DECISION MEMO
CACHE-GAME TRAIL PROJECTS

Bridger-Teton National Forest
Jackson Ranger District
Teton County, Wyoming

BACKGROUND

Trails facilitate access to the outdoors providing multiple benefits to individuals as well as contributing to community character and vitality. Within the Jackson Hole region, recreation use is growing rapidly and is evolving. Notably, there is more demand for close-to-home, day use opportunities and more desire for use-specific, high quality trails. There is also increasing demand for quiet activities that provide opportunities for release, reflection, and observing nature and at the same time there is increasing demand for activities that provide opportunities for easily-accessed adventures and social experiences with friends and family. Nowhere in Jackson Hole is this trend more apparent than in the Cache and Game Creek area due to its proximity to town and the community population centers.

Over the past four years, the Forest Service has been working with the public to address proposed trail system changes in the Cache-Game area while also developing a "master plan" to guide trail development throughout the entire Ranger District. Consistent with the trail system master plan, a scoping document identifying five proposed trail projects in the Cache-Game area was released for public comment in August 2014. The purpose of the proposed trail projects is to respond to growing recreation use by re-designing the Cache-Game trail system to work better for all non-motorized uses in a manner that concentrates use in areas near town where use can be better managed so that backcountry areas can be managed with less human disturbance. Specific purposes include:

- Reduce congestion and conflict, particularly between hikers and bikers, by separating use where necessary immediately adjacent to town.
- Improve loop opportunities for quality recreation experiences promoting shared trail use to the extent possible.
- Improve resource conditions by reducing the presence and development of unmaintained, non-system trails and increasing the sustainability of system trails.
- Provide additional opportunities to enhance the connection between the community and the National Forest through involvement in trail stewardship, restoration, and monitoring projects.

DECISION

After reviewing the resource analysis and public comment, and consulting with resource specialists, I have decided to approve four out of the five proposed trail projects described in the August 2014 scoping document subject to the requirements identified in this decision. At its core, my decision includes enhancing the trail system by adding a key loop connection and separating use by providing two trails where bicycle use will not be allowed. The approved projects include:

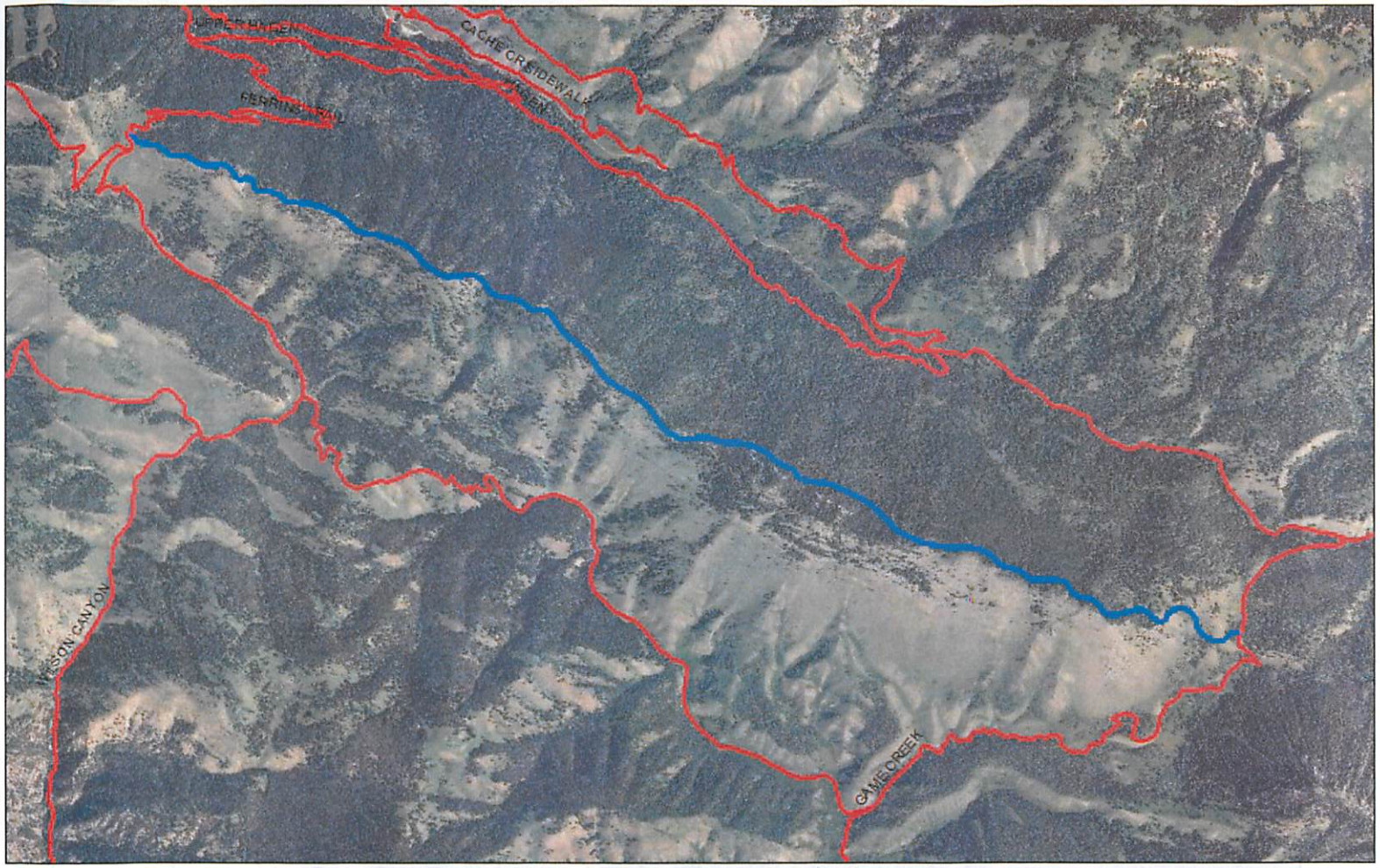
1. **Skyline Trail Construction** - Approximately 5.5 miles of shared-use trail will be constructed to create a highly scenic loop opportunity to help accommodate growing use and concentrate use in

