



State of Idaho

Department of Parks and Recreation

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September 26, 2025

Chris Waverek, District Ranger
Challis-Yankee Fork Ranger District
Salmon-Challis National Forest
HC 63 Box 1669
Challis, ID 83226

Via project portal: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=68598>

RE: Challis Backyard Trails Proposed CE, Scoping Comment Period (until 9/30/25)

Idaho Department of Parks and Recreation (IDPR) is the duly established executive department under State of Idaho Code, with the stated mission of improving the quality of life in Idaho through outdoor recreation and resource stewardship. Acting under the supervision of the Idaho Park and Recreation Board, IDPR carries out recreational policies and programs of the State. Consistent with its statutory authorities, the Department participates in federal land management planning and project planning to further the public interest in recreational, scenic, and historical/archeological values.

Responsible IDPR staff manage wheeled and over-snow off-highway vehicle (OHV) recreation throughout Idaho through the Motorized Trail Program. IDPR's Trail Ranger and Trail Cat Programs provide maintenance and construction, and its OHV Education Program provides OHV training and environmental education. Through IDPR's Off Road Motor Vehicle and Motorbike Recreation Funds, grants are awarded to fund trail building and maintenance, and law enforcement activities. IDPR Motorized Trail Program partnerships with US Forest Service, Bureau of Land Management, Idaho Department of Lands, and stakeholder volunteer organizations, result in the maintenance and improvement of hundreds of miles of Idaho's extensive and remarkable trails each year.

IDPR's Non-Motorized Trails Program advocates for non-motorized trail users across Idaho.

Regarding the subject Project, IDPR offers the following recommendations, and narrative and substantive commentary:

IDPR recommends withdrawal of the Challis Backyard Trails Proposed CE as defined in the Scoping Report.

The scope per FS's current proposal fails to approach the broader vision of the 2019 Challis Community Trails Action Plan¹. The original proposal produced by Challis Community Trails Alliance² (CCTA) would better meet the goals of the 2019 Plan through development of new, balanced trail opportunities in one of the "Out-of-Town" focus areas called out in the Plan, in this case the area of Forest Service ground west of the Bayhorse trails complex.

IDPR recommends that a replacement Proposal scope should be formed in coordination with CCTA, based on the Collaborative's original Big Hill/Garden Cr Trail Construction Project proposal (attached) submitted to USFS during October-December 2024.

Consistent with CCTA's resolution at its most recent meeting: IDPR concurs with the Collaborative's position that Forests Service's current proposal should be replaced, that FS should have given customary deference to the *Collaborative proposal*. IDPR also concurs that a replacement proposal may omit the original design feature of Class 1 E-Bike access, as well as to omit the original design feature of designation conversions from exclusive-use non-motorized, to multiple-use motorized of three existing non-motorized-designated trails (CCTA proposal, page 2: NFS Trails 4159, 4201, and 4154.1). It is understandable that use-type redesignation proposals may be

impractical to address in a CE project due to the complexity of analysis required. And in the case of specialized accommodation for Class 1 E-Bike access to otherwise non-motorized trails (CCTA proposal, page 1), it is recognized that there may not yet be sufficiently developed Rules and Guidance presently to realistically address that design component.

CCTA members, community stakeholders, and government agency advisors invested two years in developing the original Big Hill/Garden Creek Collaborative proposal. In the process, IDPR contributed significant user-funded Trail Program resources through staff hours including multiple days of field reconnoitering for determining motorized components of the proposal, advising the Collaborative body during meetings, as well as assistance with developing maps for the Collaborative proposal.

Consider that IDPR has over many years made significant contributions to development of Challis area recreational opportunities, through the Land of Yankee Fork State Park³ facility and trails, remediation and redevelopment of the Bayhorse Townsite as an interpretive facility, participation in the planning and implementation of the significant improvements to the multiple-use trail network⁴ on BLM Challis Field Office lands, and most recently the purchase and redevelopment of the Challis Hot Springs facility. Working on behalf of its recreational stakeholders who fund IDPR's Programs, the agency therefore has a stake in any project, such as was proposed in the original Big Hill/Gardiner Creek, which would most advantageously further the expansion of a balance of recreational opportunities in the Challis area.

While Backyard Trails appears to be in-part informed by Big Hill, FS's proposal comes up well short in significant aspects. The original intent of Big Hill was to offer a balanced split of trail opportunities for both non-motorized use (19.7 miles proposed) and for multiple-use with motorized component (13.7 miles proposed). Instead, Backyard Trails appear to have earmarked all of the proposed 33.4 miles of trail as entirely exclusive-use non-motorized.

