



October 30, 2023

Todd Stiles
todd.stiles@usda.gov
Jackson Ranger District
Bridger-Teton National Forest

RE: Scoping Comments E-Bike Designations on Jackson Area Trails

Dear Mr. Stiles,

The Wilderness Society appreciates the opportunity to provide scoping comments on the proposed e-bike trail designations for three areas on the Bridger-Teton National Forest.

We appreciate that this proposal clearly states that, “Areas such as Wilderness, Wilderness Study Areas (WSA), and sensitive wildlife zones are not being proposed.” We support that uses, such as these, that conflict with the Palisades Wilderness Study Area are not and will not be included in this proposal.

The Horsetail Creek and Big Munger trails are currently open to motorcycles and e-bikes from July 1 till September 9. This proposal will extend the season for e-bikes on both loops from July 1 till Dec 1. We believe this seasonal extension will negatively impact wildlife—specifically migrating and wintering big game. We ask that the Forest Service take into account the wildlife habitats outlined below and consider the best available science on bike and e-bike recreational impacts to big game in order to modify the proposed extension. There could be serious impacts on big game migration habitats from additional recreation trail use for both of these trail systems during the fall migrations. The impacted habitats include:

- The Horsetail Creek trail bisects the Path of the Pronghorn that was recognized by the BTNF in a 2008 Forest Plan Amendment. The following standard that was added to the Forest Plan states, “All projects, activities, and infrastructure authorized in the designated Pronghorn Migration Corridor will be designed, timed and/or located to allow continued successful migration of the pronghorn that summer in Jackson Hole and winter in the Green River basin.” We believe allowing increased e-bike recreation during the migration season conflicts with this management direction.
- The Horsetail Creek trail bisects the route of the world’s longest mule deer migration. Deer 255, migrates 242 miles one-way from the Red Desert to Island Park, Idaho.
- The Horsetail Creek trail bisects numerous migration routes of the Dubois mule deer and Jackson elk herds.
- The Big Munger trails bisects a mule deer migration route from the Mesa (Sublette) herd that winters south of Pinedale.
- Additionally, the trails overlap with areas identified by the WGFD as crucial winter range for elk and moose.

The BTNF should account for the available peer-reviewed migration research by recognizing known migrations and associated habitats in this project and in the forthcoming Forest Plan Revision. Specifically, the BTNF should analyze migration data provided by USGS Reports: Ungulate Migrations of the Western United States Volume 1-3.

The BTNF should ensure consistency with 2022 USFS guidance, *Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions*, that states, “Consider the impacts of Agency actions on ecological connectivity and wildlife corridors during broad-scale planning associated with the land management planning process and implementation of land management plans through localized project planning and decision-making.”

Wyoming is blessed with the most robust ungulate migration corridors in the lower 48 states. Research has shown that migratory herds show greater population abundance over non-migratory herds and provide an important role in our cultural, hunting, and conservation heritage. We encourage the BTNF to prioritize decisions that will ensure the continued functionality of our wildlife migrations. Shortening the proposed seasonal extensions should be considered in the range of alternatives for this Environmental Assessment as well as prioritizing other areas for this recreational use that do not conflict with sensitive wildlife habitats.

If you have any questions regarding our comments, please do not hesitate to contact us.

Respectfully,

A handwritten signature in black ink, appearing to read 'Nick Dobric', is positioned above the printed name.

Nick Dobric
Wyoming Conservation Manager
The Wilderness Society