the Cache Creek drainage. Approval of this project includes the following requirements:

a. Lift-served bike access from the summit of Snow King will not be permitted. The current accepted 2014 Snow King Master Development Plan will be amended to reflect this decision.
b. A seasonal restriction will be placed on the trail prohibiting human use from May 1st through June 30th to reduce human disturbance during the calving season for elk, deer, and other wildlife.
c. The preliminary trail corridor, based on several field reviews, is shown on Map 1. The trail would generally follow the ridge with preference given to placing the trail on the north-facing aspect to avoid ungulate foraging areas. The final layout will be done in coordination with biologists including personnel from the Wyoming Game and Fish Department (WGFD) to further minimize localized wildlife impacts.
d. Additional great gray owl and boreal owl surveys will be conducted in suitable habitat prior to project activities. If owls are detected, the Forest Service will consult with WGFD to determine appropriate mitigation measures.
e. The finished product will be approximately an 18 inch wide native surface trail designed and built to accommodate shared use. Attention will be given to ensuring sustainability to minimize soil erosion and provide good line of sight to avoid potential collisions. Trail design elements, such as pinch points and grade reversals, will be used to reduce speed and encourage trail users to take the time to absorb the beauty and scenery afforded by the ridge. The trail will be designed to visually blend with the environment but will take advantage of key viewpoints and offer a gradient from a moderately developed trail starting at Ferrin's saddle to a more rustic, primitive trail as one travels towards the Game Creek saddle.
f. Construction will be done in a way that minimizes overnight human activity, avoids tree cutting, minimized potential for soil erosion, and ensures crew safety. Construction may include use of small trail machines in the more difficult terrain as well as hand-tools and cannot occur during the seasonal restriction from May 1st through June 30th. Use of volunteers and service corps will be encouraged, but oversight will be provided by the Forest Service.
g. Trail machinery must be cleaned prior to entry onto National Forest lands. Monitoring and treatment of any new weed infestations will occur for a minimum of three years after project completion.
h. All existing user-created trails and any future user-created trails will be closed and rehabilitated using native plants and natural materials to prevent use.
i. Signage, consistent with what currently exists in the Cache-Game area, will be installed at trail junctions and allow for wildlife specific messages.