Single-track multiple-use motorized trails proposed by CCTA (Collaborative proposal pages 4-5) were Big Hill Summit Path (3.76), Bull of the Woods (2.8), and Tollgate to Fanny's Hole (7.14). If designated in a CE Decision (now to be a "Finding..." under new NEPA guidance for CEs) instead as exclusive-use non-motorized, none of these miles will be eligible for construction by IDPR Motorized Trail Program staff and the Trail Cat Program, nor will they be eligible for ongoing maintenance investments from the Trail Ranger Program.

IDPR appreciates the opportunity to work in partnership with SCNF and the CCTA Collaborative to expand recreational trail offerings on Forest Service managed lands in the greater Challis area. IDPR looks forward to continuing its partnership with community stakeholders and Forest Service in pursuit of a replacement proposal which addresses the broadest of stakeholders' interests and is in the spirit of the Challis Community Trails Action Plan.

Thank you for the opportunity to contribute during the comment period for Challis Backyard Trails Proposed CE.

Regards,

Land Access Coordinator
Idaho Department of Parks and Recreation – Recreation Bureau

Notes:

- 1) Challis Community Trails Action Plan published 2019 <https://challistrails.org/action-plan/>
- 2) CCTA is a 501(c)(3) non-profit organization, formerly known as Challis Community Trails Collaborative, formed by a local steering committee in 2017, with National Parks grant funding, <https://challistrails.org/>
- 3) Land of Yankee Fork: <https://parksandrecreation.idaho.gov/state-park/land-of-the-yankee-fork-state-park/>
- 4) Challis Foothills Master Trails Plan EA, Amendment DNA, and Travel Map
<https://eplanning.blm.gov/eplanning-ui/project/2026393/510>
<https://eplanning.blm.gov/eplanning-ui/project/2035177/510>
<https://www.blm.gov/documents/idaho/public-room/map/challis-georeferenced-travel-map>

Attachments:

- Collaborative's Letter of Support to FS RE: CCTA Big Hill/Garden Creek Trail Construction Project
- CCTA Big Hill/Garden Creek Trail Construction Project written proposal (5 pages)
- CCTA Big Hill/Garden Creek Trail Construction Project Map



Challis Community Trails Collaborative

Challis, ID 83226

October 31, 2024

Salmon – Challis National Forest
Chris Waverek – District Ranger
Challis, ID 83226

Subject: Big Hill/Garden Creek Trail Construction Project – Letter of Support

Dear Chris,

The Challis Community Trails Collaborative (CCTC) requests the Forest Service consider initiating the appropriate analysis in support of new single track trail construction in the Big Hill/Garden Creek area. Included is our proposal, with a listing of new trails that would enhance recreational single-track trail opportunities that currently don't exist for visitors and community members of Challis, Idaho. These trails were developed this summer by CCTC members who conducted field surveys to locate and identify potential issues and remedies if allowed to proceed after analysis and clearances. The proposal includes new single track motorized and non-motorized trails. Additionally, we identify new and existing trails in this proposal. Please reach out to us if you have any questions.

The Challis Community Trails Collaborative (CCTC) is a voluntary member-based group consisting of interested individuals and multiple partners who meet monthly. The CCTC vision as outline in our Challis Community Trail Action Plan (The Plan) is “to develop a network of trails that connects popular destinations in Challis with parks and trails on the surrounding public lands”.

Sincerely,

Ben Leber
Co-chairman CCTC

Janeen Bradshaw
Challis City Council

Sherry Maestas
Challis Chamber of Commerce

Brian Dilegne
Idaho Parks and Recreation

Kate Yeater
Salmon Valley Stewardship

Jolie Turek
CEDA – Custer Economic Development Association

Big Hill/Garden Creek Trails Construction Project

Purpose and Need

The purpose and need are to build a network of multi-use single-track motorized and non-motorized trails within the Big Hill Gulch and Garden Creek drainage and re-establish four existing single-track trails in the Garden Creek and Bayhorse Lake area. The existing Forest Service single track motorized and non-motorized trails systems centric to the community of Challis, ID are more than 10 miles away and only accessible by high clearance vehicles. This can be a deterrent to many recreationists. A trail network that is closer (7miles), via a road that was designed for cars would enhance recreational opportunities in the area by creating a variety of trail options for hikers, trail runners, Nordic skiers, mountain bikers, horseback riders, motorcyclists, families, and other users. This trail system would provide a unique recreational opportunity for visitors and residents in a forested ecosystem that is accessible by car via the Custer Motorway and closer to the community of Challis.

What are we going to do?

