



October 30, 2023

Invitation for Comments
E-Bike Use Designation on Select Jackson Area Trails
Bridger-Teton National Forest
Jackson Ranger District
P.O. Box 1689 Jackson WY 83001

Submitted online via USFS webpage: [US Forest Service NEPA Projects Home \(usda.gov\)](https://www.usda.gov/forestservice/NEPA-projects)

To whom it may concern,

The Greater Yellowstone Coalition (GYC) is a regional conservation organization based in Bozeman, Montana. Its five field offices, strategically placed in Idaho, Wyoming, and on the Wind River Indian Reservation, create opportunities to work with all people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem (GYE) now, and for future generations. For more than 40 years, GYC and our 100,000 supporters from across the country have advocated for a science-driven, collaboration-focused, and forward-thinking approach to keeping lands wild, rivers free-flowing, and iconic wildlife moving throughout a connected and vibrant landscape. Many of GYC's supporters enjoy the trail systems of the Jackson Ranger District, where secure habitat and uninterrupted wildlife movement provide opportunities for wildlife viewing, hunting, and other types of quiet recreation.

On behalf of the members and supporters of the Greater Yellowstone Coalition, please accept the following comments on the E-bike Use Designation on Select Jackson Area Trails scoping process. If you have any questions or comments about the contents of this letter, please feel free to reach out to me.

Sincerely,

Teddy Collins

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Greater Yellowstone Coalition
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GYC recognizes the growing popularity of e-bikes across the country. We acknowledge the importance of providing access and opportunities for diverse user groups to experience the magnificent qualities of the Bridger-Teton National Forest (BTNF). Forest users travel from local, regional, national, and global locations to recreate within the boundaries of the forest. The BTNF is obligated to “provide a diverse range of high quality, sustainable recreation opportunities” (Forest-wide prescription, Forest Plan). The desire to provide more opportunities for e-bike users, however, must be addressed alongside the utmost importance of maintaining ecological integrity and management of the BTNF’s unique natural resources.

As noted in the scoping letter, “the local trail system has evolved over the past 20 years” as has the increased, and seemingly insatiable, demand for recreational access. We would encourage the Forest to better define and refine the purpose and need for this project as they are not clearly articulated in the scoping letter. Is the purpose to “recognize the growing interest in e-bikes”? Arguably that is not a strong purpose, as there are growing interests in various recreational pursuits that do not require the Forest to provide access or opportunities. Concurrently, it is also difficult to understand the “need” without more data points or information as e-bikes currently have access to both summer motorized trails and singletrack motorized trails, totaling 111 miles combined with allowed motorized and e-bike use on adjacent federal lands. This need may be more of a “want”. Finally, this proposal may be premature as Bridger-Teton has begun forest plan revision. Unlike many forests in the United States, the Bridger-Teton contains many superlative conservation values such as secure wildlife habitat, opportunities for solitude, and cold, clean water. This proposal for expanded e-bike use should be considered and measured in forest plan revision so it can be comprehensively evaluated with other values.

Forest Service Manual 7705 defines electric mountain bikes (e-bikes) as “a type of motor vehicle.” Currently, e-bikes are allowed on roads and trails open to motor vehicles. To satisfy the classification and allowance of e-bikes, the agency must continue to apply a transparent and practical approach to trail designations. Due to recent technological advancements, e-bikes can cover significant distances at higher speeds compared to traditional mountain bikes. As a result, many e-bike users are looking for long-distance routes that may enter remote settings. Misinterpretations of e-bike allowance and illegal use of non-motorized trails is already a frequent occurrence and will only increase with discrepancies between different types of motorized vehicle use and should be analyzed in the EA. Furthermore, differentiating the season dates between e-bike and other motor vehicle allowance on specific trails could lead to increased violations and ensuing management issues for agency staff.

The BTNF contains wildlife values unique within the contiguous United States. Ungulate species such as elk, mule deer, and pronghorn antelope undertake significant seasonal migrations from high elevation summer range within the BTNF to lower elevation winter range on the forest and adjacent BLM, State, and private lands. The BTNF also supports a robust and growing population of grizzly bears. This iconic species utilizes the exceptional habitat within the Jackson Ranger District to complete annual life cycles. A defining characteristic for secure grizzly habitat is a lack of roads and human infrastructure, which is present throughout much of the Jackson Ranger District and Blackrock Ranger District to the north.

We appreciate that the proposed action states “areas such as Wilderness, Wilderness Study Areas (WSA), and sensitive wildlife zones are not being proposed.” Critical wildlife habitat does exist, however, near and adjacent to these trail systems. The sensitive wildlife habitat located on the Teton Pass, Munger Mountain, and Horsetail Creek trail systems must be recognized during the EA.

Munger Mountain is well known as crucial habitat for elk calving during the spring months. Additionally, elk, mule deer, and moose utilize the abundant late season forage to build critical fat reserves in advance of the harsh winter months. This transition zone is important as ungulate species travel to critical winter range on or adjacent to USFS lands. Allowing year-round e-bike use on the Munger Mountain trail system (excluding the Big Munger Trail), would undoubtedly place more recreational users into areas of sensitive wildlife habitat while also increasing the potential for intrusion into closed routes.

The Horsetail Creek Trail is located within critical wildlife habitat and known migratory corridors. Situated to the south of Mt. Leidy Highlands and north of the Gros Ventre Wilderness, the Horsetail Creek Trail is in the heart of prime grizzly bear habitat. Elk utilize the terrain adjacent to the Gros Ventre River corridor during seasonal migrations, spring calving, and the fall rut. Pronghorn antelope follow the Path of the Pronghorn migration route from summer habitat in the Jackson Hole valley to winter range in Sublette County, traversing the Gros Ventre River drainage and numerous game trails along its flanks.

Both the Horsetail Creek and Big Munger Trails are currently open to motorcycle and e-bike use from July 1 to September 9. The proposed action would extend e-bike use from September 9 to December 1. Increasing the seasons for e-bikes beyond that of motorized use in these locations has the potential to negatively impact wildlife and create user conflicts. Grizzly bears enter hyperphagia during the autumn months, increasing their feeding activity driven by a biological need to build fat reserves in preparation for hibernation. Extending the season for e-bike use during the fall months on the Horsetail Creek Trail has the potential to displace grizzly bears and increase chances for a conflict between bears and recreationists. Grizzly bear attacks on mountain bikers have occurred regionally in recent years, specifically in the Flathead National Forest (Halfmoon Lakes area) in 2016, and the Custer-Gallatin National Forest (Big Sky region) in 2020.

We ask that the Forest Service consider the ecological ramifications of extending seasons for e-bike use in the Horsetail Creek, Teton Pass, and Munger Mountain trails. Environmental impacts must be addressed if more recreational users are to be placed in ecologically sensitive areas of the BTNF.

The EA should include:

- Impacts to migratory and/or parturition areas for big game
- Impacts to secure grizzly bear habitat
- User conflicts
- Illegal use and encroachment of e-bikes into sensitive wildlife habitat, Wilderness, and Wilderness Study Areas
- Impacts to Inventoried Roadless Areas (IRA's)

Please keep us informed of any further actions regarding this project. Thank you for the opportunity to comment.