2. **Nelson Drive trail reconstruction, use separation and restoration** - Approximately 1.2 miles of trail will be constructed or reconstructed to separate hiking and biking use to reduce conflict and provide a short hiking trail near town. Map 2 displays the approximate location of the new hiking and separate biking trails. Reconstruction and restoration work on the existing non-system trails located on the Nelson Hill, north of the trailhead, is approved but implementation will be deferred pending the outcome of further discussions regarding access points from town. All remaining and future user-created, non-system trails will be closed and restored using native plants and natural materials to prevent use. One or two benches will be provided along the trails to enhance opportunities for older adults and encourage all recreationists to spend some quiet time absorbing the beauty and sounds of nature. Information will be added to trail maps to show people how to access the Nelson Drive trails directly from town as an alternative to driving to the trailhead.

Map1- Preliminary Skyline Trail Alignment



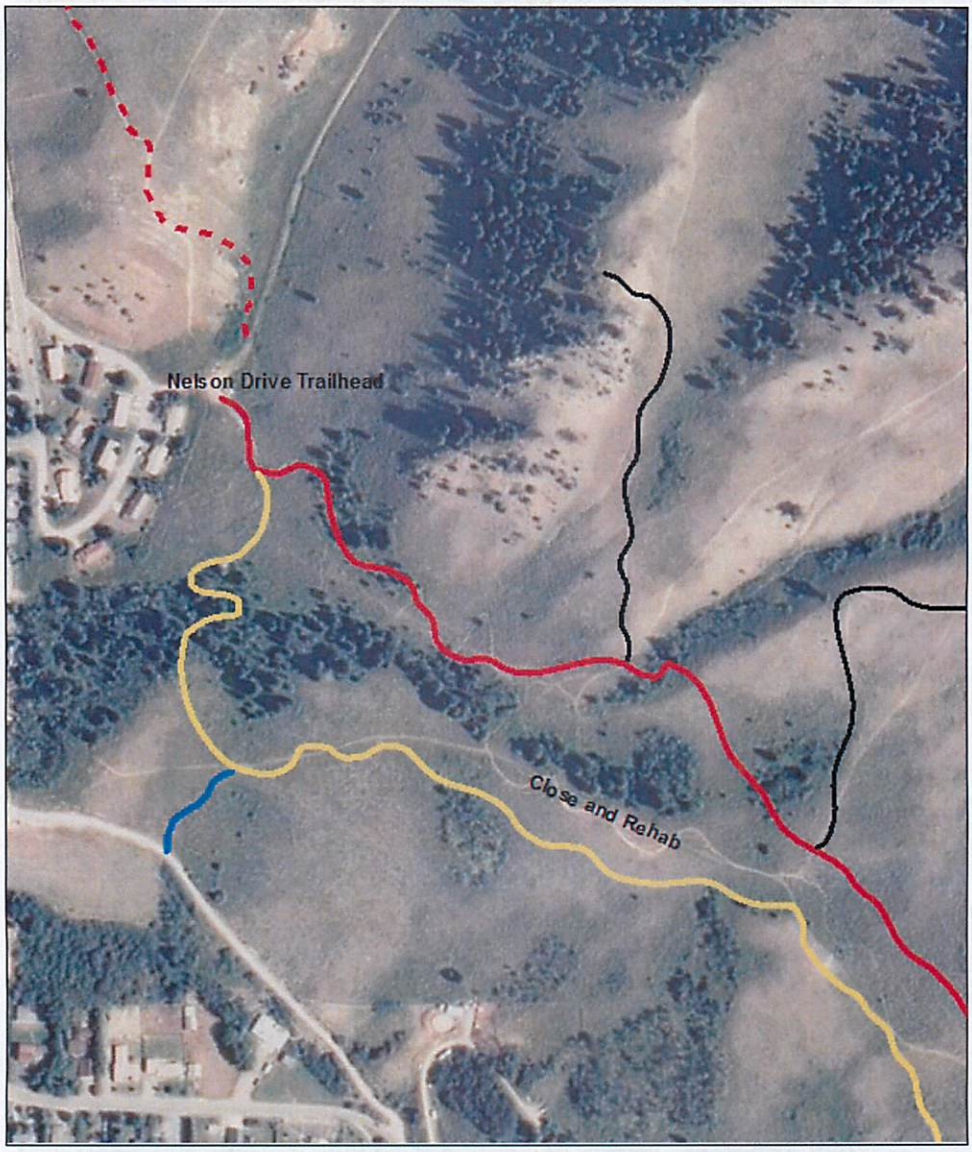
Preliminary Skyline Route

Exisiting System Trail

N

0 0.25 0.5 1 Miles

Map 2- Nelson Drive Trails



3. **Josie's Ridge trail reconstruction, use separation** - The lower portion of Josie's ridge trail will be reconstructed to improve sustainability and the lower part of the ridge trail will be designated for foot travel only to provide short hiking loop near town. Map 3 shows the loop designated for hiking as well as the upper portion of the Josie's Ridge trail which remains open for bike use. All remaining and future user-created, non-system trails will be closed and restored using native plants and natural materials to prevent use with special attention to emerging fall-line trails.