The proposed action is to build 19.7 miles of trails composed of fifteen segments of single track non-motorized trails within the Big Hill and Daugherty Gulch area. These trails will create a variety of non-motorized recreational opportunities with multiple loops with connections to open Forest Service roads. Additionally, three of the segments will serve as Nordic and fat biking trails during the winter months. There are multiple access points with parking immediately off the Custer Motorway (FS 40070). These include the BLM ATV/UTV parking area and the Big Hill Summit crest on the Motorway. A new trailhead will be established 1.2 miles in on the Big Hill Road (FS 40256). That trailhead will be approximately 1 acre in size. *The proposed action should allow Class I e-bike access to these trails. A Class I e-bike is a pedal assist bike that cannot exceed 20 miles per hour and does not have a throttle.*

The proposed action will also three segments of single-track motorized trails within the Garden Creek and the Big Hill area for a combined distance of 13.7 miles. These trails will create a variety of recreational opportunities for motorcycle and non-motorized users. These trails will connect with existing motorized and open routes within the Bayhorse Lakes, Big Hill, and Custer Motorway area (Fanny's Hole, Tollgate Station) allowing for additional riding and hiking loops.

The proposed actions will reestablish three legacy trails, Garden Creek (4159), Spruce Gulch (4201), and Trelor Spur1 (4154.1). These trails will require some improvements such

as signage, clearing, reconstructing, rerouting around water, and improvements such as puncheons, bridges, or raised turnpikes. These trails are currently designated as single track non-motorized. We propose to change the current designation to single track motorized with seasonal closure. This change will match other trails in the area offering multi users access in the Bayhorse or Buster Lake area. This change in designation should allow more frequent trail maintenance.

The proposed action will reroute portions of Bayhorse Lakes trail (0325) between the two campgrounds to address grade and erosion issues that currently exist.

Single Track Non-motorized

258 to Woodcutters Cabin - .21 miles. This new trail spurs off the 258 to Woodcutters Trail that goes to the Woodcutters Cabin path.

258 to Woodcutters Trail - .54 miles. This is a new trail from FS #40258 down to the Woodcutters Trail.

260 Link - .4 miles. This new construction trail utilizes an existing road prism that extends from the open route FS #40256 over to route FS #40260 to a water trough. This was the original path of the buried water line for the Big Hill range improvement water system. To establish this as a single track trail, the prism width will be narrowed by scattering debris.

Ben's Trail - 1.21 miles. This new construction trail that starts on FS #40256. This trail will also be a Nordic path during the winter. The trail is below the road and travels west towards the Aspen grove, crossing FS #40256. A spur on the west side of the aspen grove, will climb up and turn east to cross Big Hill Gulch returning above FS #40256 road to its origin. Water runoff will be an issue during spring and early summer.

Big Drop Part 1- 1.37 miles. This new construction trail starts on FS #40258 and returns to FS #40256. The trail will be downhill only due to a variety of difficult technical features (rocks, etc.). The trail will require some constructed improvements to access rock features (ramps, kickers).

Big Drop Part 2 - 1.55 miles. This is a new construction trail that starts on FS #40258 and returns to FS #40256. The trail is multi-directional, but the preferred route will be downhill. No improvements are needed.

Big Drop Part 3 - .62 miles. This is a new construction trail that starts on FS #40256 and returns to FS #400070. The trail will be downhill only due to it steeper grade.

Big Hill Small Drop - 1 mile. This is a new construction trail that starts from the Woodcutter Trail down to the junction of the 260 link trail and FS #40256. Improvements may be needed to access certain features.

Daugherty Up - 1.65 miles. This is a new construction trail that starts off FS # 40078 and proceeds uphill to FS # 40259.

Daugherty Down - 1.62 miles. This is a new construction trail that starts at the junction of FS #40259 and FS #40078.

Low Trail - 1.49 miles. This is a new construction trail that starts at the new Trailhead off FS #40256. The trail proceeds downhill then west crossing FS #40256. A spur to the west side of the aspen grove ascends and connects with Ben's Trail.

Mill Ridge - 2.72 miles. This is a new trail (2.27 miles long) that begins at the Southwest corner of Ben's Trail. The trail proceeds north, gaining elevation, then turning south up to a user created road spur off of FS # 40256 above Big Hill Gulch Spring. Spur trails will be narrowed to single track by placement of debris.

Nordic 1 - .16 miles. No construction required. Brushing and clearing of debris to a 6 feet width will be required. This trail starts off FS #40256 and returns crossing FS #40256 connecting to Ben's Trail.

Nordic 2 - .22 miles. No construction required. Brushing and clearing debris of trail to a 6' width will be required. This trail spurs off Nordic 1, crosses FS #40256 and connects to Ben's Trail.

Pipeline - .61 miles. A prism exists at this location from when the pipeline was placed. Minor brushing and tread work is required. The trail starts at the water trough at the end of 260 link trail and contours east to FS #40258.

