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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

October 9, 2020

Director, Recreation Staff
1400 Independence Avenue SW
Washington, DC 20250-1124

Dear Ms. Wu,

Following are the Wyoming Department of Agriculture (WDA) comments regarding United States Department of Agriculture, Forest Service (USFS) update for guidance on management of electric bicycle (e-bike) use on National Forest System lands.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

We understand the USFS' desire to meet recreational interests with the inclusion of e-bikes. Recreation is an important industry for the State of Wyoming given the large tracts of public lands. The WDA serves as a Cooperating Agency with numerous USFS District Ranger offices and appreciate the opportunity to provide our comments regarding e-bike guidance and future consideration at the local level.

We are aware of numerous conflicts between recreationalists and public lands livestock grazing. Recreationalists are seeking an experience of solitude and unspoiled landscapes. However, like many states across the West, agriculture also plays an important economic role in addition to recreation to our local economies. Public lands are critical for the viability of ranching families grazing their livestock. We offer the following comments regarding e-bike classification, trail designation, trail maintenance, and reducing conflict.

It is imperative to determine what class of e-bike is allowed in actively stocked livestock grazing allotments where USFS could allow e-bikes. The USFS states they are aligning their revision to 27 states and Department of Interior's (DOI) policies. The DOI Order number 3376 Section 4(a) states "E-bikes shall be allowed where other types of bicycles are allowed." We strongly disagree with this policy and urge USFS to not follow the DOI at this level for e-bike use. While Class 1 does require pedaling with assistance from a motor and has a maximum speed limit of 20 miles per hour, the USFS should consider Class 2 and 3 as motorized vehicles and appropriated for use to only those same areas where other motorized off-highway vehicle uses are allowed.

WDA is concerned how the USFS will consider and incorporate public comment at the local level for the designation of trails, whether this occurs through travel management planning or individual project analysis. Recreation groups and associations should not determine or dictate identification of new trails. Many trails utilized currently by hikers, backpackers, and mountain bikers are actually trails developed by wildlife and livestock. The potential for conflict

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between recreationalists using e-bikes and livestock on active grazing allotments and trails designated or non-designated is highly probable. We urge the USFS consider how to reduce these conflicts through increased signage at the trailheads and along trails to reduce non-designated trail use. WDA is a strong proponent of multiple-use, but believe educating e-bike users and other recreationalists about public lands grazing on the area they are about to utilize is vital to reduce conflicts.

The USFS is seeking additional comments regarding trail management. We support the USFS working closely with e-bike and other recreation groups to communicate closely on trail management to ensure management only occurs on designated trails. Trail management on non-designated trails will only increase use by e-bikes and ultimately increase conflict with livestock. Direct conflict with livestock and e-bike users could pose not only a human safety issue, but also with livestock through hazing or harassment.

We support continued efforts to closely coordinate with state agencies including the WDA to review and comment on proposed trail designation, decisions on e-bike class use, and reducing potential conflicts. We request the USFS closely communicate with impacted livestock grazing permittees on active allotments and provide additional opportunity for annual review of use on designated or non-designated trail use.

We look forward to working with your staff on this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
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