4. **Game Creek road** –The season of motor vehicle use for a portion of the Game Creek road will be changed to allow vehicle use only between September 1st – October 30th annually to help protect the road surface and reduce use conflict. Between September 1st and October 30th, the road may be temporarily closed if necessary to prevent resource damage. Additionally, if the road deteriorates to the point where resource damage is occurring or conditions no longer accommodate vehicle use, further road restrictions or closures will be implemented and the road may be reconfigured as a non-motorized trail if appropriate.

I have decided not to approve the proposed Putt-Putt trail extension based on the resource analysis which suggests that there are more negative effects associated with this project compared with the other proposed projects and adding this trail would not be consistent with Forest Plan guidelines for trail density. Additionally, further discussion supports that the Cache Creek road/trail can reasonably accommodate shared use with minimal conflict. These facts suggest that the potential benefits of extending the Putt-Putt trail are not strong enough to justify the additional ground disturbance associated with adding another mile to this trail.

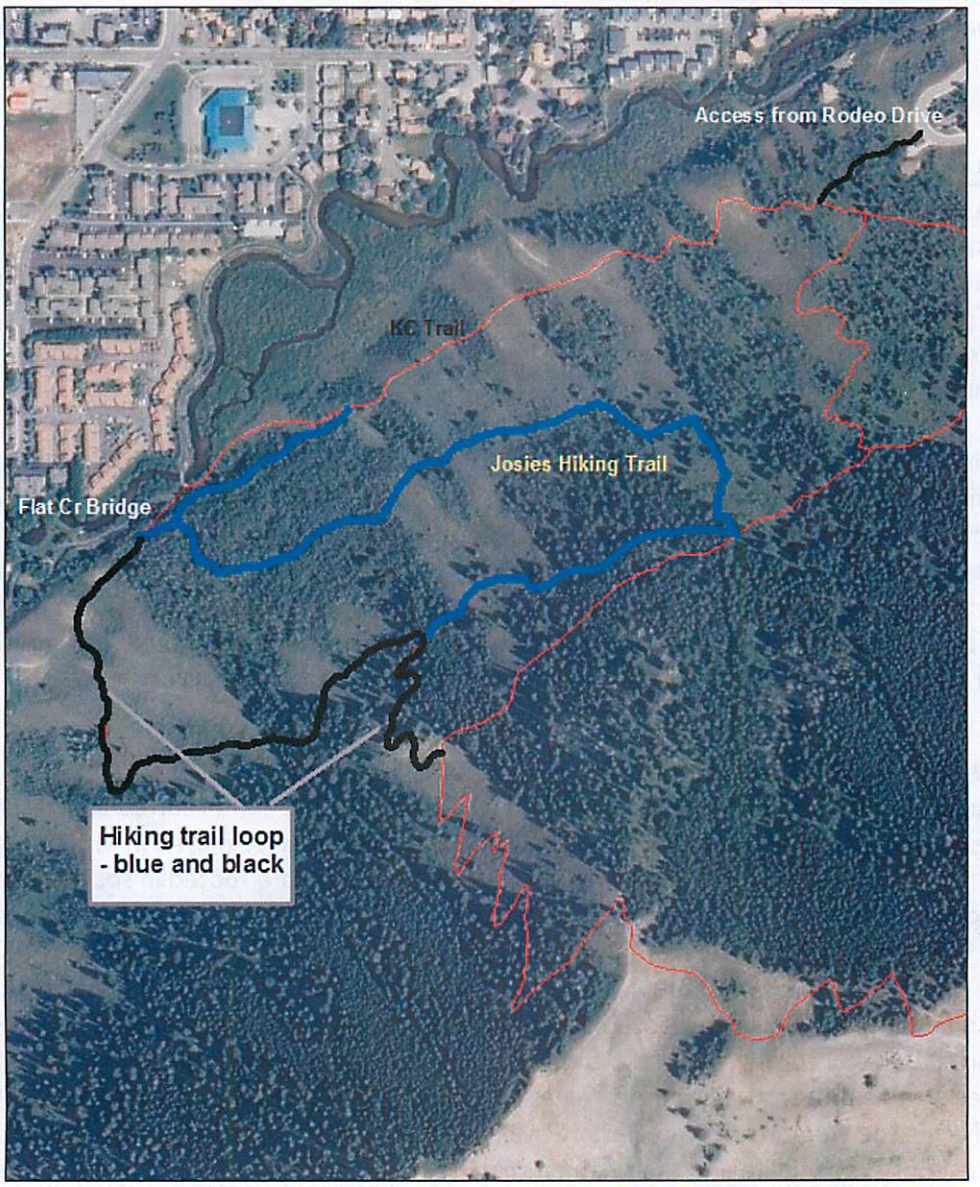
RATIONALE FOR DECISION

I greatly appreciate the in-depth public dialog and collective learning that occurred as a result of these proposed projects and I am thankful for the role that local partners have played in facilitating those conversations. Many of the concerns expressed with the proposals are rooted in social perspectives even though at first blush they appear to be resource based so I feel that is important that I speak directly to how those issues have influenced my decision.

At times, the discussions on the proposed actions implied that this decision is about "wildlife versus recreationists", which I consider a false dichotomy. All forms of recreation have impacts to wildlife, that much is inescapable, but that is not the same as saying that wildlife and recreationists cannot successfully coexist. Numerous strategies are available to not only minimize impacts, but to also increase the odds that wildlife and their habitats can be sustained or even improved over the long-term. It is important to recognize that focusing on project level impacts alone provides a narrow and incomplete picture as to what is required to maintain wildlife across the landscape. As a community that cares about wildlife and also wants to be outside recreating in natural places, I believe the paradigm needs to shift to a focus on wildlife and recreation, not wildlife or recreation.