Pipeline 2 - .55 miles. New trail construction needed for approximately 500' to an existing prism where abandoned water pipeline was buried. This trail will start at the junction of FS #40256 and the 260 Link trail. The trail contours across the hill to the west returning to FS #40256 road. The prism portion will require brushing and minor tread work.

Woodcutter Cabin Path - .54 miles. The new trail starts off the Woodcutters trail, then proceeds south with climbing switchbacks ending at the historic woodcutters' cabin. An interpretive sign could be placed at this location explaining how the community of Challis in its early days hired woodcutters in this area to meet their needs.

Woodcutter Trail - .77 miles. This trail is a mixture of an existing prism and new trail to be built. This trail starts off FS #40256 very near where the Pipeline 2 and Ridge to Big Hill

Gulch trail end. The trail proceeds east for .22 miles on an existing trail prism to the Timber sale boundary. New trail construction will be needed to gain elevation through the west side of the timber sale boundary. The trail will connect with one of the existing skid trails that contours across. An existing skid trail connects with an old wagon path prism near the Woodcutter cabin path. The trail follows the wagon path east for .14 miles. Debris will be cleared though the single track character of the trail will be maintained. From the end of the wagon path prism, a new trail contouring across the timber sale unit over to the FS # 40258 will be required. This section drops approximately 150' below on to FS #40258.

Big Hill Trailhead - 1 acre. This new trailhead is located where FS #40260 road meets FS #40256. The trailhead will be built on the saddle located just below this junction. Leveling will need to occur along with the placement of harden surfacing material. A wooden fence should be placed around the parking area and a cattle guard at the entrance.

Single Track Motorized

Big Hill Summit Path - 3.76 miles. This trail starts at the end of FS #40241. The trail follows the old road prism across the top. The trail travels east where it ends at 1.64 miles. From there, 2.12 miles of new construction will follow the ridge down into Daugherty Gulch to FS #40259. A barricade or restrictor will be needed at the trail's west end to clearly define it as a single track trail.

Bull of the Woods – 2.8 miles. This trail begins of FS #40069 and continues along an existing prism for approximate 1.48 miles. No construction is needed on this section other than brushing. At the end of prism, partial new trail construction will be required. Where the prism is not visible, new construction is required. Where the prism is present, brushing and minor tread work are needed. This trail ends where it intersects FS # 4124. Two water crossings occur on this trail made up of hard cobble rock. Two small bridges can be built if trail usage is significant.

Tollgate to Fannys' Hole Trail - 7.14 miles. This is a new construction trail that starts at FS #4153 and proceeds west along the ridge divide for 5.82 miles. From here, the trail will head down for 1.32 miles into the Mill Creek drainage, crossing Mill Creek, and coming out at Tollgate Station on FS #40070.

Legacy Trails

Garden Creek #4154 – This trail begins at Bruno Cabin just off FS #40069. The trail proceeds west where it ends just east of Buffalo Ridge. The trail junctions with the Spruce Gulch trail 4201. The trail location is not what is shown on the current Forest Service map.

Water and grade issues exist on this trail. Small reroutes and improvements such as puncheon, turnpikes, or a bridge can resolve these issues.

Spruce Gulch #4201 – This trail begins just east of Little Bayhorse Lake and proceeds west above Big Bayhorse Lake. The trail turns northwest over to FS #4152 where it meets at the divide into Passasikwana Naokwaide drainage. Three reroutes are needed, one by Little Bayhorse Lake and two other locations on the trail between the lakes. The trail location is incorrect on the current Forest Service map. The trail remains to the east of Buffalo Ridge.

Trelor Spur 1 #4159.1 – This trail begins off FS #4159 and follows the fence line over Buffalo Ridge to FS #4201 above Big Bayhorse Lake. This trail crosses several open meadows making it hard to follow. Minor reroutes are needed to address some erosion concerns on the Bayhorse side.

Bayhorse Lake Trail #0325 – This trail connects the two campgrounds on Bayhorse and Little Bayhorse Lakes. Erosion issues are visible as follow the trail into the gully. Rerouting the trail can address these issues with a trail that maintains the appropriate grade and drainage. A possible reroute would be to follow the hill and come out at the outlet at Little Bayhorse Lake. A spur trails could be added for those who want to walk down to the upper end of Little Bayhorse Lake along the existing trail.

Big Hill/Garden Creek Trail Construction

2025 Winter proposal to create new single track motorized and non motorized trails

Legend

- Chipmunk Hill Ski Area
- Legacy Trails
- Mountain
- Single Track Motorized
- Single Track Non-motorized

Track 10/23/24 15:28

Bayhorse Hike

Buffalo Ridge

Ramshorn Mountain

258 trail to cabin

258 to Woodcutter Wagon Path 2

Low Trail

Ben's Trail

Corkscrew Mountain

Chipmunk Hill Ski Area

Google Earth

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2 mi