward then discovering during the NEPA process and public scoping, that the proposal needs to be altered. If the proposal is changed during the NEPA process, I am required to start the process over with new time frames. Given my experience with public scoping, I would not be surprised if there are issues brought forward by the public that neither the City of Victor nor the Forest Service has considered at this point in time. It is in both of our interests to ensure the submitted proposal is detailed and reflects the views of all interested Teton Valley residents.

I believe your proposal will enhance the recreation experience for both visitors and valley residents for decades to come. Please give Kurt Kluegel or me a call if you have any questions or are need of help in refining your proposal.

Sincerely,

A handwritten signature in cursive script that reads "Jay Pence" with a large, stylized "J" and "P". Below the name, the word "for" is written in a smaller, simpler cursive script.

JAY PENCE

District Ranger