Based on National Forest visitor use surveys, viewing natural features/scenery and wildlife/birds consistently ranks as the top recreational activity regardless of people's mode of transportation. Protecting wildlife values also consistently rises to the top of surveys in Teton County and is reflected in the goals of the Jackson/Teton County Comprehensive Plan. At the same time, outdoor recreation consistently ranks as one of the most important reasons why people choose to move to and stay in

Map 3- Josies Ridge Area



0 0.075 0.15 0.3 Miles

Note: Red trails are still open for shared use including bikes

Teton County (Schechter 2002, Headwaters Economics 2015). The interplay between recreation and wildlife interest allow National Forest recreationists to develop a firsthand affinity for and knowledge of wildlife. This passion and awareness regularly pays dividends in informing land management decisions and creating community-based or political conservation initiatives that benefit wildlife. Therefore, I feel it is vital to maintain the public's continued interaction with and connection to their National Forests.

Looking back historically to present times, there is a clear and steady trend where planning or conservation initiatives have resulted in wildlands becoming wilder with direct benefits to wildlife as a result. Within the Cache-Game area, specific examples include successful efforts to prevent oil and gas development, the designation and enforcement of crucial wildlife winter range closed to all human activity, the requirement for dogs to be leashed adjacent to crucial wildlife areas, reduction of summer motorized access in Cache-Game and Leeks Canyon, relocation of trails away from riparian and wetland areas, the adoption of food storage requirements to benefit bears, and programs to teach people how to live in bear and lion country. At a broader scale, examples include mitigation or removal of barriers to fish and wildlife migration (e.g. removal of dams or fences, adding wildlife highway crossings), the establishment of protective wildlife standards in the Forest Plan to prevent new impacts, the closure and conversion of active grazing allotments to forage reserves, motorized vehicle use designations, road and trail decommissioning, wolf reintroduction, designation of Wilderness and Wild and Scenic Rivers, additions to public lands through purchases and donations, conservation easements on private lands, as well as the use of prescribed and wildland fire to improve wildlife habitat and ecological function.

