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August 11, 2026

Mayor and Members of the City Council

City of Victor

138 N Main Street / P.O. Box 122

Victor, ID 83455

Via email: City Clerk 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 8.5 miles of new trail 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 8.5 miles of trail 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).

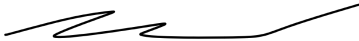
² Wisdom, M.J., H.K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, and M.M. Rowland. 2018. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management* 411:223-233 (experimental work finding elk avoidance of mountain biking second only to avoidance of motorized use). 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,

A handwritten signature in black ink, appearing to read 'Renee Seidler', with a stylized, flowing script.

Renee Seidler
Executive Director
Jackson Hole Wildlife Foundation