I expect the trend of conservation initiatives will continue, but it is also apparent that social demands in the wildland-urban interface will present ever-changing management challenges. Change is inevitable and I recognize that change can be hard to accept. Achieving both wildlife and recreation goals will require more attention to changes at the landscape scale and a willingness to focus recreation use in some small areas. Continuing land development coupled with a population expected to potentially double over the coming years suggests that recreational demand, particularly near town, will only intensify. The appropriate management response will not always be "build more trails" or "separate use", but in some situations, such as those described in this decision, these options are key components necessary to manage use well. In making this decision, I am affirming my commitment to use the Trail Assessment to guide trail development into the future to ensure important wildlife habitat and migration corridors are protected while also ensuring a diversity of high quality recreation opportunities is offered including the provision of truly wild experiences.

I fully recognize and accept that these projects alone will not address all of the needs associated with managing growing recreation use in the Cache-Game area. To manage recreation use well, both individual and collective action will be needed to meet the challenges. In particular, with growing use, more attention will be needed to promote shared use trail ethics, land and wildlife conservation ethics, monitoring, trail and facility sustainability, and restoration. Doing this well will require the collective effort of agencies and partners coupled with community investment and a commitment by individuals to "raise the bar" in demonstrating respect for people and the land including wildlife. Managing social conflict will be particularly challenging. The public dialog regarding the proposed trails raised a troubling perception that some types of recreationists are less ethical, have less of a connection to the land, or are being favored over more traditional users. Examples of strong conservation leadership, or conversely, poor land ethics and attitudes of entitlement can be found among all "user groups". I see no value in creating artificial stereotypical divisions, especially when most recreationists enjoy National Forests in

multiple ways and are not associated solely with a single user group. That said, there clearly needs to be more done to emphasize shared use as a united trail community and build awareness of actions that help create positive interactions among all recreationists.

National Forest System lands play a unique role in serving communities by offering accessible recreational opportunities that enhance quality of life, promote health, and contribute to local and regional economies. Based on existing conditions and trends, and the public's desire and propensity to use their public lands, I feel that doing nothing is not a responsible course of action given the anticipated growth and evolution in demand for recreational opportunities. In summary, I believe the approved projects help respond to growing recreation use in a way that allows the Jackson Ranger District trail system as a whole to work better for people and wildlife for the following reasons:

- The trail projects help focus recreation use near town where such use can be more successfully managed rather than dispersing use across the landscape. This indirectly protects wild areas and wildlife habitats at the broader scale. Even within the Cache-Game area, there are three distinct "zones" to provide a diversity of settings, both for people and wildlife and the trail projects are designed to focus recreation use primarily within the direct "interface" zone. Appendix A provides more information on recreation management direction and the zones in the Cache-Game area.

- The potential disturbance effects associated with recreation use on the new Skyline trail are expected to be minimal due to the requirements identified in this decision, notably the restriction on use during the spring calving season and the prohibition on lift-served bike access from the summit of Snow King Resort. Furthermore, attention to promoting behaviors that minimize disturbance on wildlife and reduce the likelihood of negative encounters throughout the entire Cache-Game area will do much to help recreation and wildlife successfully coexist (e.g. dog control, carrying bear spray, staying alert).

- It is vital to maintain people's connection to the National Forest in a way that offers immersion in nature as well as contributing to community health and people's quality of life. These trail projects enhance direct community connection to the National Forest from locations where people live and work, thus allow people to incorporate outdoor activity, particularly walking and biking, into their daily lives. This direct connection also offers opportunities for adult and youth engagement in resource stewardship that is critical to develop the next generation of conservation leaders. Providing such connections is aligned with Forest Service priorities to serve people and communities and the projects are also consistent with Forest Plan direction.

- The trail projects respond to input expressed over the past four years by the public for trail system improvements in the Cache-Game area. Recreation is evolving, thus how people connect with the National Forest is changing. A recent random survey of over 1,000 Teton County residents found that the top two most important trail improvements cited were: (1) more loop trails, and (2) separate dogs/bikes/hikers/horses (Headwaters Economics 2015). The need to focus more attention on ethics and responsible behavior, particularly related to dogs and bike speed, was also frequently cited by survey respondents. I agree and believe that promoting responsible recreation will need to be a community focus, whether or not trails are added or improved. I and my staff remain committed to do our part to emphasize collective learning and education, not only to

promote the shared use of trails, but also to build greater understanding of wildlife, plant communities, water, and natural processes that form the foundation of this treasured place.

Rationale for Categorial Exclusion

This action is categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The applicable category of actions is identified in agency procedures as category 32.2, described in Forest Handbook 1909.15, May 28, 28, 2014. This category is for "Construction and reconstruction of trails." 36 CFR 220.6(e)(1)

Throughout this project, there has been a high level of public discussion as well as considerable resource analysis commensurate with what would be done for an environmental assessment. However, I find that there are no extraordinary circumstances that would warrant further analysis and documentation in an EA or EIS. I took into account resource conditions identified in agency procedures that should be considered in determining whether extraordinary circumstances might exist:

- **Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species** – Analyses for these species are included in Appendix B. With respect to Section 7 consultation determinations, this project will have *No Effect* for grizzly bear, gray wolf, Canada lynx, and designated critical Canada lynx habitat, yellow-billed cuckoo or proposed yellow-billed critical habitat. Determinations for sensitive species are *May Impact Individuals or Their Habitat, but Will Not Likely Contribute to a Trend Toward Federal Listing or Loss of Population Viability* for bighorn sheep, northern goshawk, great grey owl, and boreal owl, and *No Impact* for sage grouse, wolverine, fisher, common loon, trumpeter swan, harlequin duck, bald eagle, peregrine falcon, flamulated owl, northern 3-toed woodpecker, spotted bat, Townsend's big-eared bat, Columbia spotted frog, and boreal toad.

- **Flood plains, wetlands, or municipal watersheds** – none are present or potentially impacted

- **Congressionally designated areas such as wilderness, wilderness study areas, or national recreation areas** – none are present or potentially impacted

- **Inventoried roadless areas or potential wilderness areas** – there is no uncertainty about the effect on inventoried roadless areas – non-motorized trails are completely acceptable

- **Research natural areas** – none are present or potentially impacted

- **American Indians and Alaska Native religious or cultural sites** – Cultural resource specialists completed surveys in the affected areas and identified no concerns. However, if any cultural materials are discovered during construction, work in the area shall halt immediately, the federal agency must be contacted, and the materials evaluated by an archaeologist or historian meeting the Secretatry of the Interior's Professional Qualification Standards (48 FR 22716, Sept. 1983).

- **Archaeological sites, or historic properties or areas** – Cultural resource specialists completed

surveys in the affected areas and identified no concerns. SHPO concurrence

Appendix C contains an analysis of and documentation for the lack of cumulative affects with recent or proposed projects in the Cache-Game Creek area.

PUBLIC INVOLVEMENT

This action was originally listed as a proposal on the Bridger-Teton National Forest Schedule of Proposed Actions and updated periodically during the analysis. A scoping document for the proposed Skyline Trail and Putt-Putt trail extension was released for public comment on March 3, 2011. The proposed trail projects were well-covered by local newspapers and 215 public comments were received. Although there was considerable public support for these projects, several concerns arose, notably (1) what is the "master plan" for trail development? and, (2) How will wildlife populations be protected in the face of growing recreation use? In response to these concerns, the Jackson District Ranger put the proposed Skyline and Putt-putt trail project on hold pending a more holistic examination of the trail system across the Jackson Ranger District. On September 21, 2011, a community design charrette was held to gather input on what was working well and what needed improvement considering the entire district trail system. Primary recommendations were drafted for each of the nine geographic areas on the Jackson Ranger District and presented to the public on May 22, 2012. Public field trips also occurred during the summer of 2012. The trail assessment was released in April 2014 followed by an updated scoping document for the Cache-Game area (also known as the Greater Snow King area). Again, the projects were extensively covered in local newspapers and 118 public comments were received. The preliminary results from the interdisciplinary resource analysis were presented in a public Trail Forum on February 10, 2015 which was attended by approximately 100 people and all the information was also made available to the public via the Forest website. Appendix D contains a summary of the comments received and the Forest Service responses to them.

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

Consistent with the National Forest Management Act, this project was designed in conformance with the Bridger-Teton National Forest 1990 Forest Plan as amended and incorporates the appropriate Forest Plan standards and guidelines as outlined in Table 1. The public involvement, and disclosure and documentation of environmental impacts completed for this project are consistent with the National Environmental Policy Act (42 U.S.C. §§ 4321-4347).

Table 1: Summary of Project Compliance with Relevant Forest Plan Direction

Forest Plan Direction	Is Decision Consistent	Remarks
Habitat effectiveness standard: Non-motorized and motorized vehicle access will be regulated either seasonally or year-round to protect important big-game habitat components such as primary feeding areas, calving areas, big game rearing areas, rutting complexes, and big-game migration complexes.	Yes	Seasonal restriction is applied to the Skyline trail where some big game calving and migration occurs.
Elk calving area standard: Human activity and disturbance will be restricted in elk calving areas from May 15 to June 30 if big game are present in the area.	Yes	Seasonal restriction is applied to Skyline trail from May 1 – June 30 where calving occurs.
Road and trail drainage standard: Roads and trails will be	Yes	Trail projects are not located near

designed and maintained so that drainage from the road or trail surface does not directly enter water-bodies		water bodies and are designed to be fully sustainable so that erosion potential is minimized.
Trail condition standard: Trail tread width will not exceed 24 inches. Multiple "braided" trails that develop will be obliterated and re-located so that there is only one tread.	Yes	The trail projects include work to obliterate user-created trails and create one sustainable tread.
***Trail conflict guideline*:** The trail system should be managed to minimize conflicts among users, including motorized and non-motorized recreation and livestock.	Yes	A primary purpose of the trail projects is to minimize use conflict.
DFC 2A: Management emphasis is to maintain or enhance primitive and semi-primitive non-motorized dispersed recreation opportunities. Appropriate activities include mtn. biking, hiking, horse riding, XC skiing, and hunting. Trail density guideline is 1 mile of trail per square mile of area. Encounter guideline is average of 12 parties per day	Yes	The far end (eastern portion) of the Skyline trail is located in this DFC. The existing trail density is 0.84 miles of trail/sq.mile. The Skyline trail would add about 1.25 miles of new trail in this DFC which would increase the trail density to 0.96 miles/sq.mile.
DFC 9A: Management emphasis is on existing and proposed developed recreation sites and Forest Service administrative sites. Appropriate activities include mtn. biking, developed recreation facilities, concentrated recreation, and hiking. No trail density guideline. No limit on the number of parties encountered/day	Yes	The majority of the Skyline trail is located in this DFC as are the Nelson area trail projects.
DFC 9B: Management emphasis is on concession operations, ski areas, lodges, and other privately operated sites on National Forest lands. Appropriate activities are the same as 9A plus concession facilities and horse trails. No trail density guideline. No limit on number of parties encountered/day	Yes	The beginning (western portion) of the Skyline trail is located in this DFC.
DFC 12: Management emphasis is on providing important habitat for big game such as calving areas and security areas. Appropriate activities include mtn. biking, concentrated recreation, hiking, horse riding, hunting, fishing. Trail density guideline is 1 mile of trail per sq.mile of area. Encounter guideline is average of 12 parties/day	Yes	The Josie's Ridge trail and Game Creek road are located in this DFC and Skyline trail is adjacent. Existing trail density is 0.60 miles of trail/ sq.mile of area. The projects would not change this existing density.

IMPLEMENTATION

On January 17, 2014, the President signed into law the Consolidated Appropriations Act of 2014 (Pub. L. No. 113-76). Among other things, Section 431 of that Act directs that the 1992 and 2012 legislation establishing the 36 CFR 215 (post-decisional appeals) and 36 CFR 218 (pre-decisional objections) processes "shall not apply to any project or activity implementing a land and resource management plan … that is categorically excluded ….under the National Environmental Policy Act [NEPA]." On February 7, 2014, the President signed into law the Agricultural Act of 2014 (Farm Bill) (Pub. L. No. 113-79). Section 8006 of the 2014 Farm Bill repealed the Appeals Reform Act (ARA) (Pub. L. No. 102-381). The ARA's implementing regulation was 36 CFR 215. The 2014 Farm Bill also directs that the pre-decisional objection process established in the Consolidated Appropriation Act of 2012 shall not be applicable to categorically excluded projects or activities.

Therefore, this decision is not subject to appeal or objection. Implementation of approved projects may occur immediately in accordance with previously identified Management Requirements and BMPs.

CONTACT

For additional information concerning this decision, contact: Linda Merigliano, Program Manager, (307) 739-5428

Dale A. Deiter — 28 May 2015

Dale A. Deiter — Date

Jackson District Ranger

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